

Culver CITY

PLANNING DIVISION

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9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

PROPOSED MITIGATED NEGATIVE DECLARATION

Project Title and Culver City File No.: 9735 Washington Boulevard Project or "Brick and Machine"
Administrative Modification, Administrative Use Permit, Site Plan Review,
General Plan Map Amendment, Zoning Code Map Amendment, P2017-
0021 – AM, -AUP, -SPR, -GPMA, and -ZCMA;
Mitigated Negative Declaration P2017-0021 -MND

Project Location: 9735 Washington Boulevard, Culver City, CA 90232

Project Sponsor: Clarett West Development

Project Description: The project would redevelop a 0.66-acre property located at 9735 Washington Boulevard (additional addresses – 9723 and 9727 Washington Boulevard) on the northeast corner of the Washington Boulevard and Delmas Terrace intersection in downtown Culver City. The existing two-story bank building with a mezzanine formerly occupied by "Bank of the West" and now vacant, along with an associated asphalt-paved surface parking lot would be removed as part of the project. The project is proposing a mix of retail, restaurant, and office uses within a partial 4-story building (up to 56 feet tall). The Ground Level would consist of two retail spaces totaling approximately 9,187 SF of retail uses. The Ground Level would also include approximately 4,411 SF of restaurant space with an additional 798 SF of outdoor dining for a total of approximately 5,209 SF of restaurant uses. The project would include an additional 2,000 SF of outdoor dining located within the roof terrace/garden and courtyard of Level 4. The 60,065 SF creative office space would be located on the Ground Level through Level 4. The 1,022 SF of main office lobby would be located within the central portion of the building on the Ground Level accessible from Delmas Terrace. Parking for the proposed uses would be provided on site on the Ground Level and within a 3-level subterranean parking structure.

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

www.culvercity.org

Contact: Jose Mendivil, Associate Planner at (310) 253-5757 or ose.mendivil@culvercity.org

The public is invited to comment on the proposed MITIGATED NEGATIVE DECLARATION during the review period, which ends August 23, 2017.



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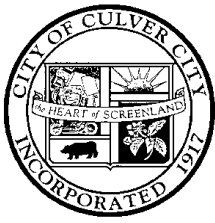
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Environmental Checklist and Environmental Determination



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PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title:	9735 Washington Boulevard Project or "Brick and Machine"		
City of Culver City Case Nos:	Administrative Modification, Administrative Use Permit, Site Plan Review, General Plan Map Amendment, Zoning Code Map Amendment, P2017-0021 – AM, -AUP, -SPR, -GPMA, and -ZCMA; Mitigated Negative Declaration P2017-0021 -MND		
Lead Agency Name & Address:	City of Culver City, Planning Division 9770 Culver Blvd., Culver City, CA 90232		
Contact Person & Phone No.:	Jose Mendivil, Associate Planner: (310) 253-5757		
Project Location/Address:	9735 Washington Boulevard, Culver City, CA 90232		
Nearest Cross Street:	Northeast corner of Washington Boulevard and Delmas Terrace	APN:	4207-002-025 4207-002-024 4207-002-014
Project Sponsor's Name & Address:	Clarett West Development 1901 Avenue of the Starts, Suite 1465 Los Angeles, CA 90067		
General Plan Designation:	Downtown General Corridor	Zoning:	Commercial Downtown (CD) Commercial General (CG)
Overlay Zone/Special District:	N/A		
Project Description and Requested Action: <i>(Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary)</i> The project would redevelop a 0.66-acre property located at 9735 Washington Boulevard (additional addresses – 9723 and 9727 Washington Boulevard) on the northeast corner of the Washington Boulevard and Delmas Terrace intersection in downtown Culver City. Washington Boulevard is considered to run in an east/west orientation. The existing two-story bank building with a mezzanine formerly occupied by "Bank of the West" and now vacant, along with an associated asphalt-paved surface parking lot would be removed as part of the project. The project is proposing a mix of retail, restaurant, and office uses within a partial 4-story building (up to 56 feet tall). The Ground Level would consist of two retail spaces totaling approximately 9,187 SF of retail uses. The Ground Level would also include approximately 4,411 SF of restaurant space with an additional 798 SF of outdoor dining for a total of approximately 5,209 SF of restaurant uses. The project would include an additional 2,000 SF of outdoor dining located within the roof terrace/garden and courtyard of Level 4. The 60,065 SF creative office space would be located on the Ground Level through Level 4. The 1,022 SF of main office lobby would be located within the central portion of the building on the Ground Level accessible from Delmas Terrace. Parking for the proposed uses would be provided on site on the Ground Level and within a 3-level subterranean parking structure. Please refer to Attachment A, Project Description, for a detailed discussion of the proposed project.			

Existing Conditions of the Project Site:

The project site is currently improved with a two-story bank building with a mezzanine formerly occupied by "Bank of the West" and now vacant, along with an associated asphalt-paved surface parking lot, walkways, and landscaped areas. The existing building footprint is approximately 8,871 SF with an approximate 7,208 SF second floor for a total building size of approximately 16,079 SF. The associated asphalt-paved surface parking lot is approximately 18,981 SF with 500 SF of walkways and 350 SF of landscaped areas. The total site area is approximately 28,785 SF (or 0.66 acres). The bank building is located in the southwestern portion of the project site with the asphalt-paved surface parking lot occupying the northern and eastern portions of the project site. Ingress/egress to the project site is available via one curb cut driveway located on Delmas Terrace; and one ingress only curb cut driveway and one ingress/egress curb cut driveway along Washington Boulevard.

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

The project site is located on the northeastern corner of the Washington Boulevard and Delmas Terrace intersection within downtown Culver City. The San Diego Freeway Interstate 405 (I-405) is located less than 1.5 miles west of the project site and the Santa Monica Freeway Interstate 10 (I-10) is less than 0.5-mile north of the project site.

The project site is generally surrounded by a mix of hospital, medical office, retail, restaurant, office, and residential uses. Surrounding land uses include:

North – (CG Zone) The 7-story Southern California Hospital Culver City with associated medical offices/facilities and surface parking lots are located immediately north of the project site along Delmas Terrace.

East – (CD Zone) A single-story retail and commercial building (i.e., Alandales Men's Clothing, Sportswear & Hair Studio, Goda Yoga Studio, The Wellness Spa, and a State Farm Insurance office) is located immediately east of the project site along Washington Boulevard. To the north of the retail/commercial building is a 2-story multi-family residential apartment building with an associated surface parking lot, accessible from Watseka Avenue.

South - (CD Zone) Washington Boulevard borders the site to the south and is followed by the 2-story Washington Building which includes office and retail uses (i.e., Starbucks, Kelton Global, Art Machine, Lundeen's).

West - (CD Zone) Delmas Terrace borders the site to the west and followed by a 2-story bank building (Chase Bank) and an associated surface parking lot. Along the western side of Delmas Terrace north of the Chase Bank Building is a mix of one- to seven hospital and medical-office related buildings.

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

- City of Culver City [MND Approval; General Plan Map Amendment/Zoning Code Map Amendment, Administrative Modification for parking; Administrative Use Permit; Site Plan Review; Master Sign Program; Construction-related permits (i.e., demolition permit, haul route permit, building permit, grading permit, etc.)]
- Los Angeles Regional Water Quality Control Board
- South Coast Air Quality Management District
- Other agencies as needed.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Less Than Significant Impact With Mitigation Incorporated" as indicated by the checklist on the following pages:

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

ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

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



Jose Mendivil, Associate Planner, City of Culver City

August 1, 2017

Date

PURPOSE OF THE INITIAL STUDY

The project is analyzed in this Initial Study, in accordance with the California Environmental Quality Act (CEQA), to determine if approval of the project would have a significant impact on the environment. This Initial Study has been prepared pursuant to the requirements of CEQA, under Public Resources Code 21000-21177, of the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) and under the guidance of the City of Culver City. The City of Culver City is the Lead Agency under CEQA and is responsible for preparing the Initial Study for the proposed project.

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

I. AESTHETICS – Would the project:

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

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

Would the project:

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

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

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

V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?	☐	☐	☐	☒

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?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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VII. GREENHOUSE GAS EMISSIONS – Would the Project:

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

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

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

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>IX. HYDROLOGY AND WATER QUALITY</u> – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

X. LAND USE AND PLANNING – Would the project:

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

Issues:	Potentially Significant Impact	Less Than Significant	Less Than Significant Impact	No Impact
		With Mitigation Incorporated		
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

XI. MINERAL RESOURCES – Would the project:

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

XII. NOISE – Would the project result in:

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

XIII. POPULATION AND HOUSING – Would the project:

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

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIV. PUBLIC SERVICES

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

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

XV. RECREATION

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

XVI. TRANSPORTATION/TRAFFIC – Would the project:

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

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

XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:

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

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

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

Attachment A – Project Description



ATTACHMENT A PROJECT DESCRIPTION

A. INTRODUCTION

Clarett West Development (the Applicant) proposes to redevelop a 0.66-acre property located at 9735 Washington Boulevard, on the northeast corner of the Washington Boulevard and Delmas Terrace intersection in downtown Culver City. The proposed development ("9735 Washington Boulevard", or "Brick and the Machine", or "the project") would include a mix of commercial (retail and restaurant) and office uses. The project site is currently developed with a two-story bank building with a mezzanine formerly occupied by "Bank of the West" and now vacant. The balance of the property is improved with an asphalt-paved surface parking lot. All existing site uses would be demolished and removed to support the development of the project.

The project is proposing a partial 4-story building with a building height up to 56 feet. On Level 1 (Ground Level), the building would include approximately 9,187 square feet (SF) of retail uses and approximately 5,209 SF of restaurant uses. The Ground Level would also include an approximate 1,022 SF main office lobby. Levels 2 through 4 would include approximately 60,065 SF of office uses with an additional 2,000 SF of outdoor dining for the ground level restaurant on the Level 4 outdoor deck (atop the Level 3 ceiling). Parking for the proposed uses would be provided on the Ground Level and within a 3-level subterranean parking structure. Vehicular ingress/egress to the project site would be provided from Delmas Terrace. A detailed description of the project is provided below.

B. PROJECT LOCATION AND SURROUNDING USES

The project site is located on the northeastern corner of the Washington Boulevard and Delmas Terrace intersection within downtown Culver City. The San Diego Freeway Interstate 405 (I-405) is located less than 1.5 miles west of the project site and the Santa Monica Freeway Interstate 10 (I-10) is less than 0.5-mile north of the project site. **Figure A-1, *Regional and Project Vicinity Locations***, illustrates the location of the project site from a regional and local perspective.

The project site is generally surrounded by a mix of hospital, medical office, retail, restaurant, office, and residential uses. Surrounding land uses include:

- **North** – The 7-story Southern California Hospital Culver City with associated medical offices/facilities and surface parking lots are located immediately north of the project site along Delmas Terrace.
- **East** – A single-story retail and commercial building (i.e., Alandales Men's Clothing, Sportswear & Hair Studio, Goda Yoga Studio, The Wellness Spa, and a State Farm Insurance office) is located immediately east of the project site along Washington Boulevard. To the north of the retail/commercial building is a 2-story multi-family residential apartment building with an associated surface parking lot, accessible from Watseka Avenue.



SOURCE: Open Street Map, 2016.

9735 Washington Boulevard

Figure A-1
Regional and Project Vicinity Locations

- South – Washington Boulevard borders the site to the south and is followed by the 2-story Washington Building which includes office and retail uses (i.e., Starbucks, Kelton Global, Art Machine, Lundeen's).
- West – Delmas Terrace borders the site to the west and followed by a 2-story bank building (Chase Bank) and an associated surface parking lot. Along the western side of Delmas Terrace north of the Chase Bank Building is a mix of one- to seven hospital and medical-office related buildings.

Figure A-2, *Aerial Photograph with Surrounding Land Uses*, illustrates the surrounding uses.

C. PLANNING AND ZONING

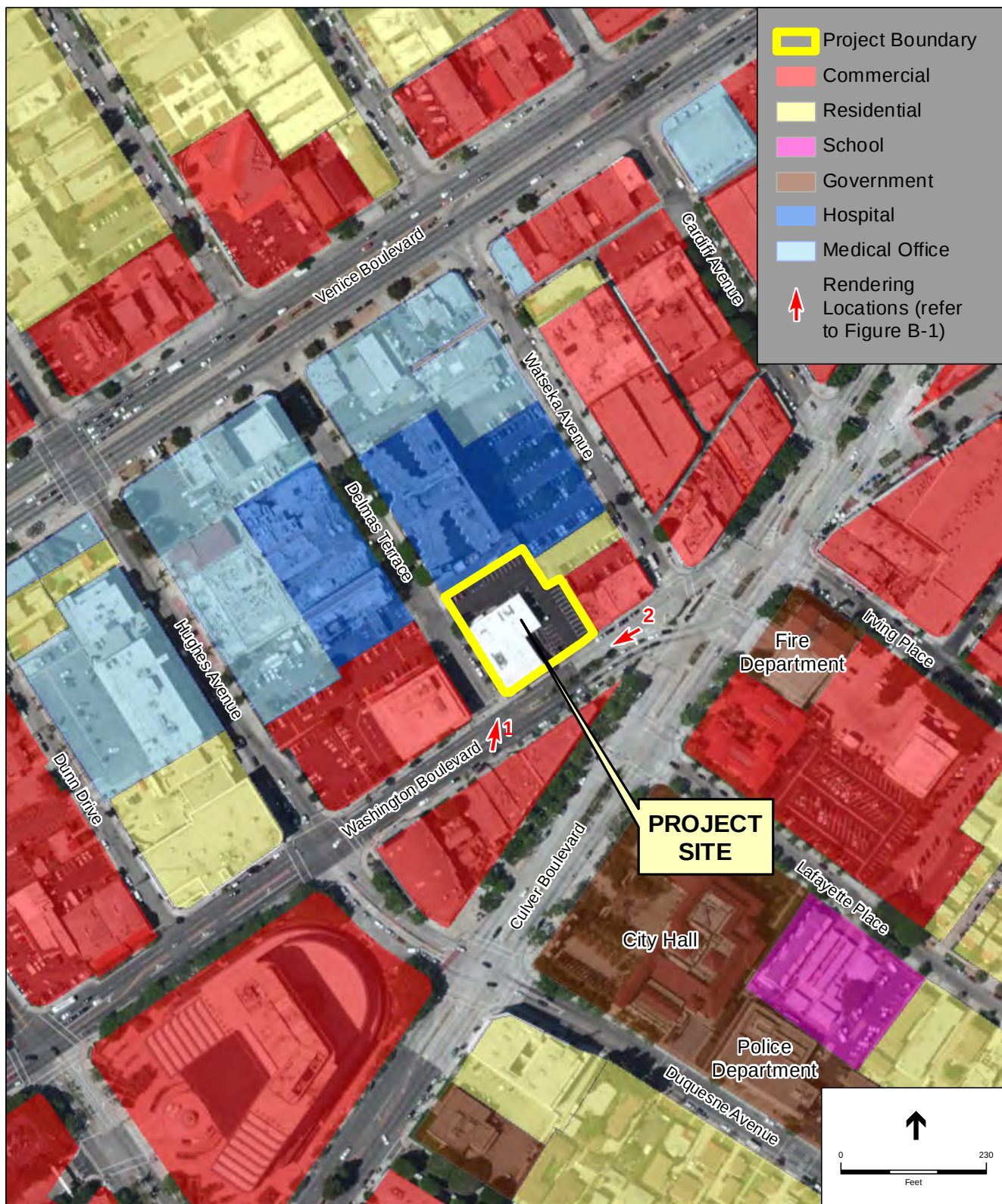
The Culver City general plan designation for the project site's two Washington Boulevard fronting lots is Downtown which allows medium and large-scale commercial uses and shared parking. The Downtown designation is intended to support desirable existing and future commercial uses and mixed-use housing opportunities within the Downtown area, and to encourage a pedestrian-friendly environment with a positive nightlife ambiance. The project site's third lot at the rear has a General Plan General Corridor Land Use designation. This designation allows small to medium-scale commercial uses. It is intended to support neighborhood and community serving commercial uses and allows heights up to 56 feet.

The Culver City zoning code designations for the project site are Commercial Downtown (CD) and Commercial General (CG). The CD zone permits medium and large-scale commercial uses, emphasizing retail, entertainment, restaurant, and cultural uses up to 44 feet in height. The CG zone permits small to medium scale commercial uses, emphasizing community-serving retail, office and service uses up to 56 feet in height.

The project is proposing amendments to the project's general plan and zoning map designations. The current line dividing the CD and CG zoning designations (and their corresponding General Plan Map land use designations) occurs at an arbitrary angle and location within the site boundaries. The map amendment requests would shift the line between the General Plan General Corridor and Downtown designations and corresponding CD and CG zoning designations to allow for a useable office space on Level 4. A portion of the General Corridor designated area will be shifted south a maximum of 32 feet with an accompanying zone change of CD to CG. This shift will make the division line between the project's CD and CG zones parallel with the rear property line creating the ability to provide a more uniform building division where height will increase from a maximum allowed 44 feet in the CD Zone to a maximum allowed 56 feet in the CG Zone. Without these minor General Plan Map and Zoning Map amendments the building would be comprised of two irregularly shaped rectangles creating difficulty in mapping floor plans for each level.

D. EXISTING CONDITIONS

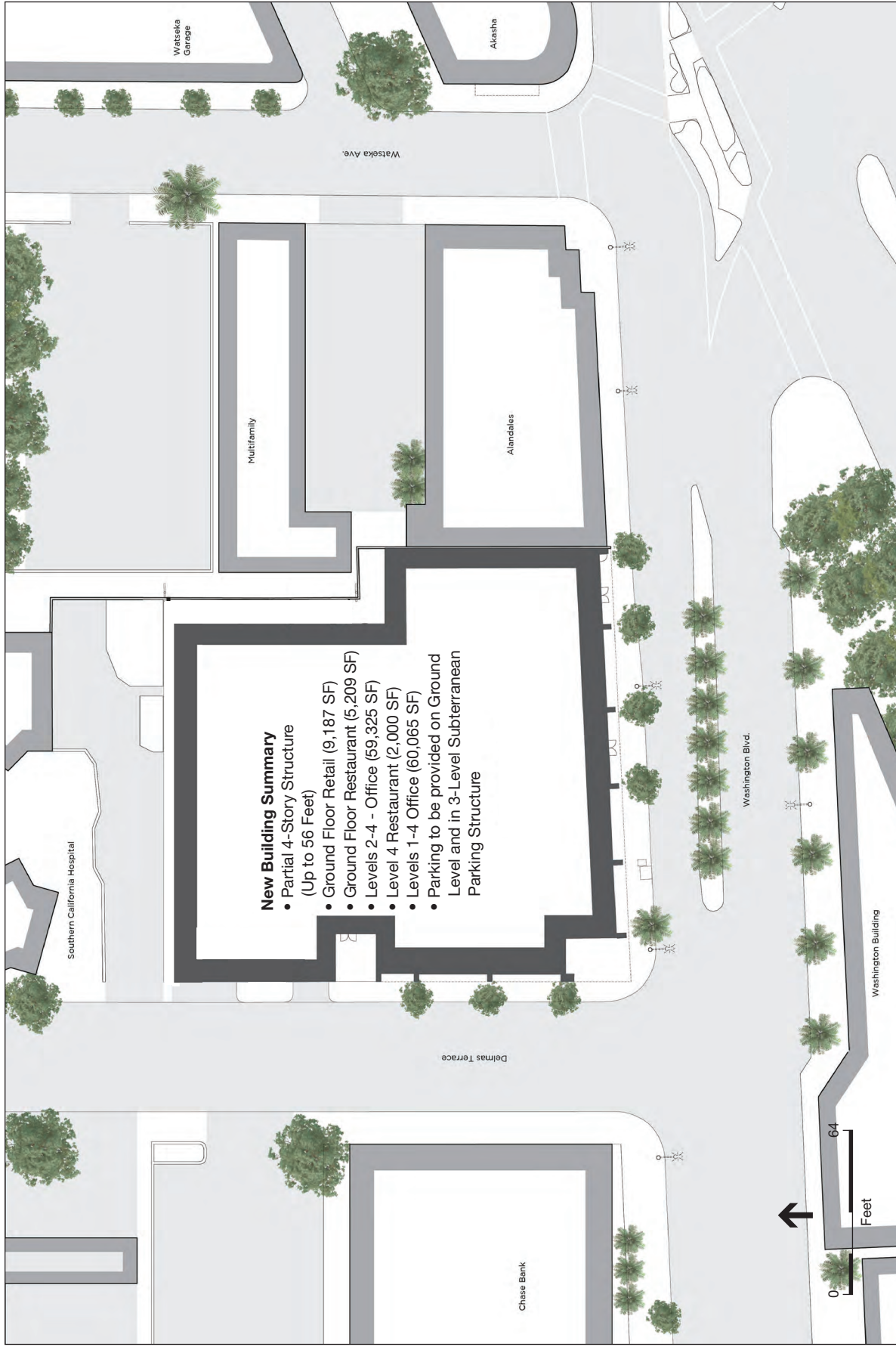
The project site is currently improved with a two-story bank building with a mezzanine formerly occupied by "Bank of the West" and associated asphalt-paved surface parking lot, walkways, and landscaped areas. The existing building footprint is approximately 8,871 SF with an approximate 7,208 SF second floor for a total building size of approximately 16,079 SF. The associated asphalt-paved surface parking lot is approximately 18,981 SF with 500 SF of walkways and 350 SF of landscaped areas. The total site area is approximately 28,785 SF (or 0.66 acres). The bank building is located in the southwestern portion of the project site with the asphalt-paved surface parking lot occupying the northern and eastern portions of the project site. Ingress/egress to the project site is available via one curb cut driveway located on Delmas Terrace; and one ingress only curb cut driveway and one ingress/egress curb cut driveway along Washington Boulevard.



SOURCE: Google Map, 2015 (Aerial).

9735 Washington Boulevard

Figure A-2
Aerial Photograph with Surrounding Land Uses



SOURCE: Abramson Teiger Architects, 2017

9735 Washington Boulevard
Figure A-3
 Site Plan

E. DESCRIPTION OF PROPOSED PROJECT

1. Project Uses

The project is proposing a mix of retail, restaurant, and office uses within a partial 4-story building (up to 56 feet tall). Retail, restaurant, and main office lobby uses would be located on the Ground Level. On Levels 2 through 4, the project would include office uses with additional restaurant space on Level 4. Parking for the proposed uses would be provided on site on the Ground Level and within a 3-level subterranean parking structure. **Figure A-3, Site Plan** and **Figure A-4, Ground Floor Plan**, illustrate the site plan for the project. The uses proposed by the project are described in detail below and a summary of the project is provided in **Table A-1, Proposed Project Land Use Summary**. As shown in Table A-1, the project would provide a total of approximately 9,187 SF of retail uses, approximately 7,209 SF of restaurant uses, 60,065 SF of office uses, and 87,016 SF of parking area for a total buildable area of 163,477 SF.

Table A-1
Proposed Project Land Use Summary^a

	Square Feet (SF)
Retail (Level 1)	9,187 SF
Restaurant (Level 1 and 4)	
Level 1	5,209 SF
Level 4	<u>2,000 SF</u>
	7,209 SF
Office (Levels 1-4)	
Level 1 (main office lobby)	1,022 SF
Level 2	24,172 SF
Level 3	24,244 SF
Level 4 (partial)	<u>10,627 SF</u>
	60,065 SF
Parking (Level 1 – Parking Level 3)	
Parking Level 3	26,354 SF
Parking Level 2	26,354 SF
Parking Level 1	26,354 SF
Level 1	<u>7,954 SF</u>
	87,016 SF
Total Buildable Area	163,477 SF

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

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

Source: Memo: BM16 – Memorialized Site Plan Review Areas, quantities from T2.1A – Traffic Study Areas, prepared by Abramson_Teiger Architects, dated November 28, 2016.

(a) Ground Level and Level 4 Commercial Component

The Ground Level consists of two retail spaces of 7,187 SF and 2,000 SF for a total of approximately 9,187 SF of retail uses within the southeastern and southcentral portion of the building along Washington Boulevard. The Ground Level would also include approximately 4,411 SF of restaurant space with an additional 798 SF of outdoor dining for a total of approximately 5,209 SF of restaurant uses within the southwestern portion of the building on the corner of Washington Boulevard and Delmas Terrace. The project would include an additional 2,000 SF of outdoor dining located within the roof terrace/garden and courtyard of Level 4 (see Figure A-7 below). Thus, the project's total restaurant space would be approximately 7,209 SF. Figure A-4 illustrates the project's commercial components on the Ground Level.

(b) Office Component

The 60,065 SF creative office space would be located on the Ground Level through Level 4. The 1,022 SF of main office lobby would be located within the central portion of the building on the Ground Level accessible from Delmas Terrace. Office uses within Levels 2-4 would include approximately: 24,172 SF on Level 2; 24,244 SF on Level 3; and 10,627 SF on the partial Level 4. The office space would be separated into two separate components/building volumes with complementary operational characteristics.

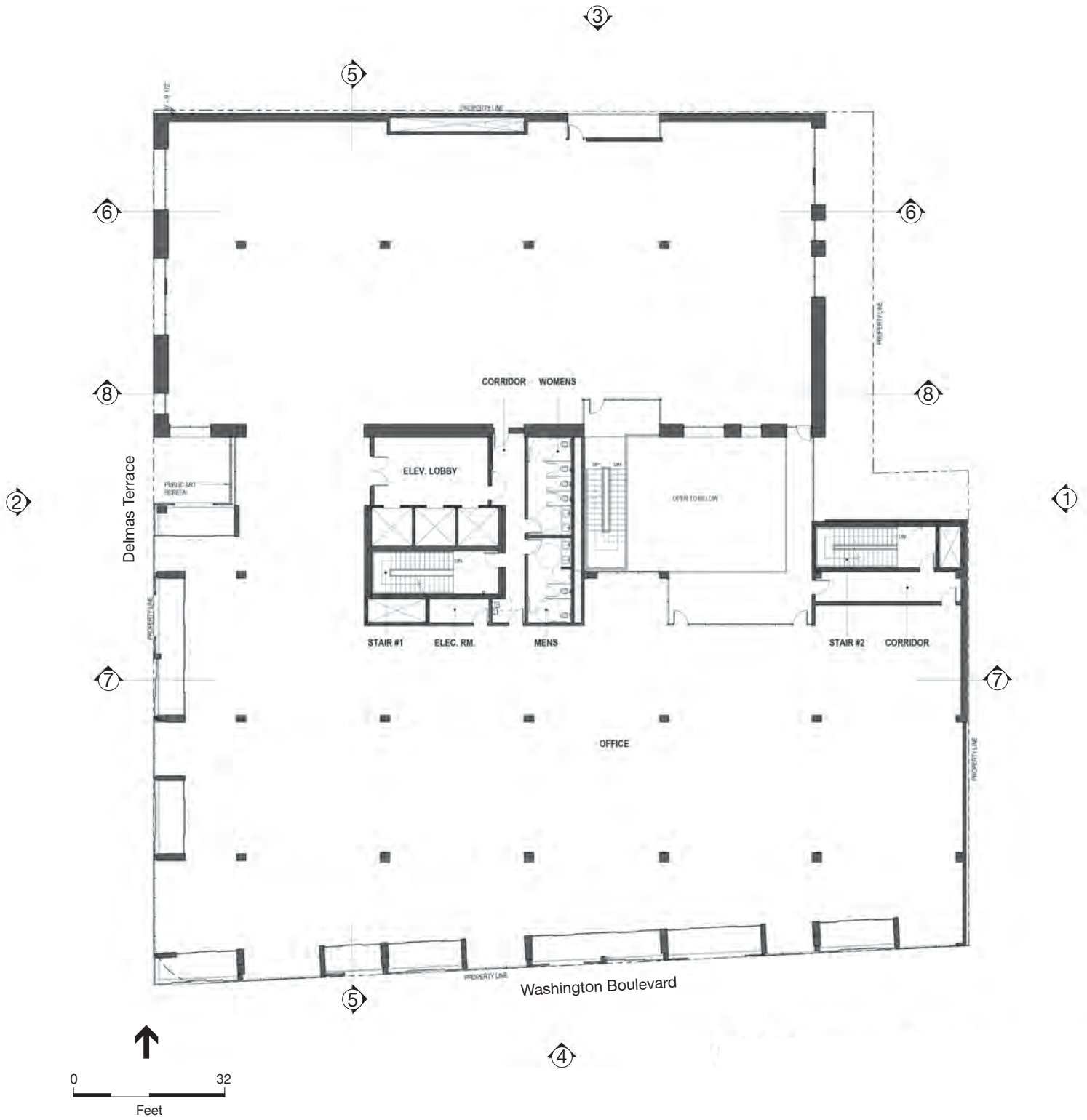
The northern office component, the "Brick", would act as the anchor to the project site, featuring a shift between large, building-scale window openings and a finely textured human-scale materiality. The southern office component, the "Machine", would sit atop the pedestrian streetscape, featuring an operable, experiential concrete frame façade that provides layered systems of sliding doors and perforated screens which allow tenants to modify their working environment, generating a modulated indoor-outdoor atmosphere. Level 2 would include office space of both the Brick and the Machine office components with an additional shared lobby area with associated elevator, stairway, and hallway corridor leading to the restroom facilities. In addition, Level 2 would include an approximately 1,326 SF open air interior shared office courtyard (described below). The interior courtyard would include an exterior stairway to be directly accessible from Levels 3 and 4. **Figure A-5, 2nd Floor Plan**, illustrates the office uses and the courtyard on Level 2.

Similar to Level 2, Level 3 would include office space of both the Brick and the Machine office components with an additional shared lobby area with associated elevator, stairway, and hallway corridor leading to the restroom facilities and an open air space above the Level 2 interior courtyard; refer to **Figure A-6 3rd Floor Plan**. Level 4 would include the partial 4th-story building situated in the northern/rear portion of this level which would include additional office uses and restroom facilities within the Brick office component. The remaining central and southern portion of Level 4 would include an approximate 10,927 SF roof terrace/garden and courtyard (described below) with an open air space above the Level 2 interior courtyard and outdoor dining. The Level 4 elevator lobby area would open to the office uses while the stairways would open to the roof terrace/garden. **Figure A-7, 4th Floor Plan**, illustrates the office uses and the roof terrace/garden and courtyard on Level 4. Levels 2 and 3 would include a series of balconies within the Machine office component located on along West Washington Boulevard and Delmas Terrace frontages and at the northern portion of the building within the Brick office component. Level 4 would include a single balcony situated at the northwestern corner of the office space of the Brick office component.

2. Building Heights and Elevations

As discussed above, the project would include a partial 4th story of office uses up to 56 feet in height. The remainder of the site would not exceed 44 feet in height. The proposed zone change would not impact the

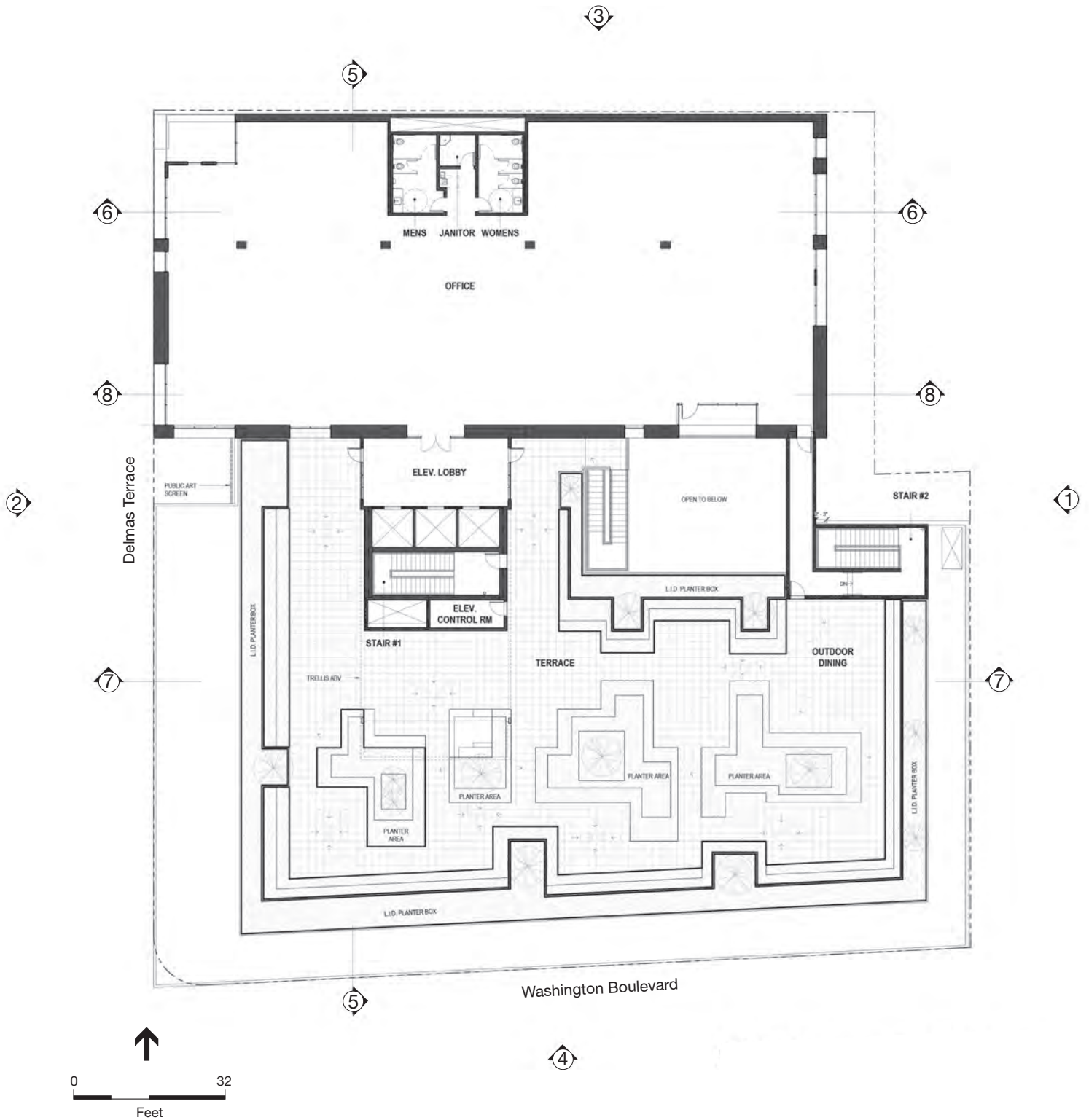
building height as viewed from Washington Boulevard as the frontage of the building along Washington Boulevard complies with the height requirements of the CD height requirements. Building heights would slightly vary at different points and elevations of the building to provide focal relief and visual interest to the building. Roof mounted mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts, etc.) would be screened from public view from adjoining public streets and rights-of-way. The method of screening would be architecturally compatible with other on-site development in terms of colors, materials, and architectural style as approved by the City Planning Manager. The roof mounted mechanical equipment screening and stair parapets would have a maximum height of up to 61 feet, which would be consistent and allowed for under Culver City Municipal Code (CCMC) requirements. Building elevations for the project are illustrated in **Figure A-8, West and East Elevations** and **Figure A-9, North and South Elevations**. Building sections are illustrated in **Figure A-10, Building Sections 1** and **Figure A-11, Building Sections 2**.



SOURCE: Abramson Teiger Architects, 2017

9735 Washington Boulevard

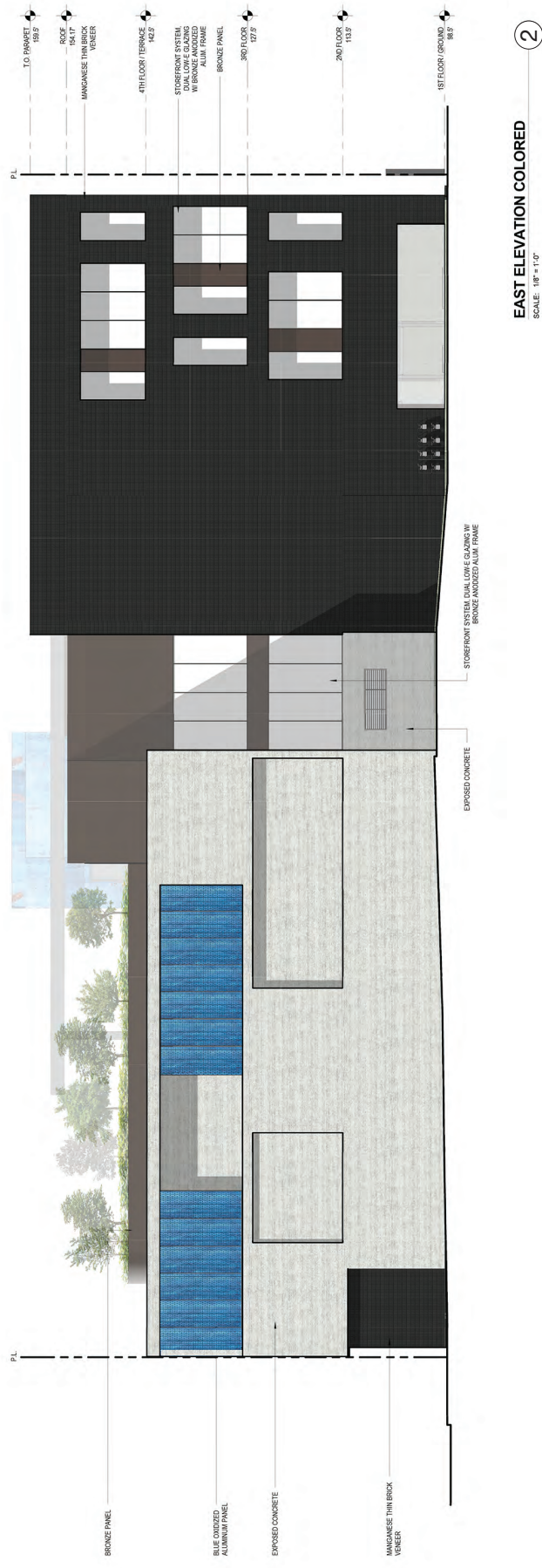
Figure A-6
3rd Floor Plan



SOURCE: Abramson Teiger Architects, 2017

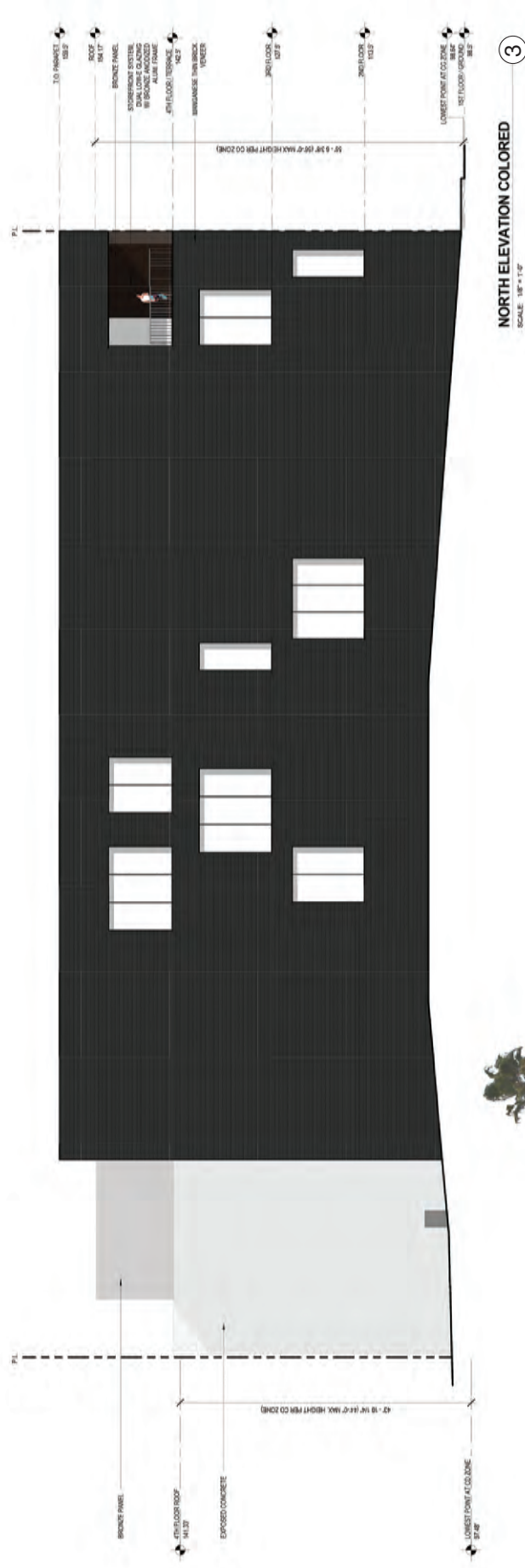
9735 Washington Boulevard

Figure A-7
4th Floor Plan



NOTE: Elevation locations are shown on Figures A-4 through A-7.

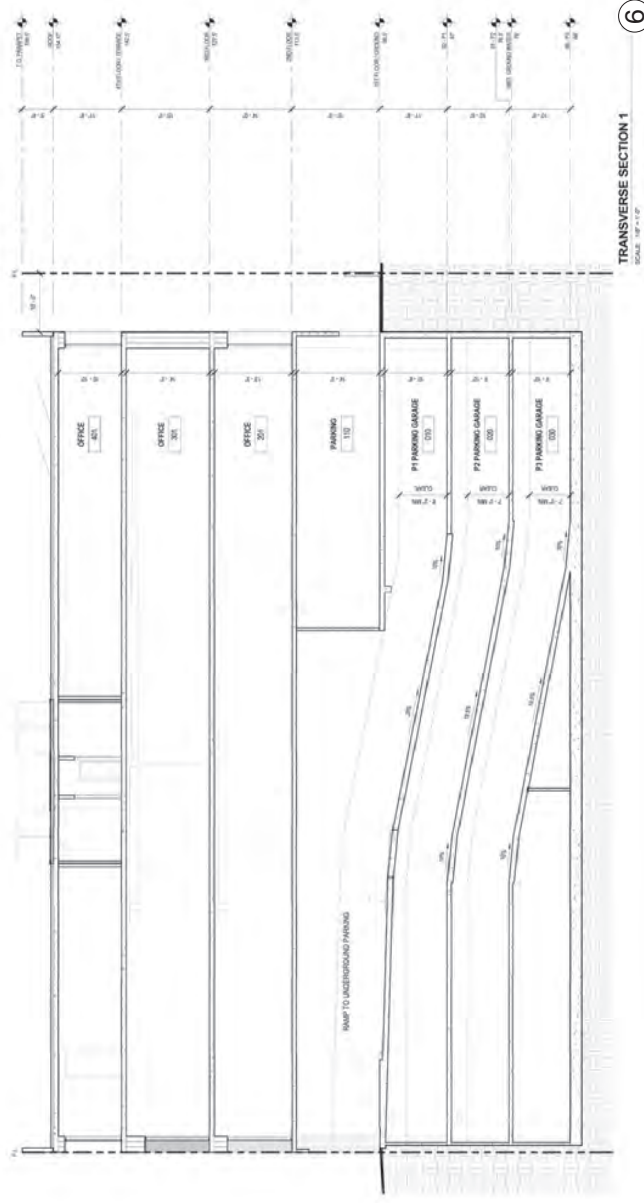
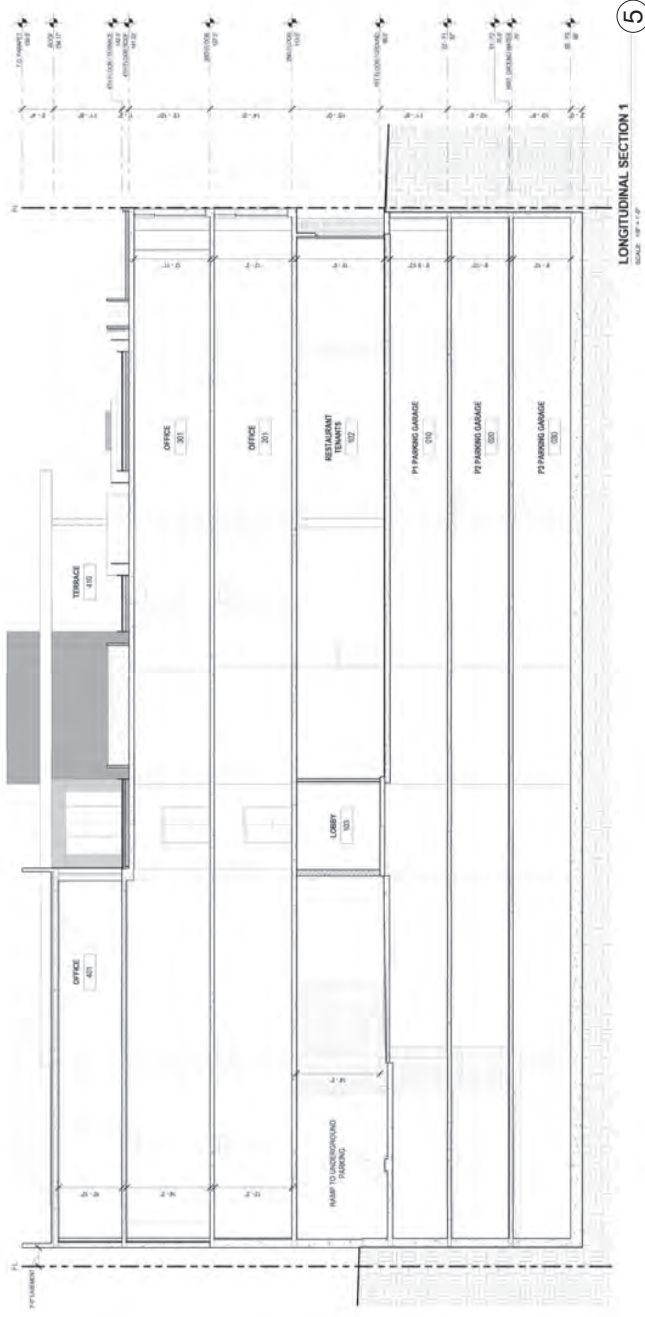
SOURCE: Abramson Teiger Architects, 2017



NOTE: Elevation locations are shown on Figures A-4 through A-7.

SOURCE: Abramson Teiger Architects, 2017

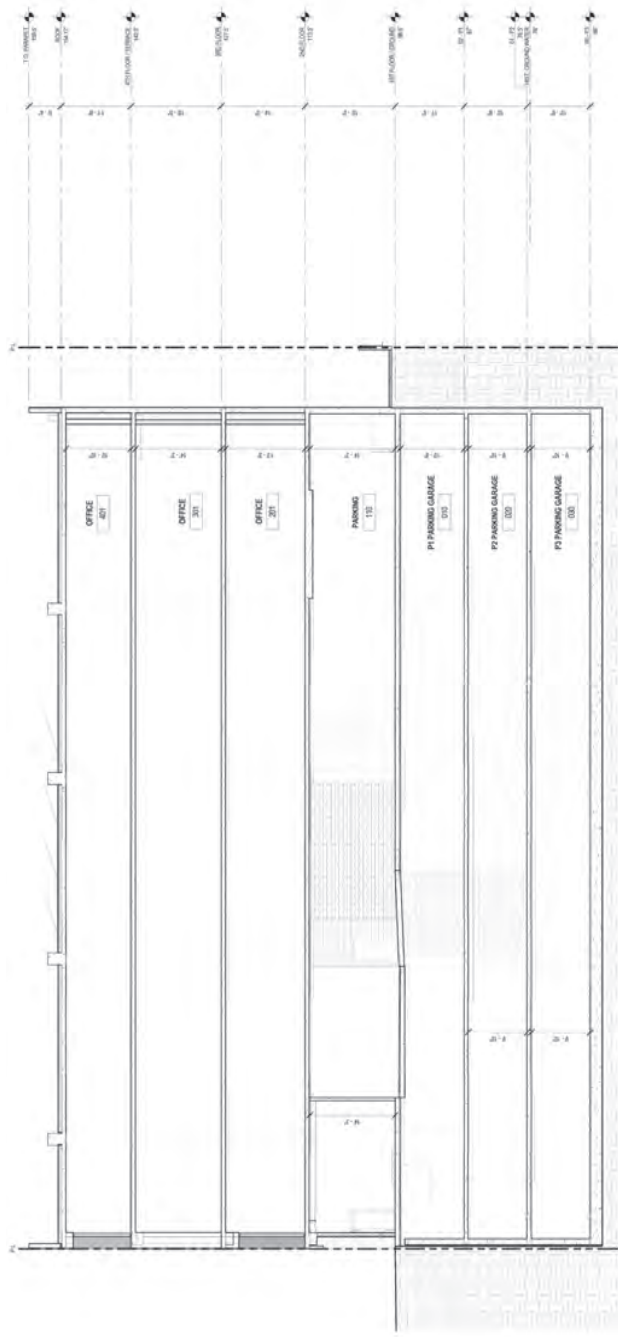
9735 Washington Boulevard
Figure A-9
 North and South Elevations



NOTE: Section locations are shown on Figures A-4 through A-7.

SOURCE: Abramson Teiger Architects, 2017

9735 Washington Boulevard
Figure A-10
 Building Sections 1



TRANSVERSE SECTION 2
SCALE: 1/8" = 1'-0"



TRANSVERSE SECTION 3
SCALE: 1/8" = 1'-0"

NOTE: Section locations are shown on Figures A-4 through A-7.

SOURCE: Abramson Teiger Architects, 2017

9735 Washington Boulevard
Figure A-11
Building Sections 2

3. Parking and Access

(a) Parking

The project would include 214 vehicular parking spaces distributed within the Ground Level and three levels of a subterranean parking structure. Vehicular parking on the Ground Level would be provided via 5 surface spaces and 6 two-level automobile stackers/parking lifts providing twelve spaces (i.e., each automobile stacker/parking lift provides two vertically stacked parking spaces) for a total of 17 vehicular parking spaces. Parking on the Ground Level would be exclusively for retail and restaurant uses. Vehicular parking spaces per level of the subterranean parking structure would include 60 spaces on Parking Level 1 (P1); 67 spaces on Parking Level 2 (P2); and 70 spaces on Parking Level 3 (P3). Parking within the subterranean parking structure would be for office, retail, and restaurant uses. The CCMC requirements for vehicular parking are summarized below in **Table A-2, Project Vehicular Parking Code Requirements**. As shown in Table A-2, the project would be required to provide 243 vehicular parking spaces (if no shared parking). This parking demand was used to develop a parking reduction and shared parking profiles based on the parking demand ratios and methodology provided in the Urban Land Institute's Shared Parking, 2nd Edition, 2005, Handbook. Based on the calculation results provided in the *9735 Washington Boulevard Mixed-Use Project Shared Parking Demand*, (herein referred to as the "Shared Parking Analysis") prepared by Crain & Associates, dated December 16, 2016, the peak parking demand for the project site would be expected to occur on December weekdays at approximately 2:00 PM in the afternoon, of which the demand would be expected to be 214 vehicular spaces. As shown in Table A-2, the project would meet the number of vehicular parking spaces required to meet this demand. The Shared Parking Analysis is provided under separate cover available at the Culver City Planning Division.

(b) Access

As shown on Figure A-4, direct vehicular access to the project site would be provided on the Ground Level located along Delmas Terrace. Vehicular access to the Ground Level parking would be provided via an ingress/egress driveway ("driveway"). The Ground Level driveway would be located north of the main office lobby.

Vehicular access to the subterranean parking structure would be provide along Delmas Terrace via an ingress/egress parking structure ramp ("ramp") to the P1 to P3 levels. The ramp would be located north of the driveway along the northern edge of the building. The driveway leading to the ground level parking would be to the right or south of the ramp driveway as one enters the building. Vehicles would enter and exit the parking structure ramp via an automated entry system that would be activated by either a ticket and/or key card system. The entry drive aisle would include a parking gate with a short raised median to separate the ingress and egress vehicular traffic and would be located at the bottom of the ramp at the entrance to the P1 level providing car queuing along the ramp driveway instead of on Delmas Terrace. Once past the parking gate, the retail, restaurant, and office parking spaces would be directly accessible.

(c) Bicycle Parking

The project would provide six (6) short term bicycle parking spaces and eight (8) long term bicycle parking spaces for a total of 14 spaces. The long term bicycle parking spaces would be provided on the Ground Level adjacent the enclosed trash and recycling room and adjacent the automobile stacker/parking lifts. The six short term bicycle parking spaces would be provided on the Ground Level adjacent the restaurant uses along Delmas Terrace.

Table A-2
Project Vehicular Parking Code Requirements

	Areas (SF) ^a	Required/ Factor ^b	Required
Office Space	55,607	1/370 SF	151
Retail Space	8,158	1/400 SF	21
Restaurant	7,032	1/100 SF	71
Total Project Parking Required (Prior to Shared Parking)			243^b
Total Project Shared Parking Required			214^c
Total Project Parking Provided			214

Notes: SF = square feet

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

^b Parking requirements based on CCMC, Title 17: Zoning Code, Chapter 17.320: Off-Street Parking and Loading, Section 17.320.020 – Number of Parking Spaces Required, Table 3-3B.

^c Parking demand was used to develop shared parking profiles based on the parking demand ratios and methodology provided in the Urban Land Institute's Shared Parking, 2nd Edition, 2005, handbook. The procedures in the ULI handbook account for parking demand fluctuations based on customer/visitor versus employee, month of year, weekday versus weekend, and time-of-day. Adjustments for shared parking calculations recommended in the ULI handbook include: the ULI handbook recommends parking generation ratios being divided into employee and visitor/guest portions, which were implemented to the calculated Code parking demand for the project (i.e., 243 vehicular spaces); the ULI handbook estimated parking month to month demand variation percentages by use, and those percentages were applied to the various project components; the peak weekday demand and peak weekend demand from the ULI handbook were compared to the ULI peak overall demand to determine the expected percent of the Code parking demand expected to occur on each type of day; and the separate hour-by-hour percentage curves from the ULI handbook were applied to the peak demand for 1) visitors-guests on weekdays, 2) employees on weekdays, 3) visitors-guests on weekends, and 4) employees on weekends. The above standard ULI adjustment factors were utilized in the calculation worksheet and the summary of the shared-parking spaces for the project within the Shared Parking Analysis.

Sources:

Memo: BM16 – Memorialized Site Plan Review Areas, quantities from T2.1 – Culver City Gross Areas, prepared by Abramson_Teiger Architects, dated November 28, 2016.

9735 Washington Boulevard Mixed-Use Project Shared Parking Demand, prepared by Crain & Associates, dated December 16, 2016.

(d) Pedestrian Access

Pedestrian access to the retail and restaurant uses would be provided from at-grade sidewalks along Washington Boulevard and Delmas Terrace as shown on Figure A-4. The main office lobby would be located within the central portion of the building on the Ground Level accessible from Delmas Terrace. The parking garage would provide access to all uses within the site via stairs and/or elevators. Office employees would access the office uses via elevators or stairways located in the office/lobby or the parking garage. Access to the office uses would be restricted through the use of an electronic key system. The service corridor located on the Ground Level accessible from Washington Boulevard would provide ingress/egress to the retail and restaurant uses for service personnel only.

4. Open Space, Landscaping and Amenities

The Ground Level public open space along Washington Boulevard and Delmas Terrace would include a streetscape design that includes an eight to 10-foot wide public sidewalk along Washington Boulevard and an 8-foot wide public sidewalk along Delmas Terrace with street trees, landscape planters, tree grates, and benches, tables for outdoor seating and dining, trash receptacles, and street furniture to activate the pedestrian environment. The project would include balconies, an open air interior office courtyard, and a roof terrace/garden and courtyard for use by office employees; refer to **Figure A-12, Courtyard and Roof Garden**. Level 2 would include an approximately 1,326 SF open air interior office courtyard, which would be composed of a vegetated wall backdrop, two mature shade trees with a built-in table system and seating beneath them, and separate landscaped congregation areas with additional outdoor tables and seating. Level 4 would include approximately 10,927 SF of roof terrace/garden and courtyard, which would be composed of separate landscaped congregation areas for leisure and entertainment activities with bench seating and an outdoor kitchen equipped with a barbeque area and covered patio with a shaded dining area with additional seating. From the roof terrace/garden, the office tenants could descend from the sculptural stairway to the recessed open air interior courtyard in the building's center on Level 2.

5. Lighting and Signage

New site signage would be used for project identity, building identification, retail, restaurant, and office tenant advertising/branding, pedestrian wayfinding, and security markings. It would be designed and located to be compatible with the architecture and landscaping of the project. No off-site signage is proposed. All signage would be provided consistent with Culver City requirements.

Pedestrian areas would be well lit for security. The proposed buildings would include accent lighting to complement the building architecture. Façade lighting is intended to reinforce the architecture of the building and to provide a nighttime presence for the project. Fixtures would be designed to prevent light trespass on adjacent properties. Recessed LED fixtures would be designed to eliminate unwanted glare and set to limit all light pollution into the sky. Surface mounted LED fixtures would be integrated into the landscape planters throughout the site. Ingrade LED fixtures would provide focused uplight on the site trees along the perimeter of the property. Project lighting would include time scheduling and on-demand dimming.

6. Sustainability Features

Energy saving and sustainable design would be incorporated throughout the project. The project would incorporate green building design which would promote conservation, energy efficiency, and carbon emission reduction.



SOURCE: Abramson Teiger Architects, 2017

9735 Washington Boulevard
Figure A-12
 Courtyard and Roof Garden

Conservation and Energy Efficiency

1. Recycling of building materials during demolition of existing structures.
2. Using non-wood alternatives for exposed wood products such as Nichiha (simulated wood manufactures from fiber cement) on the wood siding and Resysta (simulated wood manufactures from rice husks) in the wood decks.
3. Using local manufactures and recycled products where possible.
4. Stormwater filtration and capture systems.
5. Permeable roof pedestal paving surfaces to reduce stormwater runoff.
6. Implementation of Green Roof and Green Planter Systems to reduce stormwater runoff and CO2 Emissions.
7. Installation of a photovoltaic system, which meets or exceeds the Culver City requirements.
8. Water saving fixtures in all locations including waterless urinals in public restrooms and water saving landscaping.
9. Water meter installation for irrigation as well as monitoring for tenants, food service/restaurants, and other occupants that consume more than 1,000 gallons of water per day.
10. Incorporation of low-water and drought tolerant plants in the landscape plan for the streetscape and green roof.
11. Irrigation using captured stormwater.
12. Dual low emissivity glazing.
13. High reflective roof material.
14. High efficiency heating and air conditioning systems.
15. Occupancy sensor lighting in all common areas.
16. Reliance on fluorescent, LED or other type of high efficiency systems for all interior and exterior lighting. New lighting installed in parking structures and all common areas shall be motion sensor controlled;
17. Natural ventilation.
18. Operable solar shading screens built into façade system.
19. On-site recycling collection facilities.

Carbon Emission Reduction

1. Bicycle racks spread along the Delmas Terrace portion of the site for public use
2. Other bicycle oriented facilities include safe lockable storage areas for office and retail use.
3. Mixed office/retail use development adjacent to public transit.

Mobility Features

The project's central location within Los Angeles County and proximity to the Culver City Metro Station presents an opportunity to enhance mobility. In addition, the features described above, some specific initiatives include:

1. Access to multi-modal transit with connecting bike, bus, and train routes. The property is located southwest of the Culver City Metro Station, which is the approximate center of the EXPO line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to 18 bus routes and bicycle lanes/routes.
2. Bike friendly design with bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services.
3. Designated parking for low-emission/zero-emission vehicles.
4. Connections to the EXPO bike path and Culver City and City of Los Angeles bike paths.
5. Promotion of walking through a "walk to work" program in coordination with the onsite office employees and a posted neighborhood map with approximate walking distances and times to local neighborhood amenities.
6. The perimeter of the site area will incorporate the City's approved Streetscape plan which will create an attractive and inviting walkable environment.
7. Inclusion of a shared parking program with miscellaneous neighboring retailers and the City.

7. Site Security

Site security would include provisions of 24-hour video surveillance and a full-time security guard. Duties of the security personnel would include, but would not be limited to, assisting office employees and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property. The site security would interface and collaborate with the CCPD, as necessary. Site security features would include building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. The project design would include lighting of entry-ways and public areas for site security purposes. The buildings would include controlled access to office uses in order to ensure the safety of office employees.

8. Loading and Trash Removal

As shown on Figure A-4, loading for large deliveries for retail, restaurant, and office uses would occur in designated temporary loading area adjacent to the enclosed trash and recycling room located on site on the Ground Level. This loading area would be accessed via the entrance/exit driveway on the Ground Level along Delmas Terrace.

A trash and recycling room designated for use by all tenants would be located on the Ground Level adjacent the bike storage facility. All trash would be collected by on-site maintenance and collectively disposed or recycled. The project would foster recycling of reusable materials (i.e., cardboard, plastics and aluminum) by providing dedicated and easily accessible bins. Trash trucks would utilize the temporary loading area near the trash and

recycling room for turnaround which would be marked restricted from use during the scheduled time of waste pick-up.

9. Construction Schedule/Activities

A Draft Construction Traffic Management Plan has been prepared for the project.¹ This Plan documents how the project's construction management team would implement and conduct its site management responsibilities during the construction phase of the project. The goal of the Plan is to describe the scope and anticipated scheduling of construction as a means of ensuring and facilitating an integrated and coordinated construction phase and informative framework for public education of the objectives of the project. The Plan describes how the construction management team would comply with City requirements relating to construction; defines the project objectives and targets of particular relevance to the construction phase; describes constraints specific to the construction phase and the project in general; and details the proposed strategy for the construction phase, with particular regard to establishment resourcing, site organization, and construction controls. As the scope of work is further detailed in the later design phases of the project, the Draft Construction Traffic Management Plan would also require modification. A Final Construction Traffic Management will ultimately be required to be reviewed and approved by the City.

As discussed within the Plan, the project would comply with Culver City's allowable construction hours of (unless project conditions require more stringent hours such as not work on Sundays and National Holidays):

- Monday-Friday: 8:00 AM through 8:00 PM
- Saturdays: 9:00 AM through 7:00 PM
- Sundays: 10:00 AM through 7:00

Any work outside of the above hours would require consultation and approval with pertinent Culver City departments prior to any works being scheduled. Businesses and surrounding residents would be given notification of the proposed after hours work prior to the starting said work including details of the work to be performed with an anticipated time required to undertake each activity. After hours work would be limited, but may be required for specific tasks in order to minimize impacts to pedestrians, vehicular traffic or in the interest of safety.

Dirt hauling and construction material deliveries or removal would not be allowed during morning (7:00 AM – 9:00 AM) and afternoon (4:00 PM – 6:00 PM) peak traffic periods. It should be noted that this requirement will have the effect of prolonging overall construction time. However, this would minimize peak hour traffic impacts. Also, every effort would be made to minimize the need for lane closures. Should lane closures be required, neighbors and city officials would be notified via the email notification system set up at the commencement of construction. Lane closures, if required, will occur only between the hours of 9:00 AM – 3:00 PM. Again, avoiding the peak traffic periods. Such events would be coordinated with neighboring construction projects, as necessary.

A series of permits would be required for project phases including demolition, excavation, subterranean and above ground construction. These approvals may include contingencies requiring additional design and submittals that must be approved before work can begin. Some anticipated items requiring further approval might include, but not be limited to: Final Construction Traffic Management Plan; Erosion and Sediment Control Plan;

¹ *Draft Construction Management Plan, The Brick & The Machine, prepared by BenchMark Contractors, Inc., 2016, which is available for review at the Culver City Planning Division.*

and Shoring and Excavation Plan. The Final Construction Traffic Management Plan would include measures to minimize traffic impacts associated with any concurrent construction activities occurring in the project vicinity.

Before any lane closures and/or other temporary modifications to traffic are implemented, further approvals would be required from Culver City Public Works Traffic Management Division and/or other pertinent city departments. These items may include, but would not be limited to: Traffic Control Plan including, but not limited to vehicular, bicycle, and pedestrian traffic routing; Off-site Civil work including lighting, signage, landscape, paving, and striping; and After Hours Application.

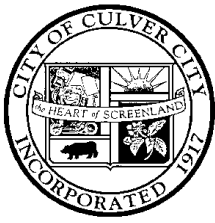
It is anticipated that construction activities would commence as early as September 2017 and occur over approximately 20 months until May 2019. Full build-out and occupancy could occur in 2019.

F. NECESSARY APPROVALS

It is anticipated that approvals required for the project from the Culver City would include, but may not be limited to, the following:

- Site Plan Review.
- General Plan Map Amendment/Zoning Code Map Amendment to shift the current line dividing the CD and CG zoning designations (and corresponding General Plan Designations) within the site boundaries to allow for a useable office space on Level 4. The new line would be parallel to the rear lot line and accommodate the required square feet for a Level 4 office tenant. The proposed zone change would not impact the building height as viewed from Washington Boulevard as the frontage of the building along Washington Boulevard complies with the height requirements of the CD height requirements.
- Administrative Modification for parking resulting in increase of fees for a ten percent reduction in parking stall width per Table 5-2, Administrative Modifications, of CCMC Section 17.550.010.
- Administrative Use Permit for allow for shared and tandem parking.
- Demolition Permits to remove the existing on-site structure to allow for construction of the proposed building.
- Construction Permits, including building, grading, excavation, foundation, and associated permits.
- Haul Route Permit, as may be required by Culver City.
- Other approvals as needed.

Attachment B – Explanation of Checklist Determinations



ATTACHMENT B EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS

Would the project:

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

Less Than Significant Impact. The project site is located in a highly urbanized area with a mix of hospital, medical office, retail, restaurant, office, and residential uses in the nearby vicinity. The topography surrounding the project site is flat with no notable ocean, mountain or other scenic vistas that would be affected by the project. In addition, although the project is proposing a partial 4-story building (with a building height up to 56 feet), the surrounding area consists of a range of low-to mid-rise buildings, including the 7-story Southern California Hospital Culver City and associated medical buildings at varying heights. As such, given the flat topography in the area, the proposed buildings would not substantially obstruct views not already obscured or blocked by other buildings and structures in the area. Further, the project site is not located in a scenic resource area or area with protected views designated by Culver City. As such, the project would have a less than significant impact with respect to scenic vistas.

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

No Impact. The project site is located in a highly urbanized area of downtown Culver City and is currently developed with a two-story bank building and an associated asphalt-paved surface parking lot.

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

Vegetation on the project site is largely confined to two mature palm trees and four ornamental trees situated along Delmas Terrace adjacent to the existing two-story bank building, all of which would be removed as part of the project. As discussed under Response IV.e, below, the project would comply with the applicable provisions pertaining to the removal and replacement of street trees in the Culver City Municipal Code (CCMC) within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.220: Removal of Trees in Parkways Related to Private Improvement or Development Project. Per the City's requirements, the project is required to plant two new Street Right-of-Way trees or Parkway trees for each tree that is removed from the site. The size and location of the replacement trees would be determined by the Public Works Director based on what is appropriate for the particular Street Right-of-Way or Parkway.

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

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

Less Than Significant Impact. The project site is located in a highly urbanized area of downtown Culver City and is currently developed with a two-story bank building with a mezzanine and an associated asphalt-paved surface parking lot. The site's existing building and features do not convey a high level of visual quality, and as previously stated, there are no unique natural or urban features on the project site and no historic buildings. There are a limited number of street trees around the perimeter of the site, none of which are considered unique or highly valued visual resources.

Upon project completion, the project would include a mix of retail, restaurant, and office uses within a partial 4-story building (with a building height up to 56 feet). The retail and restaurant uses would be located on the Ground Level. On Levels 2 through 4, the project would include office uses. Parking for the proposed uses would be provided on site on the Ground Level and within a 3-level subterranean parking structure.

Designed with the specific intent of managing building scale, the project's office space would be separated into two separate components/building volumes with complementary operational characteristics. The northern office component, the "Brick", would act as the anchor to the project site, featuring a shift between large, building-scale window openings and a finely textured human-scale materiality. This scalar design would offer a variegated, yet fixed atmosphere befitting of the contemporary creative office tenant. Materials within the Brick's design would include bronze panels, bronze anodized frames, exposed concrete, and manganese thin bricks. The southern office component, the "Machine", would sit atop the pedestrian streetscape, featuring an operable, experiential concrete frame façade that would provide layered systems of sliding doors and perforated screens which would allow tenants to modify their working environment, generating a modulated indoor-outdoor atmosphere, specific to the desire of the office tenant. Materials within the Machine's design would include perforated bronze anodized aluminum, bronze anodized frames, exposed concrete, aluminum frames, and perforated blue anodized aluminum. Together, the Brick and the Machine would share expansive vegetated regions for outdoor interaction composed of balconies, the open air interior office courtyard, and the roof terrace. Design materials within the Ground Level office lobby, restaurant, and retail uses would include bronze anodized aluminum, exposed concrete, manganese thin brick, blue anodized aluminum and lighting aggregation. The Ground Level public open space along Washington Boulevard and Delmas Terrace would include a streetscape design that includes wide public sidewalks, landscape planters, benches, tables for outdoor seating and dining, trash receptacles, and street furniture to activate the pedestrian environment. From the outside-in, the Brick and Machine would be designed to be an energetic, contextual insertion into the southwestern edge of the evolving downtown Culver City.

Figure B-1, *Rendering Locations*, illustrates a northerly view of the project from the Washington Boulevard and Delmas Terrace intersection and a southerly view of the project from Washington Boulevard. Figure B-1 provides views of the Ground Level retail and restaurant storefronts and streetscape design from Washington Boulevard and Delmas Terrace. Figure B-1 also shows the vehicular ingress/egress to the project site provided from Delmas Terrace and the office spaces (Ground Level through partial Level 4). As seen in Figure B-1, the Ground Level public



RENDERING LOCATION 1: Northerly view of the project from the West Washington Boulevard and Delmas Terrace intersection.



RENDERING LOCATION 2: Southerly view of the project from West Washington Boulevard.

SOURCE: Abramson Teiger Architects, 2017

9735 Washington Boulevard

Figure B-1
Rendering Locations

open space along Washington Boulevard and Delmas Terrace would include a streetscape design that activates the pedestrian environment and improves the street-level visual corridor of Washington Boulevard. Thus, the project would introduce a pedestrian friendly environment to an area that currently has minimal streetscape and landscape improvements. Per Culver City's standard conditions of approval, all planted areas on the property would be landscaped and irrigated pursuant to CCMC Chapter 17.310 - Landscaping. Signage would be integrated into the architecture of the buildings and outdoor lighting installed per applicable City standards.

Although the project is proposing a partial 4-story building (with a building height up to 56 feet), the immediate surrounding area consists of a range of low- to mid-rise buildings, including the 7-story Southern California Hospital Culver City and associated medical buildings at varying heights. The project would contribute to the downtown area's ongoing revitalization and would be compatible in its urban character. Further, as discussed under Response I.a, there would be no substantial or significant effects on scenic vistas due to construction of the project's buildings at the proposed height(s).

As the project site does not currently reflect a high level of visual quality, and because the project has been designed at a scale and with a unified architectural aesthetic that would be compatible with existing and planned development in the downtown vicinity, the project would not substantially degrade the visual character and quality of the site and its surroundings. Furthermore, the project would enliven the pedestrian experience through a new streetscape design that would provide landscaping, benches, tables for outdoor seating and dining, trash receptacles, and street furniture. Thus, impacts on visual quality would be less than significant.

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

Light and Glare

Less Than Significant Impact. The project site is located in a highly urbanized area and is surrounded by hospital, medical offices/facilities and surface parking lots to the north; retail, commercial, and residential uses and surface parking lots to the east; office and retail uses to the south; and commercial and hospital and medical-office related buildings and parking lots to the west. The project vicinity exhibits considerable ambient nighttime illumination levels due to the densely developed nature of the area, existing building and parking lot on-site, as well as from adjacent properties. Artificial light sources from the on-site uses and other surrounding properties include interior and exterior lighting for security, parking, architectural highlighting, incidental landscape lighting, and illuminated signage. Automobile headlights, streetlights and stoplights for visibility and safety purposes along the major and secondary surface streets contribute to overall ambient lighting levels as well.

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

Glare occurs from sunlight reflected from reflective materials utilized in existing buildings along the adjacent roadways and from vehicle windows and surfaces. Glare-sensitive receptors include the hospital and medical offices/facilities to the north; residential uses to the east; and hospital and medical-office related buildings to the west; and motorists on the roadways surrounding the site. As glare is a temporary phenomenon that changes

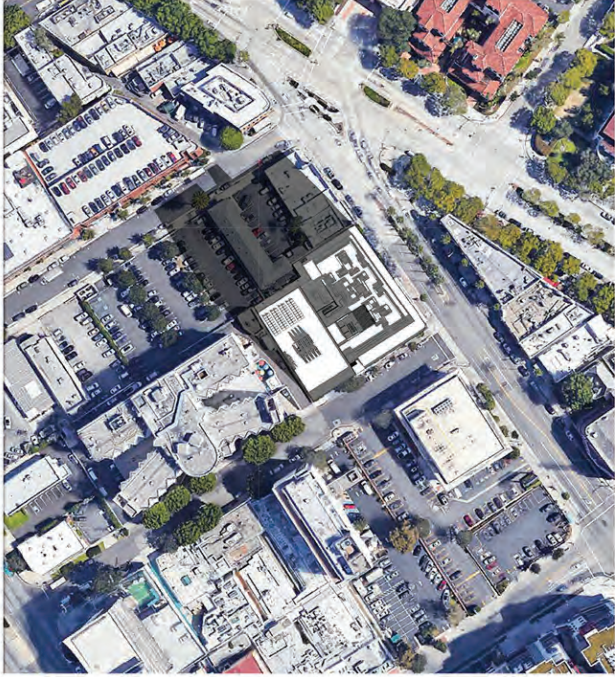
with the movement of the sun, receptors other than motorists are generally less sensitive to glare impacts than to light impacts. Glass fenestration incorporated into the Ground Level commercial component and the office component on the Ground Level through partial Level 4 have been designed with low-reflectivity values (no mirror-like tints or films), minimizing off-site glare. To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets it would be temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Based on the above, glare impacts would be less than significant.

Shade and Shadow

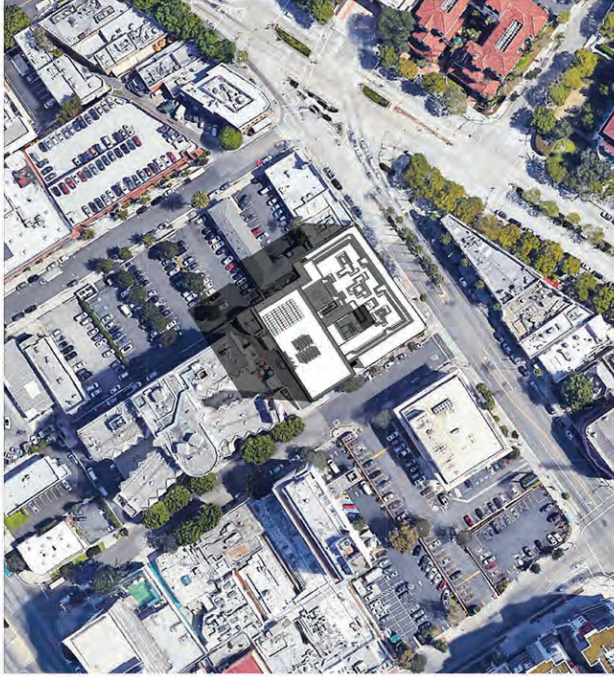
Less Than Significant Impact. Shading impacts were addressed in the project's *Shade/Shadow Report* prepared by ESA-PCR in February 2017. The report is available for review at the Culver City Planning Division. Potential shading impacts could result when shadow-sensitive uses are located to the north, northwest, or northeast of new structures in excess of 60 feet in height. The potential for impacts decreases the further the sensitive use is located from a project site. Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. For purposes of this analysis, a project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (PST), between early November and mid-March or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (PDT) between early mid-March and early November.¹ The Shade/Shadow Report illustrates shadows cast by the project on nearby surrounding uses during the winter solstice, spring equinox, summer solstice, and fall equinox from 9:00 A.M. to 3:00 P.M. **Figure B-2, Winter Shadows**, presents the worst-case scenario (longest shadows) of the project shadows cast onto adjacent uses.

The only usable outdoor space subject to project shadows is an exterior patio area of the Southern California Hospital Culver City located immediately north of the project site. As illustrated in Figure B-2, the project building would cast shadows on this area during the winter solstice at 9:00 A.M. and 12:00 P.M., with shadows anticipated to occur until just before 3:00 P.M. Thus, continuous shading may occur for upwards of 6 hours during the winter. This outdoor space is limited to approximately 25 feet in length and 25 feet in width and currently includes outdoor patio furniture with numerous umbrella canopies. It is assumed this area is utilized by Hospital employees for short-term use throughout the day. Despite the anticipated shading, because this area is utilized for short-term spans periodically throughout the day by various personnel, the lack of direct sunlight would not substantially change the function or physical comfort of this periodically used space, nor would any commerce-related impacts occur. As such, a less than significant shadow impact would occur.

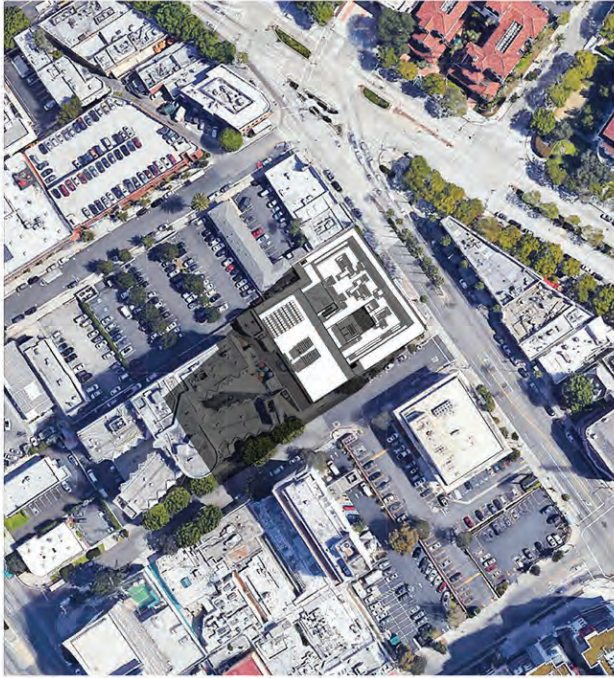
¹ The durations originally cited in the L.A. CEQA Threshold Guide, were originally geared to change in early April and Late October, consistent with the change to daylight savings time that was in effect at that time. The durations used here have been modified to match the current starting and ending dates for daylight savings time.



WINTER SOLSTICE AT 3 PM



WINTER SOLSTICE AT 12 PM



WINTER SOLSTICE AT 9 AM

SOURCE: Abramson Teiger Architects, 2017

9735 Washington Boulevard
Figure B-2
 Winter Shadows

II. AGRICULTURE AND FOREST RESOURCES

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

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

No Impact. The project site is located in a highly urbanized area of downtown Culver City and is currently developed with a two-story bank building and an associated asphalt-paved surface parking lot. The project site does not contain agricultural uses or related operations and is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.² Furthermore, the Culver City General Plan does not identify the project site as an area designated for agriculture use. Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Accordingly, project implementation would have no impact on farmland.

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

No Impact. The project site's existing zoning designations are Commercial Downtown (CD) and Commercial General (CG). The project is proposing a zone change. The current line dividing the CD and CG zoning designation occurs at an arbitrary angle and location within the site boundaries. The zone change request would shift the line between the CD and CG zoning designations to allow for a useable office space on Level 4. No portion of the project or surrounding land uses are zoned for agriculture and no nearby lands are enrolled under the Williamson Act. As such, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract and no impact would occur in this regard.

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

No Impact. As discussed under Response II.b, the project site's existing zoning designations are Commercial Downtown (CD) and Commercial General (CG). No forest land or timberland zoning is present on the project

² State of California Department of Conservation, California Important Farmland Finder, <http://maps.conservation.ca.gov/ciff/ciff.html>, accessed October 2016.

site or in the surrounding area. As such, the project would not conflict with existing zoning for forest land or timberland and no impact would occur in this regard.

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

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

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

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

III. AIR QUALITY

The following impact analysis pertaining to air quality impacts is based on information contained in the project's *Air Quality Technical Report* prepared by ESA-PCR in February 2017 (provided under separate cover available at the Culver City Planning Division).

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

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

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

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

from diesel-fueled vehicles. The project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403. Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

As discussed under Response X.b, below, the project would be consistent with applicable policies of the Southern California Association of Governments Regional Transportation Plan which support establishing a land use pattern that reduces vehicle trips and air pollution by locating employment opportunities (office and retail) uses within an area that has public transit (with access to rail lines), restaurants and entertainment all within walking distance.

As discussed under Response XIII.a, below, the project could result in a total employment increase of approximately 206 employees. Project-related employment growth is within the SCAG 2012 Regional Transportation Plan (RTP) projections which forms the basis of the 2012 AQMP growth projections. Thus, operation of the project would have no significant impacts related to consistency with the AQMP.

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

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

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

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

Less Than Significant Impact. As indicated above, the project site is located within the SoCAB, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the SoCAB, including those monitoring stations nearest to the project location. The project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and project occupancy (long-term). However, based on the following analysis, construction and operation of the project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases.

Construction Impacts

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

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for volatile organic compounds (“VOCs”), (2) 100 pounds per day for nitrogen oxides (“NOx”), (3) 550 pounds per day for carbon monoxide (“CO”), (4) 150 pounds per day for sulfur oxides (“SOx”), (5) 150 pounds per day for PM10, and (6) 55 pounds per day for PM2.5.³

The project would involve demolition of existing uses and construction of a mix of retail, restaurant, and office uses. Construction activities would include demolition, excavation, building construction, architectural coatings and paving. Construction would take place over approximately 20 months, anticipated to begin in fall 2017. Full build-out and occupancy would occur in 2019. During construction, a variety of heavy-duty diesel powered equipment would be used on-site. Building construction and finishing activities would require equipment such as excavators, drill rigs, cranes, concrete pumps, and air compressors. Regional construction-related emissions associated with construction equipment were calculated using the SCAQMD-recommended California Emissions Estimator Model (“CalEEMod”).

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

Operational Impacts

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

³ South Coast Air Quality Management District, *Air Quality Significance Thresholds*, (March 2011), <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>, accessed September 2015.

Table B-1

Maximum Regional Construction Emissions (pounds per day) ^a

Regional Emissions	VOC	NO _x	CO	SO ₂	PM ₁₀ ^b	PM _{2.5} ^b
Demolition - 2017	1	15	9	<1	1	1
Site Preparation - 2017	1	13	11	<1	1	1
Grading/Excavation - 2017	5	57	33	<1	4	3
Grading/Excavation - 2018	4	51	32	<1	7	3
Drainage/Utilities/Subgrade - 2018	1	8	8	<1	1	1
Building Construction - 2018	4	34	30	<1	3	2
Building Construction and Architectural Coating - 2018	8	38	35	<1	4	2
Building Construction and Architectural Coatings - 2019	8	35	34	<1	3	2
Maximum Regional (On-Site and Off-Site) Emissions		8		57		35
SCAQMD Numeric Indicators	75	100	550	150	150	55
Over/(Under)	(67)	(43)	(515)	(150)	(143)	(52)
Exceed Threshold?	No	No	No	No	No	No

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

Source: ESA, 2017.

pounds per day PM_{2.5}.⁴ Regional air pollutant emissions associated with project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., electricity generation and natural gas consumption) are classified by the SCAQMD as regional stationary source emissions.

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

- Installation of a 7.5 kilowatt photovoltaic system, as required by the City's standard conditions of approval.
- Reliance on fluorescent, LED or other type of high efficiency systems for all interior and exterior lighting.
- New lighting installed in parking structures and all common areas shall be motion sensor controlled.
- Installation of dual-flush toilets and waterless urinals to reduce indoor water usage and wastewater generation.

⁴ South Coast Air Quality Management District, Air Quality Significance Thresholds, (March 2015), <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed October 2015.

Regional operational emissions for the project were calculated using CalEEMod, and model results are provided under separate cover available at the Culver City Planning Division. Inputs into the CalEEMod model include project-related vehicle trips and square footage to determine energy and water usage as well as waste generation.

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

Table B-2

Maximum Regional Operational Emissions (pounds per day) ^a

Source	VOC	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Existing Project Emissions						
Area (Coating, Consumer Products, Landscaping)	<1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile Sources	<1	3	8	<1	1	<1
Subtotal Existing Emissions	1	3	8	<1	1	<1
Proposed Project Emissions						
Area (Coating, Consumer Products, Landscaping)	2	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile Sources	3	13	34	<1	8	2
Subtotal Proposed Emissions	5	14	35	<1	8	2
Net Regional (On-Site and Off-Site) Emissions	4	10	28	<1	7	2
SCAQMD Numeric Indicators	55	55	550	150	150	55
Over/(Under)	(51)	(45)	(522)	(150)	(143)	(53)
Exceeds Thresholds?	No	No	No	No	No	No

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

Source: ESA, 2017.

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

Less Than Significant Impact. The SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the

Federal and State Clean Air Acts. As discussed earlier, the SCAQMD has developed a comprehensive plan, the 2012 AQMP, which addresses the region's cumulative air quality condition.

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

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

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

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

d. Expose sensitive receptors to substantial pollutant concentrations?

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

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the project according to the SCAQMD's localized daily significance threshold (“LST”) methodology. Daily localized emissions caused by the project were compared to the LSTs in the SCAQMD's

look-up tables to determine whether the emissions would cause violations of ambient air quality standards.⁵ The current closest existing sensitive receptors to the project are multi-family residential uses adjacent to the east of the site to the site and hospital use adjacent to the north. Therefore, thresholds used for the LST analysis were based on a one-acre site within 25 meters of the nearest sensitive receptor in Source Receptor Area 2, Northwest Coastal Los Angeles County. As shown in **Table B-3, Maximum Localized Construction Emissions**, maximum daily localized emissions would not exceed the thresholds for NO_x, CO, PM₁₀ or PM_{2.5}.

Table B-3

Maximum Localized Construction Emissions (pounds per day) ^a

Regional Emissions	NO_x	CO	PM₁₀ ^b	PM_{2.5} ^b
Demolition - 2017	10	8	1	1
Site Preparation - 2017	13	11	1	1
Grading/Excavation - 2017	35	27	2	2
Grading/Excavation - 2018	30	26	2	2
Drainage/Utilities/Subgrade - 2018	8	8	1	<1
Building Construction - 2018	30	24	2	2
Building Construction and Architectural Coating - 2018	34	29	2	2
Building Construction and Architectural Coating - 2019	31	28	2	2
Maximum Localized Emissions	35	29	2	2
SCAQMD Localized Significance Thresholds ^c	103	562	4	3
Over (Under)	(68)	(533)	(2)	(1)
Exceed Threshold?	No	No	No	No

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

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

^c The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Coastal Los Angeles County) for a 1-acre site within a 25-meter receptor distance.

Source: ESA, 2017.

Construction Impacts

The greatest potential for toxic air contaminants (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. In addition, incidental amounts of toxic substances such as oils, solvents, and paints would be used. Such substances would comply with all applicable SCAQMD rules for their manufacture and use. Construction activities associated with the project would be sporadic, transitory, and temporary in nature. Given the temporary duration of the construction

⁵ LSTs are only applicable to the following criteria pollutants: NO_x, carbon monoxide ("CO"), PM₁₀, and PM_{2.5}.

phases of the project, construction impacts associated with TACs are addressed qualitatively based on consistency with strategies and measures that limit, minimize, or reduce diesel emissions.

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

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

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

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

Operational Impacts

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

Project traffic during the operational phase of the project could have the potential to create local area CO impacts. Existing CO levels in the project area are substantially below the federal and state standards.⁶ Carbon monoxide decreased dramatically in the SoCAB with the introduction of the catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the SoCAB for some time and the Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Air quality data from local monitoring station between 2011-2015 indicate that the maximum CO levels in recent years are 2 ppm (1-hour average) and 1.4 ppm (8-hour average) compared to the thresholds of 20 ppm (1-hour average) and 9.0 (8-hour average). Thus, it is not expected that CO levels at project-impacted intersections would rise to such a degree as to cause an exceedance of these standards.

⁶ See Table 3, *Pollutant Standards and Ambient Air Quality Data from Representative Monitoring Stations, in the Air Quality Technical Report.*

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

The SCAQMD recommends a hot-spot evaluation of potential localized CO impacts when vehicle to capacity (“V/C”) ratios are increased by two percent or more at intersections with a level of service (“LOS”) of D or worse. Based on the traffic impact analysis prepared for the project (refer to Response XVI.a, below), no study intersections within the project vicinity meet this criteria. Therefore, additional analysis was performed qualitatively.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the SoCAB. These include: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day.⁷ This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue.⁸ When added to the existing background CO concentrations, the screening values would be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average).

Based on the project Traffic Study, of the studied intersections that are predicted to operate at a Level of Service (“LOS”) of D, E, or F under future year 2020 plus project conditions, one intersection at La Cienega Boulevard and Venice Boulevard would potentially have peak traffic volumes of about 50,720 per day.⁹ As this intersection would result in less than 100,000 vehicles per day, CO concentrations are not expected to exceed SCAQMD significance thresholds. Thus, this comparison provides evidence that the project would not contribute to the formation of CO hotspots and no further CO analysis is required. Therefore, the project would result in less than significant impacts with respect to CO hotspots.

With regard to on-site sources of emissions, the project would generate emissions resulting from sources such as natural gas heaters, landscaping equipment, and consumer products. As the building footprint of the project is less than 1-acre, SCAQMD LST lookup tables were used to assess localized operational impacts. As shown in **Table B-4, Maximum Localized Operational Emissions**, on-site sources of emissions would remain below SCAQMD LST thresholds.

⁷ South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24.

⁸ The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

⁹ Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project. Crain and Associates. December 2016.

Table B-4

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

Source	NO _x	CO	PM ₁₀	PM _{2.5}
Existing Project Emissions				
Area (Coating, Consumer Products, Landscaping)	<1	<1	<1	<1
Energy	<1	<1	<1	<1
Subtotal Existing Emissions	<1	<1	<1	<1
Proposed Project Emissions				
Area (Coating, Consumer Products, Landscaping)	2	<1	<1	<1
Energy	<1	<1	<1	<1
Subtotal Proposed Emissions	2	<1	<1	<1
Net Localized (On-Site) Emissions	1	<1	<1	<1
SCAQMD Numeric Indicators	103	562	1	1
Over/(Under)	(102)	(562)	(1)	(1)
Exceeds Thresholds?	No	No	No	No

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

^b The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Coastal Los Angeles County) for a 1-acre site within a 25-meter receptor distance.

Source: ESA, 2017.

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

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

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

Less Than Significant Impact. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. Through adherence with mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create objectionable odors. The nearest existing sensitive receptors are multi-family residential uses adjacent to the east of the site and hospital use adjacent to the north. However, the project's proposed uses would not typically generate nuisance odors at nearby sensitive receptors.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project would not involve elements related to these types of uses. On-site trash receptacles used by the project would be covered and properly maintained to prevent

adverse odors. With proper housekeeping practices, trash receptacles would be maintained in a manner that promotes odor control, no adverse odor impacts are anticipated from these types of land uses. While there is a potential for odors to occur, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts to a less than significant level.

IV. BIOLOGICAL RESOURCES

Would the project:

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

No Impact. The project site is located in a highly urbanized area of downtown Culver City and is currently developed with a two-story bank building with a mezzanine and an associated asphalt-paved surface parking lot. The project site does not include suitable habitat for candidate, sensitive, or special status species. Due to high levels of human activity and density of development in the project area, there is no potential for sufficient natural habitat to support candidate, sensitive, or special status species on the project site. As such, the project would not have a substantial adverse effect on candidate, sensitive, or special status species and no impact would occur in this regard.

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

No Impact. As discussed under Response IV.a, the project site is currently developed with urban uses. No designated riparian habitat or natural communities exist on the project site or in the surrounding area. Two mature palm trees and four ornamental trees are situated along Delmas Terrace adjacent to the existing two-story bank building. The project site and surrounding area does not include any vegetation that constitutes a plant community. As such, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community and no impact would occur in this regard.

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

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

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

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

Nonetheless, the project area does include ornamental trees that could support nesting bird habitat. As discussed under Response IV.b, two mature palm trees and four ornamental trees are situated along Delmas Terrace adjacent to the existing two-story bank building. Washington Boulevard and Delmas Terrace are highly utilized streets with high levels of ambient noise and human disturbance resulting from pedestrian and vehicular traffic. Species tolerant of human disturbance have the potential to nest within these trees.

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

Mitigation Measure

BIO-1 The applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Either:

(1) Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would insure that no active nests are disturbed; or

(2) If avoidance of the avian breeding season (February 15 through August 31) is not feasible, then:

(a) A qualified biologist shall conduct a preconstruction nesting bird survey within 15 days and again within 72 hours prior to any ground disturbing activities (staging, grading, vegetation removal or clearing, grubbing, etc.). The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code are avoided. Survey areas shall include suitable nesting habitat within 200 feet of construction site boundaries. This two-tiered survey method is intended to provide the project applicant with time to understand the potential issue and evaluate solutions if nests are present, prior to mobilizing resources. If active nests are not identified, no further action is necessary.

(b) If active nests are identified during pre-construction surveys, an avoidance buffer shall be demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Given the high disturbance level, general avoidance buffers include a minimum 100-foot avoidance (for smaller birds more tolerant of human disturbance) to a 250-foot avoidance buffer for passerine and a 500-foot avoidance buffer from active raptor nests, or reduced buffer distances determined at the discretion of a qualified biologist familiar with local nesting birds and breeding bird behavior within the project area.

Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the Culver City Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.

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

Less Than Significant Impact. The project site does not support protected tree species. Vegetation within the project area is confined to two mature palm trees and four ornamental trees are situated along Delmas Terrace adjacent to the existing two-story bank building, all of which would be removed as part of the project. The project would comply with the applicable provisions pertaining to the removal and replacement of street trees in the CCMC within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.220: Removal of Trees in Parkways Related to Private Improvement or Development Project. Per the City's requirements, the project is required to plant two new Street Right-of-Way trees or Parkway trees for each tree that is removed from the site. The size and location of the replacement trees would be determined by the Director of the Culver City Department of Public Works based on what is appropriate for the particular Street Right-of-Way or Parkway. With compliance to the applicable street tree removal and replacement provisions of the CCMC, a less than significant impact would occur in this regard.

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

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

V. CULTURAL RESOURCES

The following analysis of historical, archaeological, and paleontological resources provided in this section is based on information contained in the *Cultural Resources Assessment of the Proposed 9735 Washington Boulevard Project, Culver City, Los Angeles County* (herein referred to as the “Cultural Resources Assessment”), prepared by ESA, dated February 2017. The analysis of tribal cultural resources provided in this section is based on project notification and request to consult letters that the City submitted to Native American individuals and organizations and follow-up Native American consultations pursuant to Assembly Bill (AB) 52. The Cultural Resources Assessment and the Native American consultation documentation are provided under separate cover available at the Culver City Planning Division.

Would the project:

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

No Impact. An intensive pedestrian survey of the project site was conducted by qualified ESA architectural historians to assess whether the project site contained any historical resources and analyze the potential for the project to impact such resources in the project vicinity (i.e. .25 mile radius). The project site contains one altered bank building (Charter Bank Building), 9735 W. Washington Boulevard, constructed in 1963 to house the Charter Bank. ESA recorded the survey data on the Charter Bank Building and eligibility assessment results on a Department of Parks and Recreation (DPR) Primary Form, Building Structure, Object (BSO) form and Continuation sheets, included within the Cultural Resources Assessment.

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

A project with an effect that may cause substantial adverse change in the significance of a resource is a project that may have a significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.¹⁰ Direct impacts are those that cause substantial adverse physical change to a historic property. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historic property such that the significance of a historical resource would be materially impaired.

In addition to ESA’s architectural historians pedestrian survey, archival records (i.e., historic Sanborn maps, historic topographical quadrangles, historic aerials, and historic *Los Angeles Times* articles) were examined and a South Coastal Information Center (SCCIC) archival records search was conducted to determine whether historical resources may be present within the project area. At the local level, Culver City historical resources

¹⁰. California Code of Regulations, Title 14, Chapter 3, Article 5, Section 15064.5 (b) (1)

surveys and landmark designation lists were also reviewed. Site-specific research on the project site was conducted including review of building permits on file at the Culver City building department, Sanborn Fire insurance maps, historical photographs and aerials, the *Los Angeles Times* archives, and other published sources.

The Charter Bank Building was constructed in 1963 for by contractor R.J. Blanco for Charter Bank. The next major alterations included a \$30,000 addition in 1967 at an unspecified location and a larger 6,384 square foot addition on the east elevation that included an automobile teller and porte cochère. In 1974 the Charter Bank Building was sold to Golden State Sanwa who would occupy the building until 2002. During Golden State Sanwa's ownership period they would make the following improvements: interior remodels, new signage, re-roofing campaigns, installation of screening around AC units, installation of a 24 hour teller, relocation of automated teller. Golden State Swana's largest alteration was remodeling the bank interior in 1986 at an estimated \$150,000. In 2002, Bank of the West assumed ownership of the bank building and altered the building for their bank brand. Bank of the West invested approximately \$113,000 in the Charter Bank Building and installed a bullet resistant acrylic teller counter in the interior, extensively improved the interior, replaced HVAC screen, and installed new signage. Currently the building is vacant.

Following the investigations of the project site, ESA architectural historians assembled the survey and research data and concluded based on substantial evidence that the Charter Bank Building is not individually eligible as a historical resource under the federal, State, or local evaluation criteria. The Charter Bank Building was evaluated in association with the following historical themes: Mid-Century Modern Style and Postwar Development of Culver City. Due to substantial alterations, the Charter Bank Building lacks architectural and historical merit, significance, and integrity. The Charter Bank Building is an average representation of Mid-Century Modern style architecture designed by a general contractor and developer, who based on *Los Angeles Times* research, is better known for his housing developments in the Valley. The Mid-Century features of the bank are the arcade, glazing and geometry on the primary elevation, while all other elevations are devoid of ornamentation. R.J. Blanco is not considered a master builder and there is no architect of record. Furthermore, the Charter Bank Building underwent substantial interior and exterior alterations with two new owners, Golden State Swana and Bank of the West, in 1974 and 2002. While the Charter Bank Building is representative of Postwar Development in Culver City in response to the automobile and banking industry, the bank building does not appear to have a significant association with development patterns in Culver City and Charter Bank was a failed bank that went out of business by 1974. In addition, there is no evidence to suggest that the subject property is associated with productive lives of historic personages or with historic events. ESA concluded the Charter Bank Building lacks historical and architectural associations and integrity and therefore does not appear to satisfy the National Register of Historic Place (National Register) criteria, California Register of Historical Resources (California Register) criteria, or any of the Culver City Cultural Resources criteria. Because the building does not qualify as a historical resource under CEQA, project implementation, which would involve demolition of the building, would have no direct impact on historical resources on the project site.

Indirect impacts were also analyzed to determine if the project would result in a substantial material change to the integrity and significance of historical resources or their contributing setting within the project vicinity. ESA reviewed a cultural resources records search conducted through the South Central information Center (SCCIC), Culver City's list of historical resources and properties identified in historical resources surveys, SurveyLA's findings for the Palms, Mar Vista, and Del Rey Community Redevelopment Area (CRA), and HistoricPlacesLA.org to determine whether known historical resources have been previously recorded within

the project site or within a quarter-mile of the project site. The records search is included within the Cultural Resources Assessment.

The project site has not been previously surveyed or determined eligible as a historical resource. Within a quarter-mile radius of the project site, ESA identified 19 previously surveyed historic architectural resources. Out of these 19 resources, four are located within close proximity to the project site and would have direct and indirect views of the project site, as described further in the following paragraph. The remaining 15 historic architectural resources would not have direct or indirect views of the project site. The project would have no adverse impact on these 19 previously surveyed resources and there is no need to consider them further in this analysis.

Three historic architectural resources would have direct views of the project site: the Washington Building (Flatiron Building), 9720-30 Washington Boulevard, Culver City; the Culver Theater, 9820 W. Washington Boulevard, Culver City; and the Brotman Medical Center, 9808 W. Venice Boulevard, Los Angeles. Constructed in 1926, the Beaux Arts style Washington Building (Flatiron Building) is listed on the National Register, California Register and is a designated Culver City Landmark structure. Located on the same block at the Washington Building (Flatiron Building), the Culver Theater, built in 1946, is also a designated Culver City Landmark structure. Both the Washington Building (Flatiron Building) and the Culver Theater are located across the street to the south of the project site and would have direct views of the project site. The eligibility of both the Washington Building (Flatiron Building) and the Culver Theater, constructed prior to the Charter Bank Building, are not tied to neighborhood setting therefore the redevelopment of the project site with a partial 4-story building along Washington Boulevard would not affect their integrity of setting.

The Brotman Medical Center, constructed in 1963, was recommended eligible for the National Register, California Register, and local listing in SurveyLA. The Brotman Medical Center is located 0.07 miles north of the project site and would have an indirect view of the project. The Brotman Medical Center faces north towards Venice Boulevard and due to its location and orientation, the construction of the proposed three-and-four story tall would not compromise the Brotman Medical Center's integrity of setting or detract from its eligibility as a historical resource.

Lastly, the Hull Building at 9543 Culver Boulevard in Culver City is a designated Culver City Landmark structure that is located 0.06 miles to the northeast of the project site, and -would have an indirect view of the project. The Hull Building's integrity of setting has already been compromised by other contemporary building in the immediate vicinity. The project would not demolish or materially alter any of the character-defining features that contribute to the eligibility of Washington Building (Flatiron Building), the Culver Theater, the Brotman Medical Center, or the Hull Building as historical resources. Therefore, the project would have no indirect impacts on historical resources in the project vicinity

In summary, the project would result in the demolition of the Charter Bank Building located at 9735 W. Washington Boulevard located on the project site. The Charter Bank Building was surveyed and evaluated by ESA architectural historians and found ineligible for designation as a historical resource. The Charter Bank Building does not possess sufficient historical or architectural importance to reach the threshold of significance as a historical resource and does not retain a high level of integrity.

In Conclusion, the project would have no direct or indirect impacts to historical resources and no known adjacent historic resources or eligible contributors to a historic district would be indirectly impacted by the project. Therefore, pursuant to CEQA, the proposed redevelopment of the project site would result in a finding of no adverse impact on historical resources.

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

Less Than Significant Impact With Mitigation Incorporated. The project site is located in a highly urbanized area of Culver City and is currently developed with a two-story bank building with a mezzanine and an associated asphalt-paved surface parking lot, which allowed for no direct observation of the native ground surfaces. The project site is located within the original flood plain of Ballona Creek prior to its channelization. According to the Cultural Resources Assessment, results of the cultural resources records search through the South Central information Center (SCCIC) indicated that the project site appears to not have been previously surveyed by an archaeologist and no known archaeological resources have been recorded within the project site or a half-mile radius. However, seven prehistoric archaeological resources and one historic-period archaeological resource have been recorded within a one-mile radius of the project site in the vicinity of Ballona Creek approximately one-half mile southeast of the project site.¹¹ The prehistoric resources are described as seasonal villages or camp sites that include shell, ground stone artifacts, chipped stone artifacts, fire-affected rock, faunal bone, and human remains and are located between a half-mile and one-mile from the project site. The one historic-period archaeological resource is described as a historic refuse deposit that includes artifacts (i.e., liquor and soda bottles, sanitary seam cans, and other household items) and is located one-mile east of the project site.

In addition, according to the Cultural Resources Assessment, the results of a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search indicated that no prehistoric or Native American resources have been recorded within the boundaries of the project site or vicinity. As part of the AB 52 tribal consultations, the City received one response from the Native American groups that were contacted. This response was received by the City from Mr. Andrew Salas of the Gabrieleno Band of Mission Indians – Kizh Nation in a letter dated January 17, 2017. In his letter, Mr. Salas also mentioned that due to the project's location and the "high sensitivity of the area location", that they request Native American monitoring during ground disturbing activities at the project.

According to the Cultural Resources Assessment, the project site was originally developed with a single-family residence addressed as 9723 West Washington Boulevard from at least 1919 to 1970. From approximately 1938 to 1952, the property was also developed with a gas and oil service station addressed as 9727 West Washington Boulevard. A restaurant was present on the southern portion of the project site at 9735 West Washington Boulevard from 1954 to 1963, and an apartment building was present on the northern portion of the property at 3852 Delmas Terrace from circa 1948 to 1970. The current building was constructed beginning in 1963 for use as a bank. In the early 1970s, the remaining structures onsite were demolished and the subject property building was expanded to its current size. The current building has been utilized exclusively as a bank since it was constructed. In addition, fill soils are known to exist from the surface to a depth of three feet across the project site and are underlain by natural or native alluvium.¹²

Excavations associated with the construction of the existing bank building has likely displaced or destroyed buried historic-period archaeological resources (such as privy features or refuse pits/dumps) associated with the prior residential use at the project site that is depicted on the 1919 Sanborn Map. However, it is possible that other buried historic and prehistoric archaeological resources still exist underneath the areas of the project site, currently developed as surface parking lots, as these areas would not have been subject to deep excavations

¹¹ Refer to Table 1, Known Archaeological Resources Located Within a One-Mile Radius of the Project Site, of the Cultural Resources Assessment.

¹² Geotechnologies, Inc., 2015, *Geotechnical Engineering Investigation, Proposed Mixed Use Development, 9735 West Washington Boulevard, Culver City, California*

that would have displaced or destroyed resources that may be present. Therefore, the sequence of development at the project site has likely allowed preservation of buried archaeological resources associated with previous occupations, if any were to exist.

The Project would require excavation and grading for building foundations, a 3-level subterranean parking structure, and other improvements. The potential to encounter buried historic-period archaeological resources (e.g. privies, bottle dumps, refuse deposits, building foundations, etc.) is considered moderate given the project site's former residential and commercial uses (dating back to at least 1919), the sequence of development that may have allowed for the preservation of buried resources, and the identification of one historic archaeological resource in the vicinity of the project site. Moreover, given that seven prehistoric archaeological resources have been recorded within one-mile of the project site, the sequence of development that may have allowed for the preservation of buried resources, and since the Ballona Creek (located one-half mile southeast of the project site) would have attracted prehistoric inhabitants to the project area, the potential to encounter buried prehistoric archaeological resources (e.g., Native American artifacts and features) during construction excavations is considered high. As a result, Mitigation Measures CULT-1 to CULT-4 are prescribed to ensure that potentially significant impacts to previously unknown archaeological resources that are unexpectedly discovered during project implementation are reduced to a less than significant level.

Mitigation Measures

- CULT-1:** Prior to issuance of demolition permit, the applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist). Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the Qualified Archaeologist and Gabrieleno Tribe and shall focus on how to identify archaeological and cultural resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.
- CULT-2** Prior to issuance of demolition permit, the applicant shall retain a Native American tribal monitor from a Gabrieleno Tribe who shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall take into account the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrieleno Tribe.
- CULT-3:** In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be

allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and the Gabrielino Tribe. If the resources are Native American in origin, the Gabrielino Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall incorporate the Gabrielino Tribe’s treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area for educational purposes.

CULT-4: Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

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

Less Than Significant Impact With Mitigation Incorporated. The project site is completely developed and there is no visible soil/sediment or rock outcrops to examine for paleontological resources or fossiliferous geological formations. However, the proposed three-level subterranean automated parking structure would likely warrant excavations occurring at depths to approximately 30 feet below the surface. According to the Cultural Resources Assessment, the geologic units that underlie the project site are mapped as younger Quaternary Alluvium which is derived primarily as fluvial deposits from Ballona Creek that flow just a half-mile southeast of the project site. These deposits typically do not contain vertebrate fossils in the uppermost layers, but at relatively shallow depth (six feet) in this area there are older Quaternary sediments that are conducive to retaining paleontological resources. For instance, resource LACM 3368 produced a fossil horse while LACM 4250 produced a fossil mammoth-both resources from these sediments at unknown depths. Moreover, LACM 4232 (also designated as archaeological resource P-19-000272) produced the remains of fossil human at a depth of 12 to 13 feet below the surface. These three localities (LACM 3368, 4250, and 4232) are located approximately 0.75 to 1.25 miles from the project site. Additional vertebrate fossil localities (LACM 1159, LACM 3366, LACM 3367 and LACM 3369 and LACM 3370) have also been recorded between Crenshaw Boulevard and Ballona

Creek (along the Southern Pacific Railway and Rodeo Road) approximately one to three miles from the project site during excavations for the Outfall Sewer area in the 1920s. LACM 1159 yielded a fossil human at a depth between 19 to 23 feet below the surface. LACM 3366 (fossil camel), LACM 3367 (fossil mastodon), and LACM 3370 (sabretooth cat) were all recovered at unknown depths. LACM 3369 produced a fossil horse at a depth of six feet below the surface. Lastly, 78 fossil specimens were encountered less than 0.75 miles northeast of the project site during construction monitoring for the Washington National Project. These specimens included plant, mammal, and mollusks that were encountered between 28 and 29 feet below the street grade.¹³

Based on the rich paleontological findings near the project site and given that the proposed excavations for the subterranean parking would extend into fossiliferous native soils (i.e., older Quaternary alluvium), the potential to encounter paleontological resources during construction excavations extending past artificial fill is considered high. As a result, Mitigation Measures CULT-5 to CULT-7 are prescribed to ensure that potentially significant impacts to previously unknown paleontological resources that are unexpectedly discovered during project implementation are reduced to a less than significant level.

Mitigation Measures

CULT-5: A qualified Paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter older Quaternary sediments. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older Quaternary sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Paleontologist.

CULT-6: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Paleontologist shall implement a paleontological salvage program to remove the resources from the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall

¹³ SWCA Environmental Consultants, 2016, *Final Paleontological Resources Monitoring and Mitigation Report for the Washington National Project, Culver City, Los Angeles County, California*

be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

CULT-7: The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the project applicant to the City and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

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

Less Than Significant Impact With Mitigation Incorporated. According to the Cultural Resources Assessment, the results of the NAHC SLF search and SCCIC search indicated that no known human remain resources have been recorded within the boundaries of the project site or a one-half mile radius. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface that may be encountered during construction excavations associated with the project. Two resources with human remains, P-19-000055 and -000172, are recorded 0.75 miles southeast and 1.25 miles east of the project site, respectively. P-19-000172 is described as the skeletal remains of a male (dubbed “The Los Angeles Man”) that were encountered approximately 12 feet below the surface in Ballona Creek river bed deposits¹⁴ while P-19-000055 is described as “prehistoric camp site where skeletal material had been found”¹⁵. Moreover, as mentioned above, Ballona Creek (located less than one-half mile southeast of the project site) would have attracted prehistoric inhabitants to the project area. The project would require excavation and grading for building foundations, a 3-level subterranean parking structure, and other improvements. Based on the archaeological findings (some of which include human remains) in the vicinity the project site and the project site’s proximity to Ballona Creek, the potential to encounter human remains during construction excavations is considered moderate to high. As a result, in the event that previously unknown human remains are encountered during construction excavations, Mitigation Measure CULT-8 is prescribed to ensure that potentially significant impacts in this regard are reduced to a less than significant level.

Mitigation Measures

CULT-8: If human remains are encountered unexpectedly during implementation of the project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate

¹⁴ Pilling, 1950, DPR Site Record for Resource P-19-000172. Record on file at SCCIC.

¹⁵ Rozaire and Belous, 1950, DPR Site Record for Resource P-19-000055. Record on file at SCCIC.

vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

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

e. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?

No Impact. The analysis of tribal cultural resources is based on project notification and request to consult letters that the City submitted to six Native American individuals and organizations on the City's AB 52 Notification List on January 9, 2017. The City's AB 52 project notification and request to consult letters, along with the single response letter received (discussed below), are provided under separate cover and are available at the Culver City Planning Division. As of February 27, 2017, the City has received one response to their AB 52 request to consult letters from the Native American contacts. This response was received by the City from Mr. Andrew Salas of the Gabrieleno Band of Mission Indians – Kizh Nation in a letter dated January 17, 2017. In the letter, Mr. Salas indicated that he had concerns for cultural resources as the "project lies in an area where the Ancestral territories of the Kizh (Kitc) Gabrieleños villages adjoined and overlapped with each other." Mr. Salas also mentioned that due to the project's location and the "high sensitivity of the area location", that they request Native American monitoring during ground disturbing activities at the project. In his letter, Mr. Salas did not provide information to the City to suggest that a known tribal cultural resource exists at the project site or vicinity. To date, no other response letters from the Native American community have been received as part of the AB 52 tribal consultation effort. As a result of AB 52 consultations for the project, no known tribal cultural resources have been identified at the project site or vicinity and therefore no impact to known tribal cultural resource would occur.

VI. GEOLOGY AND SOILS

The following impact analysis pertaining to the site's underlying geology and soils is based on information contained in the *Geotechnical Engineering Investigation Proposed Mixed Use Development 9735 West Washington Boulevard, Culver City, California* (herein referred to as the "Geotechnical Engineering Investigation"), prepared by Geotechnologies, Inc., dated July 20, 2015. This document is provided under separate cover available at the Culver City Planning Division.

Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

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

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

The project site is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The Geotechnical Engineering Investigation conducted for the project indicates that no currently known active or potentially active surface faults traverse the project site, and the site is not located within a designated Alquist-Priolo Earthquake Fault Zone. The nearest fault zone to the project site is the Newport Inglewood Fault Zone, located approximately 5,000 feet (~1 mile) northeast of the site.¹⁶ As such, the potential for surface rupture on the project site is considered very low. Furthermore, project buildings would be designed and constructed to resist the effects of seismic ground motions as provided in the Culver City Building Code and the 2013 California Building Code (CBC). Thus, a less than significant impact would occur in this regard.

ii. Strong seismic ground shaking?

Less Than Significant Impact With Mitigation Incorporated. Seismicity is the geographic and historical distribution of earthquakes, including their frequency, intensity, and distribution. The level of ground shaking at a given location depends on many factors, including the size and type of earthquake, distance from the earthquake, and subsurface geologic conditions. The type of construction also affects how particular structures and improvements perform during ground shaking. A common measure of ground motion is the peak ground acceleration (PGA). It is not a measure of total energy of an earthquake, such as the Richter and moment magnitude scales, but rather of how hard the ground shakes in a given geographic area. PGA is expressed as the percentage of the acceleration due to gravity (G), which is approximately 980 centimeters per second squared. According to the United States Geological Survey (USGS), **Table B-5, Seismic Acceleration**, shows the extent of perceived shaking and potential damage associated with a given acceleration:

¹⁶ Refer to the Local Geologic Map – Dibblee and the Earthquake Fault Zone Figure in the Geotechnical Engineering Investigation.

Table B-5

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

Source: United States Geological Survey. Accessed from website at:
http://en.wikipedia.org/wiki/Peak_ground_acceleration, accessed September 2016.

Per the CBC, an estimated PGA is determined for a site of proposed construction based on the mapping by the USGS along with detailed analysis as an estimate of anticipated ground shaking for use by the project structural engineer in design of the proposed structures to resist ground shaking. There is potential for significant ground shaking at the project site during a strong seismic event on the Newport Inglewood Fault, as well as on the other large active faults in the Southern California region. According to the Geotechnical Engineering Investigation, a maximum probable event could produce a PGA value at the project site of 0.730g. This is a relatively high acceleration due to the proximity of the Newport Inglewood Fault. If this relatively high ground acceleration was not considered in the design and construction phase, ground shaking at this intensity could result in heavy damage to buildings and improvements associated with project implementation.

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

Mitigation Measures

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

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact With Mitigation Incorporated. Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the

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

According to the State of California Seismic Hazard Zone Map of the Beverly Hills Quadrangle, the project site is not located within an area designated as “liquefiable”.¹⁷ This determination is based on groundwater depth records, soil types, and distance to a fault capable of producing a substantial earthquake. Groundwater was encountered during exploration at depths between 42 and 44.5 feet below the ground surface. According to the Seismic Hazard Zone Report of the Beverly Hills 7 1/2-Minute Quadrangle, the historic high groundwater level for the project site was approximately 23 feet. To further evaluate the potential for liquefaction hazards, the Geotechnical Engineering Investigation conducted a site-specific liquefaction analysis which considered groundwater depths and soil conditions. The Geotechnical Engineering Investigation concluded that the soils underlying the project site would not be prone to liquefaction. While the project would be required to comply with applicable seismic-related regulatory requirements of the Culver City Building Code and the 2013 CBC, implementation of the site-specific design parameters and recommendations of the Final Geotechnical Engineering Investigation per Mitigation Measure GEO-1 to be implemented during construction would ensure that seismic-related ground failure impacts, including liquefaction, would be less than significant.

Mitigation Measures

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

iv. Landslides?

No Impact. The project site is relatively flat with sloping gently toward the south. The project site is located in a highly urbanized area of downtown Culver City and is currently developed with a two-story bank building and an associated asphalt-paved surface parking lot. According to the Geotechnical Engineering Investigation, the probability of seismically-induced landslides affecting the project is considered to be remote due to the lack of significant slopes on the site and surrounding areas. Thus, the project would not be subject to, or result in, landslides and there would be no impact in this regard.

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

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

¹⁷ The liquefaction areas near the project site are illustrated on the Seismic Hazard Zone Map in the Geotechnical Engineering Investigation.

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

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

Less Than Significant Impact With Mitigation Incorporated. According to the Geotechnical Engineering Investigation, fill over natural alluvial soil were encountered within the project site. The fill soils generally consist of sandy silt that is dark brown, moist and stiff. The fill extends to a depth of three feet across the project site. The natural alluvial soils were encountered below the fill. The natural alluvium consists of silty sands to sandy silts, clayey sands to sandy clays, and sands. The alluvium is generally brown to medium brown and grayish brown, slightly moist to moist, stiff or dense to very dense, and predominately fine grained, with some fine to coarse grained sands, gravels, and occasional gravel. At a depth of 45 feet, the alluvium is distinctly gray and bluish gray in color. This layer closely associated with the presence of groundwater and is interpreted to be an anoxic, submerged zone closely associated with a long-term groundwater zone.

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

While the project construction and design would be required to comply with the 2013 CBC, which is designed to assure safe construction, implementation of the site-specific design measures including foundation design recommendations of the Final Geotechnical Engineering Investigation per Mitigation Measure GEO-1 would ensure that ground and soil stability hazards would be less than significant.

Mitigation Measures

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

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

Less Than Significant Impact With Mitigation Incorporated. Soils with shrink-swell or expansive properties typically occur in fine-grained sediments and cause damage through volume changes as a result of a wetting and drying process. Structural damage may occur over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. According to the Geotechnical Engineering Investigation, the soils found at the two potential subgrade depths within the project site are dense and granular and do appear to be expansive. Regardless, expansive soils, if encountered within the project site, would be removed and/or replaced as part of standard construction practices pursuant to Culver City and the 2013 CBC building requirements. Furthermore, with incorporation of the site-specific design measures including foundation design slabs on grade recommendations of the Final Geotechnical Engineering Investigation per Mitigation Measure GEO-1, a less than significant impact would occur in this regard.

Mitigation Measures

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

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

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

VII. GREENHOUSE GAS EMISSIONS

The following impact analysis pertaining to greenhouse gas (GHG) impacts is based on information contained in the project's *Greenhouse Gas Technical Report* prepared by ESA PCR in February 2017 (provided under separate cover available at the Culver City Planning Division).

Would the project:

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

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

The City has not yet adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emission. When no guidance exists under CEQA, the lead agency may look to and assess general compliance with comparable regulatory schemes.¹⁸ In its January 2008 CEQA and Climate Change white paper, the California Air Pollution Control Officer's Association (CAPCOA) identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents. In its white paper, CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency.

The Office of Planning and Research released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."¹⁹ Furthermore, the technical advisory states that "CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project."²⁰

¹⁸ See *Protect Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107 ["[A] lead agency's use of existing environmental standards in determining the significance of a project's environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution. ""]. Lead agencies can, and often do, use regulatory agencies' performance standards. A project's compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 99 (upholding use of regulatory agency performance standard).

¹⁹ Governor's Office of Planning and Research, *Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, (2008).

²⁰ *Ibid.*

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.²¹ The Working Group released draft guidance regarding interim CEQA GHG indicators of significance in October 2008, proposing a tiered approach whereby the level of detail and refinement needed to determine significance increases with a project's total GHG emissions. Under Tier 1, Projects that are exempt from CEQA would be less than significant. Under Tier 2, projects that are consistent with an adopted GHG reduction plan would be less than significant. Under Tier 3, non-industrial projects with 3,000 metric tons of CO₂e per year or less would be less than significant. Tier 4 uses performance standards, which requires projects to demonstrate a percent emission reduction target below an identified baseline level or an efficiency-based threshold such as GHG emissions on a per service population basis. The aforementioned Working Group was inactive in 2011 through 2015 and did not formally submit the thresholds to the Governing Board for approval.

"Tier 3," the primary tier by which SCAQMD currently determines the significance of stationary emission sources, relies on Executive Order S-3-05 as the basis for a screening level, and was established at a level that captures 90 percent of SoCAB -wide land use GHG emissions. The SCAQMD proposed a screening level of 3,000 metric tons of carbon dioxide equivalents (MTCO₂e) per year for commercial or mixed-use residential projects under which project impacts are considered less than significant, "to achieve the same policy objective of capturing 90 percent of the GHG emissions from new development projects in the residential/commercial sectors."²² In CAPCOA's January 2008 CEQA and Climate Change white paper, CAPCOA suggested a possible quantitative threshold option that would capture 90 percent of GHG emissions from future discretionary development projects. According to CAPCOA, the "objective was to set the emission threshold low enough to capture a substantial fraction of future residential and nonresidential development that will be constructed to accommodate future statewide population and job growth, while setting the emission threshold high enough to exclude small development projects that will contribute a relatively small fraction of the cumulative statewide GHG emissions."²³ A 90 percent capture rate would "exclude the smallest proposed developments from potentially burdensome requirements ... to mitigate GHG emissions."²⁴ The SCAQMD's proposed screening level of 3,000 MTCO₂e per year is a South Coast Air Basin-specific level that would meet CAPCOA's intent for the suggested quantitative threshold option. It should be noted that the SCAQMD has formally adopted a GHG significance thresholds of 10,000 MTCO₂e per year for industrial/stationary source projects where the SCAQMD is the lead agency based on a 90 percent capture rate for the industrial/stationary source sector. Given the lack of a formally adopted numerical significance threshold applicable to this project, the significance of the project is evaluated based on the SCAQMD's proposed screening level of 3,000 MTCO₂e.

For purposes of this analysis, it is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions resulting from project-related incremental (net) increase in the use of on-road mobile vehicles, electricity, and natural gas compared to existing conditions. This includes project construction activities such as demolition, hauling, and construction worker trips. This analysis also considers indirect GHG

²¹ California Air Resources Board, *Greenhouse Gases CEQA Significance Thresholds*, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>, accessed November 2015.

²² South Coast Air Quality Management District, *Board Meeting, December 5, 2008, Agenda No. 31, Interim GHG Significance Threshold Proposal – Key Issues/Comments Attachment D*.

²³ California Air Pollution Control Officer's Association, *CEQA and Climate Change*, (2008) 42-43.

²⁴ California Air Pollution Control Officer's Association, *CEQA and Climate Change*, (2008) 43-44.

emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis.

The project's net increase in GHG emissions is estimated using the California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.²⁵

Construction of the project has the potential to generate temporary GHG emissions through the use of heavy-duty construction equipment and through vehicle trips generated from export and import of materials and from visitors and workers traveling to and from the project site. Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. The emissions estimated from the CalEEMod (Version 2016.3.1) software is based on outputs from the OFFROAD and EMFAC models, which are emissions estimation models developed by the California Air Resources Board (CARB) and used to calculate emissions from construction activities, including on- and off-road vehicles and equipment. The output values used in this analysis were adjusted to be project-specific based on equipment types and the construction schedule. Construction would take place over 20 months, anticipated to begin in fall 2017. Because the project is anticipated to start construction in fall 2017 and end in late 2019, there would be construction 3 calendar years although actual construction would take place over a 20 month duration. Full build-out and occupancy would occur in 2019. The emissions of GHGs associated with construction of the project were calculated for each year of construction activity. The results are shown in **Table B-6, Construction Greenhouse Gas Emissions**. It should be noted that the GHG emissions shown in Table B-6 are based on construction equipment operating continuously throughout the work day. In reality, construction equipment tends to operate periodically or cyclically throughout the work day. Therefore, the GHG emissions shown reflect a conservative estimate. A complete listing of the equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets that are provided in the *Greenhouse Gas Technical Report* under separate cover available at the Culver City Planning Division.

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²⁵ See <http://www.caleemod.com>.

Table B-6

Construction Greenhouse Gas Emissions

Emission Source	CO₂e (Metric Tons) ^a
Construction Year 1	314
Construction Year 2	836
Construction Year 3	309
Total	1,459
Annual (Amortized over 30 years)	49

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

Source: ESA PCR, 2017.

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

As shown, the annual amortized project GHG emissions would not exceed the SCAQMD Tier 3 threshold of 3000 MTCO₂e. As a result, project construction would have a less than significant impact with respect to GHG emissions.

Operational emissions were estimated using CalEEMod for the existing site uses and the project in order to determine the net incremental change in GHG emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the trip length values for the existing and project land uses in CalEEMod, which are Basin-wide average trip distance values. To estimate the total vehicle miles traveled (VMT) generated by existing site and project trips, trip generation rates provided in the project Traffic Study were used.²⁶ The trips take into account trip reductions from internal capture from co-locating different land uses on the site and from nearby access to public transportation.²⁷

The estimated reduction in VMT for the existing site uses (although currently vacant building) and project uses is credible as the site is located in a transit priority area, which is defined in Senate Bill (SB) 743 as an area located within one-half mile of a major existing or planned transit stop, or which are identified in regional transportation plans. The project would be developed with a bicycle friendly design with bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services. The project's urban infill location close to jobs, shopping and entertainment uses and in close proximity to existing and future public transit stops would result in reduced vehicle trips and VMT, as compared to the Basin-wide average. As such, the project would result in a corresponding reduction in transportation-related emissions compared to the Basin-

²⁶ Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project. Crain and Associates. December 2016.

²⁷ California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010).

wide average. According to the project Traffic Study,²⁸ the project would result in a reduction in total project VMT by a minimum of 15 percent from its proximity to major high-quality public transit stations and stops.

With regard to energy usage, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Future fuel consumption rates are estimated based on specific square footage of the existing and project land uses, as well as estimated water supply needs. Energy usage (off-site electricity generation and on-site natural gas consumption) for the project is calculated within CalEEMod using the California Energy Commission (CEC) California Commercial End Use Survey (CEUS) data set for nonresidential uses, which lists energy demand by building type.²⁹ Since the data from the CEUS is from 2002, the CalEEMod software incorporates correction factors to account for compliance with the current Title 24 Building Standards Code. This assessment also includes electricity-related GHG emissions from the proposed enclosed parking structure, which includes elevators, lighting, and a ventilation system. The existing site uses were modeled using historical energy factors based on previous Title 24 standards.

Water and wastewater generated from the existing site and project requires energy to supply, distribute and treat. The CalEEMod software uses the electrical intensity factors from the 2006 CEC report *Refining Estimates of Water-Related Energy Use in California*.³⁰ The emissions of GHGs associated with the wastewater treatment process emissions are also calculated using the CalEEMod software as described in the *California Emissions Estimator Model User's Guide, Appendix A*.³¹

Emissions from solid waste handling generated from the existing site and project are also accounted for in the GHG emissions inventory. The GHG emission factors, particularly for CH₄, are based on the default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery).

Other sources of GHG emissions from operation of the existing site uses and project uses include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment GHG emission factors from the CARB OFFROAD2011 model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)*.³² The CalEEMod software estimates that landscaping equipment operate for 250 days per year in the South Coast Air Basin.

Emissions calculations for the project include credits or reductions for GHG reducing measures that are required by regulation, such as reductions in energy and water demand from the current Title 24 standards and the California Green Building Standards (CALGreen) Code. The project would be designed to meet the standards for LEED Certified level by the USGBC through the incorporation of green building techniques and other sustainability features. The project also would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the Culver City Green Building

²⁸ *Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project*. Crain and Associates. December 2016.

²⁹ *California Energy Commission, California Commercial End-Use Survey*, <http://capabilities.itron.com/CeusWeb/Chart.aspx>. Accessed December 2013.

³⁰ *California Energy Commission, Refining Estimates of Water-Related Energy Use in California, PIER Final Project Report, CEC-500-2006-118, (2006)*.

³¹ *California Air Pollution Control Officers Association, California Emissions Estimator Model User's Guide, (2013)*.

³² *California Air Resources Board, OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, (6/13/2003)*, http://www.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_act.pdf. Accessed November 2013.

Program. Some of the project's "green building measures" as part of its design to reduce GHG emissions would include, but are not limited to the following:

- Installation of efficient fixtures and flush technology would reduce indoor water use by 26 percent over the baseline, which would exceed the California Green Building Code's mandatory 20 percent reduction, and further reduce wastewater generation.
- Installation of a 7.5 kilowatt photovoltaic system, which exceeds the Culver City requirements.
- Reliance on fluorescent, LED or other type of high efficiency systems for all interior and exterior lighting. New lighting installed in parking structures and all common areas shall be occupancy-sensor controlled. A demonstration project by the United States Department of Energy indicated that the use of occupancy-sensor controlled lighting achieved a reduction of 50 percent or more in lighting energy use compared to a similarly lighted parking structure without occupancy-sensor controls.³³
- Incorporation of low-water and drought tolerant plants in the landscape plan, which would use at least 50 percent less potable water from irrigation than the LEED baseline.

The results of the analysis for operational emissions are presented in **Table B-7, Annual Greenhouse Gas Emissions**. As shown, the incremental net change in project GHG emissions would not exceed the SCAQMD Tier 3 annual mass emission threshold of 3,000 MTCO₂e. As a result, the project would have a less than significant impact with respect to GHG emissions for construction as well as for operation, and mitigation measures would not be required.

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

No Impact. The Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, requires the State to achieve 1990 GHG emission levels by 2020 by setting statewide GHG reduction targets. To achieve these goals, the CARB has established an emissions cap and developed a Climate Change Scoping Plan to identify mandatory strategies for reducing statewide GHG emissions. In addition, the California Climate Action Team (CAT) was formed which consists of members of various state agencies tasked with identifying strategies to reduce GHG emissions. Several other bills have been passed as a companion to AB 32 which include SB 1368 (electricity generation standards), SB 97 (CEQA analysis for GHGs), Low Carbon Fuel Standards, SB 375 (Regional Transportation Planning and GHG emissions), CALGreen building standards and others plans to achieve the goals of AB 32.

The State has promulgated regulations and programs for the purpose of reducing GHG emissions. The GHG emissions analysis in this MND was performed in accordance with SCAQMD and CARB guidance developed in compliance with, and as a result of, those regulations and programs. The result of the analysis of the project's potential impacts in terms of GHG and global climate change indicates that the construction-related

³³ United States Department of Energy, Building Technologies Office, SSL Demonstration: Parking Garage Lighting, Washington DC, June 2013.

Table B-7

Annual Greenhouse Gas Emissions

Emissions Sources	CO ₂ e (Metric Tons per Year) ^a
	Project
Existing Operational	
On Road Mobile Sources	256
Area	<1
Electricity	57
Natural Gas	9
Water Conveyance	4
Waste	4
Existing Subtotal	330
Proposed Project Operational (Opening Year 2019)	
On Road Mobile Sources	1,724
Area	<1
Electricity	729
Natural Gas	90
Water Conveyance	178
Waste	42
Proposed Subtotal	2,762
Net Operational	2,432
Construction (Amortized)	49
Total Annual Emissions	2,481
Significance Threshold	3,000
Over/(Under)	(519)
Exceeds Threshold?	No

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

Source: ESA PCR, 2017.

GHG emissions from the project alone would not be expected to cause a direct physical change in the environment. Therefore, the project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHG.

According to CARB in its First Update to the Climate Change Scoping Plan, infill development that offers a mix of uses can reduce dependence on motor vehicles, thus reducing associated GHG emissions.³⁴ Thus, the project would be consistent with reducing GHG emissions via infill development strategies in close proximity to public transportation and other nearby off-site land uses.

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

³⁴ California Air Resources Board, *First Update to the Climate Change Scoping Plan*, (2014) 104.

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

Since 2000 the City initiated various sustainability focused community visioning efforts that ultimately helped identify a range of GHG reduction activities and strategies that is anticipated to form the basis of the City’s future Sustainable Community Plan (SCP). GHG reduction activities and strategies are grouped into six categories: Community Education and Civic Participation; Environmental Pollution and Public Health Protection; Resource Conservation; Waste Management and Recycling; Sustainable Land Use and Open Space; and Sustainable Transportation. While the SCP has not been formally adopted by the City, the analysis below provides an assessment of the project’s consistency with the considered SCP strategies.

Table B-8, *Consistency with Applicable and Comparable GHG Regulatory Schemes*, contains a list of GHG-reducing strategies and actions applicable to the project. The project-level analysis describes the consistency of the project’s GHG emission sources with local and regional GHG emissions reduction strategies. As

Table B-8

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
Culver City Strategies (not formally adopted)		
Environmental Pollution and Public Health Protection	Working hard to improve stormwater quality by implementing a Stormwater Management Program.	Consistent. Construction activities would be carried out in accordance with the requirements of the NPDES General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented by the project that incorporates Best Management Practices (BMPs) to minimize pollutant runoff during the project’s construction period by preventing the off-site movement of potential contaminants. With regards to long-term water quality impacts, per the applicable requirements of Chapter 5.05, Stormwater and Urban Runoff Pollution Control, Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects, of the CCMC, and Chapter 6, Public Works and Property, Article 4.4, Stormwater and Urban Runoff Pollution Control, of the LAMC, the project would require a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. According to the Utility Infrastructure Assessment, various water quality features such as, planter boxes and green roof, are being considered in treating onsite stormwater prior to discharging into the storm drain system. Other typical BMPs to address pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and dissemination of educational materials.

Table B-8 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
	Catching as much trash as we can before it enters the storm drain system by installing catch basin inserts in storm drain sites throughout the City with the help of Proposition 50 grant funds and EPA appropriations.	Consistent. The project's storm drain filtration system would prevent large pieces of debris from entering the parkway drain.
	Completing improvements to make our traffic signal system more intelligent and efficient. The City has already completed a new traffic control center and traffic signal synchronization program, and has plans to implement an Adaptive Traffic Control System. These improvements will allow the City to better manage its traffic flow and reduce congestion and associated emissions.	Consistent. The project's traffic impact analysis includes an impact assessment of project traffic as well as signalization. Details of the analysis are provided in Section XVI, Transportation and Circulation, this MND document. Required improvements to the network of traffic signals, as necessary, in the project area would be made in accordance with the findings and recommendations of the traffic impact analysis, with traffic impacts being less than significant.
Resource Conservation	Encouraging environmental sustainability and resource conservation through changes to the City's code. Within the last several years, the City has 1) Revised the City's Water Conservation Ordinance to bring it in line with Municipal Water District's model ordinance; 2) Passed a Mandatory Solar Photovoltaic Ordinance requiring 1 kilowatt of solar photovoltaic energy generation for each 10,000 square feet of gross floor area of new commercial or multi-family construction, including additions and major renovations. This was the first such mandatory program in the US; and 3) Approved a Mandatory Green Building Ordinance.	Consistent. The project would meet applicable City Code requirements for environmental sustainability and resource conservation. The project would include at least 7.5 kW of photovoltaic electricity generation on-site.
	Managing the City's urban forest in an environmentally sustainable way, and emphasizing species in the Street Tree Master Plan that are drought-tolerant and emit low or moderate amounts of Biogenic Volatile Organic Compounds (biogenics) as practicable.	Consistent. The project would incorporate low-water and drought tolerant plants in the landscape plan, which would use less potable water from irrigation.
	Operating in compliance with California State Model Water Model Efficiency Landscape Ordinance (AB 1881) by conducting water audits at all the city parks, medians, parkways and buildings; using evapotranspiration (ET) based weather station controllers; and, upgrading existing irrigation systems using the latest technology to increase efficiency and reduce run-off.	Consistent. The project would incorporate low-water and drought tolerant plants in the landscape plan, which would use less potable water from irrigation.
	Showcasing the versatility, conservation properties and beauty of native and indigenous plants in our public landscape areas through design techniques that both reduce the City's maintenance and water costs and raise public awareness of the benefits of non-traditional plantings.	Consistent. The project would incorporate low-water and drought tolerant plants in the landscape plan, which would use less potable water from irrigation. The open space areas within the project site would incorporate seating to serve the project visitors and the local community.

Table B-8 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
	Providing the public with recycling opportunities to recycle a wide range of materials including: bottles, cans, plastics, paper, batteries, cell phones, hearing aids and eyeglasses.	Consistent. The project would provide areas for the collection of recyclable materials on the project site.
Waste Management and Recycling	Helping all businesses comply with AB 341 by providing recycling assessments, presentations, and easy to use templates to businesses starting recycling programs. AB 341 is a state law that, among other things, requires businesses with four or more cubic yards of commercial solid waste per week to arrange for recycling services.	Consistent. The project would provide areas for the collection of recyclable materials on the project site. Consistent with AB 341, the project would separate recyclable waste and/or subscribe to a recycling service that may include mixed waste processing that yields diversion results comparable to source separation.
Sustainable Land Use and Open Space	Encouraging multi-use developments that make the City more walkable.	Consistent. The project would include a mix of office and retail uses. Project uses would be positioned at grade to create connectivity between the various uses and the community. Connectivity would further be achieved through the use of pathways between areas of landscape, providing pedestrian pathways linking retail and office uses around the ground level open space. The perimeter of the site area would incorporate a City approved Streetscape plan which would create an attractive and inviting walkable environment.
	Promoting revitalization, encouraging reinvestment and eliminating blight in the City's Area Improvement Projects.	Consistent. The perimeter of the site area would incorporate a City approved Streetscape plan which would create an attractive and inviting walkable environment. The project would include a streetscape design that includes an eight to ten foot sidewalk along project boundaries with street trees, landscape planters, and tables for outdoor seating. The open space areas within the project site would incorporate seating and would support outdoor dining and rooftop recreational activities.
	Raising public awareness of the importance of reducing the City's overall carbon footprint by continually striving to meet the "Net Goal" of grounds maintenance; that is, achieving a net landscape benefit by producing more oxygen than carbon dioxide through the use of environmentally responsible maintenance practices. Practices that the City has implemented that have been or can be easily adopted by community members include limiting the pruning of trees and shrubs, increasing water efficient irrigation practices and utilizing energy efficient machinery to maintain landscaped areas.	Consistent. The project would include measures to reduce the overall carbon footprint. The project would install efficient water fixtures and flush technology that would reduce indoor water use and exceed the California Green Building Code's mandatory 20 percent potable water reduction, and reduce wastewater generation. The project would install at least 7.5 kilowatt photovoltaic system. The project would rely on high efficiency lighting systems for all interior and exterior lighting. New lighting installed in parking structures and all common areas would be motion sensor controlled. The project would incorporate low-water and drought tolerant plants in the landscape plan and utilize rainwater harvesting systems, which would use less potable water from irrigation. The project would use mixed-mode ventilation strategies to shut down mechanical cooling systems when windows are open and use high efficiency mechanical systems.

Table B-8 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
	Implementing the Parks and Recreation Master Plan, which is a comprehensive report that catalogues and analyzes the condition of the City's recreation programs and facilities and also presents recommendations for the future growth and development of parks and recreation that are based on the cornerstones of public input, objective data, technical expertise and emerging best practices.	Consistent. The project would include a streetscape design that includes an eight to ten foot sidewalk along project boundaries with street trees, landscape planters, and tables for outdoor seating. The open space areas within the project site would incorporate seating and would support outdoor dining and rooftop recreational activities. Therefore, with the proposed open space features and payment of applicable fees, as applicable, the project would not have a have a significant physical impact upon parks, nor would there be a significant increase in demand for existing public park facilities.
Sustainable Transportation	Relying heavily on alternative fuels to power the City's fleet. The City's use of alternative fuel vehicles and other environmentally-friendly activities has earned it high rankings as a Best Green Fleet in North America by the Top 100 Fleets Certification Program (Best Fleet in 2013) and has resulted in: ▪ Reduced diesel fuel consumption by 60% over the past five years, annually displacing over 800,000 gallons of diesel fuel with CNG, and saving the City over \$1.2 million per year in fuel costs. ▪ Removal of over 80,000 pounds of NO_x (oxides of nitrogen - the brown emission exhaust) from the air ▪ Removal of over 32,000 pounds of PM (particulate matter - the black soot exhaust) from the atmosphere.	Consistent. While the measure applies to the City, the project would nonetheless support the City efforts to reduce transportation-related emissions by encouraging alternative transit. The project would provide nearby and convenient access to multi-modal transit with connecting bike, bus, and train routes. The project would be near the Culver City Metro Station, which is the approximate center of the Expo Line, connecting Downtown Los Angeles to Santa Monica. The project would also be developed with a bicycle friendly design with bicycle parking for visitors.
	Implementing a rideshare program to encourage employees to use alternative forms of transportation. The City's Employee Rideshare Program removes over 2.8 tons of emissions per year by encouraging alternative modes of commuting to work.	Consistent. The project would promote bicycle and public transportation use by providing: bike racks for site tenants and public use and other bicycle oriented facilities such as safe lockable storage areas for office use.
	Operating Culver CityBus, a high-quality municipal bus service that provides transportation options for the community. Culver CityBus was the first public transit fleet in the South Coast Air Quality Management District (AQMD) to operate on 100 percent compressed natural gas (CNG), and the second in the State of California.	Consistent. While the measure applies to the City, the project would nonetheless support the City efforts to reduce transportation-related emissions by encouraging alternative transit. The project would provide nearby and convenient access to multi-modal transit with connecting bike, bus, and train routes. The property is near the Culver City Metro Station, which is the approximate center of the Expo Line, connecting Downtown Los Angeles to Santa Monica.

Table B-8 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
	Coordinating with the construction of an Expo Light Rail Station in Culver City. The Culver City station opened in 2012. It marks the furthest rail has reached into the Westside in more than 50 years, allowing commuters to travel 7.9 miles between downtown Los Angeles and the eastern area of Culver City in about half an hour.	Consistent. The project would provide nearby and convenient access to multi-modal transit with connecting bike, bus, and train routes. The project is very near the Culver City Metro Station, which is the approximate center of the Expo Line, connecting Downtown Los Angeles to Santa Monica. The project would also be developed with a bicycle friendly design with bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services.
Regional Strategies		
Sustainable Communities Strategy	The RTP/SCS, developed by SCAG, demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. The RTP/SCS successfully achieves and exceeds the GHG emission reduction targets, set by CARB by achieving a 9 percent reduction by 2020 and 16 percent reduction by 2035 compared to the 2005 level on a per capita basis.	Consistent. The project would provide nearby and convenient access to high-quality multi-modal transit with connecting bike, bus, and train routes. The property is very near the Culver City Metro Station, which is the approximate center of the Expo Line, connecting Downtown Los Angeles to Santa Monica. The project would provide bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services. As a result, the project would be consistent with the goals and the intent of the RTP/SCS to on job growth in high-quality transit areas and to reduce transportation-related GHG emissions.

Source: ESA PCR, 2017.

discussed in Table B-8, the project would be consistent with the applicable portions of Culver City's Green Building Program and Culver City SCP strategies, and is consistent with applicable SCAG RTP/SCS policies intended to meet the region's GHG reduction targets as assigned by CARB. Thus, the project would be consistent with GHG reduction measures from applicable plans.

Since AB 32 sets statewide targets for future GHG emissions, the Scoping Plan and other implementing tools of the law are clear that the reductions are not expected to occur uniformly from all sources or sectors. As discussed previously and shown in Table B-8, the Project would be consistent with the applicable GHG reductions strategies and local actions considered by the City in the SCP (not formally adopted). Additionally, the Project would be consistent with GHG reduction measures from other applicable regional plans. **Table B-9, *Applicable GHG Reduction Strategies***, contains a list of other state, regional, and local GHG-reduction strategies applicable to the project, the identified related projects, and future development similar in scope and

Table B-9

Applicable GHG Reduction Strategies

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

Source	Description	Demonstration of Project Consistency
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	Consistent. CALGreen Code implements this goal, and the project would be consistent with the requirements.
	The California Energy Commission updates building energy efficiency standards that apply to newly constructed buildings and additions to and alterations to existing buildings. Both the Energy Action Plan and the Integrated Energy Policy Report call for ongoing updating of the standards.	Consistent. CALGreen Code implements this goal, and the project would be consistent with the requirements.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	Consistent. CALGreen Code implements this goal, and the project would be consistent with the requirements.
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors, and implementing intelligent transportation systems.	Consistent. The project would be located in an infill location in proximity to existing residential and commercial businesses, which would minimize trip lengths and associated emissions.
Culver City		
Green Building Program	Enhance building insulation, low flow fixtures, efficient lighting and HVAC systems.	Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the Green Building Program.
	For new construction totaling more than 50,000 square feet, the project must attain the Leadership in Energy and Environmental Design (LEED) "Certified" level or equivalent.	Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the Green Building Program.
	For parking garages which requires all new lighting to be motion sensor controlled and minimum base level lighting is permitted using high efficiency lighting.	Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the Green Building Program.
Photovoltaic Requirement	Requires 1 kilowatt (kw) of photovoltaic power installed per 10,000 square feet of new development	Consistent. The project would be consistent with this requirement via compliance with City ordinances.

Source: ESA PCR, 2017; Climate Action Team, Attorney General's Office, 2011.

location. Included are the regulations or guidelines from which the strategies were developed. The project-level analysis highlights the manner by which the project intends to meet the applicable strategies. Because the project would not conflict with strategies to reduce GHG emissions, it would be consistent with the overarching regulation to reduce GHG emissions.

Through incorporation of the project's green building features discussed above, the project complies with applicable portions of the CalGreen Code for non-residential uses (California Code of Regulations, Title 24, Part 11), as required by the Culver City Green Building Ordinance which requires LEED certification or equivalent, and the Culver City Mandatory Solar Photovoltaic requirement which requires 1 kW of solar power per 10,000 SF. of applicable building area. In summary, the project, as designed, meets or exceeds the applicable requirement of the CalGreen Code and the Culver City Green Building Ordinance, all of which is supportive of

the State’s GHG-reduction goals under state law AB 32. Therefore, the project would not conflict with applicable plans, policies, or regulations to reduce GHG emissions, and no impact would occur.

VIII. HAZARDS AND HAZARDOUS MATERIALS

The following hazardous materials discussion is based, in part, on the *Phase I Environmental Site Assessment Report, Commercial Building, 9735 West Washington Boulevard, Culver City, California 90232* (herein referred to as the “Phase I”), prepared by Partner Engineering and Science, Inc., dated May 22, 2015 and *Phase II Subsurface Investigation Report, Commercial Building, 9735 West Washington Boulevard, Culver City, California 90232* (herein referred to as the “Phase II”), prepared by Partner Engineering and Science, Inc., dated July 17, 2015 (both provided under separate cover available at the Culver City Planning Division).

Would the project:

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

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

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

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

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

Less Than Significant With Mitigation Incorporated. The main purpose of the Phase I was to identify existing or potential recognized environmental conditions (RECs) affecting the project that constitute or result in a material violation or a potential material violation of any applicable environmental law; impose any material

constraints on the operation of the project site or require a material change in the use thereof; require clean-up, remedial action or other response with respect to hazardous substances or petroleum products on or affecting the project site under any applicable environmental law; may affect the value of the project site; and may require specific actions to be performed with regards to such conditions and circumstances. A REC refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. A controlled recognized environmental condition (CREC) refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. A historical recognized environmental condition (HREC) refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. In order to identify RECs at the project site, the Phase I included the following: a project site and adjacent site reconnaissance; interviews with key personnel; a review of historic sources; a review of regulatory agency records; and a review of a regulatory database report provided by a third-party vendor. Agencies contacted include environmental health departments, fire departments and building departments in order to determine any current and/or former hazardous substances usage, storage and/or releases of hazardous substances on the project site.

The project site is located in a highly urbanized area of downtown Culver City and is currently developed with a two-story bank building with a mezzanine and an associated asphalt-paved surface parking lot. According to the Phase I review of historic sources, the project site was originally developed with a single-family residence addressed as 9723 West Washington Boulevard from years 1919 to 1970. From approximately 1938 to 1952, the project site was also developed with a gas and oil service station addressed as 9727 West Washington Boulevard. A restaurant was present on the southern portion of the project site at 9735 West Washington Boulevard from years 1954 to 1963. An apartment building was present on the northern portion of the project site at 3852 Delmas Terrace from years 1948 to 1970. The current building was constructed in the beginning of 1963 for use as a bank. In the early 1970s, the remaining structures on the project site were demolished and the bank building was expanded to its current size. The current building has been utilized exclusively as a bank since construction.

As the current building was constructed in as early as 1963 and expanded in 1970, it is possible that lead-based paint (LBP), asbestos-containing building materials (ACBMs) and/or other hazardous paint residues are present in the buildings. Lead is a highly toxic metal that affects virtually every system of the body. LBP is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm² (or 5,000 ug/g or 0.5 percent by weight) or more of lead. If released into the environment, these materials could pose a significant hazard to construction workers or the public. The Phase I indicated that suspect ACMs and painted surfaces were observed in good condition and do not pose a health and safety concern to the occupants of the project site. Implementation of Mitigation Measures HAZ-1 and HAZ-2 would require comprehensive surveys of the existing building prior to demolition in accordance with applicable regulations—including the National Emissions Standards for Hazardous Air Pollutants standards, SCAQMD Rule 1403, and California Division of Occupation Safety and Health (Cal/OSHA)—to verify the presence or absence of any of these materials. If LBPs and/or asbestos containing materials (ACMs) are encountered, Mitigation Measures HAZ-1 and HAZ-2 would require remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences. Adherence with these Mitigation Measures HAZ-1 and HAZ-2 would reduce risks associated with LBPs and ACMs to acceptable levels and associated impacts would be less than significant.

As discussed above and based on review of Sanborn Fire Insurance Maps and aerial photographs, the project site was formerly developed with a gas and oil service station between approximately 1938 and 1952. The project site was not listed on the regulatory database as a current or former underground storage tank (UST) site. However, based on the former use, it is apparent that USTs were located and utilized onsite as part of the service station operation. The locations of the former USTs are unknown and no information pertaining to UST removals or subsurface sampling at the project site was identified. As part of the Phase I, record requests were submitted to the Los Angeles County Department of Public Health Investigation (LACPHI) and Los Angeles County Fire Department (LACFD) – UST Division, for information pertaining to hazardous substances, USTs, releases, and inspection records for the project site and/or adjacent sites. To date, no response has been received from LACPHI or LACFD. However, the Phase I does indicate the gas and oil service station operated in an era prior to regulatory oversight and as such, pertinent records may not exist for the former station. Based on the potential presence of USTs at the project site and/or residual contamination in soil or groundwater resulting from the former USTs, the Phase I concluded that the former presence of an onsite gas and oil service station constitutes evidence of a REC for the project site. The Phase I did not identify any CRECs or HRECs. Because of the Phase I acknowledgement of an REC at the site associated with potential presence of a UST and/or residual contamination in soil or groundwater resulting from the former USTs, a Phase II ESA was conducted, described below.

A Phase II subsurface investigation was conducted at the project site to identify the location of on-site USTs, former tankholds, and/or other associated features and to investigate the potential impact of petroleum hydrocarbons to soil gas and/or soil as a consequence of a release or releases from the former onsite gas and oil service station. The Phase II included a geophysical survey and the advancement of four borings (B1 through B4) for the collection of representative soil and soil gas samples. Four samples were analyzed for carbon chain total petroleum hydrocarbons (TPH-cc), volatile organic carbons (VOCs), and polynuclear aromatic hydrocarbons (PAHs), and four soil gas samples were analyzed for VOCs. The geophysical survey did not identify the presence of USTs, backfilled excavations, or anomalies. The Phase II indicates that it is unlikely that USTs remain on-site from the former gas and oil service station. Subsurface lithology encountered in the upper 15 below ground surface (bgs) consisted of brown, fine to very fine grained, low density, loose, moist sand with silt. From 15 to 25 feet bgs, subsurface lithology consisted of light brown, fine to very fine grained, medium density, loose, moist sandy silt with trace gravel. Groundwater was not encountered. According to the Phase II, based on the lack of detections of targeted compounds in the soil samples collected, there did not appear to be an on-site release from the former gasoline station activities. Given the low concentrations of trichloroethene (TCE) and tetrachloroethene (PCE) detected in several of the soil gas samples above residential and below industrial soil gas screening levels, there does not appear to be a threat to the on-site occupants or environment. The Phase II recommended that no further investigation with respect to the former onsite gas and oil service station at this time.

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

Overall, implementation of Mitigation Measures HAZ-1 and HAZ-2 and compliance with applicable standards and regulations would ensure that potentially significant construction-related impacts associated with hazardous

materials releases or accident conditions would be reduced to a less than significant level. Operational impacts in this regard would be less than significant.

Mitigation Measures

- HAZ-1:** Prior to the issuance of any permit for the demolition or alteration of the existing on-site building, a comprehensive ACMs survey of the buildings shall be performed. If no ACMs are found, the project applicant shall provide a letter to the Culver City Building Safety Division from a qualified asbestos abatement consultant indicating that no ACMs are present in the on-site buildings. If ACMs are found to be present, an operations and maintenance (O&M) program shall be implemented to safely manage the suspect ACMS located at the project site. Further, ACMs found to be present shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.
- HAZ-2:** Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a comprehensive LBP materials survey shall be performed to the written satisfaction of the Culver City Building Safety Division. Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

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

Less Than Significant With Mitigation Incorporated. The Linwood Elementary School, located at 4100 Irving Place, is approximately 0.2 miles east of the project site. First Lutheran School/Church located at 3751 Hughes Ave., is located approximate 0.2 miles north east of the project site. Happyland pre-school, located at 4045 Lafayette Place, is located approximately 0.1 miles south of the project site. Construction of the project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions.

As discussed in Response VIII.b, the Phase I indicates the gas and oil service station operated in an era prior to regulatory oversight and as such, pertinent records may not exist for the former station. Based on the potential presence of USTs at the project site and/or residual contamination in soil or groundwater resulting from the former USTs, the Phase I concluded that the former presence of an onsite gas and oil service station constitutes evidence of a REC for the project site. The Phase I did not identify any CRECs or HRECs. However, according to the Phase II, based on the lack of detections of targeted compounds in the soil samples collected, there did not appear to be an on-site release from the former gasoline station activities. Given the low concentrations of TCE and PCE detected in several of the soil gas samples above residential and below industrial soil gas screening levels, there does not appear to be a threat to the on-site occupants or environment. The Phase II recommended that no further investigation with respect to the former onsite gas and oil service station at this time.

Also, project demolition activities could involve the removal of ACM and LBPs. However, any such removal would occur in adherence with Mitigation Measures HAZ-1 and HAZ-2. The project's demolition activities would be implemented pursuant to strict regulatory requirements would be localized to the project site, and existing schools are sufficient distance from the project site to preclude impacts from the remediation and demolition

activities. Implementation of the prescribed mitigation measures would reduce risks associated with LBPs and ACMs to acceptable levels and associated impacts would be less than significant.

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

Mitigation Measures

Refer to Mitigation Measures HAZ-1 and HAZ-2. No additional mitigation measures are necessary.

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

Less Than Significant Impact. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Geotracker is the State Water Resources Control Board's (SWRCB's) data management system for managing sites that impact groundwater, especially those that require groundwater cleanup [USTs, Department of Defense, Site Cleanup Program] as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's database includes lists of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) from the State Water Board.

As part of the Phase I, a search was conducted for available Federal, State, and local environmental database records for the project site and where practicable, adjoining properties and nearby properties or surrounding areas within approximate minimum search distances from the project site. The site's property records were reviewed by CalEPA, LACPHI, LACFD, SCAQMD, California Regional Water Quality Control Board (CRWQCB), DTSC, Culver City Department of Building Safety, Culver City Planning Department, California Division of Oil, Gas and Geothermal Resources (DOGGR), Los Angeles County Assessor's Office (LACAO), and the Los Angeles County Department of Public Works (LACDPW). No records pertaining to hazardous material storage/use and/or the presence of active and use limitation (AULs) were on file for the project site.

A regulatory agency database search report prepared by EDR was reviewed within the Phase I. The project site identified as Culver City Branch No 252 at 9735 Washington Boulevard was listed as a hazardous waste manifest (HAZNET) site for the offsite transfer of 1.6856 tons of asbestos-containing waste in the year 1998. However, no hazards associated with the transfer of these materials are currently evident at the project site. As discussed above, any removal ACM and LBPs from the existing on-site building would occur in adherence with Mitigation Measures HAZ-1 and HAZ-2. The adjacent property to the northwest at 3828 Delmas Terrace was formerly equipped with three diesel USTs (3,000-gallon, 550-gallon, and 275-gallon) with at least one of which was installed in 1972. This site reported a release of diesel that impacts soils, and a leaking underground storage tank (LUST) case was opened under the oversight of Los Angeles County. The case was granted regulatory closure on March 23, 2005. Based on the regulatory status and the soil-based nature of the case, this release was not expected to constitute a significant environmental concern. No additional sites of concern were identified from the records search.

Based on the above, a less than significant impact would occur in this regard.

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

No Impact (e and f). The project site is not located within an airport land use plan or within two miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately 2.75 miles to the west and five miles to the south of the project site, respectively. Therefore, the project would not result in an airport-related safety hazard for people residing or working in the project area, and no impact would occur in this regard.

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

Less Than Significant Impact. The project site is located in an established urban area that is well served by a roadway network. Venice Boulevard, 0.1 mile north of the project site, is a transportation facility that could be utilized during a disaster event.^{35,36} While it is expected that the majority of construction activities for the project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In these instances, the project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with Culver City requirements, the project would develop a Construction Traffic Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

³⁵ City of Los Angeles General Plan Safety Element – Critical Facilities and Lifeline Systems, Exhibit H November 26, 1996.

³⁶ County of Los Angeles Department of Public Works. <http://dpw.lacounty.gov/dsg/disasterroutes/map/culver%20city.pdf>, accessed September 2016.

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

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

No Impact. The project site is not located in an area of moderate or very high fire hazard.^{37,38} The nearest very high fire hazard severity zone (VHFHSZ) is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately 0.85 miles southeast of the project site. Further, the project site is surrounded by urban development and is not adjacent to any wildlands. As such, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Thus, no impacts would occur in this regard.

IX. HYDROLOGY AND WATER QUALITY

The following hydrology and water quality discussion is based, in part, on the *Existing and Proposed Conditions Assessment The Brick and The Machine Utility Infrastructure Technical Memorandum* (herein referred to as the "Utility Infrastructure Assessment"), prepared by Fuscoe Engineering, dated January 3, 2017 (provided under separate cover available at the Culver City Planning Division).

Would the project:

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

Less Than Significant Impact With Mitigation Incorporated. The project site is at an elevation of approximately 99 feet above sea level and gently slopes towards the south. Surface drainage flows to Washington Boulevard and Delmas Terrace curb and gutters.

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

³⁷ Culver City Fire Department Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012.

³⁸ The Culver City Very High Fire Hazard Severity Zones in LRA as recommended by CAL FIRE, prepared by CAL FIRE, dated September 2011.

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

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

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

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

The project would be subject to all existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with the requirements of the NPDES General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented by the project that incorporates Best Management Practices (BMPs) to minimize pollutant runoff during the project's construction period by preventing the off-site movement of potential contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides. As part of the SWPPP, Culver City would require BMPs as listed in the California Stormwater Quality Association's California Storm Water Best Management Practice Handbooks. Compliance with the NPDES permit would be reviewed by the Culver City Department of Public Works during the plan check phase of the project.

As discussed under Response VI.a.iii, above, according to the Geotechnical Engineering Investigation, groundwater was encountered during exploration at depths between 42 and 44.5 feet below the ground surface. According to the Seismic Hazard Zone Report of the Beverly Hills 7 1/2-Minute Quadrangle, the historic high groundwater level for the project site was approximately 23 feet. As such, construction activities could encounter groundwater. Typically, groundwater removed from a construction site is disposed of in the storm drain system. However, if any removed groundwater contain contaminants that exceed acceptable water quality regulatory standards of the Los Angeles Regional Water Quality Control Board (LARWQCB) or other appropriate agencies, this could be a potentially significant impact. Thus, Mitigation Measure WQ-1 is prescribed to address this potential impact, which requires implementation and completion of a dewatering plan that would dispose of

contaminated groundwater in compliance with applicable regulatory requirements. Implementation of Mitigation Measure WQ-1 would ensure that potentially significant impacts regarding groundwater contamination during dewatering activities on the project site are reduced to a less than significant level.

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

With regard to long-term water quality impacts, per the applicable requirements of Chapter 5.05, Stormwater and Urban Runoff Pollution Control, Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects, of the CCMC, the project would require a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. According to the Utility Infrastructure Assessment, various water quality features such as, planter boxes and green roof, are being considered in treating onsite stormwater prior to discharging into the storm drain system. Other typical BMPs to address pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and dissemination of educational materials. Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations. The project would not interfere with the implementation of NPDES water quality regulations and standards. Compliance with applicable SUSMP and long-term water quality requirements would be reviewed by the Culver City Department of Public Works during the plan check phase of the project. Compliance with applicable stormwater requirements would ensure that impacts to water quality during the project's operational activities would be less than significant.

Mitigation Measures

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

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

Less Than Significant Impact. The project site is located in a highly urbanized area of downtown Culver City and is currently developed with a two-story bank building with a mezzanine and an associated asphalt-paved surface parking lot. As such, the site does not currently provide a substantial opportunity for recharge of groundwater. Furthermore, the project does not propose the development of long-term groundwater production

wells. Given the size of the site at approximately 0.66 acres and the temporary nature of construction activities, while some dewatering could be necessary during construction activities, such dewatering activities would not be to the extent that would substantially alter groundwater supplies. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, and a less than significant impact would result.

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

Less Than Significant Impact. No streams or rivers occur on the project site. According to the Utility Infrastructure Assessment, existing site conditions show that the landscaped area is a nominal 1.3 percent of the project area when compared to the area of impervious surfaces of 98.7 percent of the project area. Existing site drainage is partially conveyed southerly via surface towards Washington Boulevard and westerly towards Delmas Terrace. The roof drains of the existing building outlet via curb drains along Washington Boulevard and Delmas Terrace. Drainage from the project site is then conveyed through the curb and gutter along both adjacent streets and toward catch basins near the curb return of the northerly intersection of Washington Boulevard and Delmas Terrace. Both the 3.5-foot wide catch basin at Washington Boulevard and the 7-foot wide catch basin located at Delmas Terrace outlet through separate 18-inch laterals. The stormwater collected from these laterals are conveyed through an existing 45-inch round concrete pipe (RCP) main line flowing southwestwardly along Washington Boulevard. This 45-inch main line discharges approximately 900 feet downstream at the intersection of Washington Boulevard and Clarington Avenue/Madison Avenue to an existing 22-foot wide by 20.5-foot high reinforced concrete box (RCB) known as the Benedict Canyon Channel. The Los Angeles County Flood Control District (LACFCD) maintains all existing facilities mentioned above.

Under the Project, similar to existing conditions, the project site would have impervious conditions that generally are equal to or less than existing impervious conditions. Proposed stormwater runoff would be also discharged into the existing storm drains adjacent to the project site. The existing LACFCD storm drain systems are not anticipated to change as a result of this project. **Table B-10, Existing and Proposed Peak Flows**, provides a comparison of the existing and proposed peak flows for the 10-year and 25-year storm events. As shown in Table B-10, there would be no net increase in peak stormwater flows.

Table B-10

Existing and Proposed Peak Flows

Condition	Area (Acres)	Q₁₀ (cfs)	Q₂₅ (cfs)
Existing	0.66	1.40	1.73
Proposed	0.66	1.40	1.73
Difference	0	0	0
Percent Increase or Decrease	0	0%	0%

cfs = cubic feet per second

Source: Existing and Proposed Conditions Assessment The Brick and The Machine Utility Infrastructure Technical Memorandum, prepared by Fuscoe Engineering, dated January 3, 2017.

The project would include appropriate drainage treatment improvements on site to direct stormwater flows to the local drainage systems, similar to existing conditions. The current requirement for the Culver City's SUSMP follows closely to the Los Angeles County's Low Impact Development (LID) guidelines. The County LID manual states the following:

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

The use of LID features would be consistent with the prescribed hierarchy of treatment provided in the LID guidelines: infiltration, evapotranspiration, harvest/reuse and biotreatment. However, per the geotechnical report provided by Geotechnologies, Inc. dated July 20, 2015, stormwater infiltration into the subgrade soils is not feasible. For those areas of the site where LID features are not feasible or do not meet the feasibility criteria, treatment control BMPs with biotreatment enhancement design features will be utilized to provide treatment. Various water quality features such as, planter boxes and green roof, are being considered in treating onsite stormwater prior to discharging into the storm drain system.

The proposed drainage facilities would capture and treat the design storm for which the SWQDV is calculated, which for the project site is the 1.1 inch for the 85th percentile rainfall depth, 24-hour rain event.³⁹ With the proposed drainage system in place, the existing off-site drainage patterns would be maintained.

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

³⁹ *Low Impact Development, 8777 Washington Boulevard, Culver City, CA 90232, prepared by Kimley Horn, dated January 2017.*

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

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

As discussed in Responses IX.a and IX.c, project implementation would include treatment control BMPs with biotreatment enhancement design features to provide treatment. Various water quality features such as, planter boxes and green roof, are being considered in treating onsite stormwater prior to discharging into the storm drain system. With the proposed drainage system in place, the project would not substantially change the amount of impervious surface area on site and, thus, would not result in substantial increases in surface water runoff quantities. Additionally, with implementation of the project, overall existing drainage patterns would be maintained, and the project would include appropriate on site drainage improvements to convey anticipated stormwater flows. Final plan check by the City would ensure that adequate capacity is available in the storm drain system in surrounding streets prior to project approval. The project applicant would be responsible for providing the necessary on-site storm drain infrastructure to serve the project site, as well as any connections to the existing system in the area. It is also acknowledged that there are no known deficiencies in the existing storm drain system. Furthermore, the project would not alter the course of any stream or rivers. Because runoff would not increase over existing conditions, and BMPs would be implemented to capture and treat runoff, the project would not result in on- or off-site flooding, and impacts would be less than significant.

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

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

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed in Response IX.a above, construction and operational BMPs, including the proposed filtration and good housekeeping practices during project construction and operation would preclude substantial amounts of sediment and stormwater pollutants from entering stormwater flows. Therefore, the project would have a less than significant impact in surface water quality.

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

No Impact (g-h). The project site is mapped by the Federal Emergency Management Agency (FEMA) as located within Zone X, an area determined to be outside the 0.2 percent Annual Change Flood Hazard Zone.⁴⁰ The site is not located in a 100-year or 500-year flood zone as delineated by Culver City.⁴¹ Since the project site is not located within a 100-year flood plain, no impact would occur in this regard.

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

Less Than Significant Impact. As discussed under Responses IX.g-h, the project site would not be located within a mapped 100-year floodplain. According to the Geotechnical Engineering Investigation and per the Culver City's "Natural Hazards – Fire and Flooding" map, the site is not located within a potential inundation zone, including the Stone Canyon Dam Inundation Zone, Silverlake Dam Inundation Zone, and Mullholland Dam Inundation Zone.⁴²

However, Los Angeles County's General Plan indicates that a large portion of Culver City, including the project site, is located within the potential inundation area of the Hollywood Reservoir/Mulholland Dam and Franklin Canyon Reservoir Dam.⁴³ The project site is located approximately six miles away from both dams with a variety of development, hills, and terrain that would slow and limit any impacts of dam failures on the site and surrounding area. In addition, the National Dam Safety Act of 2006 authorized a program to reduce the risks to life and property from dam failure by establishing a safety and maintenance program. The program requires regular inspection of dams to reduce the risks associated with dam failures.

Measures to maintain the safety of the dam in accordance with dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams provides periodic review of all dams in the State; and dams and reservoirs are monitored by the City during storms. Measures are instituted in the event of potential overflow. If a breach were to occur at the reservoir, flood water would disperse over a large area where water flows would be redirected by intervening development and changes in topography. Reservoir water, were it to reach the project site, would generally flow along roadways adjacent to or within the vicinity of the project site. Given the low likelihood of a breach and low potential of the project to affect flows, the project would not be expected to result in a significant impact with regard to the exposure of people and structures to risk of loss or injury associated with the Hollywood Reservoir/Mulholland Dam and Franklin Canyon Reservoir Dam.

⁴⁰ FEMA Mapping Information Platform January 2013. FEMA Flood Insurance Rate Map Number 06037C1595F. FEMA <https://hazards.fema.gov>, accessed October 2016.

⁴¹ Ibid and Culver City, Natural Hazards – Fire and Flooding Map, February 1, 2007. Available on Culver City website at: <http://www.culvercity.org/home/showdocument?id=126>, accessed October 2016.

⁴² Ibid

⁴³ Los Angeles County General Plan, Safety Element, December 6, 1990.

j. Inundation by seiche, tsunami, or mudflow?

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

As discussed under Response IX.i, according to the Geotechnical Engineering Investigation and per the Culver City's "Natural Hazards – Fire and Flooding" map, the site is not located within a potential inundation zone, including the Stone Canyon Dam Inundation Zone, Silverlake Dam Inundation Zone, and Mullholland Dam Inundation Zone. However, Los Angeles County's General Plan indicates that a large portion of Culver City, including the project site, is located within the potential inundation area of the Hollywood Reservoir/Mulholland Dam and Franklin Canyon Reservoir Dam. As discussed under Response IX.i, a breach of the dam facilities is very unlikely. Reservoir water, were it to reach the project site, would generally flow along roadways adjacent to or within the vicinity of the project site. Thus, during the unlikely failure of the dams, impacts regarding flooding hazards associated with seiches would be less than significant.

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

X. LAND USE AND PLANNING

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. The project site is currently developed with a two-story bank building and an associated asphalt-paved surface parking lot. The project vicinity in downtown Culver City is highly urbanized and generally built out. The local project vicinity is characterized by a blend of low- to mid-rise hospital (i.e., Southern California Hospital Culver City), medical office, retail, restaurant, office, and residential uses. As such, the project would be an infill project providing uses in keeping with the mixed-use character of the surrounding area. Given the type of uses in the project vicinity, and the infill character of the project, the project would not physically divide an established community.

The project's enhanced streetscape design along Washington Boulevard and Delmas Terrace would promote the movement of people throughout the established downtown Culver City. Because the project would promote and enhance pedestrian, bicycle, and vehicle access and would complement and be consistent with existing land uses in the area, impacts with the respect to the division of an established community would be less than significant.

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

Less Than Significant Impact.

General Plan Land Use Designation

The Culver City general plan designation for the project site's two Washington Boulevard fronting lots is Downtown which allows medium and large-scale commercial uses and shared parking. The Downtown designation is intended to support desirable existing and future commercial uses and mixed-use housing opportunities within the Downtown area, and to encourage a pedestrian-friendly environment with a positive nightlife ambiance. The project is consistent with the Downtown designation as it is proposing a mix of retail, restaurant, and offices uses within a partial 4-story building located in the downtown area of Culver City. The project site's third lot at the rear has a General Plan General Corridor Land Use designation. This designation allows small to medium-scale commercial uses. It is intended to support neighborhood and community serving commercial uses and allows heights up to 56 feet. A portion of the General Corridor designated area will be shifted south a maximum of 32 feet with an accompanying zone change of CD to CG as discussed below. This shift will make the division line between the project's CD and CG zones parallel with the rear property line creating the ability to provide a more uniform building division where height will increase from a maximum allowed 44 feet in the CD Zone to a maximum allowed 56 feet in the CG Zone. Without this minor General Plan Map Amendment the building would be comprised of two irregularly shaped rectangles creating a difficulty in mapping floor plans for each level. This minor map amendment will result in changing one type of commercial designation for another type of commercial designation in the Downtown area which is highly urbanized. As such, the project would have a less than significant impact with respect to the General Plan.

General Plan Map Amendment/Zoning Code Map Amendment

The Culver City zoning code designations for the project site are Commercial Downtown (CD) and Commercial General (CG). The CD zone permits medium and large-scale commercial uses, emphasizing retail, entertainment, restaurant, and cultural uses up to 44 feet in height. The CG zone permits small to medium scale commercial uses, emphasizing community-serving retail, office and service uses up to 56 feet in height. The project is consistent with the CD and CG designations as the project is proposing a mix of retail, restaurant, and office uses. Further, the proposed amendments to both the General Plan and Zoning Code maps for a small portion of the project will ensure that each zone designation is consistent with its land use designation.

The project is proposing a general plan map amendment/zoning code map amendment. The current line dividing the CD and CG zoning designations occurs at an arbitrary angle and location within the site boundaries. The zone change request would shift the current line between the CD and CG zoning designation to allow for useable office space on Level 4. The new line would be parallel to the rear lot line and accommodate the required square feet for a Level 4 office tenant while assuring the lower 44 foot high/3 level frontage on Washington Boulevard thus scaling down the building's Downtown face. The proposed zone change would not impact the building height as viewed from Washington Boulevard as the frontage of the building along Washington Boulevard complies with the height requirements of the CD height requirements.

Roof buildings heights would not exceed the maximum allowed height of 56 feet. Heights would vary at different points and elevations of the building to provide focal relief and appropriate building scale to surrounding development. Roof-mounted mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts, etc.), would be screened from public view from adjoining public streets and rights of- way. The method of screening would be architecturally compatible with other on-site development in terms of colors, materials, and architectural style as determined by the City.⁴⁴

The project seeks to enhance the pedestrian experience. The Ground Level public open space along Washington Boulevard and Delmas Terrace would include a streetscape design that includes an eight to ten-foot wide public sidewalk along Washington Boulevard and an 8-foot wide public sidewalk along Delmas Terrace with street trees, landscape planters, tree grates, and benches, tables for outdoor seating and dining, trash receptacles, and street furniture to activate the pedestrian environment. The project would include balconies, an open air interior office courtyard, and a roof terrace/garden and courtyard for use by office employees.

In addition to the development standards outlined above, every land use and structure as part of the project would comply with applicable requirements of the CCMC, Title 17, Zoning Code, or as amended. This includes parking requirements which are discussed in Section XVI, Transportation and Circulation, below.

Other Approvals

It is noted that the other land use related approvals requested as part of the project include, but are not limited to, the following: Administrative Modification for parking for a ten percent reduction in parking stall width per Table 5-2, Administrative Modifications, of CCMC Section 17.550.010; Administrative Use Permit to allow shared parking and tandem parking; Site Plan Review because the project involves new building construction above 4,999 square feet; demolition permits; grading, excavation, and building permits; and haul route permits. None of these approvals would conflict with an applicable land use plan (i.e., City General Plan), policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. These approvals have been assessed as part of the project throughout this MND evaluation.

Conclusion

Based on the analysis above, the approval of the requested discretionary actions, the project would be consistent with the applicable General Plan and Zoning provisions of Culver City. As demonstrated in this MND analysis, with implementation of the project's design features and prescribed mitigation measures, all identified potentially significant impacts associated with the proposed uses and land use designations would be reduced to a less than significant level. Therefore, with approval of the requested discretionary actions, the project would not result in conflicts with the applicable General Plan or Zoning Code or any other applicable land use plan, policy, or regulation of an agency with jurisdiction over the project such that significant physical impacts on the environment would occur. Thus, impacts would be less than significant.

⁴⁴ Roof-mounted ancillary structures would be allowed up to a maximum of 13.5 feet above the roof height of a building. Structures for the housing of elevators and stairs would be allowed up to a maximum of 13.5 feet above the roof line of the building.

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

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

XI. MINERAL RESOURCES

Would the project:

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

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

The Inglewood Oil Field (Oil Field) is located within Culver City and the unincorporated area of Los Angeles County known as Baldwin Hills. The current active Oil Field boundary is approximately 1,000 acres of which 100 acres are located within Culver City. The Oil Field is located approximately 0.9 miles southeast of the project site. The project site is located in a highly urbanized area of downtown Culver City and is currently developed with a two-story bank building and an associated asphalt-paved surface parking lot. As such, the potential of uncovering mineral resources during project construction is considered low. Therefore, the project would not result in the loss of availability of a known mineral resource delineated on a local general plan, specific plan, or other land use plan as there are no known mineral resources or mineral resource recovery sites on or near the project site. No impact would occur in this regard.

XII. NOISE

The following impact analysis pertaining to noise and vibration impacts is based on information contained in the project's *Noise and Vibration Technical Report* prepared by ESA-PCR in February 2017, which is available for review at the Culver City Planning Division.

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

Less Than Significant Impact With Mitigation Incorporated.

Applicable Noise Regulations

City of Culver City

The City's Noise Standards are developed from those of several Federal and State agencies including the Federal Highway Administration (FHA), the Environmental Protection Agency (EPA), the Department of Housing and Urban Development (HUD), the American National Standards Institute (ANSI), and the State of California Department of Health Services. These standards set limits on the noise exposure level for various land uses. **Table B-11**, *City of Culver City Exterior Noise Standards*, lists exterior noise level standards and the type of occupancy to which they should be applied.

Table B-11

City of Culver City Exterior Noise Standards

Zone	dBA (CNEL)
Residential	65
Commercial	65

Source: City of Culver City Noise Element.

Table B-12, *Noise and Land Use Compatibility Matrix – California*, illustrates the State guidelines established by the State Department of Health Services for acceptable noise levels for counties and cities. These standards and criteria would be incorporated into the land use planning process to reduce future noise and land use incompatibilities. This table is the primary tool that allows the City to ensure integrated planning for compatibility between land uses and outdoor noise. Community Noise Equivalent Level (CNEL) noise levels for specific land uses are classified into four categories: (1) "normally acceptable" (2) "conditionally acceptable" (3) "normally unacceptable" and (4) "clearly unacceptable".⁴⁵ A CNEL value of 70 dBA is considered the dividing line between a "conditionally acceptable" and "normally unacceptable" noise environment for noise sensitive land uses, including residences, transient lodgings, schools, and library.

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

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

- Noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses, such as schools, hospitals, convalescent homes, and libraries.
- Temporary sound barrier installation at construction site if construction noise is impacting nearby noise sensitive land uses.

⁴⁵ CNEL is the time average of all A-weighted sound levels for a 24-hour period with a 10 dBA adjustment (upward) added to the sound levels which occur in the night (10:00 P.M. to 7:00 A.M.) and a 5 dBA adjustment (upward) added to the sound levels which occur in the evening (7:00 P.M. to 10:00 P.M.). These penalties attempt to account for increased human sensitivity to noise during the quieter nighttime periods, particularly where sleep is the most probable activity.

- Noise abatement and acoustical design criteria for construction and operation of any new development.

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

Table B-12

Noise and Land Use Compatibility Matrix – California

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

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

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

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

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

NA: Not Applicable

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

Ground-Borne Vibration Guidelines

The City of Culver City does not address vibration either in their municipal code or in the Noise Element of the General Plan. Instead, Caltrans' Transportation and Construction Vibration Manual (2013) and FTA's Transit

Noise and Vibration Impact Assessment (2006) document provide thresholds of vibration impact for structure and human annoyance. The threshold for vibration impacts are discussed below.

Thresholds of Significance

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

- NOISE-1:** Project construction activities occur between the hours of 8:00 P.M. and 8:00 A.M. Monday through Friday; 7:00 P.M. and 7:00 A.M. Saturdays; 7:00 P.M. and 10:00 A.M. Sundays.
- NOISE-2:** The project operation would cause ambient noise levels to increase by 5 dBA, L_{eq} or more.
- NOISE-3:** Potential Building Damage - Project construction activities cause ground-borne vibration levels to exceed 0.2 in/sec PPV at the nearest residential buildings.
- NOISE-4:** Potential Human Perception - Project construction activities cause ground-borne vibration levels to exceed 0.035 in/sec PPV at the nearest residential buildings.

Existing Conditions

The project site is generally surrounded by a mix of hospital, medical office, retail, restaurant, office, and residential uses. **Figure B-3, Noise Measurement Locations**, presents noise measurement locations utilized in the noise impact analyses below, in addition to identifying surrounding land uses. Existing noise sensitive uses within 500 feet of the project site include:

- The 7-story Southern California Hospital Culver City with associated medical offices/facilities located immediately north of the project site along Delmas Terrace and a 2-story multi-family residential apartment building located immediately east of the project site along Watseka Avenue (identified as R1 on Figure B-3);
- A 2-story multi-family residential apartment building is located approximately 340 feet north of the project site along Watseka Avenue (identified as R2);
- A mixed use building with multi-family residential uses is located approximately 390 feet southwest of the project site along Washington Boulevard (identified as R3);
- A multi-family residential building is located approximately 500 feet south of the project site at the southeast corner of Culver Boulevard and Duquesne Avenue (identified as R4), and
- Multi-family residential uses are located approximately 560 feet southeast of the project site along Lafayette Place (identified as R5).

The results of ambient sound measurements taken to establish the existing environmental setting are summarized in **Table B-13, Summary of Ambient Noise Measurements**. Long-term (24-hr) noise measurements were performed at R1 while short-term (15-min) measurements were performed at R2 through R5. Since project-related construction activities would be limited by the City's noise ordinance as discussed above, short-term noise measurements were performed during daytime hours to coincide with project construction hours. The

measured day-time noise levels range from 58 dBA, L_{eq} at R1 to 73 dBA at the R4 at off-site sensitive receptor locations during daytime. Monitoring demonstrated that the primary source of noise in the immediate area of the project site was traffic on Washington Boulevard and Culver Boulevard.



SOURCE: Google Map, 2015 (Aerial).

9735 Washington Boulevard

Figure B-3
Noise Measurement Locations

Table B-13

Summary of Ambient Noise Measurements

Location	Date and Time Period	Leq dBA	Noise Sources
R1. Hospital north of the project site and multi-family residential uses east of the project site	1/13/17 (5 p.m.) to 1/14/17 (4:59 p.m.)	Average Daytime: 58 Average Nighttime: 55	Traffic on Washington Boulevard and residential and hospital related activities
R2. Multi-family residential uses located north of the project site along Watseka Avenue	1/13/17 2:34 p.m. – 2:49 p.m.	60	Traffic on Watseka Avenue
R3. Multi-family residential uses southwest of the project site along Washington Boulevard	1/13/17 3:31 p.m. – 3:46 p.m.	62	Traffic on Washington Boulevard
R4. Multi-family residential uses south of the project site at the southeast corner of Culver Boulevard and Duquesne Avenue	1/13/17 3:12 p.m. – 3:27 p.m.	73	Traffic on Culver Boulevard and Duquesne Avenue
R5. Multi-family residential uses southeast of the project site along Lafayette Place	1/13/17 2:54 p.m. – 3:09 p.m.	71	Traffic on Lafayette Place

SOURCE: ESA PCR, 2017.

Construction Noise

It is anticipated that construction activities would commence as early as September 2017 with full build-out and occupancy in 2019. The project would comply with the City's allowable construction hours of:

- Monday-Friday: 8:00 AM through 8:00 PM
- Saturdays: 9:00 AM through 7:00 PM
- Sundays: 10:00 AM through 7:00

Any work outside of the above hours would require consultation and approval with pertinent the City departments prior to any works being scheduled. Dirt hauling and construction material deliveries or removal would not be allowed during morning (7:00 AM – 9:00 AM) and afternoon (4:00 PM – 6:00 PM) peak traffic periods. It should be noted that this requirement would have the effect of prolonging overall construction time. The assessments include construction noise impact to the noise sensitive receivers in the vicinity of the project site due to the operation of construction equipment (on-site construction activities) and due to haul truck activities (off-site construction activities).

On-Site Construction Activities

Noise from construction activities would be generated by vehicles and equipment involved during various stages of construction operations: demolition, grading, excavation, foundation construction, and building construction. The noise levels created by construction equipment would vary depending on factors such as, the type of equipment, the specific model, the operation being performed and the condition of the equipment. Construction noise associated with the project was analyzed using a mix of typical construction equipment, estimated durations and construction phasing. **Table B-14, Construction Equipment and Estimated Noise Levels (Leq)**, presents the list of construction equipment and approximate quantities per construction phase with reference noise levels.

These noise levels account for the project contractor(s) construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. The estimated noise levels represent a conservative scenario because construction activities are analyzed as if some of them were occurring along the perimeter of the construction area, whereas construction would typically occur throughout the site, further from noise-sensitive receptors.

The multi-family residential building and the Southern California Hospital Culver City buildings (R1) adjacent to the north are approximately 15 feet from the project site. During the grading and paving, the noise level would be approximately 95 dBA at 15 feet at the multi-family residential building and the hospital building (R1). As it is described in Threshold NOISE-1, project construction would be limited to between 8:00 a.m. and 4:00 p.m. from Monday through Friday and 9:00 a.m. and 4:00 p.m. on Saturdays, which complies with Title 9: General Regulations, Chapter 9.07: Noise Regulations, Section 9.07.035: Construction, of the CCMC.

However, the construction noise level would temporarily increase greater than 5 dBA over ambient condition, as the average daytime noise level at R1 is 58 dBA L_{eq} . Therefore, the construction noise would be considered a potentially significant impact. Incorporation of Mitigation Measures NOISE-1 through NOISE-4 are recommended, which would reduce potentially significant impacts to a less than significant level. Implementation of the prescribed mitigation measures would reduce construction noise levels below the significance threshold.

Off-Site Construction Activities

During construction, two potential haul routes could be utilized to remove exported soil and debris materials from the project site during construction activities. If accessing the site from the I-405 Freeway, trucks would utilize the Venice Boulevard Exit, to S. Sepulveda Boulevard, to Venice Boulevard, to Wateska Avenue, and to Washington Boulevard to access the site. Trucks leaving the site would travel along Delmas Terras, to Venice Boulevard, to S. Sepulveda Boulevard to the I-405 Freeway. If accessing the site from the I-10 Freeway, trucks would exit at Robertson Boulevard, to Venice Boulevard, to Culver Boulevard, and to Washington Boulevard to access the site. Trucks leaving the site would take Delmas Terras, to Venice Boulevard, and to Robertson Boulevard to I-10 westbound. If trucks were to go eastbound on I-10, trucks along Venice Boulevard would proceed to National Boulevard to I-10 eastbound.

Table B-14

Construction Equipment and Estimated Noise Levels (L_{eq})

Construction Equipment	Noise Level at 50 ft (dBA)	Usage Factor (%)	Hourly Quantity	Estimated Hourly Noise Levels at 50 ft (dBA)
Demolition				81
Concrete Industrial Saw	85	20	1	
Rubber Tired Dozer	82	40	1	
Tractor/Loader/Backhoe	80	25	2	
Site Prep				78
Excavator	81	40	1	
Tractor/Loader/Backhoe	80	25	3	
Grading/Excavation				86
Air Compressor	78	50	1	
Tractor/Loader/Backhoe	80	25	3	
Drill Rig Truck	79	20	1	
Excavator	81	40	1	
Generator Sets	81	50	1	
Sweepers	82	10	1	
Boom Pump Trucks	81	20	1	
Welders	74	40	1	
Drainage/Utilities/Sub				77
Excavator	81	40	1	
Tractor/Loader/Backhoe	80	25	2	
Building Construction				86
Air Compressors	78	50	1	
Tractor/Loader/Backhoe	80	25	1	
Cement and Mortar Mixer	79	40	1	
Concrete Saw	90	20	1	
Cranes	81	40	1	
Dump/Haul Truck	76	20	1	
Forklift	75	10	1	
Generator Set	81	50	1	
Pumps	81	50	1	
Rough Terrain Forklift	78	10	1	
Scissor Lift	75	20	1	
Architectural Coating				78
Scissor Lift	75	20	2	
Zoom Boom	76	20	2	

Note: Noise Levels at 50 ft and Usage Factor are derived from Federal Highways Administration's Roadway Construction Noise Model User's Guide.

Source: ESA PCR, 2017.

According to the Traffic Impact Report⁴⁶ and traffic noise calculations by ESA PCR, the average daily traffic volumes for the roadways designated for the haul truck routes are greater than 2,000 vehicles. The addition of 40 haul trucks per day along these routes would result in a negligible noise level increase and would not increase noise levels by 5 dBA over the ambient condition. Therefore, noise impacts from off-site construction traffic would be less than significant and no mitigation measures are required.

Operational Noise

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

Offsite Project Traffic

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

Table B-15 shows the change in traffic volumes resulting from project implementation. As shown in the table, the off-site roadway traffic volumes associated with the project would result in a maximum increase in CNEL of 0.1 dBA along the segments of Hughes Avenue, Culver Boulevard, and Venice Boulevard. The largest cumulative (project plus ambient growth plus other known related projects in the vicinity of the project site) roadway noise impact would be 1.4 dBA CNEL, which is predicted to occur also along Culver Boulevard, between north of Canfield Avenue. Since noise level increases would not exceed the 5 dBA CNEL Threshold NOISE-2, impacts would be less than significant and no mitigation measures are necessary.

Fixed Mechanical Equipment

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

Open Space, Landscaping and Amenities

The Ground Level public open space along Washington Boulevard and Delmas Terrace would include a streetscape design that includes an eight to ten-foot wide public sidewalk along Washington Boulevard and an 8-foot wide public sidewalk along Delmas Terrace with street trees, landscape planters, tree grates, and benches, tables for outdoor seating and dining, trash receptacles, and street furniture to activate the pedestrian environment. The project would include balconies, an open air interior office courtyard, and a roof terrace/garden and courtyard for use by office employees. Level 2 would include an open air interior office courtyard. Level 4 would include a roof terrace/garden and courtyard, which would be composed of separate landscaped

⁴⁶ Crain & Associates, Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, December 22, 2016.

congregation areas for leisure and entertainment activities with bench seating and an outdoor kitchen equipped with a barbeque area and covered patio with a shaded dining area with additional seating.

Table B-15
Off-Site Traffic Noise Impacts

Roadway Segment	Calculated Traffic Noise Levels at The Right of Roadway				
	CNEL (dBA)			Project Increment	Cumulative Increment
	Existing (2016)	Future (2020) No Project	Future (2020) with Project		
Washington Boulevard					
West of Hughes Avenue	67.8	68.5	68.5	0.0	0.7
Between Hughes Avenue and Watseka Avenue	67.6	67.9	67.9	0.0	0.3
Between Watseka Avenue and Culver Boulevard	71.3	72.1	72.1	0.0	0.8
Hughes Avenue					
North of Venice Boulevard	64.9	65.6	65.6	0.0	0.7
Between Venice Boulevard and Washington Boulevard	66.9	67.6	67.7	0.1	0.8
Culver Boulevard					
South of Washington Boulevard	68.9	69.4	69.5	0.1	0.6
Between Washington Boulevard and Irving Place	72.5	73.2	73.3	0.1	0.8
Between Irving Place and Cardiff Avenue	72.1	72.8	72.9	0.1	0.8
Between Cardiff Avenue and Main Street	71.3	72.1	72.1	0.0	0.8
Between Main Street and Canfield Avenue	71.5	72.2	72.3	0.1	0.8
Between north of Canfield Avenue	68.2	69.6	69.6	0.0	1.4
Canfield Avenue					
West of Culver Boulevard	58.3	58.5	58.5	0.0	0.2
Venice Boulevard					
West of Hughes Avenue	63.0	63.7	63.8	0.1	0.8
Watseka Avenue					
West of Washington Boulevard	58.9	59.1	59.1	0.0	0.2
Main Street					
West of Culver Boulevard	65.4	65.6	65.6	0.0	0.2

Source: ESA PCR, 2017.

As shown in Table B-15, the estimated noise levels on southern façade (along Washington Boulevard) would be 67.6 dBA CNEL. As shown in Table B-12, the noise level up to 70 dBA CNEL is considered “Normally Acceptable” for commercial retail uses. As such, impacts would be less than significant. No mitigation measures are required.

Parking Facility

The project would include 214 vehicular parking spaces distributed within the Ground Level and three levels of a subterranean parking structure. Vehicular parking on the Ground Level would be provided via 5 surface spaces and 5 two-level automobile stackers/parking lifts providing ten spaces (i.e., each automobile stacker/parking lift provides two vertically stacked parking spaces) for a total of 15 vehicular parking spaces. Parking on the Ground Level would be exclusively for retail and restaurant uses.

Sources of noise associated with parking facilities typically include engines accelerating, doors slamming, car alarms, and people talking. Noise levels at these facilities would fluctuate throughout the day with the amount of vehicle and human activity. Noise levels would generally be the highest in the early morning and evening hours when the largest number of people would enter and exit the parking facility.

For the purpose of providing a conservative, quantitative estimate of the noise levels that would be generated from vehicles entering and exiting the project’s parking structure, the methodology recommended by FTA for the general assessment of stationary transit noise sources is used. Using the methodology, the project’s peak hourly noise level that would be generated by the onsite parking levels was estimated using the following FTA equation for a parking lot:

$$L_{eq}(h) = SEL_{ref} + 10\log(NA/1000) - 35.6, \text{ where}$$

$L_{eq}(h)$ = hourly L_{eq} noise level at 50 feet

SEL_{ref} = reference noise level for stationary noise source represented in sound exposure level (SEL) at 50 feet

N_A = number of automobiles per hour

Based on the project’s traffic study, the project is forecasted to generate 1,730 total daily vehicle trips (with an anticipated 125 trips and 186 trips during the AM and PM peak hours, respectively).⁴⁷ Using the FTA’s reference noise level of 92 dBA SEL⁴⁸ at 50 feet from the noise source for a parking lot, it was determined that the project’s highest peak hour vehicle trips, which would be 186 trips during the PM peak hour, would generate noise levels of approximately 49 dBA, L_{eq} at 50 feet from the project’s parking entrance. The adjacent hospital uses, R1 is approximately 40 feet from the access driveway to the subterranean parking structure. Based on this distance, the vehicle related noise levels would be approximately 51 dBA, L_{eq} at the hospital uses, R1, which would not exceed the average nighttime ambient noise level of 55 dBA on Table B-13. During other hours of the day when

⁴⁷ *Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.*

⁴⁸ *FTA, Transit Noise and Vibration Impact Assessment. May 2006.*

less overall vehicles arrive and depart from the project site, the noise levels at the nearest offsite sensitive land uses would be even lower. Thus, this impact would be less than significant.

Loading and Refuse Collection Areas

Loading for large deliveries for retail, restaurant, and office uses would occur in designated temporary loading area adjacent to the enclosed trash and recycling room located on site on the Ground Level. This loading area would be accessed via the entrance/exit driveway on the Ground Level along Delmas Terrace. The trash and recycling room designated for use by all tenants would be located on the Ground Level adjacent the loading area. All trash would be collected by on-site maintenance and collectively disposed or recycled. Trash trucks would utilize the temporary loading area near the trash and recycling room for turnaround which would be marked restricted from use during the scheduled time of waste pick-up.

Loading dock and refuse collection related activities such as truck movements/idling and loading/unloading operations would generate noise levels that have a potential to adversely impact adjacent land uses during long-term project operations. However, because views of the ground parking level would be visually screened (enclosed) by the project building and enclosed within Ground Level parking structure, blocking the line of sight between the noise source and sensitive receptors, loading and refuse collection-related noise would not increase the ambient noise levels at off-site sensitive receptor locations. As such, impacts would be less than significant.

Noise/Land Use Compatibility Impacts

The project is proposing a mix of retail, restaurant, and office uses within a partial 4-story building (up to 56 feet tall). The estimated noise levels along Washington Boulevard would be approximately 68 dBA CNEL as shown in Table B-15. As it is described in Table B-12, the exterior noise limit for commercial uses would be up to 70 dBA CNEL. As it is described in Table B-12, the noise level within 70 dBA, CNEL is considered “Normally Acceptable”. The proposed commercial land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements. Therefore, impacts would be less than significant.

Mitigation Measures

- NOISE-1** Noise-generating equipment operated at the project site shall be equipped with the most effective noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.
- NOISE-2** The project applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison’s telephone number(s) shall be prominently displayed at the project site. Signs shall also be posted at the project site that includes permitted construction days and hours.
- NOISE-3** Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.

NOISE-4 Temporary noise barriers that provide a minimum of 20 dB noise reduction shall be used to block the line-of-site between construction equipment and noise-sensitive receptors (residences and hospital uses, R1) during project construction. Noise barriers shall be a minimum of 20-feet tall along the north boundary adjacent to residential and hospital uses.

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

Less Than Significant Impact With Mitigation Incorporated.

Regulatory Framework

The City does not address vibration either in their municipal code or in the Noise Element of the General Plan. Instead, Caltrans' Transportation and Construction Vibration Manual (2013) and FTA's Transit Noise and Vibration Impact Assessment (2006) document provide vibration impact criteria for structure damage and human annoyance.

Table B-16, Caltrans Vibration Annoyance Potential Criteria, and Table B-17, Groundborne Vibration Impact Criteria for Structure Damage, include the vibration impact criteria for human annoyance and for structure damage.

Table B-16

Caltrans Vibration Annoyance Potential Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.1
Severe	2.0	0.4

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans, *Transportation and Construction Vibration Guidance Manual*. September, 2013.

Construction Vibration

Vibration impacts due to the construction activities could occur when a large machine would be operated near the fragile structures or vibration sensitive uses within a building. The FTA document includes vibration source levels for typical construction equipment. It should be noted that there would be no pile driving or blasting during the construction. **Table B-18, Vibration Source Levels for Construction Equipment,** presents typical construction equipment with vibration source levels.

Table B-17

Groundborne Vibration Impact Criteria for Structure Damage

Building Class	Continuous Source PPV (in/sec)
Class I: buildings in steel or reinforced concrete, such as factories, retaining wall, bridges, steel towers, open channels, underground chambers, and tunnels with and without concrete alignment.	0.5
Class II: buildings with foundation walls and floors in concrete, walls in concrete or masonry, stone masonry retaining walls, underground chambers and tunnels with masonry alignments, conduits in loose material	0.3
Class III: buildings as mentioned above but with wooden ceilings and walls in masonry	0.2
Class IV: construction very sensitive to vibration; objects of historic interest	0.12

Source: Transit Noise and Vibration Impact Assessment, FTA, 2006.

Table B-18

Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011
Caisson Drilling	0.089	0.031	0.024	0.017	0.011
Loaded Trucks	0.076	0.027	0.020	0.015	0.010
Jackhammer	0.035	0.012	0.009	0.007	0.004
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004

Source: FTA, 2006. Transit Noise and Vibration Impact Assessment. May.

Structure Damage

Structures in the vicinity of the project site would be classified as Class III buildings as shown in Table B-17. In order to exceed 0.2 in/sec PPV threshold for Class III buildings, a large bulldozer needs to be at 15 feet or closer to a receiver structure. Because the adjacent residential building and hospital buildings to the north are at the property line, construction equipment would potentially be within 15 feet of a structure. When a large bulldozer is within 15 feet of a structure, a structural damage impact could occur and is considered a potentially significant impact. Therefore, mitigation measures would be required. Implementation of Mitigation Measure NOISE-5 would ensure potentially significant impacts are reduced to a less than significant level.

Human Annoyance

Construction vibration could annoy people within a nearby building. The vibration impact threshold for human annoyance at a residential would be 0.035 in/sec PPV. The residential structures that could be affected by construction activity would be the multi-family residential building and hospital buildings to the north, which is approximately 15 feet from the project site. A large bulldozer at 15 feet would generate 0.19 in/sec PPV. Therefore, the impact of human annoyance would be potentially significant and Mitigation Measure NOISE-5 would be required. Implementation of Mitigation Measure NOISE-5 would ensure potentially significant impacts are reduced to a less than significant level.

Operation Vibration

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

Mitigation Measures

NOISE-5 Contractors would phase in construction activity, use low-impact construction technologies, and avoid the use of heavy vibrating equipment where possible to avoid construction vibration impacts. Especially, contractors shall use smaller and lower impact construction technologies to avoid human annoyance to the adjacent buildings. Contractors shall avoid the use of driving piles and drill piles instead where necessary to avoid structural damage. The construction contractor shall be responsible for implementing this measure during the construction phase.

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

Less Than Significant Impact. The existing noise environment in the project area is dominated by traffic noise from nearby roadways, as well as nearby hospital, medical office, retail, restaurant, office, and residential activities. Long-term operation of the project would not have a significant effect on the community noise environment in proximity to the project Site. Noise sources that would have potential noise impacts include: off-site vehicle traffic, mechanical (i.e., air-conditioning) equipment, loading and refuse collection areas, and parking areas. Motor vehicle travel on local roadways attributable to the project, as discussed in Response XII (a), would have a less than significant impact on community noise levels. Noise levels associated with on-site operations (e.g., parking and mechanical equipment) are also considered less than significant as discussed in Response XII (a). As such, noise impacts would be less than significant.

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

Less Than Significant with Mitigation Incorporated. The project would result in a temporary increase in ambient noise near the project site during the construction period. Construction noise impacts are discussed in Response XII (a). Noise generated by on-site construction activities would have a less than significant impact on surrounding uses with incorporation of the prescribed mitigation measures (Mitigation Measures NOISE-1 through NOISE-5). Mitigation Measures NOISE-1 through NOISE-3 would reduce the construction noise levels approximately 5 dBA and Mitigation Measure NOISE-4 would reduce the construction noise levels approximately 20 dBA at the residential building and hospital buildings, R1, north of the project site. In addition, Mitigation

Measure NOISE-5 would reduce construction noise levels approximately 5 dBA at the residential building and hospital buildings, R1. Therefore, construction noise levels would be reduced to below the significance threshold at the receptor location R1. As such, construction noise impacts would be less than significant with implementation of Mitigation Measures NOISE-1 through NOISE-5

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

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

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

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

XIII. POPULATION AND HOUSING

Would the project:

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

Less Than Significant Impact. The project would not generate a new direct residential population as no residential uses are proposed. The project would provide a total of approximately 9,187 SF of retail uses, approximately 7,209 SF of restaurant uses, and 60,065 SF of office uses that could indirectly increase the population by approximately 122 persons.⁴⁹ The estimated 122 indirect persons increase in the City's population would represent a 0.31 percent increase to the existing population (39,717 persons) in Culver City.⁵⁰

The project would attract new businesses to the area with the proposed retail, restaurant, and office uses. Depending on the specific type of businesses that do locate within the individual spaces, the level of employment

⁴⁹ $9,187 \text{ SF of retail uses} + 7,209 \text{ SF of restaurant uses} = 16,396 \text{ SF of retail/restaurant}$ $\times 0.00271 \text{ employees per average square foot (per the Neighborhood Shopping Centers factor of the Los Angeles Unified School District 2014 Developer Fee Justification Study, Table 12, dated March 2014)} = 44 \text{ employees}$. $44 \text{ employees} \times .25 \times 2.36 = 26 \text{ indirect residents}$. Indirect residents are one-quarter of the employees multiplied by 2.36 persons per household. The average household size of 2.36 persons/household for Culver City, U.S. Census Bureau, 2010 Census, <http://quickfacts.census.gov/qfd/states/06/0617568.html>, accessed September 2016.

$60,065 \text{ SF of office} \times 0.00269 \text{ employees per average square foot (per the Corporate Offices factor per Table 12 mentioned above)} = 162 \text{ employees}$. $162 \text{ employees} \times .25 \times 2.36 = 96 \text{ indirect residents}$.

$26 + 96 = 122 \text{ total indirect residents}$.

⁵⁰ U.S. Census Bureau, 2010 Census, <http://quickfacts.census.gov/qfd/states/06/0617568.html>, accessed October 2016.

may vary. The project is estimated to introduce up to approximately 206 employees.⁵¹ According to SCAG, the forecast of employment growth predicted between 2008 and 2035 for Culver City is 5,000 jobs.⁵² Project employment is within the employment growth assumptions of Culver City. Furthermore, the project would be located in an area already served by existing infrastructure and anticipated within applicable Culver City infrastructure plans (i.e., roadways, utility lines, etc.). As such, the project would not induce substantial population growth in the area either directly or indirectly and impacts would be less than significant.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact (b-c). Existing uses on the project site include a two-story bank building and an associated asphalt-paved surface parking lot, all of which would be demolished and removed to support development of the project. As such, project implementation would not displace existing housing or people. Therefore, no impact would occur to existing housing or local populations such that construction of replacement housing would be necessary.

XIV. PUBLIC SERVICES

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

a. Fire protection?

Less Than Significant Impact With Mitigation Incorporated. Fire protection and emergency medical services for the project site are provided by the Culver City Fire Department (CCFD). In addition, it is acknowledged that the CCFD has a mutual aid agreement with the City of Los Angeles Fire Department (LAFD) to provide fire and emergency medical services on an as needed basis. The CCFD provides fire protection to an existing population of approximately 39,717 persons.⁵³ The City is divided into three fire districts, two rescue/emergency medical services (EMS) districts, and 15 fire management zones. The fire districts and EMS districts are evenly distributed by population served and centerline miles (i.e., total length of all the roads in the City, excluding the size and number of lanes on each road). The fire management zones are defined by occupancies within a given geographical area that share common risk. The project site is located within Fire District 1, Rescue/EMS District 1, and Fire Management Zone 5. Fire District 1 has a service population of 14,030 persons, 39.59 centerline

⁵¹ $9,187 \text{ SF of retail uses} + 7,209 \text{ SF of restaurants uses} = 16,396 \text{ SF of retail/restaurant} \times 0.00271 \text{ employees per average square foot (per the Neighborhood Shopping Centers factor in Table 12 mentioned above)} = 44 \text{ employees.}$

$60,065 \text{ SF square feet of office} \times 0.00269 \text{ employees per average square foot (per the Corporate Offices factor per Table 12 mentioned above)} = 162 \text{ employees.}$

$44 + 162 = 206 \text{ total employees.}$

⁵² 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, Table 18, Proposed 2012-2035 RTP/SCS Growth Forecast, page 36, prepared by Southern California Association of Governments, adopted April 2012, http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf, accessed October 2016.

⁵³ U.S. Census Bureau, 2015 population estimate based on 2010 Census data, <http://quickfacts.census.gov/qfd/states/06/0617568.html>, accessed October 2016.

miles, and a service area of approximately two square miles. Rescue/EMS District 1 has a service population of 20,268 persons, 55.93 centerline miles, and a service area of approximately 2.66 square miles. Fire Management Zone 5 is a general corridor, consisting of 0.24 square miles, located in Downtown Culver City. Zone 5 possesses 33 large businesses, along with some residential properties. The zone holds special risks that include two movie studios which include a total of 31 stages, a hospital, and two high-rise buildings.⁵⁴

The CCFD provides a broad range of emergency response and specialized services including: fire suppression response; emergency medical services; technical rescue; hazardous materials response; fire prevention; building plan check services; permit approvals; business inspections; fire investigation services; life safety inspections; emergency preparedness; and public education services. The CCFD includes six divisions: Office of the Fire Chief; Fire Suppression; Emergency Medical Services; Fire Prevention; Emergency Preparedness; and Telecommunications.⁵⁵ The CCFD consists of 72 members including 61 sworn personnel and 11 civilian personnel, three fire stations, a telecommunications facility/radio shop, a training drill facility, and City Hall, which includes the fire administration office and fire prevention bureau. The CCFD utilizes a three-shift schedule, staffing each shift for a 24-hour period, seven days a week, and 365 days a year. A minimum on-duty staffing level of 18 personnel has been established for continuous delivery of emergency services. During business hours, sworn administrative personnel are available to augment the on-duty shift and recall procedures are in place to facilitate additional staffing when required. There are four primary response unit types that the CCFD employs during emergencies: engine companies, truck companies, paramedic rescues, and battalion chief command vehicles. **Table B-19, CCFD Daily Minimum Staffing Levels**, provides information on the quantity of apparatus, personnel per apparatus, and total personnel. **Table B-20, CCFD Fire Stations Located in the Vicinity of the Project Site**, provides information on the location, type of equipment/staffing, and the approximate distance/direction from the project site. According to the CCFD, there are no planned changes to fire protection facilities. However, the CCFD is exploring the idea of implementation a quick response vehicle. This vehicle would be staffed with two personnel Monday thru Friday, 7AM to 7PM, and would be continuously mobile, roaming into areas that are not covered by other CCFD units. This unit would have some firefighting capability with full paramedic capability. The apparatus would be a type 6 engine, similar to a pick-up truck.⁵⁶

⁵⁴ Chief Dave White, Culver City Fire Department, written correspondence, dated August 9, 2016. Written correspondence is regarding CCFD existing conditions. Community Risk Assessment & Standards of Cover, Culver City Fire Department, Chris Sellers, Fire Chief, 2014.

⁵⁵ Annual Compliance Report 8th Edition, Culver City Fire Department, prepared by Cara Flores, Management Analyst for the Commission on Fire Accreditation International, Inc., dated June 28, 2016.

⁵⁶ Chief Dave White, Culver City Fire Department, written correspondence, dated August 9, 2016. Written correspondence is regarding CCFD existing conditions.

Table B-19

CCFD Daily Minimum Staffing Levels

Type	Number of Apparatus	Number of Staff Per Apparatus	Total Staff
Engine Company	3	3	9
Truck Company	1	4	4
Paramedic Rescue	2	2	4
Battalion Chief Command	1	1	1
			Total: 18

Source: Chief Dave White, Culver City Fire Department, written correspondence, dated August 9, 2016. Written correspondence is regarding CCFD existing conditions.

Table B-20

CCFD Fire Stations Located in the Vicinity of the Project Site

Fire Station	Address	Apparatus Equipment/Staffing	Approximate Distance/Direction from project site^a
Fire Station 1 (headquarters)	9600 Culver Boulevard	Engine One (3 personnel), Rescue One (2 personnel), Battalion Chief Command Vehicle (1 personnel), Reserve Engine Four, Reserve Engine Five, Reserve Truck One, Reserve Battalion Two	0.05 miles (approximately 290 feet) east
Fire Station 2	11252 Washington Boulevard	Engine Two (3 personnel), Truck Two (4 personnel)	1.54 miles southwest
Fire Station 3	6030 Bristol Parkway	Engine Three (3 personnel), Rescue Three (2 personnel), Reserve Engine Six, Reserve Rescue Two	2.55 miles southeast

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

Source: Chief Dave White, Culver City Fire Department, written correspondence, dated August 9, 2016. Written correspondence is regarding CCFD existing conditions. Culver City Website, About the Department, Department Stations and Facilities, <https://www.culvercity.org/Government/PublicSafety/Fire/AbouttheDepartment/Locations.aspx>, accessed September 2016.

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

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

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

Operational activities associated with the project would increase the demand for fire protection and emergency medical services. As discussed under Response XIII.a, the project could result in a total population increase of 122 indirect persons. The estimated 122 indirect persons increase in the City's population would represent a 0.31 percent increase to the existing population (39,717 persons) in Culver City.

As mentioned above, up to three CCFD fire stations would provide fire protection and emergency medical services to the project area. According to the CCFD, Fire Station 1 would provide primary fire protection services to the project site. Both Fire Station 2 and Fire Station 3 would provide back-up fire protection services when Fire Station 1 is unavailable (i.e., responding to a separate fire incident) or when the type of service call requires more resources.⁵⁷ For 90 percent of all moderate risk structure fires, the CCFD desired response time for the arrival of the first due-unit, staffed with three firefighters, is 8 minutes and 38 seconds. The first-due unit shall be staffed with a minimum of three firefighters, capable of establishing command, evaluating the need for additional specialized resources, and advancing the first line for fire attack. For 90 percent of all moderate risk structure fires, the CCFD desired response time for the arrival of effective response force (ERF) (i.e., total number of personnel necessary to address the emergency situation), staffed with 18 firefighters and officers, is 12 minutes and 20 seconds. The ERF shall be capable of providing 4,500 gallon per minute (gpm) pumping capability and be able to accomplish the necessary tasks to contain a moderate risk fire.⁵⁸ **Table B-21, First-Due Unit Fire Incident Counts and Response Times**, provides call processing times, turnout times, travel times, and total

⁵⁷ Chief Dave White, Culver City Fire Department, written correspondence, dated August 9, 2016. Written correspondence is regarding CCFD existing conditions.

⁵⁸ *Ibid.*

response times for Fire Management Zone 5 and Citywide. Call processing time is the time interval between answering the 911 call at the dispatch center and the time the dispatcher activates station and/or company altering devices. Turnout time is the time interval between the activation of station and/or company altering devices and the time when the responding crew is aboard the apparatus and responding to the incident. Travel time is the time interval that begins when units are en-route to the emergency and arrival at the scene. Total response time is comprised of call processing time, turnout time, and travel time. Due to the close proximity of multiple fire stations, including the nearest station at 0.05 miles (or 290 feet) from the site, service calls are anticipated to be responded to within the fire department's desired response times. Emergency vehicles and fire access for the project site would be provided at grade access from Delmas Terrace. The project would be designed, constructed and maintained in accordance with CCFD's development and construction requirements to minimize the risks associated with fires. Based on the considerations above, the increase in both direct and indirect population from the project would not be substantial enough to significantly impact fire and emergency services on a daily or annual basis.

Table B-21

First-Due Unit Fire Incident Counts and Response Times

	Fire Management Zone 5 (2015)¹	Culver City (2015-2016)
All Emergencies – 90th Percentile		
<i>Incident Count</i>	450	5,155
Call Processing Time	2:12	2:13
Turnout Time	2:19	2:18
Travel Time	3:13	5:20
Total Response Time	6:31	8:41
All Emergencies – 50th Percentile		
Call Processing Time	1:03	1:07
Turnout Time	1:21	1:20
Travel Time	1:46	2:49
Total Response Time	4:35	5:42
Structural Fire – 90th Percentile		
<i>Incident Count 1st Unit</i>	7	67
<i>Incident Count ERF</i>	2	12
Alarm Handling (pick up to dispatch)	1:51	2:11
Turnout Time (1st Unit)	1:56	1:56
Travel Time (1st Unit)	2:35	3:24
Travel Time (ERF)	8:32	7:59
Total Response Time (1st Unit)	6:22	6:34
Total Response Time (ERF)	11:14	10:48
EMS – 90th Percentile		
<i>Incident Count</i>	286	4,290
Alarm Handling (pick up to dispatch)	1:52	2:08
Turnout Time (1st Unit)	2:18	2:15
Travel Time (1st Unit)	2:51	5:11
Travel Time (EFR)	6:17	7:20
Total Response Time (1st Unit)	6:03	8:27
Total Response Time (ERF)	8:43	10:33

Table B-21

First-Due Unit Fire Incident Counts and Response Times

	Fire Management Zone 5 (2015)¹	Culver City (2015-2016)
Technical Rescue – 90th Percentile		
<i>Incident Count 1st Unit</i>	13	75
<i>Incident Count ERF</i>	0	1
Alarm Handling (pick up to dispatch)	2:18	2:25
Turnout Time (1st Unit)	2:07	1:52
Travel Time (1st Unit)	4:14	4:50
Travel Time (Effective Response Force)	N/A	3:48
Total Response Time (1st Unit)	7:06	4:00
Total Response Time (ERF)	N/A	5:57
Hazardous Materials – 90th Percentile		
<i>Incident Count 1st Unit</i>	4	90
<i>Incident Count ERF</i>	1	6
Alarm Handling (pick up to dispatch)	1:57	2:40
Turnout Time (1st Unit)	2:17	2:23
Travel Time (1st Unit)	3:47	5:25
Travel Time (ERF)	6:53	7:57
Total Response Time (1st Unit)	7:51	9:10
Total Response Time (ERF)	11:26	11:39

Notes: Most recent information available.

Source: Cara Flores, Management Analysis, Culver City Fire Department, email correspondence dated January 31, 2017. Chief Dave White, Culver City Fire Department, email correspondence, dated August 10, 2016. Email correspondence is regarding CCFD existing conditions.

Further, according to the CCFD, no new fire protection facilities would be necessary as a result of project implementation.⁵⁹

The project site is not located in an area of moderate or very high fire hazard.^{60,61} The nearest very high fire hazard severity zone (VHFHSZ) is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately 0.85 miles southeast of the project site. In addition, the project site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required.

The project would be subject to compliance with fire protection design standards, as necessary, per the CBC, CFD, the CCMC, and the CCFD, to ensure adequate fire protection. Culver City's standard conditions of approval generally require that plans for building construction, fire flow requirements, fire protection devices (e.g.,

⁵⁹ Chief Dave White, Culver City Fire Department, telephone correspondence, January 25, 2017.

⁶⁰ Zimas Website, <http://zimas.lacity.org/>, accessed September 2016 and Culver City Fire Department Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012.

⁶¹ The Culver City Very High Fire Hazard Severity Zones in LRA as recommended by CAL FIRE, prepared by CAL FIRE, dated September 2011.

sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the CCFD. Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards. The ability of the water service provider to provide water supply to the project site is discussed in Section XVII, *Utilities and Service Systems*. As discussed therein, adequate water supply would be available to serve the project site, including minimum fire flow requirements.

Overall, given the moderate rate of population growth in Culver City, the project's conformance to expected growth scenarios for the City, the existing number of Fire staff, and the project's planned onsite fire protection design features consistent with the applicable regulatory requirements of the CBC, CFD, the CCMC, and the CCFD, the project is not expected to be beyond the scope of available fire services. Accordingly, the CCFD's response times would not be substantially changed such that response time objectives are compromised in any significant manner. Further, according to the CCFD, project implementation would not require the physical expansion of an existing fire station or a new fire station or require additional staffing to the fire protection facilities servicing the project site.⁶² Thus, impacts regarding fire services would be less than significant.

Mitigation Measures

PS-1: Construction Traffic Management Plan – A Final Construction Traffic Management Plan shall be developed by the project contractor in consultation with the project's traffic and/or civil engineer and approved by Culver City's Building Official, Engineer and/or Planning Manager, as applicable, prior to issuance of any project demolition, grading or excavation permit. The Final Construction Traffic Management Plan shall also be reviewed and approved by Culver City's Fire and Police Department. The Culver City's Building Official, Engineer and/or Planning Manager, as applicable reserve the right to reject any engineer at any time and to require that the Plan be prepared by a different engineer.

Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector ("Inspectors") of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other surrounding developments that would potentially be under construction at around the same time as the project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another

The Final Construction Traffic Management Plan shall include, at a minimum, the following:

- The name and telephone number of a contact person who can be reached 24 hours a day regarding construction traffic complaints or emergency situations.
- An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any

⁶² Chief Dave White, Culver City Fire Department, telephone correspondence, January 25, 2017.

alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties.

- Procedures for the training and certification of the flag persons.
- The location, times, and estimated duration of any roadway closures, traffic detours, use of protective devices, warning signs, and staging or queuing areas.
- The location and travel routes of off-site staging and parking locations.
- The location of temporary power, portable toilet and trash and materials storage locations.
- The timing and duration of all street and/or lane closures and shall be made available to the City in digital format for posting on the City's website and distribution via email alerts on the City's "Gov Delivery" system. The Plans shall be updated weekly during the duration of project construction, as determined necessary by the City.
- Prior to approval of the Plan(s), the project applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community:
 - 1) Construction schedule and hours.
 - 2) Framework for construction phases.
 - 3) Identify traffic diversion plan by phase and activity.
 - 4) Potential location of construction parking and office trailers.
 - 5) Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity).
 - 6) Emergency access plan.
 - 7) Demolition plan.
 - 8) Staging plan for the concrete pours, material loading and removal.
 - 9) Crane location(s).
 - 10) Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).

b. Police protection?

Less Than Significant Impact With Mitigation Incorporated. Police protection for the project site is provided by the Culver City Police Department (CCPD). In addition, it is acknowledged that the CCPD has mutual aid agreements with the Beverly Hills Police Department, Santa Monica Police Department, and Los Angeles County Sheriff's Department on an as needed basis. The CCPD serves a nighttime population of approximately 40,000 persons and a daytime population of approximately 200,000 persons. The CCPD consists of 109 sworn officers, 21 reserve officers and 56 professional staff. In anticipation of the proposed projects, as well as the recently constructed projects, located within the Washington/National TOD and Helms Bakery District area, the City has authorized the CCPD to hire an additional four officers. The nearest CCPD station is located at 4040 Duquesne Avenue, approximately 0.12 miles southeast of the project site. The CCPD is currently divided into four patrol districts. Due to the recent and anticipated growth in the area, the City has further authorized the CCPD to establish a fifth patrol district to ensure the CCPD would meet the Department's goals by maintaining an average

emergency response time of three minutes or less for emergency calls and a 20 minute response time for non-emergency calls.⁶³ The project site is located within Patrol District 1.⁶⁴

During construction, equipment and building materials could be temporarily stored on-site, which could result in theft, graffiti, and vandalism. However, the project site is located in an area with high vehicular activity from Washington Boulevard and Delmas Terrace. In addition, the construction site would be fenced along the perimeter, with the height and fence materials subject to review approval by Culver City's Engineer and Planning Manager, as required by Culver City's standard conditions of approval. As discussed above, temporary lane closures may be required for right-of-way frontage improvements and utility construction. However, these closures would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the project site would be maintained. Emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Further, as discussed above, a Final Construction Traffic Management Plan for the project would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the project site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours (Mitigation Measure PS-1). Given the visibility of the project site from adjacent roadways and surrounding properties, existing police presence in Culver City, maintained emergency access, and construction fencing, the project is not expected to increase demand on existing police services to a meaningful extent. Therefore, with the incorporation of the project's Construction Traffic Management Plan (Mitigation Measure PS-1), the project would have a less than significant temporary impact on police protection during the construction phases.

Operational activities associated with the project would increase demand for police protection services. As discussed above, the estimated 122 indirect person increase in the City's population would represent 0.31 percent increase to the existing population in Culver City. Implementation of the project could also indirectly increase the need for police protection by permitting up to 9,187 square feet of retail uses, 7,209 square feet of restaurant uses, and 60,065 square feet of office uses which would increase the daytime population in the project area given the new employees and patrons. As discussed in Attachment A of this MND, site security would include provisions of 24-hour video surveillance and a full-time security guard. Duties of the security personnel would include, but would not be limited to, assisting office employees and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property. The site security would regularly interface and collaborate with the CCPD, as necessary. Site security features would include building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. The project design would include lighting of entry-ways and public areas for site security purposes. The buildings would include controlled access to office uses in order to ensure the safety of office employees.

To ensure that police protection considerations are incorporated into the project design, prior to the issuance of a building permit for the project, the CCPD would be provided the opportunity to review and comment upon building plans in order to facilitate opportunities for improved emergency access and response; ensure the consideration of design strategies that facilitate public safety and police surveillance; and other specific design recommendations to enhance public safety and reduce potential demands upon police protection services. Given the overall moderate rate of population growth in Culver City, the project's conformance to expected growth

⁶³ Captain Ron Iizuka, Culver City Police Department, written correspondence, dated September 21, 2016. Written correspondence is regarding CCPD existing conditions.

⁶⁴ Culver City Police Department Website, Operations Bureau, Culver City Police Car Districts Map, dated September 18, 2014, http://www.culvercitypd.org/D_table_images/DistrictMap.jpg, accessed October 2016.

scenarios for the City, the existing number of police staff and City authorization to hire four additional officers and to establish a fifth patrol district, and the project's planned on-site security measures, the project is not expected to be beyond the scope of available police services. Additionally, the project's onsite security would minimize the need for police services on the project site. Accordingly, the CCPD's response times would not be substantially changed such that response time objectives are compromised in any significant manner. Further, no new or expanded police facilities would need to be constructed as a result of the project.⁶⁵ Thus, impacts regarding police services would be less than significant.

Mitigation Measures

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

c. Schools?

Less Than Significant Impact. The project would be served by the Culver City Unified School District (CCUSD). The CCUSD includes one high school, one continuation high school, one middle school, five elementary schools, and one adult school. The project site is located within the attendance boundaries of the Linwood Howe Elementary School, the Culver City Middle School, and the Culver City High School. The Linwood Howe Elementary School, kindergarten through fifth grade (K-5), is located at 4100 Irving Place, approximately 0.22 miles east of the project site. The Culver City Middle School, (grades 6-8), is located at 4601 Elenda Street, approximately 1.10 miles south of the project site. The Culver City High School (grades 9-12), is located at 4401 Elenda Street, approximately 1.23 miles south of the project site.

Project operation would incrementally increase demand for school services. The estimated 122 indirect persons increase in the City's population would represent 0.31 percent increase to the existing population in Culver City. If project employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. However, if some employees with school age children choose to move closer to work, or if some new employees with children are hired from the surrounding community or another City, there could be a negligible increase in student population in the nearby schools. The project is estimated to generate one elementary school student, one middle school student, and one high school student for a total of three students.⁶⁶

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

⁶⁵ Captain Ron Iizuka, Culver City Police Department, telephone correspondence, January 31, 2017.

⁶⁶ Student generation rates for residential uses are taken from the Draft School Facilities Needs Analysis 2012, LAUSD, September 2012. Student generation rates for office, retail, and restaurant uses are taken from the 2010 Commercial/Industrial Development School Fee Justification Study, LAUSD, September 27, 2010 – the most recent data available for non-residential uses. For each 1,000 square feet of non-residential space – Elementary = 0.0178; Middle School = 0.0089; High School = 0.0111. Total number of students has been rounded up, in order to provide whole student number counts.

d. Parks?

Less Than Significant Impact. The Culver City Parks, Recreation and Community Services (PRCS) division oversees the maintenance and operations of 11 City parks totaling approximately 79 acres, a community garden, community and recreational facilities, senior centers, swimming pools, and a theater facility. A joint-use partnership between Culver City and CCUSD provides additional open space and park facilities for use by residents of Culver City during non-school hours. The project site is located within the vicinity of 11 park facilities. **Table B-22, Culver City Park Facilities Located in the Vicinity of the Project Site**, provides information on the park/facility, location, size, park amenities/activities, and the approximate distance/direction from the project site.

Table B-22

Culver City Park Facilities Located in the Vicinity of the Project Site

Park/Facility	Location	Size (acres)	Parks Amenities/Activities	Approximate Distance/Direction from Project site ^a
Linwood E. Howe Playground	4100 Irving Place	N/A	Linwood Elementary Playground	0.20 miles east
Ivy Substation and Media Park	9070 Venice Boulevard	N/A	99-seat theatre facility, passive grass area	0.25 miles northeast
Carlson Park	Braddock Drive at Motor Avenue	2.66	Home of Culver City Public Theater, picnic shelter, restroom facilities, barbeques, fireplaces, passive grass area	0.55 miles south
Culver City Park	9910 Jefferson Boulevard	41.55	Culver City Skate Park, The Boneyard (Dog Park), recreation hut with restroom facilities, soccer field, three softball fields, two half-court basketball courts, interpretive nature trail, picnic areas, barbeques, children's play equipment, passive grass area	0.75 miles southeast
Syd Kronenthal Park	3459 McManus Avenue	6.00	Recreation building with restroom facilities, soccer field, two softball fields, two half-court basketball courts, tennis court, picnic areas, barbeques, children's play equipment, passive grass area	1.07 miles northeast
Blair Hills Park	5950 Wrightcrest Drive	1.62	Recreation hut with restroom facilities, picnic shelter, softball fields, basketball court, barbeques, children's play equipment, passive grass area	1.15 miles southeast

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

Source: Parks, Recreation and Community Services (PRCS) Website, Park Sites, <http://www.culvercity.org/Government/PRCS.aspx> and <http://www.culvercity.org/Government/PRCS/Parks/ParkSites.aspx> and Culver City Park & Facility Information Map, http://www.culvercity.org/~media/Files/PRCS/ccliving/community_park.ashx, accessed October 2016.

Project operation would incrementally increase demand for park services. The project would not generate a new residential population as no residential uses are proposed. As discussed in Response XIII.a, above, the project is expected to result in an indirect population increase of 122 persons to the City's population, which would represent 0.31 percent increase to the existing population in Culver City.

Despite the incremental indirect population increase, most office employees are not expected to use local parks given limited lunch time hours, and to the extent they do use local parks it would likely be for passive recreation

(walking or eating lunch) on weekdays when use of these parks is not considered at peak (i.e., peak usage of parks often occurs on weekends when the office uses are not in operation). With a limited amount of commercial uses, the minimal number of commercial employees would not be substantial so as to adversely impact park facilities or services during anytime of the week. In addition, the project would incorporate passive recreation areas, which would include public open space along Washington Boulevard and Delmas Terrace with a streetscape design that includes wide public sidewalks with street trees, landscape planters, tree grates, ground cover, benches, tables for outdoor seating, bicycle racks, trash receptacles, and street furniture to activate the pedestrian environment. On the upper levels, the project includes balconies, an open air interior office courtyard, and a roof terrace for use by office employees. As such, the project is not anticipated to result in substantial adverse physical impacts to parks that would alter existing park facilities or result in the need for new facilities, construction of which could cause significant environmental impacts. Therefore, impacts on parks would be less than significant.

e. Other public facilities?

Less Than Significant Impact. The Los Angeles County Public Library (LACPL) provides library services to Culver City. The project site is served by the LACPL Culver City Julian Dixon Branch Library, which is located at 4975 Overland Avenue, Culver City, approximately one mile south of the project site. Other nearby LACPL branches are the Lloyd Taber-Marina del Rey Library, West Hollywood Library, and View Park Library. The Lloyd Taber-Marina del Rey Library is located at 4533 Admiralty Way, Marina del Rey, approximately 3.8 miles southwest of the project site. The West Hollywood Library is located at 625 North San Vicente Boulevard, West Hollywood, approximately 4.15 miles north of the project site. The View Park Library is located at 3854 West 54th Street, Los Angeles, approximately 3.75 miles southeast of the project site. Similar to park services, the introduction of new daytime employees and a nominal indirect population increase would not substantially affect the provision of library services.

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

XV. RECREATION

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

Less Than Significant Impact (a-b). As discussed under Response XIV.d, the use of existing parks is not expected to substantially increase as a result of the project, given limited lunch time hours, minimal number of

commercial employees, and provisions of passive recreation areas. Impacts on parks or recreational facilities would be less than significant.

XVI. TRANSPORTATION AND CIRCULATION

The following discussion is based, in part, on the *Draft Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project* (herein referred to as the “Traffic Study”), prepared by Crain & Associates, dated December 22, 2016 (provided under separate cover available at the Culver City Planning Division). The term “mixed use” refers to retail, restaurant, and offices uses in one development. The project does not include residential uses and the traffic study did not review residential uses. The Traffic Study was conducted using procedures and criteria adopted by the Los Angeles Department of Transportation (LADOT) and Culver City staff, and addresses the project’s trip generation and potential impacts to the surrounding roadway network. The Traffic Study evaluates four project scenarios: Existing (2016) Conditions, Existing (2016) Plus Project Conditions, Future (2020) Without Project Conditions, and Future (2020) With Project Conditions. Future conditions take into account the potential development of 40 related projects in the general project vicinity, as identified by the City of Los Angeles and Culver City.

Would the project:

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

Less Than Significant Impact. Seven (7) study intersections located within Culver City were selected for evaluation in consultation with Culver City based on project-related traffic patterns; refer to **Table B-23, Study Area Intersections**. **Figure B-4, Study Area Intersections**, illustrates the existing lane configuration and traffic control for each study intersection.

Table B-23

Study Area Intersections

No.	Intersection
1	Hughes Avenue & Venice Boulevard
2	Duquesne Avenue/Hughes Avenue & Washington Boulevard
3	Watseka Avenue & Washington Boulevard/Culver Boulevard
4	Irving Place & Culver Boulevard
5	Cardiff Avenue & Culver Boulevard
6	Main Street & Culver Boulevard
7	Canfield Avenue & Washington Boulevard/Culver Boulevard

Source: *Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.*



SOURCE: Crain & Associates, 2017

9735 Washington Boulevard

Figure B-4
Study Area Intersections

Analysis of Existing (2016) Traffic Conditions

An analysis of existing weekday AM and PM peak-hour traffic conditions was performed at the seven study intersections listed above. The methodology used in the Traffic Study for this analysis and evaluation of traffic operations at each study intersection is based on procedures outlines in Circular Number 212 of the Transportation Research Board. In the discussion of Critical Movement Analysis (CMA) for signalized intersections, procedures have been developed for determining operating characteristics of an intersection in terms of the level of service (LOS) provided for different levels of traffic volume and other variables, such as the number of signal phases. The LOS is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS “A” to overload conditions at LOS “F”. LOS “D” is typically recognized as the minimum acceptable LOS in urban areas. A determination of the LOS at an intersection, where traffic volumes are known or have been projected, can be obtained through a summation of the critical movement volumes at that intersection. Once the sum of critical movement volumes has been obtained, the values indicated in **Table B-24, Critical Movement Volume Ranges For Determining Levels of Service**, can be used to determine the applicable LOS.

Table B-24

Critical Movement Volume Ranges^a For Determining Levels of Service

Level of Service	Maximum Sum of Critical Volumes (VPH)		
	Two Phase	Three Phase	Four or More Phases
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	N/A	N/A	N/A

^a For planning applications only, i.e., not appropriate for operations and design applications. Also, a computerized traffic signal coordination system, such as Automated Traffic Surveillance and Control (ATSAC), increases these values by approximately seven percent. With the addition of a further upgrade, such as Adaptive Traffic Control System (ATCS), an additional three percent increase in these values occur.

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

“Capacity” represents the maximum total hourly movement volume of vehicles in the critical lanes which has a reasonable expectation of passing through an intersection under prevailing roadway and traffic conditions. For planning purposes, capacity equates to the maximum value of LOS “E”, as indicated in Table B-24. The critical movement analysis (CMA) indices used in this analysis were calculated by dividing the sum of critical movement volumes by the appropriate capacity value for the type of signal control present at the study intersections. Thus, the LOS corresponding to the range of CMA values is displayed in **Table B-25, Level of Service as a Function of CMA Values**.

Table B-25

Level of Service as a Function of CMA Values

Level of Volume/Capacity Delay per Vehicle			
Service	Ratio	(sec/veh)	Definition
A	0.000-0.600	<=10	Excellent. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601-0.700	>10-20	Very good. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701-0.800	>20-35	Good. Occasionally, drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801-0.900	>35-55	Fair. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901-1.000	>55-80	Poor. Represents the most vehicles that intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	Greater than 1.000	>80	Failure. Backups from nearby intersections or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

By applying this analysis procedure to the study intersections, the CMA value and the corresponding LOS for existing (2016) traffic conditions were calculated, as shown in **Table B-26, Critical Movement Analysis (CMA) Summary Existing (2016) Traffic Conditions**. As shown in Table B-26, acceptable LOS (LOS “A” to “D”) have been determined for all of the study intersections, except the intersection of Duquesne Avenue/Hughes Avenue and Washington Boulevard, which operates at LOS “F” during the AM peak hour and LOS “B” during the PM peak hour under the existing conditions.

Significant Traffic Impact Criteria

The study intersections are located in Culver City and the City of Los Angeles, who define a significant traffic impact attributable to a project based on a “stepped scale” with intersections experiencing high volume-to-capacity ratios being more sensitive to additional traffic than those operating with more available capacity. According to the Culver City policy, a significant impact is identified as an increase in the CMA value due to project-related traffic of 0.020 or more when the final (with project) level of service is LOS “E” or “F”; a CMA increase of 0.040 or more when the final level of service is LOS “D”; or a CMA increase of 0.050 or more at LOS “C”. No significant impacts are deemed to occur at LOS “A” or “B”, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic delays. These criteria are summarized in **Table B-27, Culver City Criteria for Significant Traffic Impact**.

Table B-26

Critical Movement Analysis (CMA) Summary Existing (2016) Traffic Conditions

No.	Intersection	Existing (2016) Conditions			
		AM Peak Hour		PM Peak Hour	
		CMA	LOS	CMA	LOS
1.	Hughes Avenue & Venice Boulevard	0.556	A	0.597	A
2.	Duquesne Avenue/Hughes Avenue & Washington Boulevard	1.208	F	0.639	B
3.	Watseka Avenue and Washington Boulevard/Culver Boulevard	0.769	C	0.813	D
4.	Irving Place & Culver Boulevard	0.436	A	0.479	A
5.	Cardiff Avenue & Culver Boulevard	0.327	A	0.383	A
6.	Main Street & Culver Boulevard	0.633	B	0.566	A
7.	Canfield Avenue & Washington Boulevard/Culver Boulevard	0.664	B	0.596	A

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

Table B-27

Culver City Criteria for Significant Traffic Impact

Level of Service	Final CMA Value	Project-Related Increase in CMA Value
C	> 0.700 – 0.800	equal to or greater than 0.050
D	> 0.800 – 0.900	equal to or greater than 0.040
E, F	> 0.900	equal to or greater than 0.020

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

According to the City of LADOT policy, a significant impact is identified as an increase in the CMA value due to Project-related traffic of 0.010 or more when the final (with project) level of service is LOS “E” or “F”; a CMA increase of 0.020 or more when the final level of service is LOS “D”; or a CMA increase of 0.040 or more at LOS “C”. No significant impacts are deemed to occur at LOS “A” or “B”, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic delays. These criteria are summarized in **Table B-28, LADOT Criteria for Significant Traffic Impact**. For intersections solely within one jurisdiction, that jurisdiction’s significance criteria were applied. For intersections shared between jurisdictions, the significance criteria of the jurisdiction with operational control of the traffic signal or other right-of-way control were utilized.

Table B-28

LADOT Criteria for Significant Traffic Impact

Level of Service	Final CMA Value	Project-Related Increase in CMA Value
C	> 0.700 – 0.800	equal to or greater than 0.040
D	> 0.800 – 0.900	equal to or greater than 0.020
E, F	> 0.900	equal to or greater than 0.010

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

Existing (2016) Traffic Volumes

Weekday morning and afternoon peak hour traffic counts were compiled from data collected at the analyzed intersections in May 2016 while most schools were in session. Peak-hour volumes were determined individually for each intersection based on the combined four highest consecutive 15-minute volumes for all vehicular movements at the intersection. Weekday peak-hour volumes at the study intersections used in this analysis are illustrated in Figure 3(a) – Existing AM Peak Hour Traffic Volumes and Figure 3(b) – Existing PM Peak Hour Traffic Volumes, of the Traffic Study.

Project Trip Generation

To determine the project's impacts on area intersections, the Traffic Study calculated the number of traffic trips generated by the project using the trip generation rates outlined in the Institute of Transportation Engineers (ITE) handbook titled *Trip Generation, 9th Edition*. Trip generation rates and the resulting trips that would be generated by the project are presented in **Table B-29 Estimated Project Trip Generation**. The project is estimated to generate approximately 691 net daily trips of which 65 trips would occur during the morning peak hour and 51 trips during the evening peak hour. Project Trip Distribution

The geographic distribution for project trips was assumed to be the following:

- To and From the North: 20%;
- To and From the South: 20%;
- To and From the East: 40%; and
- To and From the West: 20%.

Project Trip Assignment

The directional distribution percentages shown above were disaggregated and assigned to specific routes and intersections within the study area that are expected to be used to access the project. These project trip assignment percentages are presented in Figure 5, Project Trip Distribution Percentages, of the Traffic Study. These percentages were reviewed and approved by Culver City.

Table B-29

Estimated Project Trip Generation

LU – Use/Description		Size/Units	Daily		A.M.		A.M.		P.M.		P.M.		P.M.	
			I/B	O/B	Peak Hour	Peak Hour	Peak Hour	Peak Hour	Peak Hour	Peak Hour	Peak Hour	Peak Hour	Peak Hour	
					TOTAL	TOTAL	I/B	O/B	TOTAL	TOTAL	O/B	O/B	TOTAL	
<u>Proposed Uses</u>														
820 – Shopping Center		12,249 ksf	7	5	12	22	23	45						
710 – General Office		60,065 ksf	83	11	94	15	74	89						
932 – High-Turnover Restaurant		2,147 ksf	13	10	23	13	8	21						
931 – Quality Restaurant		2,000 ksf	<u>1</u>	<u>1</u>	<u>2</u>	<u>10</u>	<u>5</u>	<u>15</u>						
Subtotal [A]			104	27	131	60	110	170						
<u>Internal Linkages</u>														
Shopping Center		5%	0	(1)	(1)	(1)	(1)	(2)						
General Office		Based on Support	(1)	0	(2)	(1)	(2)	(4)						
High-Turnover Restaurant		5%	(1)	0	(1)	(1)	0	(1)						
Quality Restaurant		5%	<u>0</u>	<u>0</u>	<u>0</u>	<u>(1)</u>	<u>0</u>	<u>(1)</u>						
Subtotal [B]			(2)	(1)	(4)	(4)	(3)	(8)						
<u>Transit Trips</u>														
Shopping Center		15%	(1)	(1)	(2)	(3)	(3)	(6)						
General Office		15%	(12)	(2)	(14)	(2)	(11)	(13)						
High-Turnover Restaurant		15%	(2)	(1)	(3)	(2)	(1)	(3)						
Quality Restaurant		15%	<u>0</u>	<u>0</u>	<u>0</u>	<u>(1)</u>	<u>(1)</u>	<u>(2)</u>						
Subtotal [C]			(15)	(4)	(19)	(8)	(16)	(24)						
[D] Driveway/Adj. Int. Trips = [A]+[B]+[C]			87	22	108	48	91	138						
<u>Pass-by Trips</u>														
Shopping Center		25%	(2)	0	(2)	(5)	(4)	(9)						
General Office		0%	0	0	0	0	0	0						
High-Turnover Restaurant		20%	(2)	(2)	(4)	(2)	(1)	(3)						
Quality Restaurant		10%	<u>0</u>	<u>0</u>	<u>0</u>	<u>(1)</u>	<u>0</u>	<u>(1)</u>						
Subtotal [E]			(4)	(2)	(6)	(8)	(5)	(13)						

LU – Use/Description		Size/Units		Daily		A.M. Peak Hour I/B		A.M. Peak Hour O/B		A.M. Peak Hour TOTAL		P.M. Peak Hour I/B		P.M. Peak Hour O/B		P.M. Peak Hour TOTAL	
[F] Area Intersection Trips (Proposed Uses) = [D]+[E]				1,144		83		20		102		40		86		125	
Existing Uses																	
911/912 – Walk-in Bank				666		31		23		54		48		61		109	
Subtotal [G]				666		31		23		54		48		61		109	
Existing Transit/Walk-in Trips																	
Walk-in Bank				(100)		(5)		(3)		(8)		(7)		(9)		(16)	
Subtotal [H]				(100)		(5)		(3)		(8)		(7)		(9)		(16)	
[I] Driveway/Adj. Int. Trips = [G]+[H]				566		26		20		46		41		52		93	
Pass-by Trips																	
Walk-in Bank				(113)		(5)		(4)		(9)		(8)		(11)		(19)	
Subtotal [H]				(113)		(5)		(4)		(9)		(8)		(11)		(19)	
[K] Area Intersection Trips (Existing Uses) = [I]+[J]				453		21		16		37		33		41		74	
NET PROJECT TRIP GENERATION																	
Driveway/Adjacent Intersection Trips = [D]-[I]				743		61		2		62		7		39		45	
Area Intersection Trips (Net Project) = [F]-[K]				691		62		4		65		7		45		51	

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

Applying these inbound and outbound percentages to the project trip generation previously calculated in Table B-29 for each of the proposed uses, net project traffic volumes at the seven study intersections were determined for the AM and PM peak hours, as shown in Figure 6(a) – Project Traffic Volumes – AM Peak Hour and Figure 6(b) – Project Traffic Volumes – PM Peak Hour, of the Traffic Study.

No pass-by trip reductions were applied to project trips at the project driveways or the site adjacent intersection of Watseka Avenue and Washington Boulevard/Culver Boulevard. The results of this traffic assignment provide the necessary level of detail to conduct the Traffic Study.

Existing (2016) Without and With Project Conditions

The analysis of existing traffic conditions at the study intersections for existing year (2016) was performed as described previously above. The Existing intersection volumes for the AM and PM peak hours are shown on Figures 3(a) and 3(b) of the Traffic Study, respectively. These estimates are the "benchmark" volumes used in determining project traffic impacts on the existing street system. Traffic volumes generated by the project shown in Figures 6(a) and 6(b), of the Traffic Study, were then added to the Existing (2016) volumes to form the "Existing With Project" intersection volumes, as depicted on Figure 7(a) – Existing With Project Traffic Volumes – AM Peak hour and Figure 7(b) – Existing With Project Traffic Volumes – PM Peak Hour, of the Traffic Study. These volumes were calculated and used to determine traffic impacts attributable to the project.

Table B-30, Critical Movement Analysis (CMA) Summary Existing (2016) Without and With Project, presents the results of the CMA and LOS analysis of the Existing (2016) and Existing (2016) With Project conditions. As shown in Table B-30, none of the seven study intersections would be significantly impacted by project traffic under Existing (2016) conditions.

Future (2020) Without and With Project Conditions

A number of projects are either planned for development or under construction in the project area. These "related projects" could contribute to traffic in and around the project vicinity in the near future. For this reason, analysis of the future traffic has been expanded to include traffic that may be generated by yet undeveloped or unoccupied projects. In order to evaluate future traffic conditions in the project area, an analysis of the existing (2016) traffic volumes was first conducted, as described previously. For the analysis of future conditions for the study year of 2020, an ambient growth factor of 1.0 percent per year, compounded annually, was applied to the existing volumes at the seven study intersections.

The result provides the "baseline" traffic volumes for the analysis of future (2020) conditions. Although the inclusion of the annual growth factor generally accounts for area-wide traffic increases, for the purposes of providing a conservative analysis of the potential cumulative effects, the traffic generated by related projects in the study area was also added to the future baseline traffic volumes. The total future volumes, including related projects, provide the basis for the "Without Project" condition. Finally, project traffic was analyzed as an incremental addition to the Future (2020) "Without Project" condition to determine the Future (2020) "With Project" condition.

Table B-30

Critical Movement Analysis (CMA) Summary Existing (2016) Without and With Project

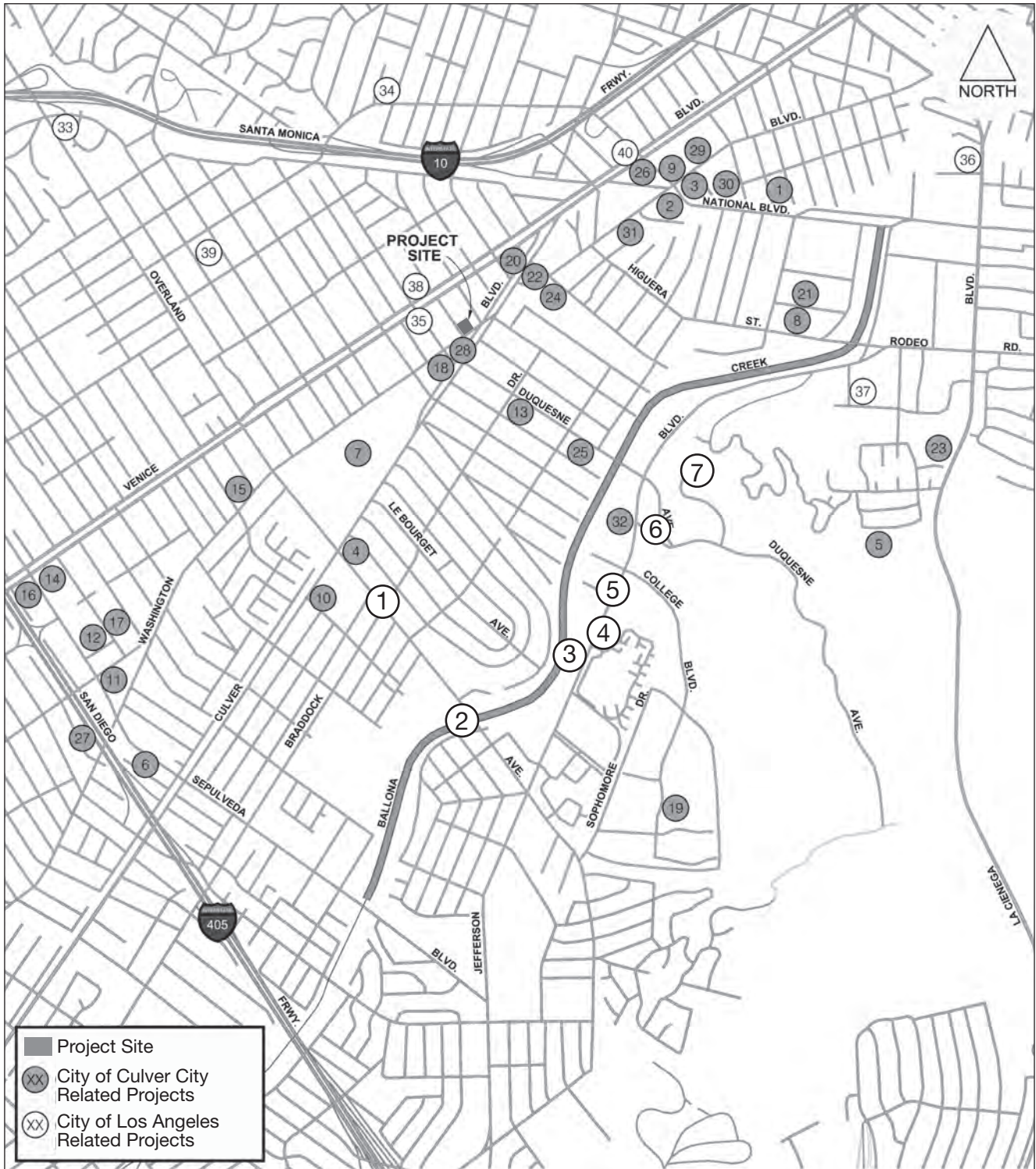
No. Intersection	Peak Hour	Without Project CMA	Without Project LOS	With Project CMA	With Project LOS	Impact
1. Hughes Avenue & Venice Boulevard	AM	0.556	A	0.560	A	0.004
	PM	0.597	A	0.602	B	0.005
2. Duquesne Avenue/Hughes Avenue & Washington Boulevard	AM	1.208	F	1.211	F	0.003
	PM	0.639	B	0.643	B	0.004
3. Watseka Avenue & Washington Boulevard/Culver Boulevard	AM	0.769	C	0.769	C	0.000
	PM	0.813	D	0.819	D	0.006
4. Irving Place & Culver Boulevard	AM	0.436	A	0.437	A	0.001
	PM	0.479	A	0.484	A	0.005
5. Cardiff Avenue & Culver Boulevard	AM	0.327	A	0.327	A	0.000
	PM	0.383	A	0.387	A	0.004
6. Main Street & Culver Boulevard	AM	0.633	B	0.641	B	0.008
	PM	0.566	A	0.570	A	0.004
7. Canfield Avenue & Washington Boulevard/Culver Boulevard	AM	0.664	B	0.668	B	0.004
	PM	0.596	A	0.599	A	0.003

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

Related Projects

In addition to the use of the ambient growth rate, listings of potential related projects in the study area that might be developed within the study timeframe were obtained from Culver City, LADOT and recent studies of projects in the area. A review of the information currently available indicated that a total of 40 projects within an approximate 1.5-mile radius of the project could add traffic to the study intersections.

The locations of these related projects are shown in **Figure B-5, Location of Related Projects**. The related project descriptions and their trip generation estimates are summarized in Table B-31 below. Some of the number of trips expected to be generated by the related projects were provided by LADOT and the EIR document of the recent studies of projects. Trip generation rates and equations used to calculate the rest of related projects trip generations are from Trip Generation, 9th Edition, 2012, published by ITE, which are included in Appendix E, of the Traffic Study. As noted previously, the ambient traffic growth rate is generally sufficient to estimate increases in traffic volumes at the study locations. However, for a more conservative estimate of cumulative traffic volumes, the trips generated by the related projects were also included.



SOURCE: Crain & Associates, 2017

9735 Washington Boulevard

Figure B-5
Location of Related Projects

For the analysis of Future (2020) Without Project traffic conditions, the related projects trip generation was assigned to the study area circulation system, using methodologies similar to those previously described for Project trip assignment. The total related projects traffic volumes assigned to the study intersections are illustrated in Figure 9(a) – Related Projects Traffic Volumes – AM Peak Hour and Figure 9(b) – Related Projects Traffic Volumes – PM Peak Hour, of the Traffic Study.

Analysis of Future (2020) Traffic Conditions Without and With Project

The analysis of future traffic conditions at the study intersections was performed using the same analysis procedures described above. As described earlier, for the analysis of future project traffic impacts, the current roadway system's geometric and signal operation characteristics were assumed to prevail.

Future (2020) baseline traffic volumes for the without project condition were determined by combining area ambient traffic growth with the total related projects traffic volumes. The Future (2020) Without Project traffic volumes are illustrated in Figure 10(a) – Future (2020) Traffic Volumes – Without Project (AM Peak Hour) and Figure 10(b) – Future (2020) Traffic Volumes – Without Project (PM Peak Hour), of the Traffic Study.

Net project volumes were then combined with the Future (2020) Without Project traffic volumes to develop the Future (2020) With Project volumes, which were used to determine traffic impacts directly attributable to the Project. The Future With Project morning and afternoon peak-hour traffic volumes are shown in Figure 11(a) – Future (2020) Traffic Volumes – With Project (AM Peak Hour) and Figure 11(b) – Future (2020) Traffic Volumes – With Project (PM Peak Hour), of the Traffic Study.

The results of the analysis of future traffic conditions at the study intersections are summarized in **Table B-31, Critical Movement Analysis (CMA) Summary Future (2020) Without and With Project**. As shown Table B-31, although the addition of project traffic would increase the CMA value at five of the intersections during the AM peak hour and all seven of the study intersections during the PM peak hour, the incremental project traffic additions would not result in a change in level of service at any study intersection. As shown in B-31, none of the seven study intersections would be significantly impacted by project traffic under Future (2020) conditions.

Parking Evaluation

The project would include 214 vehicular parking spaces distributed within the Ground Level and three levels of a subterranean parking structure. Vehicular parking on the Ground Level would be provided via 5 surface spaces and 6 two-level automobile stackers/parking lifts providing twelve spaces (i.e., each automobile stacker/parking lift provides two vertically stacked parking spaces) for a total of 17 vehicular parking spaces. Parking on the Ground Level would be exclusively for retail and restaurant uses. Vehicular parking spaces per level of the subterranean parking structure would include 60 spaces on Parking Level 1 (P1); 67 spaces on Parking Level 2 (P2); and 70 spaces on Parking Level 3 (P3). Parking within the subterranean parking structure would be for office, retail, and restaurant uses. The CCMC requirements for vehicular parking are summarized in Table A-2, *Project Vehicular Parking Code Requirements*, in Attachment A of this MND. As shown in Table A-2, the project would be required to provide 243 vehicular parking spaces (if no shared parking). This parking demand was used to develop a parking reduction and shared parking profiles based on the parking demand ratios and methodology provided in the Urban Land Institute's Shared Parking, 2nd Edition, 2005, Handbook. Based on the calculation results provided in the *9735 Washington Boulevard Mixed-Use Project Shared Parking Demand*, (herein referred to as the "Shared Parking Analysis") prepared by Crain & Associates, dated

Table B-31

Critical Movement Analysis (CMA) Summary Future (2020) Without and With Project

No. Intersection	Peak Hour	Without Project CMA	Without Project LOS	With Project CMA	With Project LOS	Impact
1. Hughes Avenue & Venice Boulevard	AM	0.637	B	0.641	B	0.004
	PM	0.719	C	0.724	C	0.005
2. Duquesne Avenue/Hughes Avenue & Washington Boulevard	AM	1.269	F	1.272	F	0.003
	PM	0.708	C	0.713	C	0.005
3. Watseka Avenue & Washington Boulevard/Culver Boulevard	AM	0.931	E	0.931	E	0.000
	PM	0.981	E	0.987	E	0.006
4. Irving Place & Culver Boulevard	AM	0.521	A	0.522	A	0.001
	PM	0.549	A	0.554	A	0.005
5. Cardiff Avenue & Culver Boulevard	AM	0.404	A	0.405	A	0.001
	PM	0.446	A	0.449	A	0.003
6. Main Street & Culver Boulevard	AM	0.722	C	0.730	C	0.008
	PM	0.688	B	0.691	B	0.003
7. Canfield Avenue & Washington Boulevard/Culver Boulevard	AM	0.817	D	0.819	D	0.002
	PM	0.705	C	0.708	C	0.003

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

December 16, 2016, the peak parking demand for the project site would be expected to occur on December weekdays at approximately 2:00 PM in the afternoon, of which the demand would be expected to be 214 vehicular spaces. As shown in Table A-2, the project would meet the number of vehicular parking spaces required to meet this demand. The Shared Parking Analysis is provided under separate cover available at the Culver City Planning Division.

- b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Less Than Significant Impact.

Regional Traffic Impact Analysis Per Congestion Management Program (CMP)

To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California, Proposition 111 enacted the Congestion Management Program (CMP) in 1990. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by Metro, the local CMP agency, designating a highway network that includes all state highways and principal arterials within the County. The level of service at each CMP monitoring station is supervised by local jurisdictions in order to implement the statutory requirements of the CMP. If the level of service standards deteriorate, then local jurisdictions must prepare a deficiency plan to meet conformance standards outlined by the countywide plan.

The local CMP requires that all CMP monitoring intersections be analyzed where a project would likely add 50 or more trips during the peak hours. The nearest such intersections are Overland Avenue and Venice Boulevard and La Cienega Boulevard and Jefferson Boulevard, located approximately half a mile west and one and a half miles east of the project, respectively. A review of the project trip distribution and net project traffic additions to the study vicinity shows that the project would not add 50 or more trips to these CMP intersections. It is estimated that the project would generate at most 6 inbound trips during the AM peak hour and 1 inbound trip during the PM peak hour at the intersection of Overland Avenue and Venice Boulevard. At the intersection of La Cienega Boulevard and Jefferson Boulevard, the project is expected to contribute at most 6 inbound trips and no outbound trips during the AM peak hour and 5 trips (1 inbound, 4 outbound) during the PM peak hour. As these volumes are below the threshold of 50 trips, no further CMP intersection analysis is warranted.

In addition, any CMP freeway monitoring segment where a project is expected to add 150 or more trips in any direction during the peak hours is to be analyzed. The nearest CMP freeway monitoring segments are the Santa Monica Freeway (I-10) east of Overland Avenue and the San Diego Freeway (I-405) north of Venice Boulevard. Based on the project trip generation described earlier in this report, the project is expected to add approximately 65 trips during the AM peak hour (62 inbound and 3 outbound) and 63 trips during the PM peak hour (7 inbound, 44 outbound) to the adjacent street system. These amounts are less than the freeway threshold of 150 directional trips. Therefore, no significant project impact to any CMP freeway monitoring location is forecast and no additional freeway analysis is necessary.

Freeway Impact Screening Analysis

A freeway impact screening analysis was conducted as per LADOT Traffic Study Guidelines. The methodology from the agreement between City of Los Angeles and Caltrans District 7 on freeway impact analysis procedures was used for the freeway impact screening analysis. As per the criteria provided by the agreement, if the project meets any of the following criteria, the project applicant would be directed to work with Caltrans to prepare a freeway impact analysis, utilizing Caltrans' "Guide for the Preparation of Traffic Impact Studies":

- The project's peak hour trips would result in a one percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS "E" or "F" (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a two percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS "D" (based on an assumed capacity of 2,000 vehicles per hour per lane); or

- The project's peak hour trips would result in a one percent or more increase to the capacity of a freeway off-ramp operating at LOS "E" or "F" (based on an assumed ramp capacity of 850 vehicles per hour per lane); or
- The project's peak hour trips would result in a two percent or more increase to the capacity of a freeway off-ramp operating at LOS "D" (based on an assumed ramp capacity of 850 vehicles per hour per lane).

The purpose of this analysis is to apply the above screening criteria to determine whether a Freeway Impact Analysis would be required for the project. The project trips along the I-10 Freeway and the I-405 Freeway mainlines were analyzed and the results are included in **Table B-32, Freeway Mainline Screening Analysis**. As shown in Table B-32, the project's peak hour trips would result in less than a one percent increase to the freeway mainline capacity. As such, a freeway mainline impact analysis is not required.

Table B-32

Freeway Mainline Screening Analysis

Mainline Segment/Direction	# of Lanes			Mainline Capacity			Percentage For Screening*	Requires Analysis?
		AM	PM		AM	PM		
I-10 Freeway/WB	4	16	2	8,000	0.20%	0.03%	1.00%	NO
E/O Washington Boulevard/EB	4	1	11	8,000	0.01%	0.14%	1.00%	NO
I-405 Freeway/NB	5	12	1	10,000	0.12%	0.01%	1.00%	NO
S/O Culver Boulevard/SB	5	7	1	10,000	0.07%	0.01%	1.00%	NO

E/O = east of; S/O = south of; WB = westbound, EB = eastbound; NB = northbound; SB = southbound.

* Criteria for freeway mainline segments and off-ramps operating at LOS E or F per Agreement Between City of Los Angeles and Caltrans District 7 On Freeway Impact Analysis Procedure, December 2015.

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

The freeway off-ramps with the most project traffic are the I-10 and I-405 Freeway off-ramps, which were analyzed and the results are included in **Table B-33, Freeway Ramp Screening Analysis**. As shown in Table B-33, the project's peak hour trips would result in less than a one percent increase to the freeway off-ramp capacity. Therefore, a freeway off-ramp impact analysis is not required.

Table B-33

Freeway Ramp Screening Analysis

Off-Ramp Location/Direction	# of Lanes	AM	PM	Ramp Capacity	AM	PM	Percentage For Screening*	Requires Analysis?
I-10 Freeway WB Off-Ramp to Washington Boulevard/WB	1	6	1	850	0.71%	0.12%	1.00%	NO
I-405 Freeway WB Off-Ramp to Culver Boulevard/NB	1	7	1	850	0.82%	0.12%	1.00%	NO

E/O = east of; S/O = south of; WB = westbound, EB = eastbound; NB = northbound; SB = southbound.

* *Criteria for freeway mainline segments and off-ramps operating at LOS E or F per Agreement Between City of Los Angeles and Caltrans District 7 On Freeway Impact Analysis Procedure, December 2015.*

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. As discussed under Responses VIII.e and f, the project site is not located within an airport land use plan or within two miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately 2.75 miles to the west and five miles to the south of the project site, respectively. The project would not introduce structures substantial enough to interfere with existing flight paths, or result in a measureable increase in airport traffic that would result in substantial safety risks. As such, no impacts would occur.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The project would not alter existing street patterns in the vicinity. There are no existing hazardous design features such as sharp curves or dangerous intersections on-site or within the project vicinity. The project would result in some modifications to access (i.e., new curb cuts for the project driveway. Direct vehicular access for the proposed uses and to the 3-level subterranean parking structure would be provided on the Ground Level located along Delmas Terrace via an entrance/exit driveway as well as an entrance/exit parking structure ramp. All on-site roadway and site access improvements would be designed in compliance with applicable City standards. As such, impacts would be less than significant in this regard.

e. Result in inadequate emergency access?

Less Than Significant Impact. The project site is located in an established urban area that is well served by the surrounding roadway network. While it is expected that the majority of construction activities for the project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day, including during construction of potential off-site infrastructure upgrades/improvements (i.e., water and sewer lines) (discussed below in Section XVII, *Utilities and Service Systems*). However, through-access for drivers, including emergency personnel, along all roads would still be provided. In these instances, the project would implement traffic control measures (e.g., construction flagmen,

signage, etc.) to maintain flow and access. Furthermore, in accordance with Culver City requirements, as applicable, the project would develop a Final Construction Traffic Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the project vicinity and would result in some modifications to access (i.e., new curb cuts for the project driveway). However, emergency access to the project site and surrounding area would continue to be provided similar to existing conditions. Emergency vehicles and fire access for the project site would be provided at grade access from Delmas Terrace. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons and employees. Subject to review and approval of project site access and circulation plans by the CCFD, as necessary, the project would not result in inadequate emergency access. Therefore, project operation would result in a less than significant impact in this regard.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. The project's central location within Los Angeles County and proximity to the Culver City Metro Station presents an opportunity to enhance mobility. As part of the project, the following features/characteristics would serve to promote alternative transportation goals and strategies:

- Access to multi-modal transit with connecting bike, bus, and train routes. The property is located southwest of the Culver City Metro Station, which is the approximate center of the EXPO line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to numerous bus routes and bicycle lanes/routes in project vicinity.
- Bike friendly design with bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services.
- Designated parking for low-emission/zero-emission vehicles.
- Connections to the EXPO bike path and Culver City and City of Los Angeles bike paths.
- Promotion of walking through a "walk to work" program in coordination with the onsite office employees and a posted neighborhood map with approximate walking distances and times to local neighborhood amenities.
- The perimeter of the site area would incorporate the City's approved Streetscape plan which would create an attractive and inviting walkable environment.
- Inclusion of a shared parking program with miscellaneous neighboring retailers and the City.

Transit Impact Analysis

The project site is located in an area well served by public transportation. The Culver City Bus, Los Angeles County Metropolitan Transportation Authority (Metro), and Los Angeles Department of Transportation (LADOT) provide an extensive system of bus lines in Culver City. Approximately 6 bus lines provide stops within approximately one-quarter mile walking distance of the project site; refer to Figure 4 – Transit Routes, of the

Traffic Study. One of these bus lines (Culver City Bus Line 5) operates on a limited schedule weekdays only during the school year, and provides one westbound bus in the morning and two eastbound buses in the afternoon. The other 5 routes, which are described in the Environmental Setting section of the report, have headways ranging from 6 to 40 minutes during peak hours. To be conservative, 15 service buses per hour during weekday peak hours (5 bus lines with 40 minute headways in each direction) were assumed for this analysis.

The analysis of project impacts on transit was performed by determining if the project transit trips could be absorbed by the available capacity on bus lines serving the area. Project transit impacts were analyzed using the transit trips results from the Project automobile trip generation calculations in **Table B-34, Project Transit Trip Summary**. In Table B-34, adjustments for the transit trips are combined with bicycle/walk-in trips. To be conservative, Table B-34 includes bicycle/walk-in trips as project transit trips. In addition, an average

Table B-34

Project Transit Trip Summary

	Daily	AM Peak Hour	PM Peak Hour
Project Transit Automobile Trip Credit	132	11	8
Project Transit Person Trips: (1.2 person trips per automobile trip)	158	13	10
Average Project Ridership/Transit Vehicles (based on 15 buses)	--	0.9	0.6

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

automobile occupancy factor of 1.2 was utilized to translate the Table B-34 automobile trip generation to person trips. As shown in Table B-34, on an average weekday, the Project would generate transit demand of approximately 158 person trips per day, including 13 person trips during the AM peak hour and 10 person trips during the PM peak hour. This equates to an estimated average of 0.9 transit riders per bus during the AM peak hour and 0.6 transit riders per bus during the PM peak hour. Given that the capacity of a standard bus is 40 riders and an articulated bus capacity is 60 riders, this level ridership is not considered to have a significant impact.

Bicycle and Pedestrian Network

The project would provide six (6) short term bicycle parking spaces and eight (8) long term bicycle parking spaces for a total of 14 spaces. The long term bicycle parking spaces would be provided on the Ground Level adjacent the enclosed trash and recycling room and adjacent the automobile stacker/parking lifts. The six short term bicycle parking spaces would be provided on the Ground Level adjacent the restaurant uses along Delmas Terrace.

The Culver City Bicycle and Pedestrian Master Plan was adopted by City Council on November 8, 2010. This bicycle and pedestrian master plan is the City's first comprehensive plan for bicycling and walking. In the project vicinity, there are several bicycle improvements proposed in the City's bicycle network.

- Washington Boulevard – Add Sharrows on applicable segments where road width does not accommodate bike lanes along both sides of Washington Boulevard; Install signage/wayfinding; Add bicycle route signage where Sharrows and lanes cannot be installed. This improvement is ranked #1 on the City’s priority list for bicycle and pedestrian improvement projects.
- Culver Boulevard – Culver Boulevard will become a bike route between Duquesne Avenue to Washington Boulevard. This is a second tier project on the City’s priority list for bicycle and pedestrian improvement projects.

In the project vicinity, the proposed bicycle facilities would improve bicycle mobility of the area, at the same time the current lane configurations of the street intersections would not be affected. The project would be responsible for the partial restriping of Washington Boulevard along the project frontage and at the intersection of Washington Boulevard and Delmas Terrace. The restriping would add Sharrows at the project frontage along Washington Boulevard. These bicycle improvements would be required as conditions of approval for the project to be consistent with the Culver City Bicycle and Pedestrian Master Plan.

Overall, the project is not expected to interfere with or degrade the performance or safety of public transit, bicycle, or pedestrian facilities, and a less than significant impact would result.

XVII. UTILITIES AND SERVICE SYSTEMS

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. As discussed in detail in Section IX, *Hydrology and Water Quality*, under the LARWQCB NPDES permit system, all existing and future municipal and industrial discharges to surface waters within Culver City are subject to applicable local, State and/or federal regulations. The project must comply with all provisions of the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the LARWQCB. Therefore, implementation of the project would not result in an exceedance of wastewater treatment requirements.

The Culver City Department of Public Works provides wastewater services for the project site. The project site is within the Hyperion Treatment System, which includes the Hyperion Treatment Plant (HTP), the Tillman Water Reclamation Plant (TWRP), the Los Angeles-Glendale Water Reclamation Plant (LAGWRP), and the Terminal Island Treatment Plant (TITP). Wastewater discharges from the project would be treated at the HTP. Following the secondary treatment of wastewater, the majority of effluent from HTP is discharged into the Santa Monica Bay while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. HTP has two outfalls that presently discharge into the Santa Monica Bay (a one-mile outfall pipeline and a five-mile outfall pipeline). HTP effluent is required to meet the LARWQCB requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system’s NPDES permit. Accordingly, HTP effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay. Further, the HTP is required to comply with associated WDRs and any updates or new permits

issued. WDRs set the levels of pollutants allowable in water discharged from a facility. Compliance with applicable WDRs would ensure that project implementation would not exceed the applicable wastewater treatment requirements of the LARWQCB with respect to discharges to the sewer system. As such, impacts would be less than significant in this regard.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The following hydrology and water quality discussion is based, in part, on the *Existing and Proposed Conditions Assessment The Brick and The Machine Utility Infrastructure Technical Memorandum* (herein referred to as the “Utility Infrastructure Assessment”), prepared by Fuscoe Engineering, dated January 3, 2017 (provided under separate cover available at the Culver City Planning Division).

Wastewater

Less Than Significant Impact. During project construction, a negligible amount of wastewater would be generated by construction workers. It is anticipated that portable toilets would be provided by a private company and the waste disposed off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer’s capacity is already constrained or that would cause a sewer’s capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled collection of the HTP. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

Existing sewer lines within the City are maintained by the Culver City Department of Public Works. Along Washington Boulevard, there is an existing 6” sewer line that serves the project site. This sewer line discharges into an existing 6” sewer main at the intersection of Washington Boulevard and Delmas Terrace, which then flows southerly across the intersection before continuing westerly along Washington Boulevard. In addition, there is an existing 6” sewer line along Delmas Terrace which flows southerly toward the Washington Boulevard intersection at the same discharge maintenance hole as the existing 6” sewer line serving the project site. Further, there is an 8” sewer line along the alley with an easement at the northeasterly portion of the project site which flows towards Watseka Avenue. The wastewater flows from the project site and adjacent sewer facilities ultimately discharge into the existing 60” Westwood Relief Sewer Trunk Line, which is owned and maintained by the City of Los Angeles.

Changes in land uses could potentially impact the existing sewer system. As Culver City has no available sewage generation factors and the project’s wastewater flows ultimately discharge to a sewer facility owned and maintained by the City of Los Angeles, average daily flows in gallons per day (gpd) are calculated using the factors from the City of Los Angeles for existing land uses. As shown in **Table B-35, Estimated Wastewater Generation**, implementation of the project would generate an estimated average daily wastewater flow of 44,876 gpd with a peak flow of 157,066 gpd beyond existing conditions. According to the Utility Infrastructure

Table B-35

Estimated Wastewater Generation

Condition	Units	Daily Sewer Generation Factor	Average Daily Flow (GPD)	Peak Sewer Flows (GPD)
Existing (Bank Building)	8,871 SF	50 gallons/1,000 SF	444	1,554
Proposed (Drainage Fixture Units)	300 DFU	110 GPM peak flow	45,320	158,620
Difference	---	---	+44,876	+157,066

gpd = gallons per day; gpm = gallons per minute; sf = square feet; dfu = drainage fixture unit.

Notes:

For the proposed flows, the number of drainage fixture units for the project is converted into gallons per day based on the City of Los Angeles conversion table. As estimated peak flow factor of 3.5 from the City of Los Angeles Sewer Design Manual is used to generate the peak sewer flows.

Source: Existing and Proposed Conditions Assessment The Brick and The Machine Utility Infrastructure, prepared by Fuscoe Engineering, dated January 3, 2017.

Assessment, for the existing sewer facilities to be able to accommodate the wastewater flow increase, the proposed flows would be distributed into multiple adjacent sewer facilities. Two-thirds (200 drainage fixture unit [dfu]) of the proposed wastewater flow served by a 6" lateral would be discharged into the existing 8" sewer located along the easement at the northeasterly portion of the project. The remaining one-third (100 dfu) of the proposed wastewater flow would be discharged into the 6" main along Delmas Terrace. To determine whether these existing sewer facilities have adequate capacity to serve the project, adjacent land uses that drain into these sewer lines have been accounted for. Wastewater flows have been estimated for the adjacent hospital, office building, multi-family residential uses, and retail building. According to the Utility Infrastructure Assessment, with the increase in wastewater flows, the existing sewer lines are anticipated to flow at or below 50 percent capacity during peak flow conditions. As such, the existing sewer facilities would have adequate capacity for the project.

Construction of the project would include all necessary on and off-site sewer pipe improvements and connections to adequately link the project to the existing City sewer system based on the City requirements. The necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the City. Construction-related impacts would be temporary, on an intermittent basis, and within the scope of impacts evaluated in this MND. Further, a Final Construction Traffic Management Plan (Mitigation Measure PS-1) for the project would be prepared in order to minimize disruptions to through traffic flow, which would consider any off-site utility improvements, as necessary. See Response XIV.a above, for further discussion of the project's Construction Traffic Management Plan.

In addition, the HTP is designed to treat 450 million gallons per day (mgd) with an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available.^{67,68} Given the current capacity of the HTP, project wastewater generation would account for a less than one percent increase in demand at the HTP and there would be ample capacity to treat this increase.

Based on the above, and given existing and anticipated future capacity at the wastewater treatment facilities and wastewater generation expected from the project, impacts regarding wastewater facilities would be less than significant.

Water

Less Than Significant Impact. During construction activities associated with the future development within the project site, there would be a temporary, intermittent demand for water for such activities as soil watering for site preparation, fugitive dust control, concrete preparation, painting, cleanup, and other short-term activities. Construction-related water usage is not expected to have an adverse impact on available water supplies or the existing water distribution system, and impacts would be less than significant.

The Golden State Water Company (GSWC) provides water and water treatment to Culver City, including the project site. An existing 12" water main along Washington Boulevard and an 8" water main along Delmas Terrace serve the project site. There are three existing fire hydrants in the project vicinity: one located at the westerly corner of Washington Boulevard and Delmas Terrace and two on Delmas located at approximately 175 and 315 feet respectively, northerly of the intersection.

The Utility Infrastructure Assessment includes a "Will Serve Letter" from the GSWC stating that water service is available for the project and would be provided from the existing water facilities. The project proposes a 2" water meter with a 2.5" domestic water service line to be located on Delmas Terrace. In addition, a 4" fire water service line located on Delmas Terrace is proposed to serve the project. As shown in **Table B-36, *Estimated Water Demand***, implementation of the project would generate an estimated average daily water demand of 47,120 gpd with a peak water demand of 164,920 gpd beyond existing conditions.

When analyzing the project for water infrastructure capacity, the projected demands for both fire suppression and domestic water consumption are considered. Although domestic water is the project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Fire flow tests performed by the GSWC on October 28, 2016, confirm the three fire hydrants available to serve the project site are each capable of delivering the minimum 2500 gpm with a residual pressure of 20 pounds per square inch (psi); refer to **Table B-37, *Existing Fire Flow Tests***, for the fire flow test results. As such, no additional upgrades to the fire flow system are anticipated. All connections and water-related infrastructure improvements would be provided

⁶⁷ The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily waste flow of 413 mgd, and peak wastewater flow of 850 mgd.. (Information regarding peak flow is included in the IRP, Facilities Plan, Volume 1, Wastewater Management, July 2004; page 7-3.)

⁶⁸ City of Los Angeles Bureau of Sanitation, Wastewater: Facts & Figures. Available at: <http://www.lacitysan.org/wastewater/factsfigures.htm>. Accessed April 2016.

Table B-36

Estimated Water Demand

Condition	Units	Daily Water Demand Factor	Average Daily Demand (GPD)	Peak Water Demand (GPD)
Existing (Bank Building)	8,871 SF	52.5 gallons/1,000 SF	466	1,631
Proposed (Drainage Fixture Units)	300 DFU	115.5 GPM peak flow	47,586	166,551
Difference	---	---	+47,120	+164,920

gpd = gallons per day; gpm = gallons per minute; sf = square feet; dfu = drainage fixture unit.

Notes:

Water demand was calculated with the same wastewater generation factors plus an additional 5 percent to account for project site irrigation needs.

Source: Existing and Proposed Conditions Assessment The Brick and The Machine Utility Infrastructure, prepared by Fuscoe Engineering, dated January 3, 2017.

by the project in consultation with the GSWC and CCFD. Further, all water line improvements and connections would be provided in consultation with the CCFD to ensure that the minimum fire flow requirements would be provided to serve the proposed development.

GSWC purchases water from the West Basin Municipal Water District (WBMWD). The 2015 WBMWD Urban Water Management Plan (UWMP) provides water demand and water supply projections in five-year increments from 2020 through 2040, which are based on regional demographic data provided by SCAG, as well as billing data for each major customer class, weather, and conservation. Year 2020 WBMWD water demand is 146,105 AFY while projected year 2040 water demand is 151,922 AFY; refer to **Table B-38, Projected West Basin Service Area Water Demand (AFY)**.

Table B-37

Existing Fire Flow Tests

Fire Hydrant Location	Hydrant Number	Residual Pressure	Fire Flow
Washington Boulevard 25' west of Delmas Terrace	562	20 psi	3,822
Delmas Terrace 175' north of Washington Boulevard	156	20 psi	4,145
Delmas Terrace 315' north of Washington Boulevard	571	20 psi	3,216

psi = pounds per square inch.

Source: Existing and Proposed Conditions Assessment The Brick and The Machine Utility Infrastructure, prepared by Fuscoe Engineering, dated January 3, 2017.

Table B-38

Projected West Basin Service Area Water Demand (AFY)

Year	2020	2025	2030	2035	2040
Baseline Demand ^a	135,719	136,447	136,466	136,706	136,284
Planned Conservation ^a	32,280	35,190	37,928	40,255	42,773
Final Total Retail Demand	167,999	171,637	174,394	176,961	179,057
Recycled Water Demand ^b	21,894	27,135	27,135	27,135	27,135
Final Potable Demand	146,105	144,502	147,259	149,826	151,922

^a Projections based on Metropolitan Demand Forecasting Model.

^b Projections based on the Capital Improvement Plan, 2015, (excludes replenishment deliveries to the Barrier and deliveries outside service area).

Source: West Basin Municipal Water District, 2015 Urban Water Manage Plan, Table ES-1: Projected West Basin Service Area Retail Demand (AFY), prepared by Arcadis and prepared by Westamerica Communications, dated June 2016.

According to the water supply section of the UWMP, Year 2020 WBMWD water supply is 189,893 AFY while projected 2040 water supply is 206,192 AFY; refer to **Table B-39, Projected West Basin Service Area Water Supply (AFY)**. Year 2020 has a water supply surplus of 43,788 AFY while projected year 2040 has a projected water supply surplus of 54,270 AFY. The WBMWD is projecting to increase current recycled water supplies as well as invest in over 20,000 AFY of ocean-water desalination supply. Coupled with additional conserved water supply through water use efficiency programs, the overall imported water use is expected to be reduced significantly by 2040. According to the UWMP, the water supplies available to the WBMWD in single dry and multiple dry years, will be sufficient to meet all present and future water supply requirements within the WBMWD's service area for at least the next 20 years.

Table B-39

Projected West Basin Service Area Water Supply (AFY)

Year	2020	2025	2030	2035	2040
Groundwater ^a	36,293	36,293	36,293	36,293	36,293
Imported Water ^b	98,426	77,654	77,673	77,913	77,491
Recycled Water ^c	21,894	27,135	27,135	27,135	27,135
Desalination ^d	1,000	22,500	22,500	22,500	22,500
Total	157,613	163,582	163,601	163,841	163,419
Conservation ^e	32,280	35,190	37,928	40,255	42,773
Total	189,893	198,772	201,529	204,096	206,192

^a Groundwater production within West Basin service area only.

^b Imported retail use only; does not include replenishment deliveries (i.e. Barrier).

^c Recycled water does not include replenishment deliveries (i.e. Barrier) and deliveries outside the service area.

^d Desalination includes both brackish and ocean water.

^e Conservation consists of Active and Passive savings according to Metropolitan's projected estimates.

Source: West Basin Municipal Water District, 2015 Urban Water Manage Plan, Table ES-3: West Basin's Service Area Projected Retail Water Supplies (AFY), prepared by Arcadis and prepared by Westamerica Communications, dated June 2016.

The project would result in an estimated average water demand of 47,120 gpd, or 17,198,800 gallons per year (approximately 52.78 AFY) when fully occupied.⁶⁹ The project's estimated water demand does not include potential credit for the existing use and existing water demand on the project site, which would further reduce the demand. The estimated 52.78 AFY water demand generated by the project would constitute less than one percent of the WBMDW year 2020 for both water supply and water demand. Further, the project would comply with Title 5: Public Works, Chapter 5.03: Water Conservation and Water Supply Shortage Program, of the CCMC. In addition, the project would comply with the Culver City mandatory green building requirements. The project would also comply with the WBMWD UWMP recommendations regarding drought management and water conservation. Based on the above, no additional water treatment facilities are required to meet the water supply demands associated with the project, and the project would not require the construction or expansion of water treatment facilities. Therefore, water infrastructure impacts associated with the project operation would be less than significant.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. As discussed in detail in Section IX, *Hydrology and Water Quality*, the project would include new stormwater drainage facilities that would be constructed in accordance with applicable regulatory requirements. The proposed design would create localized drainage inlets between the proposed buildings to capture the stormwater runoff and relay it to the stormwater treatment system for the project. The proposed condition would capture, treat, and control all on-site stormwater runoff prior to discharging or connecting to the off-site storm drain system. Environmental impacts associated with development of the project, including on-site drainage facilities, have been evaluated throughout this document. As concluded in this document, all potentially significant impacts associated with development of the project, including on-site stormwater drainage facilities, would be less than significant after implementation of the prescribed mitigation measures, where necessary. Therefore, impacts would be less than significant in this regard.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. As described in Response XVII.b, above, the project would fall within the 2015 WBMWD UWMP available and projected water supplies. According to the UWMP, the water supplies available in single dry and multiple dry years would be sufficient to meet all present and future water supply requirements within the applicable service areas for at least the next 20 years, including the project. As a result, the project is within the capacity of the GSWC to serve the project as well as existing and planned future water demands of its service area.

Sections 10910-10915 of the State Water Code (Senate Bill [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is: 1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 square feet of floor space; 2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 square feet of space, or 3) any mixed-use project that would demand an amount of water equal to or greater than the amount

⁶⁹ Proposed: 47,120 gpd X 365 days = 17,198,800 gallons per year = 52.78 AFY estimated project water demand.

of water needed to serve a 500 dwelling unit subdivision. As discussed under Response XVII.b, the project would generate a water demand of approximately 52.78 AFY (without accounting for water conservation features or subtracting existing on-site water demand). With implementation of water conservation measures per the requirements cited above, the project's actual water demand would be well below the conservative amount stated above. A typical 500 dwelling unit subdivision would have a water demand of approximately 154 AFY.⁷⁰ As the project does not meet the established thresholds, no WSA is required for this project.

Thus, for the reasons listed above, the project would have a less than significant impact with respect to water entitlements and supply.

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As indicated in the Response XVII.b, implementation of the project would generate an estimated average daily wastewater flow of 44,876 gpd. The HTP is designed to treat 450 mgd with an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available. Given the current capacity of the HTP, project wastewater generation would account for a less than one percent increase in demand at the HTP and there would be ample capacity to treat this increase. Therefore, the project would have a less than significant impact with respect to wastewater treatment capacity.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. The Culver City Environmental Programs and Operations Division collects residential solid waste. Commercial and industrial solid waste is picked up by private haulers. The division also provides a curbside recycling program including paper, cardboard, cans/aluminum, plastic, and glass. The recyclable materials are hauled to private recyclable material companies. Culver City does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

The remaining disposal capacity for the Los Angeles County's Class III landfills is estimated at approximately 129.2 million tons as of December 31, 2012, the most recent data available.⁷¹ In addition to in-County landfills, out-of County disposal facilities may also be available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the Los Angeles County Integrated Waste Management Plan (ColWMP), the County anticipates that future Class III disposal needs can be adequately met through 2027 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices.

As illustrated in **Table B-40, Projected Solid Waste Generated During Operation**, and based on solid waste generation factors from the California Integrated Waste Management Board (CIWMB), the project could generate

⁷⁰ Based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates, a Residential Single-Family (3-BR) unit generates 230 gallons per day (gpd) of wastewater. Assuming water demand is 20% greater than wastewater, single-family unit would have a water demand of 138,000 gpd or 154 AFY.

⁷¹ County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2012 Annual Report. August 2013.

approximately 442 lbs/day (0.221 tons/day or 80.67 tons/year) of solid waste, or approximately 389 lbs/day (0.194 tons/day or 70.81 tons/year) of solid waste beyond existing conditions. The annual amount of solid waste generated by the project would represent a minor amount of the estimated 129.2 million tons of remaining disposal capacity for the County's Class III landfills. As such, the solid waste generated by the project could be accommodated by the County's available regional landfills.

The California Department of Resources and Recycling and Recovery (CalRecycle) is the California State Agency that promotes the importance of reducing waste and oversees California's waste management and recycling efforts. CalRecycle has issued jurisdiction waste diversion rate targets equivalent to 50 percent of the waste stream as expressing in pounds per person per day. Thus, it is important to note that the estimate of solid waste generated by the project is conservative, in that the amount of solid waste that would need to be landfilled would likely be less than this forecast based on the City's implementation of solid waste diversion targets.

Construction of the project would result in generation of solid waste such as scrap, lumber, concrete, residual wastes, packing materials, and plastics which could require disposal of construction associated debris at the landfills. It is anticipated that a large amount of the construction debris would be recycled. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations. Culver City's standard conditions of approval specifically require the following:

Table B-40

Projected Solid Waste Generated During Operation

Land Uses	Quantity	Factor^a	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Existing Land Uses					
Office	8,871 s.f.	6 lbs/k.s.f./day	53	0.027	9.86
		Total	53	0.027	9.86
Proposed Land Uses					
Office	60,065 s.f.	6 lbs/k.s.f./day	360	0.180	65.70
Retail & Restaurant	16,396 s.f.	5 lbs/k.s.f./day	82	0.041	14.97
		Total	442	0.221	80.67
Net Increase (Existing/Proposed)			389	0.194	70.81

Notes: d.u. = dwelling unit; s.f. = square feet; k.s.f.= thousand square feet; lbs. = pounds.

^a Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates. <http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm>, accessed October 2016.

Source: ESA PCR 2016.

- Reasonable efforts shall be used to reuse and recycle construction and demolition debris, to use environmentally friendly materials, and to provide energy efficient buildings, equipment and systems. A Demolition Debris Recycling Plan that indicates where select demolition debris is to be sent shall be provided to the Building Official prior to the issuance of a demolition permit. The Plan shall list the material to be recycled and the name, address, and phone number of the facility or organization accepting the materials.

In addition, the project would comply with Title 5: Public Works, Chapter 5.01: Solid Waste Management, of the CCMC (as required by Culver City's conditions of approval). According to the CCMC, the project applicant would submit a construction and demolition recycling and waste assessment plan prior to issuance of the permit. Monthly reports would be submitted throughout the construction of the project. Further, summary reports with documentation would be submitted prior to final inspection. Therefore, the project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste.

Based on the above, a less than significant impact regarding solid waste would occur.

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. All local governments, including the City, are required under Assembly Bill 939 (AB 939), the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the City's target is exceeded, the City would be required to pay fines or penalties from the State for not complying with AB 939. The waste generated by the project would be incorporated into the waste stream of the City, and diversion rates would not be substantially altered. The project does not include any component that would conflict with state laws governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. Thus, less than significant impacts regarding compliance with AB 939 would occur with project implementation.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

- a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Less Than Significant Impact With Mitigation Incorporated. The preceding analysis does not reveal any significant unmitigable impacts to the environment. Based on these findings, the project is not expected to degrade the quality of the environment. The project site is located in a highly urbanized area of downtown Culver City and is currently developed with a two-story bank building and an associated asphalt-paved surface parking lot. The site does not support sensitive plant or animal species. As discussed above in Response V.a, no significant impacts regarding historical resources would occur with project implementation.

The 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, as discussed in Section IV. Potentially significant impacts to nesting birds would be reduced to a less than significant level with implementation of the prescribed mitigation measure. Adverse impacts to archaeological and paleontological resources could occur. However, construction-phase procedures would be implemented in the event any important archaeological or paleontological resources are discovered during grading and excavation activities, consistent with Mitigation Measures CULT-1 to CULT-8.

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 and VII concludes that impacts related to emissions of criteria pollutants, other air quality impacts, and impacts related to climate change will be less than significant. Sections IX concludes that impacts related to hydrology and water quality will be less than significant after implementation of the prescribed mitigation measures, where applicable. Based on the preceding analysis of potential impacts in the responses to items I thru XVII, no evidence is presented that this project would degrade the quality of the environment. The City hereby finds that impacts related to degradation of the environment, biological resources, and cultural resources will be less than significant with mitigation incorporated, as necessary.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact With Mitigation Incorporated. A description of 40 related projects in the project study area is provided in **Table B-41, List of Related Projects**, below. Related Projects are mapped in Figure B-5, above. The related projects are utilized to analyze cumulative impacts associated with Project implementation. Below is a discussion of cumulative impacts associated with the Project.

Table B-41

List of Related Projects

Map No.	Project Name	Location	Description
City of Culver City			
1	Caroline Condominium	3440 Caroline Avenue	2 DU condominiums
2	Washington/Landmark TOD	8810-8850 Washington Boulevard	41,745 SF shopping center, 38,732 SF office
3	Access Culver City Mixed Use TOD	8770 Washington Boulevard	115 DU apartments, 31,240 SF shopping center
4	Union 76	10638 Culver Boulevard	2,676 SF convenience store
5	Stoneview Nature Center	5950 Stoneview Drive	4,000 SF park
6	Westside Brake and Tires	4215 Sepulveda Boulevard	2,068 SF car repair, (2,068 SF retail to be removed)

Table B-41

List of Related Projects

Map No.	Project Name	Location	Description
7	Sony Expansion	10202 Washington Boulevard	218,450 SF office, 51,716 SF service building
8	Willows School Comprehensive Plan	8509 Higuera Street	150 SF school expansion
9	Expo LRT	Washington Boulevard & National Boulevard	N/A – Phase II
10	Wende Museum	10808 Culver Boulevard	12,596 SF museum
11	11198 Washington Place	11198 Washington Place	3,850 SF shopping center
12	Chevron Car Wash	11197 Washington Place	2,500 SF convenience store
13	4109-4111 Duquesne Avenue	4109-4111 Duquesne Avenue	2 DU apartment
14	Arora Condominiums	3837 Bentley Avenue	3 DU condominium
15	Culver Center Shopping Center	10799 Washington Boulevard	2,000 SF restaurant
16	Shell Carwash	11224 Venice Boulevard	2,285 SF convenience store
17	Condominiums	3961 Tilden Avenue	5 DU condominium
18	SPP Site Renovation	10000 Washington Boulevard	260,066 SF office, 9,960 SF quality restaurant, 4,835 SF restaurant, 6,961 SF general retail, 3,687 SF health/fitness club
19	West Los Angeles College Master Plan	9000 Overland Avenue	92,000 SF college expansion
20	Fresh Paint	9355 Culver Boulevard	2,947 SF shopping center
21	Warner Parking Structure	8511 Warner Drive	51,520 SF shopping center
22	Parcel B	9300 Culver Boulevard	118,000 SF restaurant
23	Lenawee-Culver Place	3814 Lenawee Avenue	8 DU single family housing
24	Culver Studios Amendment No. 6	9336 Washington Boulevard	138,997 SF production studio
25	Condominium	4241 Duquesne Avenue	3 DU condominium
26	Ivy Station – Washington/National TOD	8824 National Boulevard	10,000 SF restaurant, 10,000 SF quality restaurant, 200 DU apartment, 148 room hotel, 201,000 SF office, 24,000 SF retail
27	Globe Housing Project	4044-4068 Globe Avenue	10 DU townhouse
28	Jazz Bakery	9814 Washington Boulevard	200 SF performance theater, 7,500 SF museum and bakery
29	Surfas Site	8777 Washington Boulevard	128,000 SF office, 4,500 SF retail
30	Lorcan O’Herlihy Architects	3434 Wesley Street	15 DU apartment, 14,237 SF office
31	ICC site	8888 Washington Boulevard	2,878 SF retail, 3,184 SF restaurant, 59,325 SF office
32	9919 Jefferson Office Project	9919 Jefferson Boulevard	62,558 SF office

Table B-41

List of Related Projects

Map No.	Project Name	Location	Description
City of Los Angeles			
33	---	10612 West National Boulevard	1,726 SF other
34	United Oil 78	9815 West National Boulevard	12 fuel pump gas station
35	---	3822 South Dunn Drive	86 DU apartment
36	---	3221 South La Cienega Boulevard	Other mixed use
37	---	3640 South Holdrege Avenue	25,032 SF office
38	---	9829 Venice Boulevard	865 SF coffee shop with drive-through
39	---	3425 South Motor Avenue	115 DU apartment, 975 SF retail
40	Venice & National Hotel	8900 West National Boulevard	180 DU other, 23,795 SF retail

Notes: SF = square feet; DU = dwelling unit.

Source: Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project, prepared by Crain & Associates, dated December 22, 2016.

CUMULATIVE IMPACTS

Aesthetics

Development of the project in conjunction with the related projects would result in an incremental intensification of land uses in the heavily urbanized downtown area of Culver City. The proposed project has been designed with the goal of bringing retail, restaurant, and office uses within the downtown area. New development and concentration of development, as are some of the related projects, is consistent with the objectives of the downtown area to enliven the street front, upgrade the quality of development, and to generate more pedestrian activity.

Although the project is proposing a partial 4-story building (with a building height up to 56 feet), the immediate surrounding area consists of a range of low- to mid-rise buildings, including the 7-story Southern California Hospital Culver City and associated medical buildings at varying heights.

Related projects in combination with the project are located within designated urban lots planned for development and would not encroach upon public views through street corridors. Because the visual character of the City is defined by a range of diverse and architecturally interesting buildings, it is anticipated that new development would introduce more architecturally interesting buildings and would continue to enhance the character of the street front with updated landscaping and design components. In addition, new development, as with the project, would continue to introduce a variety of building heights and styles and, as such, contribute to the urban character of the area. Because new development that is subject to discretionary action must

implement and be consistent the City's design standards, it is anticipated that the related projects would be of high quality design and construction. As such, with the implementation of existing guidelines, related projects in combination with the project are not considered to result in the substantial, cumulative degradation of the area's visual character. Further, as the project site does not currently reflect a high level of visual quality, and because the project has been designed at a scale and with a unified architectural aesthetic that would be compatible with existing and planned development in the vicinity, the project would not substantially contribute to cumulatively considerable aesthetics impacts.

Cumulative light and glare effects would be consistent with the existing urban environment, which is characterized by high ambient light levels. Because lighting, including illuminated signage and outdoor lighting would be subject to regulations contained within the CCMC, compliance would ensure that impacts regarding lighting for the project and related projects would not cause a significant cumulative adverse effect on existing uses.

Building plans for new related projects would be reviewed on a case-by-case basis by the City Department of Building and Safety to ensure that new construction would avoid the use of glare-prone materials. For new development projects, the use of high-performance materials such as tinted non-reflective glass or other non-reflective surface materials, cladding, and trim is required. With the implementation of standard city building requirements similar to the project, cumulative glare impacts would be less than significant.

Agricultural and Forest Resources

As with the project, related projects are located within developed, urbanized areas generally zoned for commercial and residential uses and do not support farming, agricultural or forest-related operations. Development of the project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no cumulative impacts on agricultural or forest resources would occur.

Air Quality

There are a number of related projects in the project area that have not yet been built or are currently under construction. Since the project applicant has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. The SCAQMD recommends that project-specific construction air quality impacts be used to determine the potential cumulative impacts to regional air quality.

With regard to project operations, SCAQMD's approach for assessing cumulative impacts related to operations or long-term implementation is based on attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. As discussed earlier, the SCAQMD has developed a comprehensive plan, the AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the Los Angeles County portion of the Air Basin is currently in nonattainment for ozone, NO₂, PM₁₀, and PM_{2.5}, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated

under two sets of thresholds for CEQA and the SCAQMD. In particular, Section 15064(h)(3) of the CEQA *Guidelines* provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

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

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the project’s incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2012 AQMP. The project would not conflict with or obstruct implementation of AQMP and would be consistent with the growth projections in the AQMP.

Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality.

As displayed in Tables B-1 and B-2, regional burden emissions calculated for project construction and operations are less than the applicable SCAQMD daily significance thresholds, which are designed to assist the region in attaining the applicable State and national ambient air quality standards. These standards apply to both primary (criteria and precursor) and secondary pollutants (ozone). Although the project site is located in a region that is in non-attainment for ozone and PM₁₀, the emissions associated with the project would not be cumulatively considerable as the emissions would fall below SCAQMD daily significance thresholds. In addition, the project would be consistent with the AQMP, which is intended to bring the Basin into attainment for all criteria pollutants. Therefore, cumulative impacts on air quality would be less than significant.

Biological Resources

With regard to cumulative biological resources impacts, the project site is located in an urbanized area and like the project, other related projects would mostly occur on previously disturbed, urbanized land. The project does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and, therefore, could not contribute to a cumulative effect in these regards. The project would fully comply with City ordinances pertaining to tree removal, resulting in no net loss of trees from project implementation. Further, potentially significant impacts to nesting birds would be reduced to a less than significant level with implementation of the prescribed mitigation. Related projects would also be required to comply with the City’s street tree replacement requirements and implement mitigation for impacts to nesting birds. Therefore, cumulative impacts to biological resources would be less than significant.

Cultural Resources

Impacts related to cultural resources are site-specific and as such, are assessed on a site-by-site basis. As discussed previously, mitigation measures would ensure the project does not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines,

that the project does not directly or indirectly destroy a unique paleontological resource and that the project does not adversely affect human remains. It is anticipated that comparable implementation of similar mitigation measures and/or compliance with existing regulations would be incorporated into the approval of each related project. Additionally, as discussed above, the project would not result in direct historic impacts. Further, the historic setting in the area around the project site is already eroded by contemporary development. Based on the above, the project would not contribute to cumulatively considerable cultural resources impacts.

Geology and Soils

Geological and geotechnical impacts are defined by site-specific conditions for the project and related projects and are, therefore, typically confined to contiguous properties or to a localized area in which concurrent construction projects in close proximity could be subject to the same fault rupture system or other geologic hazard, or exacerbate erosion impacts. The project site is not underlain by an active earthquake fault and, thus, would not contribute to cumulative seismic rupture impacts. Although seismic shaking would occur on the project site as well as related project sites, applicable regulatory requirements require consideration of seismic loads in structural design for all related projects. As such, cumulative impacts associated with ground shaking would be less than significant. The project site is located within a State-designated hazard zone for liquefaction. However, the Geotechnical Engineering Investigation concluded that liquefaction should not pose a significant hazard to the project. The project site is not prone to landslide hazards. As such, the project would not cumulatively contribute to liquefaction or landslide impacts. While the loss of topsoil among the project and related projects during construction could result in cumulative erosion impacts, the project and related projects would be required to implement applicable local, regional and State regulations for grading and excavations during construction, including SWPPP requirements. Because the project site contains favorable conditions for foundations and, as with related projects, would be required to comply with approved geotechnical recommendations, the project's contribution to potential cumulative impacts from lateral spreading, subsidence, liquefaction, or collapse would also be less than significant. In addition, the project and related project sites are located in a highly urbanized area and would connect to existing wastewater infrastructure. Thus, the project and related projects would not need to use septic tanks or alternative waste disposal systems and, as such, cumulative impacts relative to waste disposal capacity would be nil. Because the project would not contribute considerably to geology and soils impacts, the project's cumulative geology and soil impacts would be less than significant.

Greenhouse Gas Emissions

GHG emissions impacts are cumulative. As such, the impact discussions included above in Responses VII.a-b, address the project's potential to result in a cumulatively considerable GHG impact. As discussed therein, impacts would be less than significant.

Hazards and Hazardous Materials

Many of the related projects would use, handle, store, and/or transport hazardous materials or require demolition of structures containing such materials. As with the project, related projects would be required to use and store all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with Federal, State, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, disposal, or handling of hazardous materials. Some of the related projects may be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, each related project would be required to comply with existing

Federal, State, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators. Cumulative impacts would therefore be less than significant in this regard.

Some of the related projects may also include the use of hazardous materials and, as with the project, be located within one-quarter mile of a school. However, related projects would be subject to environmental review to evaluate potential impacts from hazardous materials releases within one-quarter mile of a school. The project would not have a considerable contribution related to the use or release of hazardous materials. With the implementation of existing regulations, cumulative impacts with respect to impacts on schools would be less than significant.

Hydrology and Water Quality

The related projects would potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff within the local vicinity of the project site. However, as with the project, the related projects are located within the highly urbanized areas, which are largely characterized by existing buildings and paved surfaces with limited landscaped areas. Accordingly, the potential to generate a notable amount of new impermeable surfaces is limited. Pursuant to the City's LID stormwater requirements, related projects would be required to capture and treat runoff flow during storm events similar to the project. Further, the related projects would be subject to State NPDES permit requirements for both construction and operation. Each project greater than one-acre in size would be required to develop a SWPPP and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid or minimize impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the Culver City Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Thus, compliance with applicable regulatory requirements would avoid significant impacts on drainage/flooding conditions and the quality of water reaching the public drainage system. Cumulative impacts to hydrology and water quality would be less than significant.

Land Use and Planning

As with the project, related projects would be infill projects providing uses in keeping with the mixed office and retail/restaurant use character of the downtown area. Many related projects feature mixed-use components that provide housing and street-oriented commercial uses that would enliven the street front and enhance pedestrian activity in accordance with adopted plans. Related projects, which would accommodate a broad range of uses that provide job opportunities and enhance urban lifestyles, would be consistent with the General Plan and City growth objectives. Because it is anticipated that development of the related projects would be consistent with the objectives of the General Plan and other plans that support intensification and redevelopment, cumulative land use impacts would be less than significant.

Mineral Resources

As discussed above, the project would have no impact on mineral resources. Because of the large number and broad extent of oil drilling districts and State-designated oil fields in the greater area, some of the related projects may be located within these designated areas. However, with implementation of new methodologies, such as slant drilling, related projects would not substantially reduce extraction capabilities, impede exploratory operations, or would cumulatively result in the significant loss of availability of oil resources. Regardless, because

the project would have no incremental contribution to the potential cumulative impact on mineral resources, the project would have no cumulative impact on such resources.

Noise

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and sound reduces significantly in magnitude as the distance from the source increases. As such, only projects expected to occur in the immediate project area likely would contribute to cumulative noise impacts.

Construction Noise

Noise from construction of the project and related projects would be localized, thereby potentially affecting areas immediately within 500 feet from either/both construction sites. There are two related projects in the surrounding area within approximately 500 feet of the project site (Related Projects Nos. 18 and 28) that could have construction concurrent with the project. All other related projects with future potential concurrent construction are greater than 500 feet from the project site and would not contribute substantially to cumulative construction noise impacts. Because the timing of the construction activities for all cumulative projects cannot be defined and are beyond the control of the City and the project applicant, quantitative analysis that assumes multiple, concurrent construction projects would be speculative. The cumulative noise levels would be intermittent, temporary and would cease at the end of the respective construction periods. It is not likely that maximum construction noise impacts from the cumulative projects would occur simultaneously, as sound levels vary from day to day depending on the construction activity performed that day and its location on the development site. Due to distance attenuation and intervening structures, construction noise from one site would not result in a noticeable increase in noise at sensitive receptors near the project site, which would preclude a cumulative noise impact. Furthermore, related projects would be required to comply with City noise standards and implement mitigation measures for identified significant impacts, as required under CEQA, similar to the project. As such, cumulative impacts associated with construction noise would be less than significant.

Operational Noise

Cumulative operational noise impacts would occur primarily as a result of increased traffic on local roadways due to the project and other projects in the project vicinity. Therefore, cumulative traffic-generated noise impacts have been assessed in the analysis above based on the contribution of the project to the future cumulative base traffic volumes in the project vicinity. As cumulative traffic volumes would not double, the noise level increase would be well below a 5 dBA CNEL. As such, with respect to roadway noise, there is no potential for the project to result in a cumulatively considerable contribution when considered together with related project traffic volumes.

The project's fixed mechanical equipment and other project features (i.e., loading areas) would be shielded from adjacent uses and/or located within the interior of the building such that noise levels would be less than significant at the property line. Noise levels for similar equipment and facilities for each related project would be subject to City noise ordinance requirements. For this reason, on-site noise produced by any related project would not result in a substantial or noticeable additive increase to project-related noise levels. As the project's composite stationary-source and operational impacts would be less than significant, composite stationary-source and operational noise impacts attributable to cumulative development would also be less than significant.

Vibration

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the project site, there is no potential for the project to result in a cumulatively considerable contribution, when considered together with the related projects, to cumulatively significant construction-related or operational impacts.

Population and Housing

The project would not generate a new residential population as no residential uses are proposed. The increase in area population and employment resulting from the project and the related projects would have a less than significant cumulative impact as these increases are anticipated to be within SCAG, Culver City, and City of Los Angeles Subregion growth forecasts. Related projects in combination with the project would not result in the cumulative loss or reduction of housing. Therefore, cumulative impacts with respect to population and housing are considered to be less than significant.

Public Services

Fire Protection Services

The related projects would cumulatively generate, in conjunction with the project, the need for additional fire protection and emergency medical services. Although there would be cumulative demand on fire protection services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site specific design and safety requirements, similar to the project. All related projects would be subject to review by the LAFD and/or CCFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety. Further, project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD and CCFD are expected to help support adequate response times. Even in consideration of the related projects, if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted, and was foreseeable, the project study area is highly developed, and the site of a fire station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government, and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the project is required to mitigate.

Based on the above considerations, the project would not result in a cumulatively considerable contribution to cumulative impacts associated with the construction of new fire facilities.

Police Protection Services

The related projects would cumulatively generate, in conjunction with the project, the need for additional police protection services. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the LAPD or CCPD on a project-by-project basis to ensure that sufficient security measures are

implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. Even in consideration of the related projects, if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted, and was foreseeable, the project study area is highly developed, and the site of a police station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government, and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the project is required to mitigate.

Based on the above considerations, the project would not make a cumulatively considerable contribution to cumulative impacts associated with the construction of new police facilities.

Schools

Pursuant to California Government Code Section 65995, the payment of developer fees under the provisions of SB 50 address the impacts of new development on school facilities serving that development. Compliance with the provisions of Section 65995 is deemed to provide full and complete mitigation of school facilities impacts. The related projects would be required to pay these fees as applicable. Therefore, the full payment of all applicable school fees would reduce potential cumulative impacts to schools to less than significant levels.

Parks

The project would not generate a new residential population as no residential uses are proposed. New related residential projects are anticipated to provide on-site open space and recreational amenities to meet the needs of projected residents. In addition to the provision of on-site recreational amenities for related residential uses of related projects, the implementation of required developer paid parks and recreational fees would allow for land purchase and expansion of existing facilities. As such, related projects are not anticipated to result in substantial physical deterioration or accelerated deterioration of recreational and parks facilities. Cumulative impacts to parks would be less than significant.

Other governmental services

The related projects would cumulatively generate, in conjunction with the project, the need for additional library services. The related projects would generate revenue to the City's general funds that could be used to fund library expenditures as necessary to offset the cumulative incremental impact on library services. The related projects would pay applicable development fees based upon the projected population of the individual developments. The full payment of all applicable library fees would reduce potential cumulative impacts to libraries to less than significant levels.

The related projects' employees and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would be typical of that experienced for the highly urbanized project

vicinity. Similar to the project, the related projects would need to pay applicable development impact fees of the City of Los Angeles or Culver City. The full payment of all applicable fees would reduce potential cumulative impacts to other governmental services/facilities to less than significant levels.

Recreation

Refer to discussion under Parks, above.

Transportation and Circulation

Cumulative impacts on traffic associated with construction (e.g., an intermittent reduction in street and intersection operating capacity) are typically considered short-term adverse, but not significant impacts. The project would result in a less than significant traffic impact during construction with the implementation of a Construction Traffic Management Plan would incorporate notification and safety procedures and controls. Each related project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures as part of a Construction Traffic Management Plan, to reduce potential traffic impacts during construction. The future (2020) service level conditions presented in Table B-31 represent a combination of estimated trips from all related projects, as well as incremental annual growth, and are cumulative in nature. As shown in Table B-31, cumulative traffic impacts would be less than significant.

The regional transportation analysis, including public transit, is based on CMP procedures that have been developed to address countywide cumulative growth impacts on regional transportation facilities. The CMP Guidelines contain procedures for monitoring land use development levels and transit system performance by local jurisdictions and Metro, and are used to inform planning of infrastructure improvements to meet future needs. As indicated in the discussion of project impacts above, the project would not have a significant impact on public transit and the incremental impacts on the regional public transit system would not be cumulatively considerable. Also, while the project would contribute trips to the freeway system, project traffic did not trigger the screening thresholds at the ramps or freeway segments most likely to be used by project traffic. As such, the project would not contribute cumulatively considerable traffic to the freeway system.

With regard to access, pedestrian and bicycle access and facilities, and parking, the project would not result in a significant impact. Each project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian and cyclists. Access to each site would be accessed during the City's review process to ensure compliance with the City's requirements, which are established to minimize potential impacts. With regard to parking, the related projects would be subject to the applicable City parking requirements for vehicle and bicycle parking. Therefore, cumulative impacts on parking would be less than significant. Therefore, the project would not contribute to a significant cumulative impact with regard to these issues.

Utilities and Service Systems

Water Supply

Development of the project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. However, each related project would be subject to City review to

assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. Furthermore, LADWP as well as GSWC and WBMWD conduct ongoing evaluations to ensure facilities are adequate, and require infrastructure system improvements. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

Wastewater

Implementation of the project in combination with the related projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. The HTP currently treats an average of 362 mgd, with a capacity to treat 450 mgd. The City of Los Angeles has adopted an Integrated Resources Plan (IRP) that shows that the HTP will be able to accommodate growth within its service area to the year 2030. In addition, the potential need for the related projects to upgrade sewer lines to accommodate their wastewater needs is site-specific and there is minimal, if any, direct cumulative relationship between the development of the project and the related projects. Therefore, no significant cumulative sewer infrastructure impacts are anticipated from the development of the project and the related projects. Therefore, cumulative impacts on sewer service would be less than significant.

Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The remaining disposal capacity for the County's Class III landfills is estimated at approximately 129.2 million tons as of December 31, 2012, the most recent data available. Thus, sufficient capacity would be available to meet the demand created by related projects. As discussed above, the project impacts on solid waste disposal would be less than significant. In addition, similar to the project, related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to checklist items in the City's Green Building Code, as applicable. As such, impacts to the solid waste system from cumulative development would be less than significant and thus, the project would not contribute to a cumulatively significant solid waste impact.

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

Less Than Significant Impact With Mitigation Incorporated. Based on the analysis of the project's impacts in the Responses I thru XVII, there is no indication that this project could result in substantial adverse effects on human beings. While there would be a variety of effects during construction related to traffic, noise and air quality, these impacts would be less than significant based on compliance with applicable regulatory requirements and established impact thresholds, as well as the prescribed mitigation measures, where applicable (construction noise). Long-term effects would include increased vehicular traffic, traffic-related noise, periodic on-site operational noise, minor changes to on-site drainage, and changing of the visual character of the site, with a majority of these impacts affecting adjacent roadway segments and intersections. The analysis herein concludes that direct and indirect environmental effects will at most require mitigation to reduce potentially significant impacts to less than significant levels. Generally, environmental effects will result in less than significant impacts. Based on the analysis in this Initial Study, the City finds that direct and indirect impacts to human beings will be less than significant with mitigation incorporated, as necessary.

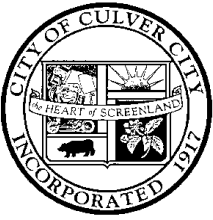
XIX. EARLIER ANALYSIS

None.

REFERENCES

1. *Air Quality Technical Report* prepared by ESA-PCR in February 2017.
2. *Annual Compliance Report 8th Edition, Culver City Fire Department*, prepared by Cara Flores, Management Analyst for the Commission on Fire Accreditation International, Inc., dated June 28, 2016.
3. Captain Ron Iizuka, Culver City Police Department, written correspondence, dated September 21, 2016 and telephone correspondence on January 31, 2017. Written correspondence is regarding CCPD existing conditions.
4. Chief Dave White, Culver City Fire Department, written correspondence, dated August 9, 2016 and telephone correspondence on January 25, 2017. Written correspondence is regarding CCFD existing conditions.
5. *Community Risk Assessment & Standards of Cover*, Culver City Fire Department, Chris Sellers, Fire Chief, 2014.
6. *Cultural Resources Assessment of the Proposed 9735 Washington Boulevard Project, Culver City, Los Angeles County*, prepared by ESA, 2017.
7. *Draft Traffic Impact Report for Proposed Washington (9735) Mixed-Use Project*, prepared by Crain & Associates, dated December 22, 2016.
8. *Existing and Proposed Conditions Assessment The Brick and The Machine Utility Infrastructure Technical Memorandum*, prepared by Fuscoe Engineering, dated January 3, 2017.
9. *Geotechnical Engineering Investigation Proposed Mixed Use Development 9735 West Washington Boulevard, Culver City, California*, prepared by Geotechnologies, Inc., dated July 20, 2015.
10. *Greenhouse Gas Technical Report* prepared by ESA-PCR in February 2017.
11. *Phase I Environmental Site Assessment Report, Commercial Building, 9735 West Washington Boulevard, Culver City, California 90232*, prepared by Partner Engineering and Science, Inc., dated May 22, 2015.
12. *Phase II Subsurface Investigation Report, Commercial Building, 9735 West Washington Boulevard, Culver City, California 90232*, prepared by Partner Engineering and Science, Inc., dated July 17, 2015.
13. *Noise and Vibration Technical Report*, prepared by ESA-PCR, dated February 2017.
14. *Shade/Shadow Report*, prepared by ESA-PCR, dated February 2017.

Attachment C – Mitigation Monitoring Program



ATTACHMENT C MITIGATION MONITORING PROGRAM

The following environmental mitigation measures shall be incorporated into the project development as conditions of approval. The project applicant shall secure a signed verification for each of the mitigation measures which indicate that mitigation measures have been complied with and implemented, and fulfills the City environmental and other requirements (Public Resources Code Section 21081.6.). Final clearance shall require all applicable verification as included in the following table. The City of Culver City will have primary responsibility for monitoring and reporting the implementation of the mitigation measures. The mitigation measures have been identified by impact category and numbered for ease of reference.

MITIGATION MONITORING PROGRAM P2017-0021 – AM, -AUP, -SPR, -GPMA, –ZCMA; and – MND 9735 Washington Boulevard “Brick and Machine”				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<u>BIOLOGICAL RESOURCES</u>				
BIO-1: The applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Either: (1) Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would insure that no active nests are disturbed; or (2) If avoidance of the avian breeding season (February 15 through August 31) is not feasible, then: (a) A qualified biologist shall conduct a preconstruction nesting bird survey within 15 days and again within 72 hours prior to any ground disturbing activities (staging, grading, vegetation removal or clearing, grubbing, etc.). The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code are avoided. Survey areas shall include suitable nesting habitat within 200 feet of construction site boundaries. This	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits	Culver City Planning

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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
two-tiered survey method is intended to provide the project applicant with time to understand the potential issue and evaluate solutions if nests are present, prior to mobilizing resources. If active nests are not identified, no further action is necessary. (b) If active nests are identified during pre-construction surveys, an avoidance buffer shall be demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Given the high disturbance level, general avoidance buffers include a minimum 100-foot avoidance (for smaller birds more tolerant of human disturbance) to a 250-foot avoidance buffer for passerine and a 500-foot avoidance buffer from active raptor nests, or reduced buffer distances determined at the discretion of a qualified biologist familiar with local nesting birds and breeding bird behavior within the project area. Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the				

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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Culver City Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds				
<u>CULTURAL RESOURCES</u> CULT-1: Prior to issuance of demolition permit, the applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist). Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the Qualified Archaeologist and Gabrielino Tribe and shall focus on how to identify archaeological and cultural resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. CULT-2: Prior to issuance of demolition permit, the applicant shall retain a Native American tribal monitor from a Gabrieleno Tribe who shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall take into account the rate of excavation and grading activities, proximity to known	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrieleno Tribe. CULT-3: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and the Gabrieleno Tribe. If the resources are Native American in origin, the Gabrieleno Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall incorporate the Gabrieleno Tribe’s treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The				

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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area for educational purposes. CULT-4: Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. CULT-5: A qualified Paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter older Quaternary sediments. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older Quaternary sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of				

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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Paleontologist. CULT-6: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Paleontologist shall implement a paleontological salvage program to remove the resources from the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. CULT-7: The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the project applicant to the City and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. CULT-8: If human remains are encountered unexpectedly during implementation of the				

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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment. Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human				

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remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.				
<u>Geology and Soils</u> GEO-1: Site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation shall be implemented per the project’s Final Geotechnical Engineering Investigation, subject to review and approval by the Culver City Building Safety Division.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading and Building Permits and a Foundation Plan	Culver City Building Safety Division and Building Safety Inspector
<u>Hazards and Hazardous Materials</u> HAZ-1: Prior to the issuance of any permit for the demolition or alteration of the existing on-site building, a comprehensive ACMs survey of the buildings shall be performed. If no ACMs are found, the project applicant shall provide a letter to the Culver City Building Safety Division from a qualified asbestos abatement consultant indicating that no ACMs are present in the on-site buildings. If ACMs are found to be present, an operations and maintenance (O&M) program shall be implemented to safely manage the suspect ACMS located at the project site. Further, ACMs found to be present shall be abated in compliance with the South Coast Air Quality Management District’s Rule 1403 as well as all other applicable State and Federal rules and regulations. HAZ-2: Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a comprehensive LBP materials survey shall be performed to the written satisfaction of the Culver City Building Safety Division. Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division; Building Safety Inspector; Fire Prevention; Fire Inspector; Planning Division
<u>Hydrology and Water Quality</u> WQ-1: If dewatering activities occur on-site during future redevelopment, samples shall be obtained from the water and analyzed for volatile organic compounds (VOCs) and oxygenates to ensure that they do not exceed applicable discharge requirements. Should the samples exceed VOC, oxygenates or any other applicable	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	On-Going During Construction	Culver City Planning, Public Works, and Building Safety Division

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discharge requirement, a dewatering plan shall be prepared by the project applicant for submittal to the Los Angeles Regional Water Quality Control Board (LARWQCB) and other appropriate agencies determined appropriate in consultation with the LARWQCB for review and approval. The plan shall include but not be limited to sampling of groundwater that may be contaminated; and treatment and disposal of contaminated groundwater in compliance with applicable regulatory requirements. Written verification from the LARWQCB of approval of a dewatering plan completion shall be submitted to the Culver City Planning Division and Department of Public Works prior to issuance of grading permit.				
Noise NOISE-1: Noise-generating equipment operated at the project site shall be equipped with the most effective noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. NOISE-2: The project applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison’s telephone number(s) shall be prominently displayed at the project site. Signs shall also be posted at the project site that includes permitted construction days and hours. NOISE-3: Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously. NOISE-4: Temporary noise barriers that provide a minimum of 20 dB noise reduction shall be used to block the line-of-site between construction equipment and noise-sensitive receptors (residences) during project construction. Noise barriers shall be a minimum of 20-feet tall along the north boundary adjacent to residential uses. NOISE-5: Contractors would phase in construction activity, use low-impact construction	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Building Permit and On-Going during Construction	Culver City Building Safety Division; Building Safety Inspector; Planning Division

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technologies, and avoid the use of heavy vibrating equipment where possible to avoid construction vibration impacts. Especially, contractors shall use smaller and lower impact construction technologies to avoid human annoyance to the adjacent buildings. Contractors shall avoid the use of driving piles and drill piles instead where necessary to avoid structural damage. The construction contractor shall be responsible for implementing this measure during the construction phase.				
<u>Public Services</u> PS-1: Construction Traffic Management Plan – A Final Construction Traffic Management Plan shall be developed by the project contractor in consultation with the project’s traffic and/or civil engineer and approved by Culver City’s Building Official, Engineer and/or Planning Manager, as applicable, prior to issuance of any project demolition, grading or excavation permit. The Final Construction Traffic Management Plan shall also be reviewed and approved by Culver City’s Fire and Police Department. The Culver City’s Building Official, Engineer and/or Planning Manager, as applicable reserve the right to reject any engineer at any time and to require that the Plan be prepared by a different engineer. Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector (“Inspectors”) of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other surrounding developments that would potentially be under construction at around the same time as the project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another. The Final Construction Traffic Management Plan shall identify, at a minimum, the following to the satisfaction of the City: ▪ The name and telephone number of a contact person who can be reached 24 hours a day regarding construction traffic	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits and On-Going during Construction	Culver City Planning, Public Works, Fire and Police Departments

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complaints or emergency situations. ▪ An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties. ▪ Procedures for the training and certification of the flag persons. ▪ The location, times, and estimated duration of any roadway closures, traffic detours, use of protective devices, warning signs, and staging or queuing areas. ▪ The location and travel routes of off-site staging and parking locations. ▪ The location of temporary power, portable toilet and trash and materials storage locations. ▪ The timing and duration of all street and/or lane closures and shall be made available to the City in digital format for posting on the City's website and distribution via email alerts on the City's "Gov Delivery" system. The Plans shall be updated weekly during the duration of project construction, as determined necessary by the City Department of Public Works or designee determined appropriate by Public Works. ▪ Prior to approval of the Plan, the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following				

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information to the surrounding community: 1) Construction schedule and hours. 2) Framework for construction phases. 3) Identify traffic diversion plan by phase and activity. 4) Potential location of construction parking and office trailers. 5) Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity). 6) Emergency access plan. 7) Demolition plan. 8) Staging plan for the concrete pours, material loading and removal. 9) Crane location(s). 10) Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers)				