ATTACHMENT NO. 7

5700 HANNUM MIXED-USE RESIDENTIAL AND COMMERCIAL PROJECT

Final Environmental Impact Report
State Clearinghouse No. 2023080709

Prepared for
City of Culver City
9770 Culver Blvd.
Culver City, CA 90232

June 2024

Culver City Case Nos:
P2023-0218-CP; -DOBI; -ZCMA; -GPMA; -EIR

ESA

LINK TO DRAFT EIR APPENDICES

5700 Hannum Ave - Proposed Project (Comprehensive Plan) - City of Culver City

5700 HANNUM MIXED-USE RESIDENTIAL AND COMMERCIAL PROJECT

Final Environmental Impact Report
State Clearinghouse No. 2023080709

Prepared for
City of Culver City
9770 Culver Blvd.
Culver City, CA 90232

June 2024

Culver City Case Nos:
P2023-0218-CP; -DOBI; -ZCMA; -GPMA; -EIR

633 West 5th Street
Suite 830
Los Angeles, CA 90071
213.599.4300
esassoc.com

ESA

Atlanta	Palm Beach County	San Diego
Bend	Pasadena	San Francisco
Irvine	Pensacola	San Jose
Los Angeles	Petaluma	Sarasota
Mobile	Portland	Seattle
Oakland	Rancho Cucamonga	Tampa
Orland	Sacramento	Thousand Oaks

OUR COMMITMENT TO SUSTAINABILITY | ESA helps a variety of public and private sector clients plan and prepare for climate change and emerging regulations that limit GHG emissions. ESA is a registered assessor with the California Climate Action Registry, a Climate Leader, and founding reporter for the Climate Registry. ESA is also a corporate member of the U.S. Green Building Council and the Business Council on Climate Change (BC3). Internally, ESA has adopted a Sustainability Vision and Policy Statement and a plan to reduce waste and energy within our operations. This document was produced using recycled paper.

TABLE OF CONTENTS

Final Environmental Impact Report

Page

Chapter 1. Introduction 1-1
1.1 Purpose of the Final EIR 1-1
1.2 Project Summary 1-1
1.3 Overview of the CEQA Public Review Process for the Draft EIR 1-2
1.3.1 Initial Study/Notice of Preparation 1-2
1.3.2 Draft Environmental Impact Report 1-3
1.4 Organization of the Final EIR 1-4

Chapter 2. Comments and Responses 2-1
2.1 Responses to Comments 2-4
2.1.1 Draft EIR Meeting 2-4
2.1.2 Agency Comments 2-13
2.1.3 Individual Comments 2-28

Chapter 3. Revisions, Clarifications, and Corrections to the Draft EIR 3-1

Chapter 4. Mitigation Monitoring Program 4-1

List of Tables

Table 2-1 Summary of Comments on the Draft EIR 2-2
Table 4-1 Mitigation Monitoring Program 4-2

Appendices

Appendix A: Original Comment Letters on the Draft EIR
Appendix B: Draft EIR Public Meeting Materials

This page intentionally left blank

CHAPTER 1
Introduction

1.1 Purpose of the Final EIR

The City of Culver City (City), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Final Environmental Impact Report (Final EIR) for the proposed 5700 Hannum Avenue Mixed-Use Residential and Commercial Project (Project). This document, in conjunction with the Draft Environmental Impact Report (Draft EIR), comprise the Final EIR.

As described in CEQA Guidelines Sections 15088, 15089, 15090 and 15132, the Lead Agency must evaluate comments received on the Draft EIR and prepare written responses and consider the information contained in a Final EIR before approving a project. Pursuant to CEQA Guidelines Section 15132, a Final EIR consists of: (a) the Draft EIR or a revision of the Draft; (b) comments and recommendations received on the Draft EIR either verbatim or in summary; (c) a list of persons, organizations, and public agencies commenting on the Draft EIR; (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and (e) any other information added by the Lead Agency.

1.2 Project Summary

As further described in Chapter 2, *Project Description*, of the Draft EIR, 5700 Hannum Owner, LLC c/o Lincoln Property Company, the Applicant, proposes to develop a mixed-use residential and commercial project on an approximately 2.23-acre (97,264 square feet [sf]) site (Project Site) located at 5700 Hannum Avenue within the Fox Hills neighborhood of the City of Culver City (City). The Project Site is currently developed with an existing 30,672 square foot, two-story office building in the northern portion of the Project Site and associated surface parking. The Project would develop a new 6-story (up to a height 78-feet) mixed-use building with two (2) semi-subterranean levels, consisting of 309 residential units (including 27 Very Low Income units) and 5,600 square feet of retail space. The Project would provide a total of 7,507 square feet of publicly accessible open space, 19,526 square feet of private open space and 27,123 square feet of common open space (for residents) for a total of 54,156 square feet of open space. The building would be constructed atop two levels of semi-subterranean vehicular parking, with parking also provided on the first floor of the building. The Project would include a total of 428 vehicular parking spaces (399 residential, 6 guest and 23 commercial) within three parking levels. Two points of vehicular access would be provided to the Project Site, including a residential only driveway along Buckingham Parkway and a commercial and residential driveway along Hannum Avenue. The Project would also provide a total of 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces in compliance with Culver City Municipal Code (CCMC)

requirements. The Project would also include private and publicly accessible open space. The Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza fronting Hannum Avenue. Common open space available to residents only would include a centrally located courtyard, a community room on the second floor; a gym, an amenity deck, and a community room on the sixth floor.

The Project is proposing to change the Project Site's zoning designation from Commercial Regional Business Park to Planned Development (PD) with adoption of a Comprehensive Plan that would serve as the overarching entitlement mechanism for the Project Site. To achieve the Project's proposed density and mix of uses, a General Plan Amendment Map would be needed to designate the Project Site from Regional Center to General Corridor. The Project is also requesting Density and Other Bonus Incentives (DOBI) to allow for Increased Density with affordable units incorporated into the Project; and approval for Extended Hours of Construction (CCMC Section 9.07.035.C.1). In addition, the Project would require ministerial permits including but not limited to demolition, grading, building, haul route and engineering permits.

1.3 Overview of the CEQA Public Review Process for the Draft EIR

In compliance with the CEQA Guidelines, the City, as the Lead Agency for the Project, has provided opportunities for the public to participate in the environmental review process. As described below, throughout the environmental review process, an effort was made to inform, contact and solicit input from the public and various State, regional, and local government agencies and other interested parties on the Project.

1.3.1 Initial Study/Notice of Preparation

In accordance with CEQA Guidelines Section 15063(a), the City prepared an Initial Study to identify potential environmental impacts. The Initial Study determined that the Project had the potential to result in significant impacts associated with a number of environmental issues. As a result, the Initial Study led to a determination that a Draft EIR should be prepared to address those issues where the Project could result in significant environmental impacts, and to consider feasible mitigation measures and alternatives to the Project.

Pursuant to the provision of CEQA Guidelines Section 15082, the City circulated a Notice of Preparation of an Environmental Impact Report and Community Meeting/EIR Scoping Meeting (NOP) to State, regional, and local agencies, and members of the public for a 30-day review period commencing August 29, 2023 and ending September 29, 2023. The purpose of the NOP was to formally notice that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. See Appendix A of the Draft EIR for a copy of the NOP.

The NOP included notification that a virtual Community Meeting and an EIR Scoping Meeting would be held. Consistent with City policy, but independent of the CEQA process, the purpose of the Community Meeting was for the Applicant to present the Project, solicit community comments,

and receive feedback in association with the entitlement applications submitted to the City. In accordance with the CEQA Guidelines, the purpose of the EIR Scoping Meeting was for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the Draft EIR. The virtual Community Meeting and EIR Scoping Meeting was held on September 12, 2023, at 7:00 P.M. The EIR Scoping Meeting was held in an online format using zoom and provided interested individuals, groups, and public agencies the opportunity to view materials and ask questions regarding the scope and focus of the Draft EIR as described in the NOP and Initial Study. The presentation materials from the EIR Scoping Meeting are provided in Appendix A-3 of the Draft EIR

During the public review period for the NOP, 10 commenters submitted responses to the NOP. Correspondence was received from the California Air Resources Board's (CARB), California Department of Transportation (Caltrans), County of Los Angeles Department of Public Works, the Native American Heritage Commission (NAHC), interested organizations, and interested parties. All written comments are provided in Appendix A-4, of the Draft EIR.

1.3.2 Draft Environmental Impact Report

In accordance with the provision of CEQA Guidelines Sections 15085(a) and 15087(a), the City, serving as the Lead Agency: (1) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (2) published a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for public review at the City's Current Planning Division; (3) provided copies of the NOA and Draft EIR to the Culver City Julian Dixon Library, Baldwin Hills Branch Library; (4) posted the NOA and the Draft EIR on the City's Planning Division website at: https://www.culvercity.org/Active-Projects/5700-Hannum-Ave-Proposed-Project; (5) sent a NOA to all property owners within 500 feet of the Project Site; (6) sent a NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project; and (7) filed the NOA with the County Clerk. The public review period commenced on April 4, 2024 and ended on May 20, 2024 for a total of 47 days.

During the Draft EIR public review period, the City Planning Division received 16 comment letters on the Draft EIR from agencies and individuals through written correspondence and emails. These comment letters are included in Appendix A, Original Comment Letters, of this Final EIR. Also during the Draft EIR public review period, the City conducted a Public Meeting focused on the Draft EIR on April 30, 2024. This Public Meeting was not required by the CEQA Guidelines, but rather conducted by the City to provide an additional opportunity for public input. The Public Meeting on the Draft EIR provided an overview of the findings in the Draft EIR, explained the process for providing comments on the document, and outlined the remaining process for completion of a Final EIR. Copies of the materials provided at the Public Meeting on the Draft EIR are included in Appendix B of this Final EIR. All written comments received during the public review period and also during the Public Meeting on the Draft EIR are presented, and responses are provided in Chapter 2, *Comments and Responses*, of this Final EIR.

1.4 Organization of the Final EIR

The Final EIR consists of the following four chapters:

Chapter 1, Introduction. This chapter describes the purpose of the Final EIR, provides a summary of the Project, summarizes the Draft EIR public review process, and presents the contents of this Final EIR.

Chapter 2, Comments and Responses. This chapter presents all comments received by the City during the 47-day public review period of the Draft EIR (April 4, 2024 to May 20, 2024) and during the virtual Public Meeting held on April 20, 2024 as well as the responses to those comments. A total of 16 comment letters were received during the public comment period.

Chapter 3, Revisions, Clarifications and Corrections to the Draft EIR. This chapter indicates that based on the comments received on the Draft EIR, no revisions, clarifications or corrections to the Draft EIR are required.

Chapter 4, Mitigation Monitoring Program. The Mitigation Monitoring Program (MMP) is the document that will be used by the City to ensure the implementation of the Project's mitigation measures and project design features. Mitigation measures and project design features are listed by environmental topic where applicable.

Appendices to the Final EIR. The following list sets forth the appendices as referenced throughout the Final EIR.

- Appendix A: Original Comment Letters on the Draft EIR
- Appendix B: Draft EIR Public Meeting Materials

CHAPTER 2
Comments and Responses

CEQA Guidelines Section 15088(a) states that: "The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments that were received during the noticed comment period and any extensions and may respond to late comments." In accordance with these requirements, this chapter of the Final EIR provides responses to each of the comments on the Draft EIR received during the public comment period. **Table 2-1,** *Summary of Comments on the Draft EIR,* provides a list of the comment letters received and the corresponding issues that were raised in response to the Draft EIR.

Section 2.1, Responses to Individual Comments, presents comments submitted during the 47-day public review comment period for the Draft EIR from State agencies, as well as from individuals as listed on Table 2-1. Each letter is assigned a number and arranged by Draft EIR Meeting, agency, and then by individuals and other interested parties in chronological order, as indicated in Table 2-1. Note as discussed in Chapter 1, *Introduction,* of this Final EIR, the City held a Public Meeting on the Draft EIR on April 20, 2024, during which oral comments were received. These comments are addressed below within Section 2.1.1, Draft EIR Meeting.

Each comment that requires a response for the Draft EIR Meeting and within the letters is assigned a number. For example, the first Agency (Letter AG 1) to provide comments was the California Department of Transportation (Caltrans) and therefore this is Letter AG 1. The first comment received from Caltrans within the letter is therefore labeled Comment AG 1-1 and the responses to each comment are correspondingly numbered, (i.e., Response to Comment AG 1-1). A copy of each comment letter is provided in Appendix A, Original Comment Letters on the Draft EIR, of this Final EIR.

As required by the CEQA Guidelines Section 15088 (c), the focus of the responses to comments is on "the disposition of significant environmental issues raised." Therefore, detailed responses are not provided for comments that do not relate to environmental issues. Accordingly, comments from the Draft EIR meeting that are not applicable to the Draft EIR or that do not relate to the environmental issues analyzed in the Draft EIR, are not included herein

TABLE 2-1
SUMMARY OF COMMENTS ON THE DRAFT EIR

Letter No.	Name	Date Received	Environmental Topic								
			Aesthetics (Height/ Massing)	Air Quality/ GHG	Breezes	Tree Removal	Hazardous Materials	Traffic Parking	Utility Infrastructure	Cumulative Impacts	Other
Draft EIR Meeting											
DEIR 1	Yumi Montrau	4/20/24	X		X			X	X		
DEIR 2	Hilton Creve	4/20/24						X			
DEIR 3	Judi Sherman	4/20/24								X	
DEIR 4	Jim MacDonald	4/20/24		X					X		
DEIR 5	Deb Wallace	4/20/24		X							X
DEIR 6	Tom O'Neil	4/20/24	X		X	X					
DEIR 7	Sharon Levnine	4/20/24	X		X	X					
Agency											
AG 1	California Department of Transportation (Caltrans), District 7 Miya Edmonson, LDR/CEQA Branch Chief 100 S. Main Street, MS 16 Los Angeles, CA 90012	5/16/2024						X			
AG 2	Los Angeles Metropolitan Transportation Authority Cassie Truong, Senior Transportation Planner One Gateway Plaza Los Angeles, CA 90012-2952	5/17/2024						X			
AG 3	California Air Resources Board Annalisa Scilla, Ph.D, Assistant Division Chief 1001 I Street, P.O. Box 2815 Sacramento, CA 94812	5/20/2024		X					X		

TABLE 2-1
SUMMARY OF COMMENTS ON THE DRAFT EIR

Letter No.	Name	Date Received	Environmental Topic								
			Aesthetics (Height/ Massing)	Air Quality/ GHG	Breezes	Tree Removal	Hazardous Materials	Traffic Parking	Utility Infrastructure	Cumulative Impacts	Other
Individuals											
IND 1	Karyn Marks	5/20/24		X				X		X	
IND 2	Jeff Haas	5/20/24								X	
IND 3	Judi Sherman	5/20/24			X					X	
IND 4	Thomas O/Neil	5/20/24									X
IND 5	Angelika Kischnick	5/20/24						X	X	X	
IND 6	Justin Ciampaglia	5/20/24 & 5/21/24		X	X		X			X	X
IND 7 (A-F) Form Letter	Tanya Ihnen (IND 7A) Yumi Mandt-Rauch (IND 7B) Eurana High (IND 7C) Irene French (IND 7D) Gabriel Parhoti (IND 7E) Received May 20, 2024 (IND 7F)	5/20/24	X		X					X	X

SOURCE: ESA, 2024

2.1 Responses to Comments

Responses to individual comments are included on the following pages.

2.1.1 Draft EIR Meeting

The comments below are summarized from the Draft EIR public meeting that occurred on April 20, 2024. As indicated above, the focus of the responses to comments is on significant environmental issues raised in the Draft EIR. Thus, detailed responses are not provided for comments that do not relate to environmental issues. Accordingly, comments from the Draft EIR meeting that are not applicable to the Draft EIR or that do not relate to the environmental issues analyzed in the Draft EIR, are not included herein

Commenter 1 - Yumi Montrau

Comment DEIR 1-1

The commenter raised concerns about the size and height of the buildings affecting ocean breezes in the area, and asserted that there is not infrastructure capacity to put in air conditioning units. The commenter inquired about whether the height was consistent with current City codes. The commenter noted that construction is generally occurring to the west.

Response to Comment DEIR 1-1

This comment raises concerns regarding the height of building affecting ocean breezes and the ability of the existing infrastructure to accommodate air conditioning units in the Fox Hills area.

First, with regard to (ocean) breezes, the Draft EIR applies the thresholds of significance contained in Appendix G of the CEQA Guidelines. Appendix G does not provide a threshold pertinent to ocean breezes and as such, there is no requirement for the Draft EIR to evaluate this topic. However, for informational purposes, a review of wind rose maps from the Wind National Oceanic and Atmospheric Administration for the Santa Monica Airport and Los Angeles International Airport , show that wind patterns during the warmer summer months (July to September – when air conditioning would likely be utilized) primarily hail from a southwesterly direction in the coastal region of Los Angeles, while it is acknowledged that a minor percentage of the wind comes directly from the west. With that said, in the immediate vicinity of the Project Site, Buckingham Parking meanders in a southwesterly to northeasterly manner, which would allow the majority of the winds hailing from southwest to pass through the area without significant obstruction to residential uses located on the east side of Buckingham Parkway. Regardless, as this is not considered an impact under CEQA, no further response is necessary on this topic.

With regard to utility infrastructure impacts, the Project evaluated its effects on electrical and natural gas infrastructure in Section 4.13.2, *Utilities and Services Systems - Electric Power, Natural Gas, and Telecommunications Facilities*. In addition, Section, 4.13.2*, Utilities and Services Systems – Water Supply*, evaluated impacts to the water purveyor and water infrastructure serving the Project area. As evaluated therein, the Project would be able to be served by existing utility providers and development of the Project and the related projects (cumulative impacts) is not

anticipated to adversely affect the electric power or water facilities serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. There is no substantial evidence provided by the comment that the Project would affect breezes in the area. Regardless, it would be speculative to assume a significant number of new air conditioning units would be purchased and operated in the immediate vicinity such that the existing infrastructure would be affected. Since there is no evidence that this circumstance would occur, any analysis of potential infrastructure impacts to the surrounding area would be speculation which is not required by CEQA (CEQA Guidelines Section 15145).

With regard to the Project's building heights, as discussed in Chapter 2, Project Description, of the Draft EIR, the Project would develop a new 6-story (up to a height 78-feet) mixed-use building. As discussed on page 2-21 of the Draft EIR, per Culver City Municipal Code (CCMC) Section 17.400.065 Table 4-2, the maximum allowable height for the Project is 56 feet. However, the Project is proposing to include 27 units (12 percent of base density) of its residential units as Very Low Income affordable units. By doing so, consistent with the CCMC and State Density Bonus Law (Gov't Code §65915), the Project is entitled to receive development incentives including a height increase. The Project is requesting a height increase of 22 feet beyond the maximum allowable height as a development incentive for providing affordable units. With this incentive, the Project would have a height of up to 78 feet due to the existing site topography. However, note that there is a grade change from the northern end of Buckingham Parkway down to the southern end of Buckingham Parkway adjacent to the Site. Thus, the maximum allowable building heights would only occur on the southern extent of Buckingham Parkway as viewed from this roadway. Elevations for the Project are provided in Figures 2-2-14 to 2-16 of the Draft EIR.

With this height increase, no significant physical impact to the environment would occur. As discussed in Section 4.1, *Aesthetics*, of the Draft EIR, aesthetics impacts would be less than significant. That is, as evaluated therein, the Project with a maximum building height of 78 feet would not conflict with applicable zoning and other regulations governing scenic quality. Furthermore, as discussed in the Project's Initial Study, included in Appendix A of the Draft EIR, based on the aesthetics thresholds under CEQA and utilized by the City, the Project would not have a substantial adverse effect on a scenic vista, nor would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. As such, aesthetics impacts would be less than significant.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment DEIR 1-2

The commenter expressed concerns that future site occupants and visitors may not park on-site, but rather off-site depending how they are charged. The commenter also inquired about whether parking would be provided in accordance with City requirements.

Response to Comment DEIR 1-2

This comment raises concerns about parking and the potential for off-site parking to occur. First, parking is not an impact under CEQA. Thus, the Draft EIR appropriately does not analyze impacts associated with this topic. Nonetheless, with regard to parking requirements, in October 2022, the City Council passed a motion that eliminated minimum parking requirements citywide. As a result, no minimum parking is required to be constructed by the Project per CCMC requirements. Nonetheless, the Project's provided parking is anticipated to accommodate all resident, employees and guests in consideration of the Project's Transportation Demand Management (TDM) Program, which is discussed on pages 4.11-19 to 4.11-21 in Section 4.11, Transportation, of the Draft EIR. The Project will provide a supply of 428 vehicle parking spaces (399 residential, 5 guest, and 24 commercial), which assumes 1 space per studio and 1-bedroom unit and 2 spaces for 2-bedroom (or more) units. Beginning in 2025, all new multi-family projects, including the Project, will be required to have unbundled parking, meaning that residents would rent the parking stalls separate from the residential units.[1] Thus, the Project would comply with State law. The Project's TDM Program, identified as Project Design Feature TRAF-PDF-2, consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Strategies included in a Project's TDM Program address a wide range of transportation factors, including parking, transit, commute trips, shared mobility, bicycle infrastructure, site design, education and encouragement, and management.

Comment DEIR 1-3

The commenter also inquired about bike lanes and whether the potential for new bike lanes were considered in the analysis.

Response to Comment DEIR 1-4

This comment asks about the Project's potential conflict with existing or planned bicycle facilities, and whether such facilities were considered in the Transportation Assessment. The existing eastbound Class II Bike lane on Hannum Avenue would be maintained by the Project. Also, while no existing bicycle lanes are provided on Buckingham Parkway, the Culver City Bicycle & Pedestrian Action Plan calls for a Class IV bike lane to be installed. The design for this bicycle lane has not been finalized. However, the Project's Buckingham Driveway assumes construction of this planned bicycle lane understanding it would intersect the southbound bicycle lane on the west side of Buckingham Parkway. Similar to the Hannum Driveway, the Buckingham Driveway would ensure maximum visibility by meeting all of the City's driveway requirements and would provide adequate sight distance for drivers of vehicles entering and leaving the Project Site as well as bicyclists and pedestrians wishing to cross the driveway and loading area. No exceptional horizontal or vertical curvatures exist along this section of roadway that would create sight distance issues for Project traffic utilizing the proposed driveway. The Buckingham Driveway would be restricted to residential access only. Both the existing bicycle lane on Hannum Avenue and the planned bicycle lane on Buckingham Parkway were considered in the Project's Transportation Assessment. As discussed on pages 4.11-21 to 4.11-26 of the Draft EIR, the Project would not

[1] California Assembly Bill 1317, Unbundled Parking. Passed on October 11, 2023.

conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities.

Commenter 2 - Hilton Creve

Comment DEIR 2-1

The commenter raised concerns about parking, and specifically street parking, stating that the streets are typically crowded, especially on street cleaning days.

Response to Comment DEIR 2-1

This comment raises concerns about the Project's ability to provide adequate parking and asserts that the street parking in the area is a concern. Refer to Response to Comment DEIR 1-2 which addresses concerns related to parking for the Project.

Commenter 3 - Judy Sherman

Comment DEIR 3-1

The commenter expressed concerns about cumulative impacts occurring from two mixed-use projects in the local vicinity, which she asserts collectively will include 1,705 units.

Response to Comment DEIR 3-1

The commenter expressed concerns about cumulative impacts occurring from two (2) mixed-use projects in the local vicinity, which the commenter asserts collectively with the Project will include approximately 1,700 residential units. The commenter notes that these two projects, located at 5757 Uplander Way and 5730 Uplander Way, were not included in the list of related projects within Table 3-1, Related Projects List, in Chapter 3, Environmental Setting, of the Draft EIR.

The commenter correctly indicates that these two projects were not included in the related projects list. However, consistent with CEQA requirements, the related projects list was established at the time of issuance of the Project's Notice of Preparation (NOP) in August 2023, which informed the public that the City prepared an Initial Study and was at the onset of preparing an EIR for the Project. The list was also confirmed at the time of the Memorandum of Understanding (MOU) was issued for the Project's Transportation Assessment in June 2023, which set forth the evaluation criteria and list of projects to be included in the future (non-CEQA) traffic conditions assessment. At the latter August 2023 NOP date, these two (2) projects were not known or foreseeable projects by the City.

The list of related projects is assembled at the MOU and NOP stages from City of Culver City, City of Los Angeles, and County of Los Angeles records at the Departments of Planning and Transportation and includes all known projects that have been built but not yet opened, approved projects under construction, projects that have been approved but where construction had not yet commenced, and projects with a complete application submitted to either City or the County. It is not uncommon for a new project to be proposed while the Draft EIR analysis for any given project is in process. In fact, it is assumed that additional new projects will occur as part of anticipated future development in a given area. To accommodate for this circumstance, traffic growth for

unknown projects is accounted for in traffic impact analyses through background traffic growth rate assumptions as is the case for the two projects listed by the commenter.

In addition to traffic from unknown related projects, additional future traffic growth is added to future base conditions by including a background traffic growth rate to account for land use growth outside of the study area whose traffic may use study area streets and for any related projects not included in the analyzed list.

In the case of the analysis for the 5700 Hannum project, the background growth rate assumed was 1% per year for both the Opening Year and the Future Year forecasts. That growth rate is approximately double the actual growth rate experienced on the area streets in the past decade, so it is conservative enough to account for any new related projects in the area. In addition, the historic growth rate includes all the growth generated by related projects in the area, so the traffic growth assumed in the 1% background traffic growth rate actually "double counts" the traffic generated by the 12 related projects in the Draft EIR's related project list thus making it even more conservative.

For the above reasons, the Draft EIR's assessment of cumulative impacts, including its list of related projects, was adequately prepared in accordance with applicable CEQA requirements set forth in CEQA Guidelines Section 15130.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Commenter 4 - Jim MacDonald

Comment DEIR 4-1

The commenter expressed concerns about climate change, stating that we need to get rid of as much gas as possible and go electrical. The commenter inquired about the Project's use of solar panels.

Response to Comment DEIR 4-1

The comment expresses concerns regarding climate change. The Draft EIR addressed greenhouse gas emissions (GHG) impacts in Section 4.6, *Greenhouse Gas Emissions*, with supporting data provided in Appendix C, Air Quality and Greenhouse Gas Emissions Calculations, of the Draft EIR. As analyzed therein, the Project would have less than significant impacts related to GHG emissions and potential for conflict with any applicable plan, policy, regulation, or recommendation of an agency adopted for the purpose of reducing the emissions of GHGs. GHG impacts would be less than significant.

The commenter also asserts his support for electric power, as opposed to natural gas, and asks about the Project's use of solar panels. The Project's building would be all electric, with the exception of gas in the retail portion. Also, the Project would include installation of a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 square feet (sf) of new development consistent with CCMC Chapter 15.02.1005 in order to achieve compliance with the City of Culver City's solar photovoltaic requirement, per the City's Green Building Ordinance and CALGreen standards. The

Project would also implement Project Design Feature GHG-PDF-1: Green Building Features, which would feature a variety of green building features, such as EV parking, LED lighting, ENERGY STAR-rated appliances, and efficient water management features, all of which along with the inclusion of solar panels and a mostly electric building, would serve to minimize the Project's impact on climate change.

In addition, the Project's TDM Program, identified as Project Design Feature TRAF-PDF-2, consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Strategies included in a Project's TDM Program address a wide range of transportation factors, including parking, transit, commute trips, shared mobility, bicycle infrastructure, site design, education and encouragement, and management. The effect of the TDM program would be to have less vehicle miles travelled (VMT) by Project residents, employees, and visitors, thus; reducing long-term mobile-source GHG emissions.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Commenter 5 - Deb Wallace

Comment DEIR 5-1

The commenter inquired about the Project's unit types and whether the Project Applicant intends to manage the building after it is built. The commenter also inquired the extent of excavation required for the Project.

Response to Comment DEIR 5-1

The comment inquired about the Project's unit types and whether the Project Applicant intends to manage the building after it is built. The Project proposed development program is described in Chapter 2, Project Description, of the Draft EIR. Specifically, Table 2-1, Development Program Summary, provides a breakdown of the Project's residential unit types.

The comment also inquired the extent of excavation required for the Project. As discussed on page 2-31 of the Draft EIR, the Project would require excavation to accommodate subterranean parking, building foundations, utilities and other improvements. Up to approximately 51,400 cubic yards (cy) of earthwork would be excavated and exported from the Project Site. Construction staging would be entirely internal to the Project Site. The Project would excavate to a maximum depth of 27 feet below grade. The Project's extent of excavation was accounted for throughout the Draft EIR.

As this comment does not raise any issues with respect to the content or adequacy of the Draft EIR, no further response is necessary.

Comment DEIR 5-2

The commenter also raised concerns about air pollution in the area of Fox Hills, including cumulative air quality impacts.

Response to Comment DEIR 5-2

This comment raises concerns about air quality impacts, including cumulative impacts. The Draft EIR addressed air quality impacts in Section 4.2, *Air Quality*, with supporting data provided in Appendix C, Air Quality and Greenhouse Gas Emissions Calculations, of the Draft EIR. As analyzed therein, the Project would have less than significant air quality impacts related to construction (after mitigation) and operational air quality emissions. With regard to cumulative impacts, see pages 4.2-52 to page 4.2-54 of the Draft EIR. As discussed therein, the South Coast Air Quality Management District (SCAQMD) recommends using two methodologies to assess the cumulative impact of air quality emissions: (1) a project's consistency with the current Air Quality Management Plan (AQMP) be used to determine its potential cumulative impacts or (2) that project-specific air quality impacts be used to determine the project's potential cumulative impacts to regional air quality. As the Project would not result in significant impacts based on either methodology, cumulative impacts for the Project would be less than significant.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Commenter 6 - Tom O'Neil

Comment DEIR 6-1

The commenter expressed concerns about the number of trees that would be removed based on the amount of grading and earthwork that will occur during construction.

Response to Comment DEIR 6-1

This comment expresses concerns regarding tree removal on the Project Site. There are 119 trees on the Project Site including carrotwood, Canary Island Pine, Brazilian pepper, olive, weeping bottlebrush, paperbark, and podocarpus. In addition, there are 14 carrotwood street trees along Buckingham Parkway adjacent to the Project Site.

For any street tree removed, 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, Sidewalks and Parkways, Section 9.08.215: 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 (ROW) trees or Parkway trees for each street tree that is removed from the street ROW. The size and location of the replacement trees would be determined by the Department of Public Works based on what is appropriate for the particular Street Right-of-Way or Parkway. The Project anticipates that one street tree along Buckingham Parkway near the proposed driveway would be removed. This tree will either be re-planted or replaced along Buckingham Parkway and an additional tree would be planted along Buckingham

Parkway to comply with City street tree replacement requirements. Aside from the above referenced street trees, the Project would remove the existing on-site trees and plant 56 new on-site trees. All tree removal and planting would occur in accordance with CCMC requirements.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment DEIR 6-2

The commenter raised concerns about airflow due to the height of the building being taller than those around it.

Response to Comment 6-2

This comment raises concerns about airflow due to the height of the building being taller than those around it. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes.

Commenter 7 - Sharon Levine

Comment DEIR 7-1

The commenter inquired whether there are any codes that deal with view blockage, as well as sun shadows and air circulation (blockage of ocean breezes) with the height and massing of the proposed buildings.

Response to Comment DEIR 7-1

This comment raises concerns about view blockage airflow due to the height and massing of the building being taller than those around it. Refer to Response to Comment DEIR 1-1 which addresses concerns related to view blockage and airflow.

In addition, with regard to shadows, although the CEQA Guidelines do not provide a threshold pertinent to shade/shadow, the analysis in Section 4.1, Aesthetics, of the Draft EIR, takes into account the effects of shade and shadow as a visual character and quality effect. Shadow figures prepared for the Project are included as Appendix B – Shadow Study, of the Draft EIR. As discussed on pages 4.1-14 and 4.1-15 of the Draft EIR, the Project would add limited incremental shadows to the Fox Hills Parkette during the winter season in the afternoon hours, and not shade any portion of the residential uses across Buckingham Parkway year around. Given the Project's limited shading of off-site routinely usable outdoor spaces, shading would not be an adverse effect of the Project's implementation.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment DEIR 7-2

The commenter inquired about the trees currently onsite, including mature trees along Buckingham Parkway, and whether tree codes would be followed.

Response to Comment DEIR 7-2

This comment raises concerns about tree removal. Refer to Response to Comment DEIR 6-1 which addresses concerns related to tree removal.

2.1.2 Agency Comments

Letter AG 1

California Department of Transportation (Caltrans), District 7
Miya Edmonson, LDR/CEQA Branch Chief
100 S. Main Street, MS 16
Los Angeles, CA 90012
Received May 16, 2024

Comment AG 1-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project Site is currently occupied by an approximately 30,672 square foot two-story office building. The Project would demolish the existing on-site building and construct a new 6- story (up to a height 78-feet) mixed-use building with two (2) semi-subterranean levels, consisting of 309 residential units (including 27 Very Low Income units) and 5,600 square feet of retail space. The Project would provide a total of 19,526 square feet of private open space and 34,630 square feet of common open space for a total of 54,156 square feet of open space. The Project would include a total building area of 362,596 square feet. The Project would provide a total of 428 vehicular parking spaces (399 residential, 5 guest, and 24 commercial) within three parking levels. The Project would also provide 11 short-term and 81 long term bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces.

Response to Comment AG 1-1

This comment provides a general introduction to the comments raised in this correspondence. This comment also provides an accurate summary of the Project. Because the comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 1-2

The Project is estimated to generate 1,266 net new daily trips, including 67 net new morning peak hour trips (-15 inbound trips, 82 outbound trips) and 77 net new afternoon peak hour trips (67 inbound trips, 10 outbound trips).

The Project was required to perform a VMT analysis because it is not located within 0.5 miles of a transit hub. Not accounting for any project design features or mitigations, the Project would result in a household VMT of 6.8 per capita, which is below the citywide household VMT threshold of 8.3 per capita. Based on this analysis, the Project was determined to be below the citywide VMT threshold for household VMT. Therefore, the Project would not result in a significant VMT impact, and no mitigation measures would be required.

Response to Comment AG 1-2

This comment acknowledges that the Project's VMT would be below the City's applicable thresholds and impacts would be less than significant. Because this comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 1-3

The Project provides adequate internal circulation to accommodate vehicular, pedestrian, and bicycle traffic without impeding traffic movements on City streets. The design of Project driveways does not introduce safety hazards for pedestrians, bicyclists, or motorists. The Project will incorporate pedestrian and bicycle-friendly designs, such as bicycle parking and improved sidewalks.

Response to Comment AG 1-3

This comment acknowledges that the Project would provide adequate internal circulation to accommodate vehicular, pedestrian, and bicycle traffic without impeding traffic movements on City streets. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. Because this comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 1-4

We encourage the Lead Agency to evaluate the potential Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). This reference is available online at:

http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf

Response to Comment AG 1-4

This comment encourages the City of Culver City as the Lead Agency to evaluate the potential Intelligent Transportation System (ITS) applications and TDM strategies and provides resources to access the recommended strategies. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. Because the comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 1-5

All construction activities would occur outside of the commuter morning and afternoon peak hours to the extent feasible and will not result in significant traffic impacts. A Construction Management Plan will ensure that construction impacts are less than significant.

Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # GTS-2023-04495-DEIR..

Response to Comment 1-5

This comment states that a Construction Management Plan for the Project will ensure that construction impacts are less than significant. This comment regarding oversized trucks requiring a permit and recommendation that large-size truck trips be limited to off-peak commute periods is noted. Also, this comment provides Caltrans contact information in the event additional information is needed. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is warranted.

Letter AG 2

Los Angeles Metropolitan Transportation Authority
Cassie Truong, Senior Transportation Planner
One Gateway Plaza
Los Angeles, CA 90012-2952
Received May 17, 2024

Comment AG 2-1

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed 5700 Hannum Avenue Residential and Commercial Mixed-Use (Project) located at 5700 Hannum Avenue in the City of Culver City (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082 (b) and l5086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the existing Metro bus facilities and services which should be analyzed in the ElR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.[1]

In addition to the specific comments outlined below, Metro is providing the City and Applicant with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at https://www.metro.net/devreview.

Project Description

The Project includes demolition of the existing on-suite building and construct a new six-story mixed-use building with two levels of subterranean levels. Project construction is anticipated to commence as early as the first quarter of 2025.

[1] See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Response to Comment AG 2-1

The comment provided a brief introduction to Metro and their comments on the scope and content of the EIR, as well as summary of the Project. As the comment does not raise any

specific issues regarding the content or adequacy of the Draft EIR, no further response is warranted. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment AG 2-2

Recommendations for EIR Scope and Content

Bus

Service Adjacency

l. Service: Metro Bus Line 108 operates southbound on Buckingham Parkway, adjacent to the Project. One Metro Bus stop is directly adjacent to the Project at Buckingham Parkway and Hannum Avenue. Other transit operators, such as Culver City Bus, may provide service in the vicinity of the Project and should be consulted.

2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures as appropriate. Potential impacts may include impacts to transportation services, stops, and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:

Response to Comment AG 2-2

This comment asks about impacts to Metro Bus service, specifically Line 108 which has a stop adjacent to the Project Site. The Draft EIR evaluated impacts to bus stop facilities in Section 4.11, *Transportation*, of the Draft EIR. As indicated on page 4.11-28, Metro Line 108 has a bus stop located adjacent to the Project Site along Buckingham Parkway. As neither of the Project's proposed driveways would interfere with the bus stop operation and adequate sight distance would be provided to ensure visibility between buses and vehicles at the driveway, no impact to transit activity or access would occur.

Comment AG 2-3

a. Bus Stop Condition: The ElR should identify all bus stops on all streets adjacent to the Project site. During construction, the Applicant may either maintain the stop in its current condition and location, or temporarily relocate the stop consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)- compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, the Applicant must ensure any existing Metro bus stop affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.

Response to Comment AG 2-3

This comment states the EIR should identify all bus stopped on streets adjacent to the Project Site. All bus lines in the Project area are listed on page 4.11-11 of the Draft EIR and illustrated

on Figure 4.11-1, Existing Transit Service, of the Draft EIR. Line 108 is the only line with a stope adjacent to the Project Site, as discussed in Response to Comment AG 2-2. Consistent with this comment, during Project construction, the Line 108 bus stop would be either maintained in its current condition and location, or temporarily relocated consistent with the needs of Metro Bus operations. Once the Project is completed, the bus stop would be returned to its pre-Project location and condition, unless otherwise directed by Metro.

Comment AG 2-4

b. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.

Response to Comment AG 2-4

This comment provides access requirements for transit facilities the Project must consider in its design. Consistent with this comment, driveways would be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic. Also, vehicular driveways would not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.

Comment AG 2-5

c. Bus Stop Enhancements: Metro encourages the installation of enhancements and other amenities that improve safety and comfort for transit riders. These include benches, bus shelters, wayfinding signage, enhanced crosswalks and ADA-compliant ramps, pedestrian lighting, and shade trees in paths of travel to bus stops. The City should consider requesting the installation of such amenities as part of the Project.

Response to Comment AG 2-5

This comment encourages the installation of enhancements and other amenities that improve safety and comfort for transit riders. Consistent with this comment, the City will consider requesting the installation of such amenities as part of the Project.

Comment AG 2-6

d. Bus Operations Coordination: The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

Response to Comment AG 2-6

This comment requests the Project to coordinate with Metro prior to the beginning of the Project construction. Consistent with this comment, the Project will coordinate with Metro prior to the beginning of the Project construction.

Comment AG 2-7

Transit Supportive Planning: Recommendations and Resources

Considering the Project area's proximity to Metro Bus Line 108, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Land Use: Metro supports development of commercial and residential properties near transit stops and understands that increasing development near stops represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of proposed developments in proximity to Metro bus stops, including orienting pedestrian pathways towards the bus stop.

2. Transit Connections and Access: Metro strongly encourages the City to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the proposed development site and nearby destinations. The City should consider requiring the installation of such features as part of the Project's development standards, including:

    a. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access- controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged.

    b. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at:

    http://media.metro.net/docs/ sustainability_path_design_guidelines.pdf

3. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

Response to Comment AG 2-7

This comment recommends that the City encourage the Applicant to provide features that promote walkability, bicycle use and micromobility devices, and first and last mile access. Consistent with these recommendations, the Project provides numerous features such as wide sidewalks, pedestrian lighting, shade trees, bicycle parking, secured bicycle facilities, bicycle lockers, and a bicycle fix-it/repair station to improve pedestrian access and promote alternative modes of transportation.

Also, consistent with Metro's comment, it is noted that the Project is required to develop a Travel Demand Management (TDM) Plan (see Project Design Feature TRAF-PDF-1). Among its planned elements are on-site enhancements to encourage alternative transportation modes, EV parking, off-site enhancements (i.e., mobility fees), a Transportation Information Center (TIC), bicycle parking amenities, pedestrian friendly features, employee carpool parking, a transportation coordinator, subsidized ride share programs, and transit passes. The Project would also include unbundled parking, which separates the cost of parking from the cost of leased commercial or residential space. While shared parking for on-site uses is not specifically identified among the preliminary set of strategies for optimizing on-site parking supply listed in TRAF-PDF-1, it would be considered by the City for inclusion in the final version of the TDM Plan that is required prior to issuance of the first certificate of occupancy for the Project.

The City will continue to work with the Project Applicant in advancing Metro's recommendations in this comment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 2-8

4. Wayfinding: Wayfinding signage should be considered as part of the Project to help people navigate through the Project area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

Response to Comment AG 2-8

This comment states wayfinding signage should be considered as part of the Project to help people navigate through the Project area to all modes of transportation. Consistent with this comment, the Project will provide information and wayfinding signage approved by Metro. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 2-9

If you have any questions regarding this letter, please contact me by phone at 213.547.4326, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952.

Response to Comment AG 2-9

The comment provides Metro contact information in the event additional information is needed. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 2-10

Attachment

LA Metro's comment letter included a copy of the *Metro Adjacent Development Handbook, A guide for Cities and Developers*, February 2021.

Response to Comment AG 2-10

The comment is a copy of LA Metro's informational guidebook which is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services. The Project developer will consider the information in the guidebook, as applicable, to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Letter AG 3

California Air Resources Board
Annalisa Scilla, Ph.D, Assistant Division Chief
1001 I Street, P.O. Box 2815
Sacramento, CA 94812
Received May 20, 2024

Comment AG 3-1

I am writing to provide comments on the Culver City Draft Environmental Impact Report (DEIR) for the 5700 Hannum Mixed-Use Residential and Commercial Project (Project). The California Air Resources Board (CARB) works to support the State's long-term climate goals by engaging with local jurisdictions and lead agencies as they evaluate the greenhouse gas (GHG) impacts of new development during the California Environmental Quality Act (CEQA) process. Specifically, CARB has an interest in encouraging new residential and mixed-use development to demonstrate consistency with the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan).1

As noted in Appendix D, Local Actions, of the 2022 Scoping Plan (Appendix D), "[l]ocal government efforts to reduce greenhouse gas (GHG) emissions within their jurisdiction are critical to achieving the State's long-term climate goals." With this in mind, CARB staff submit the following comments regarding the residential portion of this project.

Overall, this project is well aligned with the State's climate goals and incorporates most of the recommendations by CARB included in the 2022 Scoping Plan. This letter includes two recommendations for further reducing vehicle miles traveled (VMT) and GHG emissions associated with the project.

Response to Comment AG 3-1

This comment provides a general introduction to the comments raised in this correspondence. This comment states the Project is well aligned with the State's climate goals and incorporates most of the recommendations by CARB included in the 2022 Scoping Plan. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. Because the comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 3-2

Many aspects of the project currently align with Scoping Plan Appendix D Attributes

The project's GHG analysis uses thresholds of significance based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. Consequently, one of the thresholds in the analysis (GHG-2) specifies that the project would have a significant impact related to GHG emissions if it would "[c]onflict with any applicable plan, policy or regulation adopted to reduce the emissions of GHGs". As part of this analysis, the DEIR examines the project's consistency with the 2022 Scoping Plan.

The project incorporates many of the recommended project attributes for residential and mixed-use development listed in Appendix D, Local Actions, of the Scoping Plan. For example, the project's reuse of an existing developed site is characteristic of mixed-use development that is consistent with State GHG reduction goals. Table 1 compares the project attributes recommended in the Scoping Plan Appendix D, Table 3 to the design features included in the project.

Table 1. Appendix D Project Attributes Comparison Table

Project Attributes from Scoping Plan Appendix D, Table 3	Hannum Mixed-Use Residential and Commercial Project
Does not result in loss or conversion of natural or working lands	The project will redevelop a site within the city limits. No natural or working lands would be converted as a result of the project.
Electric Vehicle (EV) charging meeting most ambitious voluntary CA Green Building Code standard	20% of the residential parking provided will install conduit and panel capacity to accommodate electric vehicle charging stations. 10% of the spaces will be EV-ready and a further 10% will have EV charging stations installed.
Provision of on-site affordable housing	Of the 309 residential units developed by the project, 27 would be Very Low-Income units.
No net loss of existing affordable units	No housing will be removed as a result of the project.
Located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	The project will redevelop an existing two-story office building and associated surface parking. The project site is within the city limits and is surrounded by existing development.
New mixed-use or residential development includes transit-supportive densities, **or**; New mixed-use or residential development is in proximity to existing transit stops, **or**; More stringent criteria as specified in applicable SCS	Bus service exists on roadways adjacent to the site, with three bus stops either on or bordering the site. Additional bus lines exist within ¼ mile of the project boundary.
Reduces parking requirements by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit	The project would develop 399 parking spaces for use by the residential portion of the project for a parking ratio of approximately 1.3 spaces per residential unit.

Response to Comment AG 3-2

This comment provides a summary consistency analysis of the Project with recommended project attributes for residential and mixed-use development listed in Appendix D, Local Actions, of the Scoping Plan. As indicated in the table, the Project would be consistent with the recommendations Appendix D, Local Actions, of the Scoping Plan. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. Because the comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 3-3

Below, CARB provides additional details on some of the more notable features of the project identified in Table 1.

The project has a strong infill component

The project will redevelop a site that is currently occupied by an office building and associated surface parking. The project would construct 309 residential units and approximately 5,600 square feet of retail space, in addition to publicly accessible and common open space. The project site is centrally located within the city and is surrounded by existing development.

The project repurposes a site that consists of uses that are already served by utilities such as water and sewer. Consequently, the project models many of the attributes of an infill project as recommended in Appendix D of CARB's Scoping Plan. By directing this residential and commercial development to an underused site, the city is also protecting existing natural and working lands that could be threatened by greenfield development.

The project makes good use of existing transit options

Appendix D of the Scoping Plan recommends that new residential projects be developed in proximity to existing or planned transit and consist of transit-supportive densities. The project will develop approximately 138 residential units per acre, which exceeds the minimum of 20 residential dwelling units per acre necessary to be considered transit- supportive.

Additionally, the project is in proximity to transit, and several existing bus lines adjacent to the project site will serve the project. Several more transit alternatives are within ¼ mile of the project site. The availability of transit for project residents can help to reduce overall VMT, with a corresponding reduction in GHG.

Response to Comment AG 3-3

This comment provides support for the Project's consistency with CARB's Scoping Plan recommendations pertaining to infill development and proximity to transit by residential projects. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. Because the comment does not raise a substantive issue on the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 3-4

Opportunities exist to achieve additional VMT and GHG reductions

As noted above, the project incorporates many design features that are recommended in Appendix D of the State's Scoping Plan. Furthermore, the DEIR finds that the project's GHG impacts are less than significant. In addition to the elements already incorporated into the project, CARB identified some potential opportunities to further reduce operational GHG emissions associated with the project.

The project can reduce parking ratios

Appendix D recommends eliminating minimum parking requirements or establishing maximum allowable parking ratios, or supplying residential parking at a ratio of less than one parking space per dwelling unit as an additional project attribute that can reduce VMT and GHG. For multifamily residential units, Appendix D also suggests that the cost of parking be unbundled from the costs to rent or own a residential unit. The project includes a parking ratio of approximately 1.3 spaces per residential unit, which exceeds the reduced parking recommendations for residential development in Appendix D that are consistent with low VMT and GHG development.

This ratio could lead to VMT above what would be expected with a lower parking ratio. Consequently, a lower parking ratio can help to further limit the project's VMT and GHG emissions. This is especially the case because of the project's proximity to existing transit options. In addition, unbundling parking costs from rental or ownership costs can encourage reduced vehicle ownership with a resulting decrease in VMT.

Response to Comment AG 3-4

This comment offers suggestions to further reduce VMT through reduced parking and unbundled parking costs. As noted previously, the Project's VMT would be below the City's applicable thresholds and impacts would be less than significant. Consistent with this comment, the City has no minimum parking requirements. Also, the Project's parking would be unbundled. Nonetheless, the City will continue to work with the Project Applicant in advancing CARB's recommendations in this comment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 3-5

The project can provide additional EV charging infrastructure for residents

Another key project attribute listed in Appendix D of the Scoping Plan for residential and mixed-use development is the inclusion of infrastructure to promote transportation electrification. Appendix D recommends electric vehicle (EV) charging infrastructure that, at a minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.

The project would install conduit and panel capacity to accommodate EV charging stations at a minimum of 20% of the residential parking spaces. An additional 10% of the parking spaces would be EV-ready and a further 10% of the spaces would be improved with EV charging stations. This would meet the Tier 1 CalGreen voluntary standard.

The project could further support the goal of electrifying the state's light-duty vehicle fleet and reducing GHGs by meeting the California Green Building Standards Code Tier 2 voluntary standard and installing EV charging stations at a minimum of 15% of the overall residential parking spaces.

Response to Comment AG 3-5

This comment acknowledges that the Project would provide EV parking, but indicates the Project could further support the goal of electrifying the state's light-duty vehicle fleet and reducing GHGs by meeting the California Green Building Standards Code Tier 2 voluntary standard and installing EV charging stations at a minimum of 15% of the overall residential parking spaces. The City will continue to work with the Project Applicant in advancing CARB's recommendations in this comment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment AG 3-6

Conclusion

CARB appreciates the opportunity to review and comment on the DEIR for the 5700 Hannum Mixed-Use Residential and Commercial Project. The project includes many characteristics that are consistent with the 2022 Scoping Plan's recommendations for residential and mixed-use development.

Additional VMT and GHG reductions could also be realized by limiting parking to a maximum of one space per unit for residential development and charging for parking separately instead of bundling that cost in with the cost of rent, as well as by increasing the number of EV charging stations available for residential parking spaces.

CARB would like to commend the city and the project proponent for repurposing an underused site within the city to create a mixed-use development that allows for growth while being largely consistent with California's climate goals for such projects.

If you have any questions, please feel free to contact Pedro Peterson at (279) 208-7367 or by email at Pedro.Peterson@arb.ca.gov.

Response to Comment AG 3-6

This comment included conclusionary remarks about the Project's consistency with the 2022 Scoping Plan's recommendations for residential and mixed-use development and reiterates the

Project's potential opportunities to further reduce VMT and GHG emissions as previously stated in Comments AG 3-4 and AG 3-5.

The City will continue to work with the Project Applicant in advancing CARB's recommendations in this comment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

2.1.3 Individual Comments

Letter IND 1

Karyn Marks
Received May 20, 2024

Comment IND 1-1

As a resident of Fox Hills, I find it appalling that you would not consider ALL of the projects that you currently have slated for Fox Hills in an EIR for the area.

Since you are planning on "packing Fox Hills with units". The EIR's should be considered as a whole. You know what you are planning!

This is like operating on a patient with a complete disregard for the rest of the body!

You have multiple major projects planned that will impact our traffic, our flow of air, our pollution and you assess them one by one before any of them go up?

Why not a cumulative assessment? You are destroying where we live by putting so many new units and crowding our area way beyond the rest of Culver City.

We will never get out of our driveways when this is completed and our air quality with the 405 right here will be unbearable.

Spread these projects out evenly throughout Culver City.

Stop the discrimination of Fox Hills!

Do a cumulative assessment - That is the correct way to assess the impact on our community. To only look at the impact of 309 units when you are planning 3000 units is deceptive and inaccurate.

Why don't you care? As the City Council, you should care about this!

Stop the discrimination of Fox Hills! We are angry at your disregard for our welfare.

Response to Comment IND 1-1

This comment asserts the EIR should consider all projects in the Fox Hills area in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

The comment further provides general opposition to the Project citing traffic and air quality concerns. Refer to Response to Comment DEIR 5-2 which addresses concerns related to cumulative air quality impacts.

With regard to traffic impacts, the Project conducted a Transportation Assessment (TA) that evaluated transportation impacts required by CEQA, as well as a non-CEQA component for consistency with the City's CEQA transportation thresholds of significance and the Transportation Study Criteria and Guidelines (TSCG) adopted in July 2020.[2] The TA is included in Appendix I of the Draft EIR.

Pursuant to SB 743, the California Natural Resources Agency adopted the Office of Planning and Research's (OPR's) recommended vehicle miles traveled (VMT) guidelines on December 28, 2018. The guidelines resulted in changes to Section 15064.3 and Appendix G of the CEQA Guidelines that effectively removed automobile delay and associated level of service (LOS) as the metric to evaluate transportation impacts pursuant to CEQA, and replaced it with VMT. Accordingly, pursuant to these changes, the City adopted VMT as a CEQA threshold to determine transportation impacts. Therefore, the analysis of transportation impacts in Section 4.11, *Transportation*, of the Draft EIR was focused on VMT and other analyses required by Appendix G of the CEQA Guidelines. Transportation issues not required to be analyzed under CEQA are presented in Chapter 5 of the TA (Appendix I of the Draft EIR). As evaluated in Section 4.11, *Transportation*, of the Draft EIR, transportation related impacts of the Project would be less than significant.

Based on the City's TSCG guidance, LOS, congestion, delay, and parking effects are no longer considered impacts on the environment and, therefore, such effects were not evaluated as CEQA impacts in the Draft EIR. As such, refer to Chapter 5 of the TA for a discussion of these issues.

The City, through the TSCG, continues to require that transportation assessments analyze various non-CEQA transportation topics, such as pedestrian, bicycle and transit access, intersection operations, project access, construction period traffic effects, and residential street cut-through effects. The City's TSCG also establishes various criteria for these analyses where corrective actions may be appropriate to address non-CEQA adverse effects. These issues are discussed in the non-CEQA portion (Chapter 5) of the TA prepared for the Project. The results of these analyses of non-CEQA topics and the proposed corrective actions identified in the TA would be addressed through potential Project conditions of approval.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

[2] On July 13, 2020, the Culver City Council adopted a resolution formally implementing the City's updated transportation thresholds of significance for CEQA analyses and overall transportation study guidelines. The TSCG is the document providing the guidance for conducting both CEQA and non-CEQA transportation analyses.

Letter IND 2

Jeff Haas
Received May 20, 2024

Comment IND 2-1

Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development. These 2 omitted projects (listed above) must be fully analyzed for their impact on the proposed changes to the Fox Hills area streets.

Link to EIR:

https://www.culvercity.org/files/assets/public/v/2/documents/planning-amp-development/ceqa/5700-hannum-ave/00_5700-hannum-draft-eir.pdf

Response to Comment IND 2-1

This comment asserts the EIR should consider the proposed projects at 5757 Uplander Way and 5730 Uplander Way in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Letter IND 3

Judi Sherman
Received May 20, 2024

Comment IND 3-1

The following are my comments regarding the EIR for the 5700 Hannum Avenue proposed mixed use project:

The EIR is incomplete as it does not address the Cumulative Impact of the other two proposed projects in close proximity to the 5700 Hannum Avenue proposed project. Of the 12 related projects listed in the EIR on page 82/Table 3.1, the proposed projects at 5757 Uplander Way and 5730 Uplander Way were not included. These 2 projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue project and their cumulative impact must be fully analyzed for this EIR to have any value in its results.

Response to Comment IND 3-1

This comment asserts the EIR should consider the proposed projects at 5757 Uplander Way and 5730 Uplander Way in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 3-2

In addition, there is no documentation about the impact that this project will have on the natural breezes that the 26 residential complexes now have. This issue is important to fully address, as these present complexes do not have central air conditioning. A detailed effect of the blockage that the 5700 Hannum Avenue project will have was missing from this EIR as well. Please address.

Response to Comment 3-2

This comment raises concerns about airflow due to the Project's new building at its proposed height and massing. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes.

Letter IND 4

Thomas O'Neil
Received May 20, 2024

Comment IND 4-1

Is the land made for the people or were people made to serve the land?

Is the EIR to serve the planet or to serve the people living on it?

So much of what has undergirded land use policy for decades in California is pride in saving the environment for the environment's sake. The fundamental notion that the land was made for the people has been set aside.

It is essential to strike a balance in all things, however. So, the question that should be at the front of our collective mind when considering any new development is the effect that it will have ON THE PEOPLE already living in the space that is designated for that development.

There needs be space to move, easy access to essential services, preservation of existing gifts of nature that enhance the lives of the people including the natural flow of clean air, and life-giving air-purifying trees and open space, and basic efficient supplies of water and power to facilitate civilized living.

All these natural gifts and manmade services in balance with the size of the population that they can comfortably support.

The fact that the State has seen fit to block development for decades through the abuse of EIRs, throughout the State, is no excuse for now imposing overdevelopment in areas, like Fox Hills, that are in what has already been considered by the experts to be in line with their own nearer ideal criteria.

The State has tasked our City with creating 3,300 living spaces. And the projects that have been planned THUS FAR would drop 1,700 of those dwellings in what is already the most densely populated part of our fair city, Fox Hills, thereby destroying a balance that has served the people living here well, for decades.

Why Fox Hills? Why now?

Because it's easy? Because it's cheap? Because it's a fast buck? Because it serves certain vested interests like Amazon, or Apple, or Google?

Why now, when a million people have left California and while thousands of existing units sit vacant, from here to San Francisco?

There must have been considerable thought given to the portion of the proposed essential housing burden imposed on each municipality. But who made the decisions and whose ox was being gored in the making? Whose ideology or pocketbook was being served?

These are of course, to some degree, rhetorical questions.

The mindset of urban planners is well known. “Save the Planet.”

And while California remained shut down longer than any other State, who was buying up the shuttered businesses and vacated properties?

All in order to serve whom or what? Certainly not the people who live in Fox Hills or the rest of Culver City for that matter. Certainly not to bring balance where it already exists.

5700 Hannum is a foot in the door, and a slap in the face to the people of Fox Hills. The developers pitch “5700 Hannum” as a transition from the office buildings on Corporate Pointe.

Well, we already have that “transition.” A street lined with large trees and other plant life and a quiet, low-density low-rise business park that provides a real transition from the hustle and bustle of the Mall and its neighboring businesses. The developer’s ”transition” is no transition at all, rather an intrusion.

California is BIG COUNTRY. Plenty of room to live and build. But some of those who have been elected to oversee the quality of life for the rest of us, and too many unelected bureaucrats, have a twisted vision of what that living should be like. Cram as many units into as small a space as possible. Take as many cars off the street as possible. Control where and how people come and go. There’s a name for that, and it isn’t America.

Gavin Newsom lives in a 12,000 square foot house on an 8.2 acre estate along the American River in Northern California. 6 bedrooms, 10 baths, pool, tennis court, jaccuzi, and wine cave. And that's not including his winery which remained open while he shut others down.

How about some EQUITY, here. Tell the Governor to drop 3,300 units on his 8 acre estate.

That seems a reasonable sacrifice for him to make for the people of Culver City and Fox Hills, a sacrifice by someone who has made none so far.

His mantra and that of the State Houses: Rules for thee but not for me.

Doesn't our City, Culver City, hold a higher moral and ethical standard than that?

Response to Comment IND 4-1

This comment provided general opposition to the Project due the density of the Project along with other proposed projects in the Fox Hills area. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Letter IND 5

Angelika Kischnick
Received May 20, 2024

Comment 5-1

https://www.culvercity.org/files/assets/public/v/2/documents/planning-amp-development/ceqa/5700-hannum-ave/00_5700-hannum-draft-eir.pdf

Of the 12 related projects listed in the report link on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, would result in an additional 1,396 units in close proximity to the 5700 Hannum Avenue development.

Response to Comment IND 5-1

This comment asserts the EIR should consider the proposed projects at 5757 Uplander Way and 5730 Uplander Way in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 5-2

Among utmost concern:

* Utilities (water, power, gas) - Supply & Resulting Pollution ...

We current neighboring residents were already forced to cut back on water usage in recent years, urged to operate appliances during off-hours to prevent outages. Each newly built unit will run A/C's, TV's and electronic devices at minimum, possibly washers, dryers, dish washers, electric vehicle charging stations etc. The resulting detrimental pollution impact also needs to be considered.

Response to Comment IND 5-2

This comment raises concerns regarding the ability of utility providers to the serve the Project and resulting pollution from the Project (presumably pollution is referring to air quality and possibly greenhouse gas emissions). With regard to concerns regarding impacts to utility services and facilities, refer to Response to Comment No. DEIR 1-1. With regard to air quality impacts, refer to Response to Comment DEIR 5-2. In addition, with regard to greenhouse gas emission impacts, refer to Response to Comment DEIR 4-1.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 5-3

* Lack of sufficient parking per project

Most people have to share units to afford rent, so 2-3 occupants /unit would be the anticipated norm. L.A. is too wide spread and its public transportation system under-developed, one even needs a car to get to public transportation. Thus, 2 minimum parking space / unit, plus parking for guests, staff, service personnel, deliveries, commercial space traffic etc. would be needed. Drivers / cars will flood and pollute the entire neighborhood on approach, while circling for parking, and departure. Most alarming to me is that all street parking for us neighbors will be eliminated..

Response to Comment IND 5-3

This comment raises concerns regarding parking, citing that parking will potentially not be adequate resulting cars parking off-site leading to traffic and pollution. Refer to Response to Comment DEIR 1-2 which addresses concerns related to parking for the Project. Regarding transportation-related impacts, refer to Response to Comment IND 1-1. With regard to air quality impacts, refer to Response to Comment DEIR 5-2. In addition, with regard to greenhouse gas emission impacts, refer to Response to Comment DEIR 4-1.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Letter IND 6 (A-B)

Justin Ciampaglia
Received May 20 and May 21, 2024

The commenter provided two (2) comment letters, with May 21, 2024 letter including all of the comments included in his May 20, 2024 letter. Thus, below are comments from the May 21, 2024 letter.

Comment 6-1

Thank you for your efforts. Here are some recommendations for your review to balance the Affordable Housing Act with CEQA.

A day-care Montessori school may still be in operation at Heather Village Condos and trigger the requirement Impact HAZ-3:

Emit Hazardous Materials Within One-Quarter Mile of a School (Impact HAZ-3): The Project would be required to comply with existing federal, State, and local regulations related to hazardous materials, which would ensure that future development allowed under the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the Project would result in a less than significant impact related to emitting hazardous materials within one mile of a school.

Response to Comment IND 6-1

This comment raises concerns regarding the emission of hazardous materials to the Montessori school that may still be in operation at Heather Village Condos. The CEQA Guidelines Appendix G threshold question in this regard, and asks whether a Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. First, the Montessori school in question is located just over 0.30 miles from the Project Site. As such, it does not meet the distance requirement under this threshold. Regardless, all hazardous materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and State Occupational Health and Safety Administration (OSHA) requirements. As such, the use of such materials would not create a significant hazard to any nearby existing or proposed schools. Therefore, impacts would be less than significant.

Comment IND 6-2

Our concerns with 5700 Hannum include:

The EIR states, "Air Quality Management Plan (Impact AIR-1): The Project would result in a potentially significant impact related to a conflict with or obstructing implementation of the applicable air quality plan due to growth that could exceed demographic assumptions for Culver City. While implementation of mitigation measures would serve to reduce the severity of the effects, impacts would remain significant and unavoidable." Please also include significant

pollution from fossil fuel devices without any pollution controls such as leaf blowers and diesel generators at Fox Hills Park.

Response to Comment IND 6-2

This comment includes a quote that is misattributed to the Draft EIR. This quote is not included in the Draft EIR. The comment requests to include significant pollution from fossil fuel devices without any pollution controls such as leaf blowers and diesel generators at Fox Hills Park. No such statement is needed or required to support the impact analysis of the Project's consistency under Threshold AIR-1 with the South Coast Air Quality Management District (SCAMD) Air Quality Management Plan (AQMP) in Section 4.2, *Air Quality*, of the Draft EIR. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary.

Comment IND 6-3

Most buildings in Fox Hills are older and have no capability of adding effective AC systems especially if SB 326 requires balcony replacements. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This would be an unknown increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. We request the EIR to study the ocean breeze effect based on all the projects that are in Fox Hills. Some argue they do not see the 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

Response to Comment IND 6-3

This comment raises concerns about airflow due to the blockage of breezes. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes. Also, refer to Response to Comment DEIR

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 6-4

The EIR shows "Unavoidable Significant Impact". Question: Why did this study not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS? Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

Response to Comment IND 6-4

This comment asserts the EIR should consider the proposed projects at 5757 Uplander Way and 5730 Uplander Way in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 6-5

The city council can request an amended EIR including all the concerns brought up by the residents. 100 Fahrenheit temps inside our units without AC can become lethal. Here is a portion of the EIR: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts."

From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity."….. We can tell you, we live here, we have great air flow. The construction being higher and massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations." This is one more reason to study the air flow (ocean breeze) effects. It can cause air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have significant pollution from buildings, leaf blowers, diesel generators at Fox Hills Park, the 405, and high traffic streets.

Response to Comment IND 6-5

This comment raises concerns about airflow due to the blockage of breezes. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 6-6

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This is due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the

projects. Many people to be informed rely on advocacy groups that work for the neighborhood. The spirit of the law is not met with 500 ft. We must have at least 2000 ft notice requirement to make sure everyone affected by the change is notified. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice. The city can protect the residents facing the highest disproportionate burden from population density in our City**.

Response to Comment IND 6-6

This comment states that not every resident in Fox Hills received notice of the Draft EIR. The commenter suggests that the mailing radius notice be extended from 500 feet to 2,000 feet. The commenter also states the notice should include any exemption or exception of a law that protects the public. The Notice of Completion and Availability of the Draft EIR for the Project met and applicable noticing requirements per CEQA Guidelines Section 15087, Public Review of the Draft EIR. In addition to the 500-foot mailing, the notice was published in the Culver City News newspaper and made available on the City's Planning Division website, at Culver City Hall, and at the Culver City Julian Dixon Library and Baldwin Hills Branch Library. The notice also included applicable components as required by CEQA Guidelines Section 15087.

As this comment does not raise any comments with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Letter IND 7 (Form Letter)

Tanya Ihnen (IND 7A)
Yumi Mandt-Rauch (IND 7B)
Eurana High (IND 7C)
Irene French (IND 7D)
Gabriel Parhoti (IND 7E)
Received May 20, 2024 (IND 7F)

The above listed commenters submitted the same form letter comments. See Appendix A, Original Draft EIR Comment Letters, of this Final EIR, for copies of the original letters.

Comment IND 7-1

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. The only way people get to know is thru the advocacy groups that work for the neighborhood. Cemeteries, offices, park, are receiving notices and the residents are NOT. The spirit of the law is not met with 500 ft. We must have at least 2000 ft to make sure everyone affected by the change is notified. Also the notice is is [sic] given for transparency. If the developer is asking for an exemption or exception of a law that protects the public, that should be in the notice. Not the law number, but in words that a common person can understand. The city must protect the residents and always have the residents BEST interest first!

Response to Comment IND 7-1

This comment states that not every resident received direct notice for the Project, as well as other projects that affect Fox Hills residents. This comment is similarly raised in in Comment IND 6-6. Refer to Response to Comment IND 6-6 for a response to this comment.

As this comment does not raise any comments with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 7-2

This is a response to the 5700 Hannum EIR. Here are our concerns:

1. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the all projects that are happening in Fox Hills. I do not see 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The city

of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here. This is the minimum the city can do for the current residents.

Response to Comment IND 7-2

This comment raises concerns about airflow due to the blockage of breezes. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes. Also refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 7-3

2. The EIR shows “Unavoidable Significant Impact”. Question: Why this study did not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. Not partial list. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS?: Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

Response to Comment IND 7-3

This comment asserts the EIR should consider the proposed projects at 5757 Uplander Way and 5730 Uplander Way in order to provide an appropriate analysis of cumulative impacts. Refer to Response to Comment DEIR 3-1 which addresses concerns related to cumulative impacts and the list of related projects.

Comment IND 7-4

3. Message to City Council: Did you read the EIRs that you are asking us the public to comment? Do you know the change that you are deciding to impose in an entire neighborhood? The minimum that the city council can do is to provide a full well done EIR including all the concerns brought up by the residents. Item 1 above is extremely important to the community. A change of 1 or 2 degrees inside our units in the hot summer without AC, can become lethal for the most vulnerable population. Here is a portion of the EIR, please at least read this part: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the

potential for significant environmental impacts. " City Council, if your intention is to override our CEQA guidelines (protection that is in place for the public), you must understand and demand all the consequences you are going to impose in Fox Hills.

4. From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity."….. We can tell you, we live here, we have great air flow. The construction being higher and a massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. " This is one more reason to study the air flow (ocean breeze) affect. It can cause of [sic] air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have the 405 and major boulevards and high traffic street all around us. This neighborhood is ok now because we have a well balanced nature help but your construction can upset the balance we have now.

Response to Comment IND 7-4

This comment states the City should prepare an EIR which addresses the comments raised by the residents herein. However, the comments herein do not provide substantial evidence of significant new information showing that there is a new significant impact, an increase in the severity of an impact, an alternative that would lessen the impacts, or that the Draft EIR is fundamentally flawed to support a contention that the Draft EIR is required to be recirculated pursuant to CEQA Guidelines Section 15088.5. There is also no substantial evidence provided by the commenter that supports the claim that the Project could result in a change of temperature by 1 or 2 degrees. As such, the comment does not demonstrate that recirculation of the Draft EIR nor a new Draft EIR is required. Also, the only significant and unavoidable impacts the Draft EIR has identified is related to temporary construction noise. Approval of the Project would require a Statement of Overriding Considerations explaining what factors the City considered in approving the Project notwithstanding the potential for this temporary significant environmental impact.

In addition, this comment raises concerns about airflow due to the blockage of breezes. Refer to Response to Comment DEIR 1-1 which addresses concerns related to airflow and breezes.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 7-5

5. We ask for Alternative 1 or Alternative 3 (Reduced project alternative)

Response to Comment IND 7-5

This comment provides support for Alternative 1 (No Project Alternative) or Alternative 3 (Reduced Project Alternative) included in the Draft EIR. As this comment does not raise any comments with respect to the content or adequacy of the Draft EIR, no further response is

necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment IND 7-6

6. Lower height for every building. Do not exceed existing building height.

Response to Comment IND 7-6

This comment requests Project building heights that do not exceed existing building heights. As this comment does not raise any comments with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

This page intentionally left blank

CHAPTER 3
Revisions, Clarifications, and Corrections to the Draft EIR

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15132 (a), this Chapter of the Final EIR shall include changes to the Draft EIR that have been made to clarify, correct, or supplement the information provided in that document.

However, based on the comments and responses included in Chapter 2, Responses and Comments, of this Final EIR, no revisions to the Draft EIR are necessary.

This page intentionally left blank

CHAPTER 4
Mitigation Monitoring Program

This Mitigation Monitoring Program (MMP), which is provided in **Table 4-1**, *Mitigation Monitoring Program*, below, has been prepared pursuant to Public Resources Code (PRC) Section 21081.6 and CEQA Guidelines Section 15097 (Title 14 of the California Code of Regulations), which require adoption of an MMP for projects where the Lead Agency has adopted mitigation to avoid significant environmental effects. The City of Culver City (City) is the Lead Agency for the 5700 Hannum Avenue Mixed-Use Residential and Commercial Project (Project). The decision-makers must define specific reporting and/or monitoring requirements to be enforced during Project implementation prior to final approval of the Project. The primary purpose of the MMP is to ensure that the mitigation measures identified in the Initial Study (for Biological Resources), Draft EIR, and Final EIR (designated by the respective environmental issue within Chapter 4, *Environmental Impact Analysis,* of the Draft EIR) are implemented, thereby minimizing identified environmental effects.

The MMP also includes project design features identified throughout Chapter 4 of the Draft EIR. Because project design features have been incorporated into the Project, they do not constitute mitigation measures. However, project design features are included in this MMP to ensure their implementation as a part of the Project.

Final clearance shall require all applicable verification as indicated in Table 4-1. The project design features and mitigation measures are identified by the impact category and numbered to correspond with the Initial Study, in the case of Biological Resources, and the Draft EIR.

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Aesthetics				
AES-PDF-1: Screening of Utilities. Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances (such as rooftop elevator stops), will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Public Works, Engineering, and Planning Division
Air Quality				
MM-AQ-1: Construction Equipment. The Applicant shall implement the following requirements for construction equipment operating at each Project site. These requirements shall be included in applicable bid documents and contractor(s) must demonstrate the ability to supply such equipment. Construction equipment shall include the following: • The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 25 horsepower (hp) or greater during Project construction where available within the Air Basin. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification, BACT documentation, and CARB or Southern California Air Quality Management District (SCAQMD) operating permit at the time of mobilization of each applicable unit of equipment shall be provided. • Use electrified tower cranes in place of diesel-fueled equipment.	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
Biological Resources				
MM-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 and/or construction-related activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds. This would ensure that no active nests are disturbed; or 2) If avoidance of the avian breeding season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) 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	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Building Permit.	Culver City Planning Division

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
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 (or up to 300 feet, depending on topography or other factors, and 500 feet for raptors) of construction site boundaries. This two-tiered survey method is intended to provide the 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. In addition, pre-construction surveys and/or construction monitoring shall also be submitted to the California Department of Fish and Wildlife (CDFW) within two months of the completion of the monitoring activities.				

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Cultural Resources				
MM-ARCH-1: Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work such as site demolition (e.g., building footings/foundations, subsurface utilities, surface parking lots, sidewalks, etc.), clearing/grubbing, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring 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. The frequency of monitoring 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 shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
MM-ARCH-2: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, 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. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work within the buffer area shall only be allowed to continue after the evaluation and recovery efforts are completed. 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. If the Qualified Archaeologist determines the find 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	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
shall coordinate with the Applicant and the City of Culver City (City) to develop a formal treatment plan that would serve to reduce impacts to the resources and that provides for or the adequate recovery of the scientifically consequential information contained in the resources along with subsequent laboratory processing, analysis, evaluation, and reporting. 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 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. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.				
MM-ARCH-3: 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.	Condition of Approval	Report	Prior to issuance of a Certificate of Occupancy	Culver City Planning Division
Geology and Soils				
MM-GEO-1: Prior to the issuance of grading permits, the Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting, and shall be responsible for monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Grading Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
MM-GEO-2: Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments and undisturbed Baldwin Hills Paleosol. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting and wet screening sediment samples of promising horizons for smaller fossil remains. If significant vertebrate fossils are found by screening, it will be necessary to collect a 6,000-pound sample for screening	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuant of Demolition Permit, Grading Permit and Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
from each producing geologic unit, per SVP Guidelines (2010). The sample(s) can be collected by construction machinery and stockpiled and processed in a safe location on site, or transported to another site for processing. The frequency of monitoring inspections shall be determined by the Qualified 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 Qualified Paleontologist. If a potential fossil is found, the Qualified Paleontologist and the monitor shall have authority to temporarily stop excavation activity or 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 by the Qualified Paleontologist 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 Qualified 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 Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location.				
MM-GEO-3: If the older Quaternary alluvium produces any mollusk fossils, a specimen shall be submitted for radiocarbon dating. If the Fox Hills Paleosol produces any pedogenic calcium carbonate, a sample shall be submitted for radiocarbon dating.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Public Works, Engineering and Planning Division
MM-GEO-4: Any significant fossils recovered during Project-related excavations shall be prepared to the point of identification. The residue form sediment samples shall be dried and sorted with a binocular dissecting microscope. Both macrofossils and vertebrate microfossils shall be prepared to the point of identification, identified, and curated into an accredited repository. The Qualified Paleontologist shall prepare a final 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 accompany the specimens to the accredited repository. The report shall also be submitted by the Applicant to the City of Culver City to signify the satisfactory completion of the Project and required mitigation measures.	Condition of Approval	Report	Prior to issuance of a Certificate of Occupancy	Culver City Planning Division

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Greenhouse Gas Emissions				
GHG-PDF-1: Green Building Features. The Project will include the following green building features: • The Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Certified performance level or higher and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and Culver City's Green Building Program Requirements. • The Project will include installation of a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 sf consistent with CCMC Chapter 15.02.1005 in order to achieve compliance with the City of Culver City's solar photovoltaic requirement, per the City's Green Building Ordinance and CALGreen standards. • The Project will provide EV parking and charging for residential and commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. Forty-four (44) total spaces (41 residential + 3 commercial) would have EV charging stations. • The Project will include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances. • The Project will incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems. • The Project will utilize only electricity and no natural gas in all land uses except for the retail space.	Condition of Approval	Plan Check Notes	Prior to issuance of a Building Permit	Culver City Building Safety Division, Planning Division
Noise				
NOI-PDF-1 : Project Construction Schedule. Prior to issuance of a building permit, notice of the Project construction schedule will be provided to adjacent property owners and occupants. Evidence of such notification will be provided to the City of Culver City Public Works Department. The notice will identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
NOI-PDF-2: Use of Impact Pile Driver. The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating shoring piles to be drilled will be used.	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
NOI-PDF-3: Construction Rules Sign. During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers, with 24-hour availability, of the Applicant, Property Owner, construction contractor(s) will be posted on the Property in a location that is visible to the public. In addition, appropriate staff person at the City of Culver City will be notified for such incidences. These names and telephone numbers will also be made available to adjacent property owners and occupants to the satisfaction of the appropriate department (Planning Manager and/or Building Official) of Culver City.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
NOI-PDF-4: Neighborhood Streets. No construction haul trucks, including concrete trucks, will be allowed to travel through neighborhood streets that are primarily residential uses.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Grading Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
NOI-PDF-5: Mechanical Equipment Noise. All building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Culver City General Plan Noise Element Regulation of Stationary Noise Sources through the use of quiet fans, duct silencers, parapets, or similar noise attenuation methods.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of Mechanical Permit for subject mechanical equipment	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning
NOI-PDF-6: Noise Control – Amplified Sound Systems. If the Project installs permanent outdoor amplified sound systems, the systems will be located in discrete areas of the outdoor common opens space areas courtyard such that the sound would be mostly blocked by the proposed on-site building or walls from off-site residential receivers. Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions or providing entertainment which is audible at a distance of fifty (50) feet or beyond the subject's property line without first filing an application and obtaining a permit as set forth in Chapter 9.07, Noise Regulations, of the CCMC. The systems will at a minimum be designed so as not to result in a perceivable increase at the nearest noise sensitive residential receptor. Specifically, daytime outdoor	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division; Los Angeles Departments of Building and Safety and City Planning

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
amplified sound systems will not result in an increase of 5 dBA Leq over existing ambient noise conditions at the nearest noise sensitive residential receptor. Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996). A qualified noise consultant will provide written documentation and submitted to appropriate department of City of Culver City that the design of the system(s) complies with the maximum noise levels at the property line of the nearest off-site sensitive receivers.				
MM-NOI-1: Temporary noise barriers shall be installed along the southern and eastern Project boundary to shield the sensitive receptors from construction noise. The barrier shall have a minimum height of 6 to 15 feet (from south to north, with the top of the barrier at least 15 feet above the ground surface of the residences to the east along Buckingham Parkway) that is made of sound blanket, plywood or other solid material capable of reducing on-site construction noise levels by 17 to 19 dBA.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Demolition Permit, Verified at Preconstruction Meeting with City of Culver City and Ongoing during Construction.	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
MM-NOI-2: Since construction equipment operates intermittently, and the types of equipment change with the stage of construction, noise emitted during construction would be mobile and highly variable. The following features shall be implemented during Project construction to reduce noise levels: • Maintain all construction tools and equipment in good operating order according to manufacturers' specifications. • To the extent practicable, schedule construction activity during normal working hours between 8 a.m. and 5 p.m. on weekdays when higher sound levels are typically present and are found acceptable. • Equip internal combustion engines with properly operating mufflers that are free from rust, holes, and leaks. • For construction equipment that utilize internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Demolition Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
Public Services				
POL-PDF-1: Project Site Security and Access During Construction. During construction of the Project, the Project Site will be fenced and gated with surveillance cameras to monitor the site during off hours.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Grading Permit, Building Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Police Department; Public Works, Engineering and Planning Division

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
POL-PDF-2: Project Site Security and Access During Operation. During operation of the Project, access to the parking structure will be controlled through gated entries, and the entry areas will be well illuminated. Project Site security would include controlled keycard access to office spaces, security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV).	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Police Department; Public Works, Engineering and Planning Division
Transportation				
TRAF-PDF-1: Construction Management Plan. A Final Construction Management Plan (FCMP) will be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities covering the entire Project Site as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning manager for the City of Culver City, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments. Prior to commencement of construction, the contractor will advise the City's public works inspector and building inspector (inspectors) of the construction schedule. As-needed construction management meetings shall be convened with appropriate Culver City staff and representatives of surrounding developments that may have overlapping construction schedules with the Project, to ensure that concurrent construction projects are managed in collaboration with one another. The FCMP will consider potential project construction disruptions to transportation facilities near the Project Site and provide effective strategies to limit the Project's use of the public right-of-way (streets and sidewalks) during peak traffic periods and will be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare. Prior to approval of the FCMP and grading permits, the Applicant will conduct one (1) community meeting pursuant to the notification requirements of the City of Culver City 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.	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	Prior to Demolition, Grading and Building Permits, and Ongoing during Construction	Culver City Building Safety, Planning, Public Works, Fire and Police Departments

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
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). 11. Community notification procedures. The FCMP will at a minimum include the following: 1. The name and telephone number of a contact person who can be reached 24 hours a day via telephone regarding construction or construction traffic complaints or emergency situations. 2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Maps showing access to and within the site and to adjacent properties will be provided. 3. Construction plans and procedures to address community concerns the City of Culver City personnel notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures included in the Project's Mitigation Monitoring Program and best practices to reduce disturbances to adjacent and nearby land uses. 4. Procedures for the training and certification of flag persons. 5. To the extent known, identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for use of protective devices, warning signs, and staging or queuing areas. 6. The location of temporary power, portable toilet and trash and materials storage locations. 7. The timing and duration of any street, sidewalk and/or lane closures will be approved in advance by ethe City of Culver City. As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control				

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
plan(s), approved by the City of Culver City, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As applicable at the time of construction, such notices will be made available in digital format for posting on each City website and distribution via email alerts on electronic platforms such as the County of Los Angeles' "Gov Delivery" system. The FCMP will be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP will require that review and approval of any proposed lane closures include coordination with the Culver City Fire and Police Departments to minimize potential effects on traffic flow and emergency response. 8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and/or at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.				
TRAF-PDF-2: Transportation Demand Management (TDM) Program. The Project will implement TDM measures that include, but are not limited to, those listed below subject to Culver City Transportation Department review and approval prior to issuance of the first Temporary Certificate of Occupancy (TCO) for the Project in order to reduce drive-alone vehicle trips to/from the Project Site by residents, visitors and employees, as well peak hour traffic. The TDM strategies necessary comply with the TDM and trip reduction requirements of City Municipal Code Section 07.05.015, as well as City's design requirements for the Project: **On-Site Enhancements** - The Project design will incorporate mobility features to encourage alternative transportation modes. The features will be designed in accordance with the City Municipal Code requirements and standards. • Pedestrian Connections. The Project will provide exclusive pedestrian access separate from vehicular driveways. The Project will provide internal walkways that connect the pedestrian access points to off-site pedestrian facilities, rideshare, and transit. • Bicycle Parking and Amenities. The Project will provide both short-term and long-term bicycle parking spaces on-site in accordance with the City Municipal Code requirements. Short-term bicycle parking, which will include bicycle racks, will be located near the pedestrian entrance. Long-term bicycle parking, which will include bicycle lockers or secure bicycle enclosures, will be placed in an accessible weather protected location.	Condition of Approval	Approval of Plan	During Plan Check and prior to issuance of a Certificate of Occupancy	Culver City Traffic Engineering, Engineering/Public Works, Transportation Department and Planning Division

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Electric Vehicle (EV) Parking. In accordance with City Municipal Code Section 17.320.035.O.3, at least 40% of the onsite parking supply will have EV capability, including EV Capable spaces (20%), EV Ready spaces (10%), and Full EV Charger/Charging Stations (10%). **Off-Site Enhancements** - The Project will improve and contribute toward improvements to off-site mobility facilities to encourage alternative transportation modes. • Mobility Fees. In accordance with City Municipal Code Section 05.06.015, the Project will be subject to contributing its fair share toward funding the City's mobility infrastructure and improvement projects intended to reduce VMT and support housing and job growth. Pursuant to Resolution No. 2021-R055, the total mobility fee for the Project will be based on a rate of $3,394 per multi-family unit and $14.92 per sf of commercial space. **Other TDM Strategies** - The Project will implement TDM strategies to reduce peak hour vehicular traffic and air emissions to and from the Project Site. The following details the minimum TDM strategies necessary to comply with the TDM and trip reduction requirements of City Municipal Code Section 07.05.015, as well as City's design requirements for the Project: • Transportation Information Center (TIC). The Project will provide a TIC, a commuter information center where residents, employees, and visitors can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile. A TIC provides information about transit schedules, commute planning, rideshare, telecommuting, bicycle routes and facilities, and facilities and resources for carpoolers, vanpoolers, bicyclists, transit riders, and pedestrians. The TIC can be provided via a bulletin board, display case, or kiosk, as well as virtually, providing every resident, employee, and visitor access to commuter information through a website portal. • Bicycle Parking and Amenities. The Project will support bicycling to work through the provision of bike storage facilities throughout the Project site. Bicycle parking will be provided in accordance with the City Municipal Code requirements for the Project and will include short-term facilities (e.g., bicycle racks) and secure long-term bicycle parking (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner). • Pedestrian-Friendly Environment. The Project is designed to be pedestrian-friendly and accessible to the local neighborhood. The Project's pedestrian access points will be located separate from vehicular access points. To promote walkability within and around the Project site, internal pedestrian pathways will provide a safe and direct connection to external public pedestrian facilities. Safety measures will also be implemented at				

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
the Project driveway to ensure safe crossings to limit potential vehicular-pedestrian conflicts. • Employee Parking. At least 10% of employee parking will be reserved, as signed on the spaces, for use by potential carpool or vanpool vehicles and located as close as practical to employee entrances. This preferential parking will be identified on the site plan accompanying the application for a building permit. Vanpool spaces will have a minimum parking space dimension of nine feet wide by 18 feet in length and provide a minimum interior vertical clearance of eight feet two inches. A safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers will also be provided. • Bus Stop Improvements. If deemed necessary by the City, bus stop improvements will be provided to the satisfaction of the City Director of Transportation. **Plan/Program Management** - The Project will take appropriate measures to help future residents and employees manage each TM Plan element and maximize program participation through consolidation of information and proactive engagement. The following will be provided as part of the TDM Plan: • Project Transportation Coordinator. A Transportation Coordinator will be designated for the site and will be responsible for implementing, coordinating, and maintaining the elements of the TDM Plan. The identity and contact information for the Transportation Coordinator will be supplied to the City and kept current. • Transportation Information Packet for New Residents and Employees. Each new resident and employee will receive an information packet summarizing the transit and transportation alternatives available to Project tenants. The packet will emphasize the location of the TIC and include the contact information of the Transportation Coordinator. **Mobility Hub Support and Alternative Transportation** - The Project will incorporate measures and design elements to support first-mile/last-mile service connection for transit users and reduce reliance on personal automobiles. The following will be provided as part of the TDM Plan: • Bike Repair Station. The Project will provide an on-site bike parking station for use by Project residents and employees that has a space and basic tool set for bike repairs. • Subsidized Shared-Ride/Uber/Lift Service. Employees who arrive to work via a means other than a single-passenger vehicle or utilize the carpool matching service will automatically be registered in a Subsidized Shared-Ride/Uber/Lift Service by which, upon request to the Transportation Coordinator, the employee will be given a voucher to travel home or				

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Uber/Lyft (or similar shared ride service) in case of illness or emergency. The Project will provide up to $750 in total for this program every year. The subsidy will be for two years after Certificate of Occupancy over a two-year period. • Transit Passes. The Project will provide up to $500 per pass per year of subsidies for up to five Transit Access Passes (TAP) cards for a period of three years for employees who opt to take Metro instead of personal vehicles and will not be provided on-site parking accommodations and not receive a car share subsidy.				
Tribal Cultural Resources				
TCR-MM-1: Prior to the issuance of a demolition permit for the Project, the Applicant shall retain a Native American Monitor from the Gabrieliño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe). The Native American Monitor shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project, whether on the Project Site or in connection with Project off-site improvements (collectively "ground disturbing activities"). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils that have been monitored or observed prior to their disturbance and subsequently disturbed or displaced by Project-related construction. The Applicant shall prepare a monitoring agreement with the Kizh Nation that outlines the roles and responsibilities of the Native American Monitor and shall submit this agreement to the City of Culver City (City) prior to the issuance of demolition permit for the Project. Prior to commencement ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor is not present at the Project Site on any given workday, the ground disturbing activities may continue if the workers involved in such activities attended the training session. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude no later than conclusion of ground disturbing activities.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
TCR-MM-2: The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Applicant and the City upon written request to the Tribe. The Applicant shall not be deemed to be out of compliance with this measure if the Native American Monitor fails to complete or submit any such monitoring logs.	Condition of Approval	Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division
TCR-MM-3: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-MM-1 (after consultation with the Native American Monitor) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor and the Applicant, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the Qualified Archaeologist, the Tribe, and the City to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe, the Applicant, and the Qualified Archaeologist, the City determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe as necessary, and with the concurrence of the City's Planning Director. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources. If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist (including, but not limited to, the size of the buffer set forth above), the Applicant, or its	Condition of Approval	Field Inspections	Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering and Planning Division

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
successor, may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant shall pay all costs and fees associated with the mediator. The Applicant may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in the above paragraphs. The recovered Native American resources may be placed in the custody of the Tribe, who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Tribe nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes. Notwithstanding the above paragraph, any information determined to be confidential in nature by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code Section 6254(r).				
Utilities and Service Systems				
WATER-PDF-1: Water Conservation. The Project will implement water conservation measures that include, but are not limited to, the following: • Landscape and Irrigation o California Friendly® plants or native plants o Drip/ Subsurface Irrigation (Micro-Irrigation) o Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector; Public Works, Engineering, and Planning Division

This page intentionally left blank

Appendix A

Original Comment Letters on the Draft EIR

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 269-1124
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation
a California Way of Life

May 16, 2024

Jose Mendivil, Associate Planner
Planning Division, 2nd Floor
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

RE: 5700 Hannum Avenue Residential and Commercial Mixed-Use Project
SCH # 2023080709
Vic. LA-90/PM 2.94, LA-405/PM 24.28
GTS # GTS-2023-04495-DEIR

Dear Jose Mendivil:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project Site is currently occupied by an approximately 30,672 square foot two-story office building. The Project would demolish the existing on-site building and construct a new 6-story (up to a height 78-feet) mixed-use building with two (2) semi-subterranean levels, consisting of 309 residential units (including 27 Very Low Income units) and 5,600 square feet of retail space. The Project would provide a total of 19,526 square feet of private open space and 34,630 square feet of common open space for a total of 54,156 square feet of open space. The Project would include a total building area of 362,596 square feet. The Project would provide a total of 428 vehicular parking spaces (399 residential, 5 guest, and 24 commercial) within three parking levels. The Project would also provide 11 short-term and 81 long term bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces.

The Project is estimated to generate 1,266 net new daily trips, including 67 net new morning peak hour trips (-15 inbound trips, 82 outbound trips) and 77 net new afternoon peak hour trips (67 inbound trips, 10 outbound trips).

The Project was required to perform a VMT analysis because it is not located within 0.5 miles of a transit hub. Not accounting for any project design features or mitigations, the Project would result in a household VMT of 6.8 per capita, which is below the citywide household VMT threshold of 8.3 per capita. Based on this analysis, the Project was

determined to be below the citywide VMT threshold for household VMT. Therefore, the Project would not result in a significant VMT impact, and no mitigation measures would be required.

The Project provides adequate internal circulation to accommodate vehicular, pedestrian, and bicycle traffic without impeding traffic movements on City streets. The design of Project driveways does not introduce safety hazards for pedestrians, bicyclists, or motorists. The Project will incorporate pedestrian and bicycle-friendly designs, such as bicycle parking and improved sidewalks.

We encourage the Lead Agency to evaluate the potential Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf

All construction activities would occur outside of the commuter morning and afternoon peak hours to the extent feasible and will not result in significant traffic impacts. A Construction Management Plan will ensure that construction impacts are less than significant.

Any transportation of heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. Any large-size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # GTS-2023-04495-DEIR.

Sincerely,

Anthony Higgins for

MIYA EDMOSON
LDR/CEQA Branch Chief

email: State Clearinghouse

Letter AG 2

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

May 17, 2024

Jose Mendivil
City of Culver City
Current Planning Division
9770 Culver Boulevard
Culver City, CA 90232

Sent by Email: jose.mendivil@culvercity.org

RE: 5700 Hannum Avenue Residential and Commercial Mixed-Use
Notice of Availability of Environmental Impact Report (EIR)

Dear Mr. Mendivil:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed 5700 Hannum Avenue Residential and Commercial Mixed-Use (Project) located at 5700 Hannum Avenue in the City of Culver City (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the existing Metro bus facilities and services which should be analyzed in the EIR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.[1]

[1] See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

In addition to the specific comments outlined below, Metro is providing the City and Applicant with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at https://www.metro.net/devreview.

Project Description
The Project includes demolition of the existing on-suite building and construct a new six-story mixed-use building with two levels of subterranean levels. Project construction is anticipated to commence as early as the first quarter of 2025.

Recommendations for EIR Scope and Content

Bus Service Adjacency

1. Service: Metro Bus Line 108 operates southbound on Buckingham Parkway, adjacent to the Project. One Metro Bus stop is directly adjacent to the Project at Buckingham Parkway and Hannum Avenue. Other transit operators, such as Culver City Bus, may provide service in the vicinity of the Project and should be consulted.

2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures as appropriate. Potential impacts may include impacts to transportation services, stops, and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:

    a. Bus Stop Condition: The EIR should identify all bus stops on all streets adjacent to the Project site. During construction, the Applicant may either maintain the stop in its current condition and location, or temporarily relocate the stop consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, the Applicant must ensure any existing Metro bus stop affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.

    b. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.

    c. Bus Stop Enhancements: Metro encourages the installation of enhancements and other amenities that improve safety and comfort for transit riders. These include benches, bus shelters, wayfinding signage, enhanced crosswalks and ADA-compliant ramps, pedestrian lighting, and shade trees in paths of travel to bus stops. The City should consider requesting the installation of such amenities as part of the Project.

d. Bus Operations Coordination: The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

Transit Supportive Planning: Recommendations and Resources

Considering the Project area's proximity to Metro Bus Line 108, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Land Use: Metro supports development of commercial and residential properties near transit stops and understands that increasing development near stops represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of proposed developments in proximity to Metro bus stops, including orienting pedestrian pathways towards the bus stop.

2. Transit Connections and Access: Metro strongly encourages the City to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the proposed development site and nearby destinations. The City should consider requiring the installation of such features as part of the Project's development standards, including:

    a. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged.

    b. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf

3. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

4. Wayfinding: Wayfinding signage should be considered as part of the Project to help people navigate through the Project area to all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services or featuring

the Metro brand and/or associated graphics (such as Metro Bus pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

If you have any questions regarding this letter, please contact me by phone at 213.547.4326, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Cassie Truong
Senior Transportation Planner
Transit Oriented Communities

cc: Shine Ling, AICP, Director, Development Review Team

Los Angeles County
Metropolitan Transportation Authority

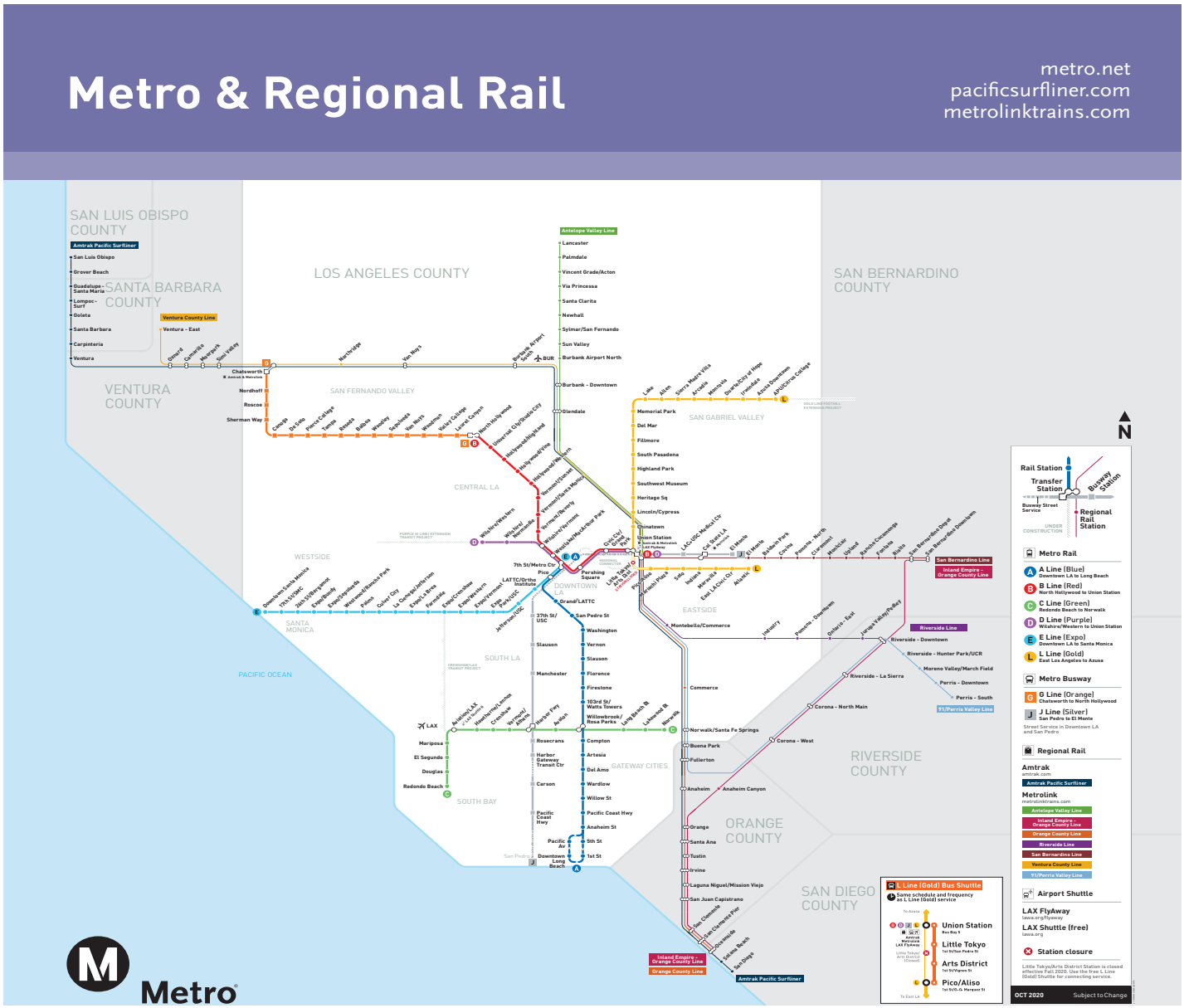
METRO ADJACENT DEVELOPMENT HANDBOOK

A GUIDE FOR CITIES AND DEVELOPERS

February 2021



Metro and Regional Rail Map



Metro is currently undertaking the largest rail infrastructure expansion effort in the United States. A growing transit network presents new opportunities to catalyze land use investment and shape livable communities.

Table of Contents

Quick Overview **1**
Background 2
Metro Purview & Concerns 4
Metro Coordination Process 6
Best Practices 8

1. Site Plan & Conceptual Design **11**
1.1 Supporting Transit Oriented Communities 12
1.2 Enhancing Access to Transit 13
1.3 Building Setback 14
1.4 Overhead Catenary System (OCS) Clearance 15
1.5 Underground Station Portal Clearance 16
1.6 Shared Barrier Construction & Maintenance 17
1.7 Project Orientation & Noise Mitigation 18
1.8 At-Grade Rail Crossings 19
1.9 Sight-Lines at Crossings 20
1.10 Driveway/Access Management 21
1.11 Bus Stop & Zones Design 22

2. Engineering & Technical Review **25**
2.1 Excavation Support System Design 26
2.2 Proximity to Tunnels 27
2.3 Protection from Explosion/Blast 28

3. Construction Safety & Management **31**
3.1 Pre-Construction Coordination 32
3.2 Track Access and Safety 33
3.3 Construction Hours 34
3.4 Excavation/Drilling Monitoring 35
3.5 Crane Operations 36
3.6 Construction Barriers & Overhead Protection 37
3.7 Pedestrian & Emergency Access 38
3.8 Impacts to Bus Routes & Stops 39
3.9 Utility Coordination 40
3.10 Air Quality & Ventilation Protection 41

Glossary **42**



Quick Overview

Purpose of Handbook

The Metro Adjacent Development Handbook (Handbook) is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services.

Overarching Goal
By providing information and encouraging early coordination, Metro seeks to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit.

Intended Audience
The Handbook is a resource for multiple stakeholder groups engaged in the development process, including:

- Local jurisdictions who review, entitle, and permit development projects,
- Developers,
- Property owners,
- Architects, engineers, and other technical consultants,
- Builders/contractors,
- Utility companies, and
- other Third Parties.

Handbook Content
The Handbook includes:

- **Introduction** of Metro's Development Review coordination process, common concerns, and typical stages of review.
- **Information** on best practices during three key coordination phases to avoid potential conflicts or create compatibility with the Metro transit system:
  - Planning & Conceptual Design,
  - Engineering & Technical Review, and
  - Construction Safety & Monitoring.
- **Glossary** with definitions for key terms used throughout the Handbook.

RULE OF THUMB: 100 FEET

Metro's Development Review process applies to projects that are within 100 feet of Metro transit facilities.

While the Handbook summarizes key concerns and best practices for adjacency conditions, it does not replace Metro's technical requirements and standards.

Prior to receiving approval for any construction activities adjacent to, above, or below Metro facilities, Third Parties must comply with the Metro Adjacent Construction Design Manual, available on Metro's website.

Contact Us
For questions, contact the Development Review Team:

- Email: devreview@metro.net
- Phone: 213.418.3484
- Online In-take Form: https://jpropublic.metro.net/in-take-form

Additional Information & Resources

- Metro Development & Construction Coordination website: https://www.metro.net/devreview
- Metro GIS/KML ROW Files: https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data
- Metrolink Standards and Procedures: https://www.metrolinktrains.com/about/agency/engineering--construction

Metro will continue to revise the Handbook, as needed, to reflect updates to best practices in safety, operations, and transit-supportive development.

Background

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail, bus, and other mobility services (e.g. bikeshare, microtransit) throughout Los Angeles County (LA County). On average, Metro moves 1.3 million people each day on buses and trains. With funding from the passage of Measure R (2008) and Measure M (2016), the Metro system is expanding. Over the next 40 years, Metro will build over 60 new stations and over 100 miles of transit right-of-way (ROW). New and expanded transit lines will improve mobility across LA County, connecting riders to more destinations and expanding opportunities for development that supports transit ridership. Metro facilities include:



Metro Rail: Metro operates heavy rail (HRT) and light rail (LRT) transit lines in underground tunnels, along streets, off-street in dedicated ROW, and above street level on elevated structures. Heavy rail trains are powered by a "third rail" along the tracks. Light rail vehicles are powered by overhead catenary systems (OCS). To support rail operations, Metro owns and maintains traction power substations (TPSS), maintenance yards, and other infrastructure.



Metrolink/Regional Rail: Metro owns a majority of the ROW within LA County on which the Southern California Regional Rail Authority (SCRRA) operates Metrolink service. Metrolink is a commuter rail system with seven lines that span 388 miles across five counties, including: Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metro-owned ROW on which Metrolink operates, and coordinates with Metrolink on any comments or concerns. Metrolink has its own set of standards and processes, see link on page 1.



Metro Bus Rapid Transit (BRT): Metro operates accelerated bus transit, which acts as a hybrid between rail and traditional bus service. Metro BRT may operate in a dedicated travel lane within a street or freeway, or off-street along dedicated ROW. Metro BRT stations may be located on sidewalks within the public right-of-way, along a median in the center of streets, or off-street on Metro-owned property.



Metro Bus: Metro operates 170 bus lines across more than 1,400 square miles in LA County. The fleet serves over 15,000 bus stops with approximately 2,000 buses. Metro operates "Local" and "Rapid" bus service within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes. Metro bus stops are typically located on sidewalks within the public right-of-way, which is owned and maintained by local jurisdictions. Metro's NextGen Bus Plan re-envisions bus service across LA County to make service improvements that better serve riders.

Why is Metro interested in adjacent development?

Metro Supports Transit Oriented Communities: Metro is redefining the role of the transit agency by expanding mobility options, promoting sustainable urban design, and helping transform communities throughout LA County. Metro seeks to partner with local, state, and federal jurisdictions, developers, property owners and other stakeholders across LA County on transit-supportive planning and developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Adjacent Development Leads to Transit Oriented Communities: Metro supports private development adjacent to transit as this presents a mutually beneficial opportunity to enrich the built environment and expand mobility options. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to:

- reduce auto dependency,
- reduce greenhouse gas emissions,
- promote walkable and bikeable communities that accommodate more healthy and active lifestyles,
- improve access to jobs and economic opportunities, and
- create more opportunities for mobility – highly desirable features in an increasingly urbanized environment.

Opportunity: Acknowledging an unprecedented opportunity to influence how the built environment develops along and around transit and its facilities, Metro has created this document. The Handbook helps ensure compatibility between private development and Metro's transit infrastructure to minimize operational, safety, and maintenance issues. It serves as a crucial first step to encourage early and active collaboration with local stakeholders and identify potential partnerships that leverage Metro initiatives and support TOCs across LA County.



Metro Purview & Concerns

Metro Purview for Review & Coordination

Metro is interested in reviewing development, construction, and utility projects within 100 feet of Metro transit facilities, real estate assets, and ROW – as measured from the edge of the ROW outward – both to ensure the structural safety of existing or planned transit infrastructure and to maximize integration opportunities with adjacent development. The Handbook seeks to:

- Improve communication and coordination between developers, jurisdictions, and Metro.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for riders and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Streamline the review process to be transparent, clear, and efficient.
- Assist in the creation of overall marketable and desirable developments.

Key Audiences for Handbook

The Handbook is intended to be used by:

- Local jurisdictions who review, entitle, and permit development projects and/or develop policies related to land use, development standards, and mobility,
- Developers, property owners,
- Architects, engineers, design consultants,
- Builders/contractors,
- Entitlement consultants,
- Environmental consultants,
- Utility companies, and
- other Third Parties.

Metro Assets & Common Concerns for Adjacent Development

The table on the facing page outlines common concerns for development projects and/or construction activities adjacent to Metro transit facilities and assets. These concerns are discussed in greater detail in the following chapters of the Handbook.

METRO ASSETS	COMMON ADJACENCY CONCERNS
 **UNDERGROUND ROW** Transit operates below ground in tunnels.	• Excavation near tunnels and infrastructure • Clearance from support structures (e.g. tiebacks, shoring, etc) • Coordination with utilities • Clearance from ventilation shafts, surface penetrations (e.g. emergency exits) • Surcharge loading of adjacent construction • Explosions • Noise and vibration/ground movement • Storm water drainage
 **AERIAL ROW** Transit operates on elevated guideway, typically supported by columns.	• Excavation near columns and support structures • Column foundations • Clearance from OCS • Overhead protection and crane swings • Setbacks from property line for maintenance activities to occur without entering ROW • Coordination with utilities • Noise reduction (e.g. double-paned windows)
 **AT-GRADE ROW** Transit operates in dedicated ROW at street level; in some cases tracks are separated from adjacent property by fence or wall.	• Pedestrian and bicycle movements and safety • Operator site distance/cone of visibility • Clearance from OCS • Crane swings and overhead protection • Trackbed stability • Storm water drainage • Noise/vibration • Driveways near rail crossings • Setbacks from property line for maintenance activities to occur without entering ROW • Utility coordination
 **BUS STOPS** Metro operates bus service on city streets. Bus stops are located on public sidewalks.	• Lane closures and re-routing service during construction • Temporary relocation of bus stops • Impacts to access to bus stops
 **NON-REVENUE/OPERATIONAL** Metro owns and maintains property to support operations (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride parking lots).	• Excavation and clearance from support structures (e.g. tiebacks, shoring, etc) • Ground movement • Drainage • Utility coordination • Access to property

Metro Coordination Process

Typical Stages of Metro Review and Coordination

Early coordination helps avoid conflicts between construction activities and transit operations and maximizes opportunities to identify synergies between the development project and Metro transit services that are mutually beneficial.



*Phases above may include fees for permits and reimbursement of Metro staff time for review and coordination.

Coordination Goal: Metro encourages developers to consult with the Development Review Team early in the design process to ensure compatibility with transit infrastructure and minimize operational, safety, and maintenance issues with adjacent development. The Development Review team will serve as a case manager to developers and other Third Parties to facilitate the review of plans and construction documents across key Metro departments.

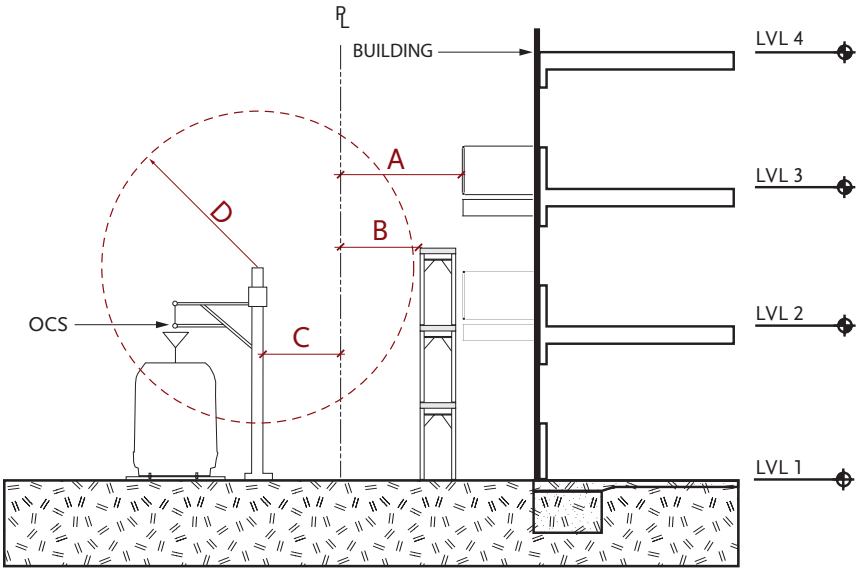
Level of Review: Not all adjacent projects will require significant review and coordination with Metro. The level of review depends on the Project's proximity to Metro, adjacency conditions, and the potential to impact Metro facilities and/or services. For example, development projects that are excavating near Metro ROW or using cranes near transit facilities require a greater level of review and coordination. Where technical review and construction monitoring is needed, Metro charges fees for staff time, as indicated by asterisk in the above diagram.

Permit Clearance: Within the City of Los Angeles, Metro reviews and clears Building & Safety permits for projects within 100 feet of Metro ROW, pursuant to Zoning Information 1117. To ensure timely clearance of these permits, Metro encourages early coordination as noted above.

To begin consultation, submit project information via an online In-Take Form, found on Metro's website. Metro staff will review project information and drawings to screen the project for any potential impacts to transit facilities or services, and determine if require further review and coordination is required. The sample sections on the facing page illustrate adjacency condition information that helps Metro complete project screening.

Contact:
Metro Development Review Team
Website: https://www.metro.net/devreview
Online In-take Form: https://jpropublic.metro.net/in-take-form
Email: devreview@metro.net
Phone: 213.418.3484

Sample Section: Adjacency Conditions



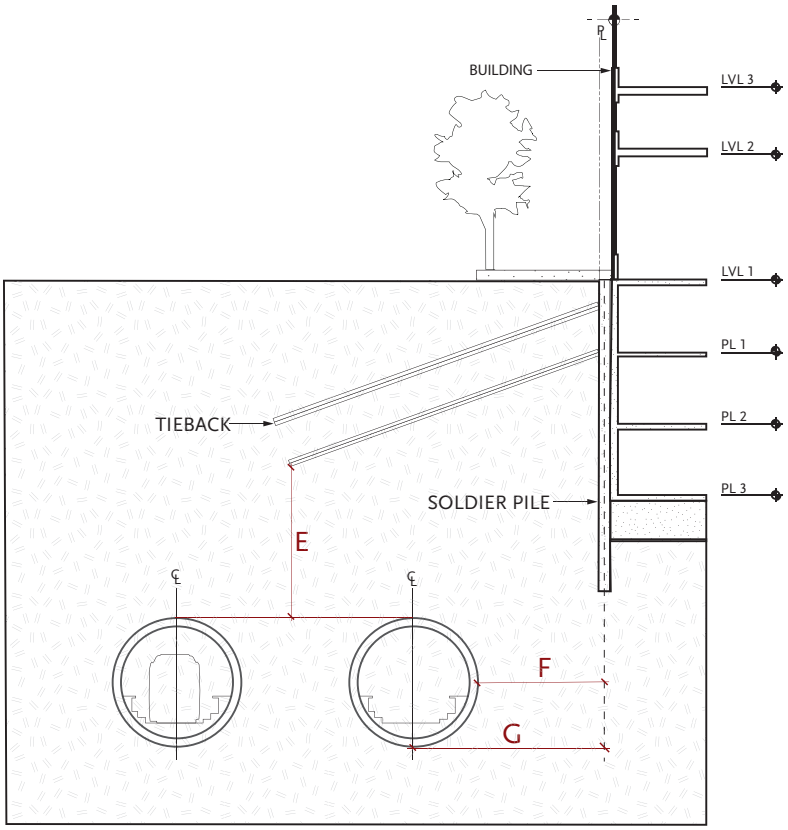
AT-GRADE CONDITION

A. Distance from property line to nearest permanent structure (e.g. building facade, balconies, terraces). Refer to Section 1.3 Building Setback of Handbook.

B. Distance from property line to nearest temporary construction structures (e.g. scaffolding).

C. Distance from property line to nearest Metro facility.

D. Clearance from nearest temporary and/or permanent structure to overhead catenary system (OCS). Refer to Section 1.4, OCS Clearance of Handbook.



BELOW-GRADE CONDITION

E. Vertical distance from top of Metro tunnel to closest temporary and/or permanent structure (e.g. tiebacks, foundation). Refer to Section 2.2, Proximity to Tunnels & Underground Infrastructure of Handbook.

F. Horizontal distance from exterior tunnel wall to nearest structure.

G. Horizontal distance from Metro track centerline to nearest structure.

Best Practices

Best Practices for Developer Coordination

Metro encourages developers of projects adjacent to Metro ROW and/or Real Estate Assets to take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies:** The Metro Development & Construction Coordination website and Handbook provide important information for those interested in constructing on, adjacent, over, or under Metro ROW, non-revenue property, or transit facilities. Developers and other Third Parties should familiarize themselves with these resources and keep in mind common adjacency concerns when planning a project.

2. **Contact Metro early during design process:** Metro welcomes the opportunity to provide feedback early in project design, allowing for detection and resolution of important adjacency issues, identification of urban design and system integration opportunities, and facilitation of permit approval. Metro encourages project submittal through the online In-Take Form to begin consultation.

3. **Maintain communication:** Frequent communication with Metro during project design and construction will reinforce relationships and allow for timely project completion. Contact us at devreview@metro.net or at 213.418.3484.

Best Practices for Local Jurisdiction Notification

To improve communication between Metro and the development community, Metro suggests that local jurisdictions take the following steps to notify property owners of coordination needs for properties adjacent to Metro ROW by:

- **Updating GIS and parcel data:** Integrate Metro ROW files into the City/County GIS and/or Google Earth Files for key departments (e.g. Planning, Public Works, Building & Safety) to notify staff of Metro adjacency and need for coordination during development approval process.Download Metro's ROW files here.

- **Flag Parcels:** Create an overlay zone as part of local Specific Plan(s) and/or Zoning Ordinance(s) to tag parcels that are within 100 feet Metro ROW and require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZI-1117)].

- **Provide Resources:** Direct all property owners and developers interested in parcels within 100 feet of Metro ROW to Metro's resources (e.g. website, Handbook).


Metro
Downtown
Santa
Monica
E



Site Plan & Conceptual Design

Site Plan & Conceptual Design

1.1 Supporting Transit Oriented Communities

Transit-oriented communities (TOCs) are places that, by their design, make it more convenient to take transit, walk, bike or roll than to drive. By working closely with the development community and local jurisdictions, Metro seeks to ensure safe construction near Metro facilities and improve compatibility with adjacent development to increase transit ridership.

RECOMMENDATION: Consider site planning and building design strategies to that support transit ridership, such as:

- Leveraging planning policies and development incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Programming a mix of uses to create lively, vibrant places that are active day and night.
- Utilizing Metro policies and programs that support a healthy, sustainable, and welcoming environment around transit service and facilities.
- Prioritizing pedestrian-scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Activating ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Reducing and screening parking to focus on pedestrian activity.
- Incorporating environmental design elements that help reduce crime (e.g. windows and doors that face public spaces, lighting).



The Wilshire/Vermont Metro Joint Development project leveraged existing transit infrastructure to catalyze a dynamic and accessible urban environment. This project accommodates portal access into the Metro Rail system and on-street bus facilities.

1.2 Enhancing Access to Transit

Metro seeks to create a comprehensive, integrated transportation network and supports infrastructure and design that allows safe and convenient access to its multi-modal services. Projects in close proximity to Metro's services and facilities present an opportunity to enhance the public realm and connections to/from these services for transit riders as well as users of the developments.

RECOMMENDATION: Design projects with transit access in mind. Project teams should capitalize on the opportunity to improve the built environment and enhance the public realm for pedestrians, bicyclists, persons with disabilities, seniors, children, and users of green modes. Metro recommends that projects:

- Orient major entrances to transit service, making access and travel safe, intuitive, and convenient.
- Plan for a continuous canopy of shade trees along all public right-of-way frontages to improve pedestrian comfort to transit facilities.
- Add pedestrian lighting along paths to transit facilities and nearby destinations.
- Integrate wayfinding and signage into project design.
- Enhance nearby crosswalks and ramps.
- Ensure new walkways and sidewalks are clear of any obstructions, including utilities, traffic control devices, trees, and furniture.
- Design for seamless, multi-modal pedestrian connections, making access easy, direct, and comfortable.



The City of Santa Monica leveraged investments in rail transit and reconfigured Colorado Avenue to form a multi-modal first/last mile gateway to the waterfront from the Downtown Santa Monica Station. Photo by PWP Landscape Architecture

1.3 Building Setback

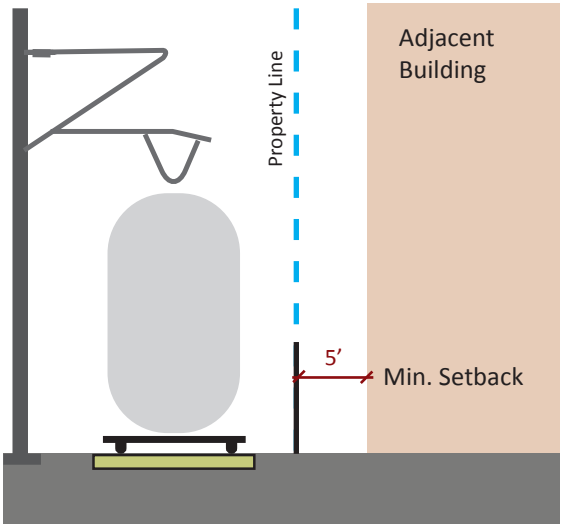
Buildings and structures with a zero lot setback that closely abut Metro ROW can pose concerns to Metro during construction. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro infrastructure.

RECOMMENDATION: Include a minimum setback of five (5) feet from the property line to building facade to accommodate the construction and maintenance of structures without the need to encroach upon Metro property. As local jurisdictions also have building setback requirements, new developments should comply with the greater of the two requirements.

Entry into the ROW by parties other than Metro and its affiliated partners requires written approval. Should construction or maintenance of a development necessitate temporary or ongoing access to Metro ROW, a Metro Right of Entry Permit must be requested and obtained from Metro Real Estate for every instance access is required. Permission to enter the ROW is granted solely at Metro's discretion.

Coordination between property owners of fences, walls, and other barriers along property line is recommended. See Section 1.5.

Refer to Section 3.2 – Track Access and Safety for additional information pertaining to ROW access in preparation for construction activities.



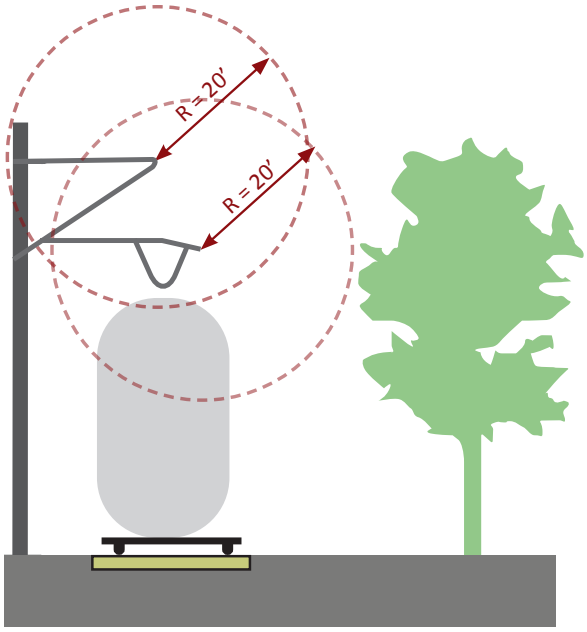
A minimum setback of five (5) feet between an adjacent structure and Metro ROW is strongly encouraged to allow project construction and ongoing maintenance without encroaching on Metro property.

1.4 Overhead Catenary System (OCS) Clearance

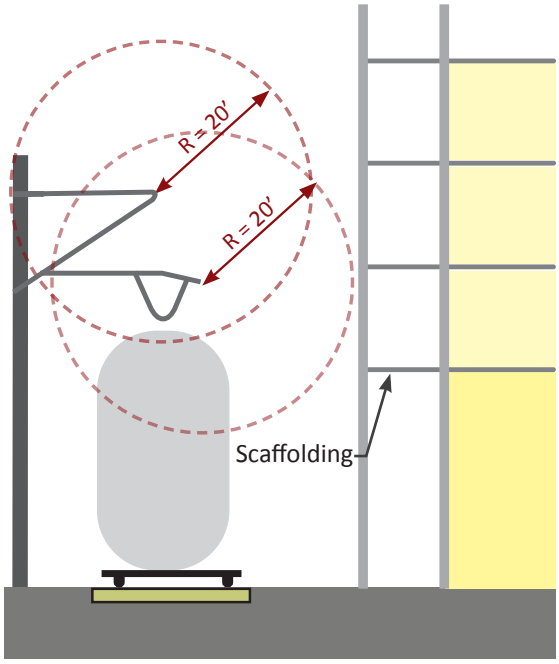
Landscaping and tree canopies can grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains. Building appurtenances facing rail ROW, such as balconies, may also pose safety concerns to Metro operations as objects could fall onto the OCS.

RECOMMENDATION: Design project elements facing the ROW to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Plan for landscape maintenance from private property and prevent growth into Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide building users direct access to Metro ROW.
- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures. If Transmission Power (TP) feeder cable is present, twenty (20) feet from the OCS and support structures is required. Different standards will apply for Metro Trolley Wires, Feeder Cables (wires) and Span Wires.



Adjacent structures and landscaping should be sited and maintained to avoid conflicts with the rail OCS.



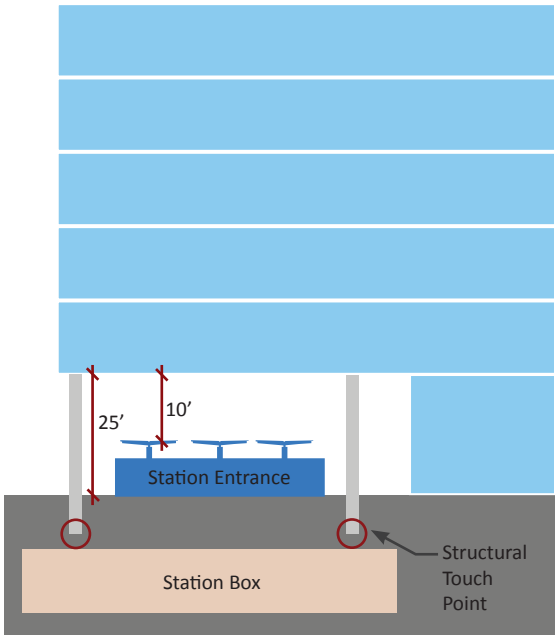
Scaffolding and construction equipment should be staged to avoid conflicts with the rail OCS.

1.5 Underground Station Portal Clearance

Metro encourages transit-oriented development. Where development is planned above station entrances, close coordination is needed for structural safety as well as access for patrons, operations, and maintenance. Below are key design rules of thumb for development planned to cantilever over an entrance to an underground Metro Rail station.

RECOMMENDATION:

1. Preserve 25 feet clearance at minimum from plaza grade and the building structure above.
2. Preserve 10 feet clearance at minimum between portal roof and building structure above.
3. Coordinate structural support system and touchdown points to ensure a safe transfer of the building loads above the station portal.
4. Coordinate placement of structural columns and amenities (e.g. signage, lighting, furnishings) at plaza level to facilitate direct and safe connections for people of all mobile abilities to and from station entrance(s).
5. Develop a maintenance plan for the plaza in coordination with Metro.



Projects that propose to cantilever over Metro subway portals require close coordination with Metro Engineering.

1.6 Shared Barrier Construction & Maintenance

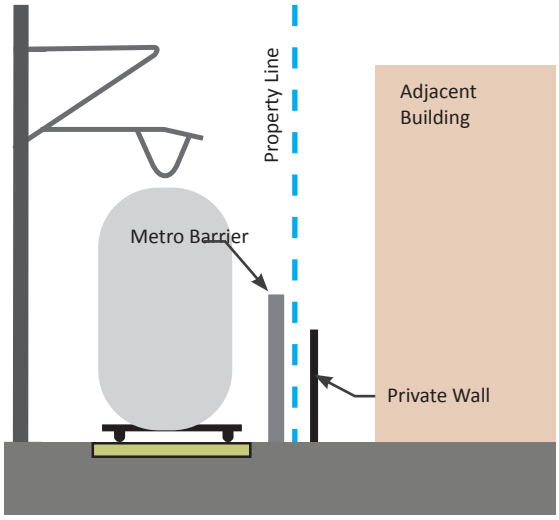
In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can be a point of contention with property owners. When double barriers are constructed, the gap created between the Metro-constructed fence and a private property owner's fence can accumulate trash and make regular maintenance challenging without accessing the other party's property.

RECOMMENDATION: Coordinate with Metro Real Estate to create a single barrier condition along the ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout LA County, Metro recommends the following, in order of preference:

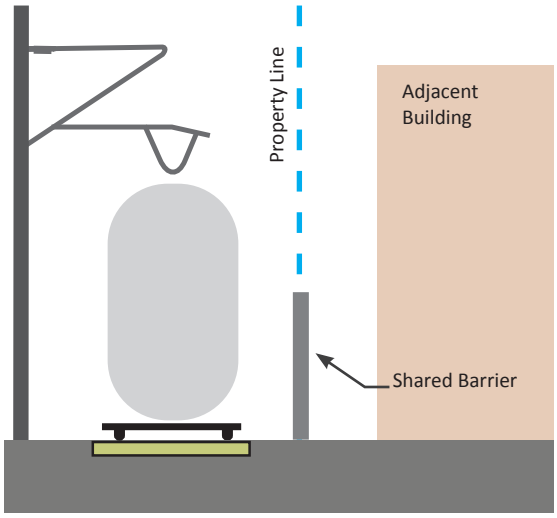
- **Enhance existing Metro barrier:** if structural capacity allows, private property owners and developers should consider physically affixing improvements onto and building upon Metro's existing barrier. Metro is amenable to barrier enhancements such as increasing barrier height and allowing private property owners to apply architectural finishes to their side of Metro's barrier.

- **Replace existing barrier(s):** if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single "shared" barrier built on the property line.

Metro is amenable to sharing costs for certain improvements that allow for clarity in responsibilities and adequate ongoing maintenance from adjacent property owners without entering Metro's property. Metro Real Estate should be contacted with case-specific questions and will need to approve shared barrier design, shared financing, and construction.



Double barrier conditions allow trash accumulation and create maintenance challenges for Metro and adjacent property owners.



Metro prefers a single barrier condition along its ROW property line.

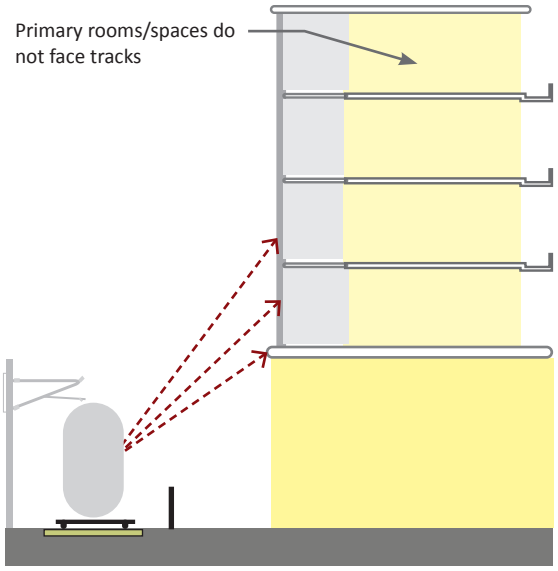
1.7 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, which can create noise and vibration (i.e. horns, power washing). Transit service and maintenance schedules cannot be altered to avoid noise for adjacent developments. However, noise and vibration impacts can be reduced through building design and orientation.

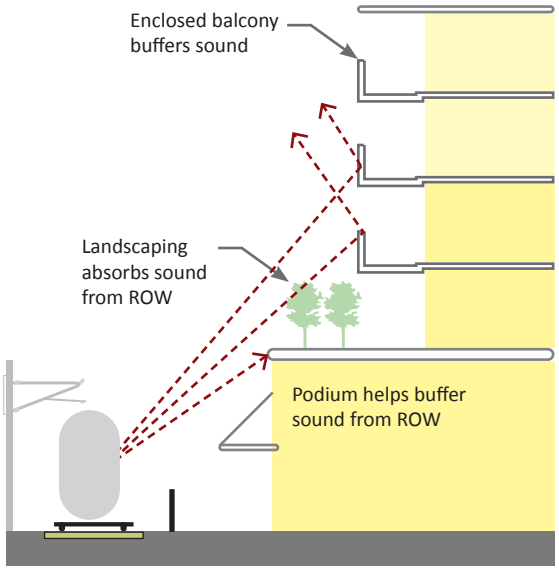
RECOMMENDATION: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

- Locate secondary or "back of house" rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than primary living spaces that are noise sensitive (e.g. bedrooms and family rooms).
- Use upper level setbacks and locate living spaces away from ROW.
- Enclose balconies.
- Install double-pane windows.
- Include language disclosing potential for noise, vibration, and other impacts due to transit proximity in terms and conditions for building lease or sale agreements to protect building owners/sellers from tenant/buyer complaints.

Developers are responsible for any noise mitigation required, which may include engineering designs for mitigation recommended by Metro or otherwise required by local municipalities. A recorded Noise Easement Deed in favor of Metro may be required for projects within 100 feet of Metro ROW to ensure notification to tenants and owners of any proximity issues.



Building orientation can be designed to face away from tracks, reducing the noise and vibration impacts.



Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.

1.8 At-Grade Rail Crossings

New development is likely to increase pedestrian activity at rail crossings. Safety enhancements may be needed to upgrade existing rail crossings to better protect pedestrians.

RECOMMENDATION: Coordinate with Metro, the California Public Utilities Commission (CPUC), and any other transit operators using the crossing (e.g. Metrolink) to determine if safety enhancements are needed for nearby rail crossings.

While Metro owns and operates the rail ROW, the CPUC regulates all rail crossings. Contact the CPUC early in the design process to determine if they will require any upgrades to existing rail crossings. The CPUC may request to review development plans and hold a site visit to understand future pedestrian activity. Metro's Corporate Safety Department can support the developer in coordination with the CPUC.



Gates and pedestrian arms are common types of safety elements for pedestrians at rail crossings.



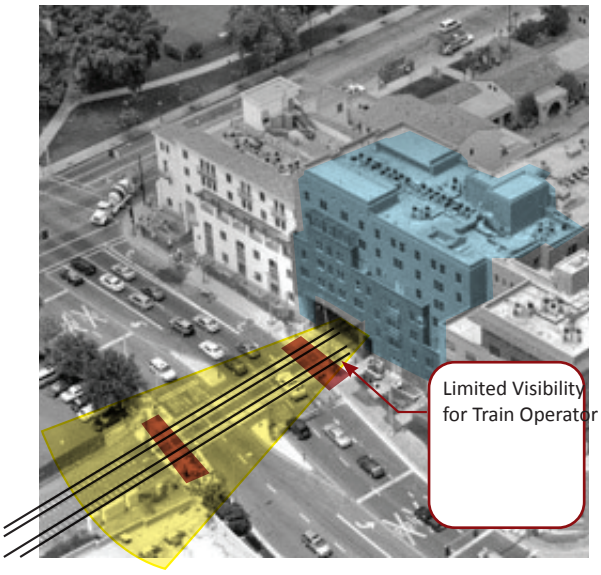
Safety elements of a gate and pedestrian arms have been constructed at the Monrovia Station.

1.9 Sight-Lines at Crossings

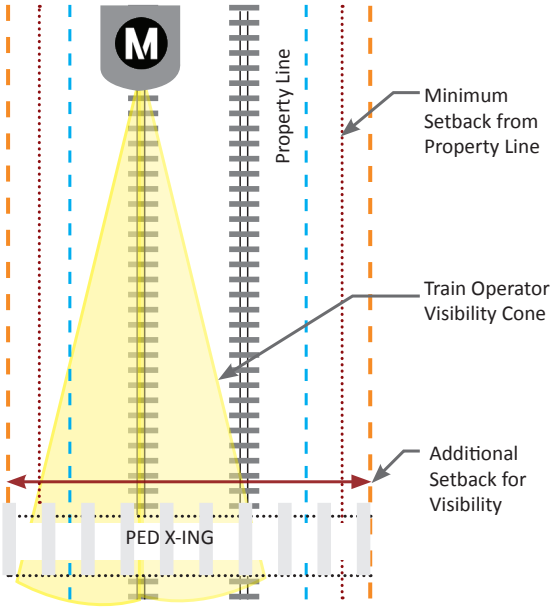
Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sight-lines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases efficiency of transit service.

RECOMMENDATION: Design buildings to maximize transit service sight-lines at crossings, leaving a clear cone of visibility to oncoming vehicles and pedestrians.

Metro Rail Operations will review, provide guidance, and determine the extent of operator visibility for safe operations. If the building envelope overlaps with the visibility cone near pedestrian and vehicular crossings, a building setback may be necessary to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.



Limited sight-lines for trains approaching street crossings create unsafe conditions.



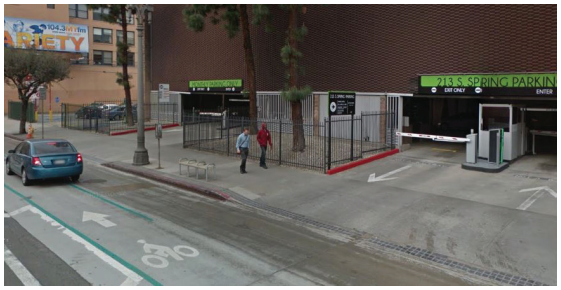
Visibility cones allow train operators to respond to safety hazards.

1.10 Driveway/Access Management

Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking lots and loading zones at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity to fast moving trains and buses, which pose safety concerns.

RECOMMENDATION: Site driveways and other vehicular entrances to avoid conflicts with pedestrians, bicycles, and transit vehicles by:

- Placing driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active ROW, transit vehicles, and people, as well as queuing on streets.
- Locating vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Placing loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidating vehicular entrances and reduce width of driveways.
- Using speed tables to slow entering/exiting automobiles near pedestrians.
- Separating pedestrian walkways to minimize conflict with vehicles.
- Encouraging safe non-motorized travel.



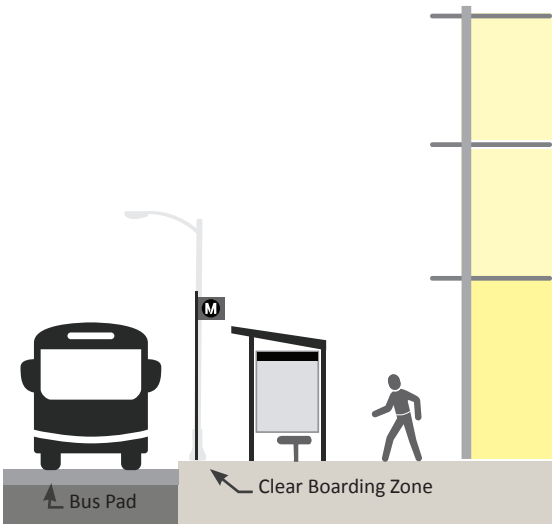
Driveways in close proximity to each other compromise safety for those walking to/from transit and increase the potential for vehicle-pedestrian conflicts.

1.11 Bus Stop & Zones Design

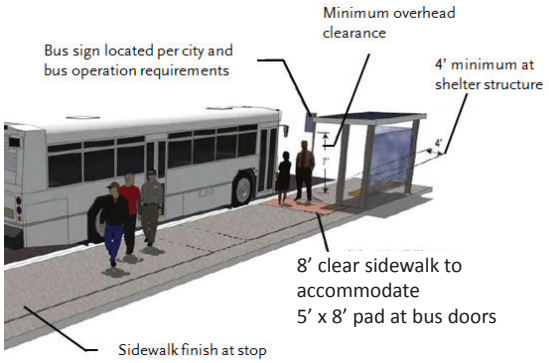
Metro Bus serves over 15,000 bus stops throughout the diverse landscape that is LA County. Typically located on sidewalks within public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones. Metro is interested in working with developers and local jurisdictions to create a vibrant public realm around new developments by strengthening multi-modal access to/ from Metro transit stops and enhancing the pedestrian experience.

RECOMMENDATION: When designing around existing or proposed bus stops:

- Review Metro's Transit Service Policy, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops.
- Review Metro's Transfers Design Guide for more information at https://www.metro.net/projects/station-design-projects/
- Accommodate 5' x 8' landing pads at bus doors (front and back door, which are typically 23 to 25 feet apart).
- Locate streetscape elements (e.g. tree planters, street lamps, benches, shelters, trash receptacles and newspaper stands) outside of bus door zones to protect transit access and ensure a clear path of travel.
- Install a concrete bus pad within each bus stop zone to avoid street asphalt damage.
- Replace stand-alone bus stop signs with bus shelters that include benches and adequate lighting.
- Design wide sidewalks (15' preferred) that accommodate bus landing pads as well as street furniture, landscape, and user travel space.
- Consider tree species, height, and canopy shape (higher than 14' preferred) to avoid vehicle conflicts at bus stops. Trees should be set back from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity. Avoid planting of trees that have an invasive and shallow root system.



A concrete bus pad should be located at bus stops and bus shelters should be located along sidewalks to ensure an accessible path of travel to a clear boarding area.



Well-designed and accessible bus stops are beneficial amenities for both transit riders and users of adjacent developments.

THIS PAGE INTENTIONALLY LEFT BLANK.


GORBEL 2.5
DANGER DO NOT
EXCEED RATED CAPACITY
730
Metro
1016
Metro



Engineering & Technical Review

Engineering & Technical Review

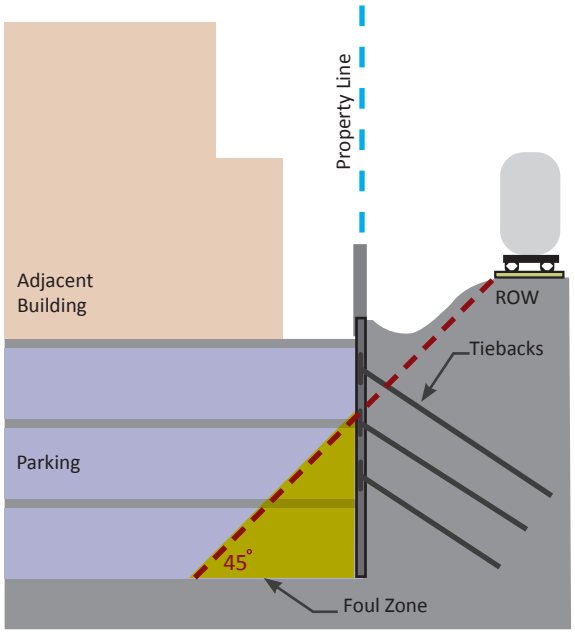
2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize support of existing Metro infrastructure. Any excavation which occurs within the geotechnical foul zone relative to Metro infrastructure is subject to Metro review and approval and meet Cal/OSHA requirements. This foul zone or geotechnical zone of influence shall be defined as the area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast. Construction within this vulnerable area poses a potential risk to Metro service and requires additional Metro Engineering review.

RECOMMENDATION: Coordinate with Metro Engineering staff for review and approval of the excavation support system drawings and calculations prior to the start of excavation or construction. Tiebacks encroaching into Metro ROW may require a tieback easement or license, at Metro's discretion.

Any excavation/shoring within Metrolink operated and maintained ROW will require compliance with SCRRA Engineering standards and guidelines.

See page 7 for a sample section showing Metro adjacent conditions.



An underground structure located within the ROW foul zone would require additional review by Metro.

2.2 Proximity to Tunnels & Underground Infrastructure

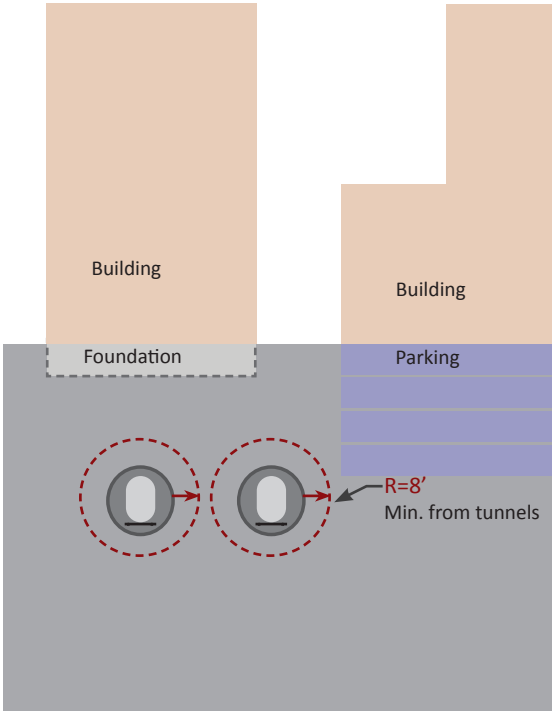
Construction adjacent to, over, or below underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

RECOMMENDATION: Coordinate with Metro early in the design process when proposing to build near underground Metro infrastructure. Metro typically seeks to maintain a minimum eight (8) foot clearance from existing Metro facilities to new construction (shoring or tiebacks). It will be incumbent upon the developer to demonstrate, to Metro's satisfaction, that both the temporary support of construction and the permanent works do not adversely affect the structural integrity, safety, or continued efficient operation of Metro facilities.

Dependent on the nature of the adjacent construction, Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations.

Metro may require monitoring where such work will either increase or decrease the existing overburden (i.e. weight) to which the tunnels or facilities are subjected. When required, the monitoring will serve as an early indication of excessive structural strain or movement. See Section 3.4, Excavation Drilling/Monitoring for additional information regarding monitoring requirements.

See page 7 for a sample section showing Metro adjacent conditions.

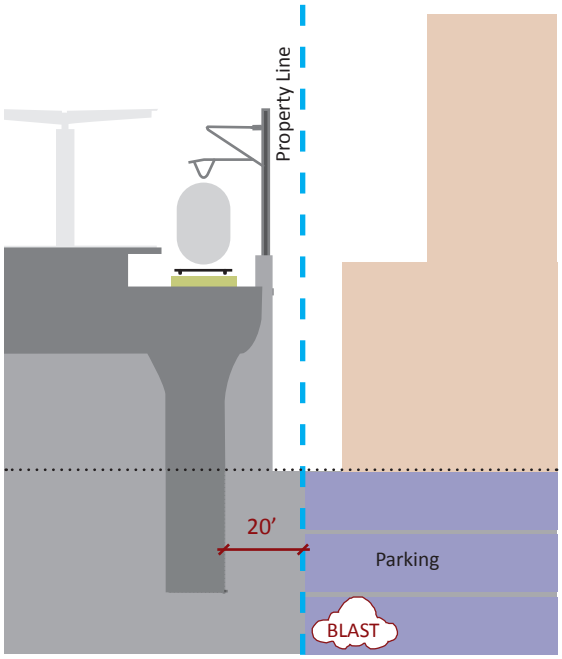


Adjacent project structures in close proximity to underground Metro infrastructure will require additional review by Metro.

2.3 Protection from Explosion/Blast

Metro is obligated to ensure the safety of public transit infrastructure from potential explosive sources which could originate from adjacent underground structures or from at-grade locations, situated below elevated guideways or near stations. Blast protection setbacks or mitigation may be required for large projects constructed near critical Metro facilities.

RECOMMENDATION: Avoid locating underground parking or basement structures within twenty (20) feet from an existing Metro tunnel or facility (exterior face of wall to exterior face of wall). Adjacent developments within this 20-foot envelope may be required to submit a Threat Assessment and Blast/Explosion Study for Metro review and approval.



An underground structure proposed within twenty (20) feet of a Metro structure may require a Threat Assessment and Blast/Explosion Study.

THIS PAGE INTENTIONALLY LEFT BLANK.


SKANSKA TAYLOR SHEA
CAT
LIEBHERR
CAT



Construction Safety & Management

Construction Safety & Management

3.1 Pre-Construction Coordination

Metro is concerned with impacts to service requiring rail single line tracking, line closures, speed restrictions, and bus bridging occurring as a result of adjacent project construction. Projects that will require work over, under, adjacent, or on Metro property or ROW and include operation of machinery, scaffolding, or any other potentially hazardous work are subject to evaluation in preparation for and during construction to maintain safe transit operations and passenger well-being.

RECOMMENDATION: Following an initial screening of the project, Metro may determine that additional on-site coordination may be necessary. Dependent on the nature of the adjacent construction, developers may be requested to perform the following as determined on a case-by-case basis:

- Submit a construction work plan and related project drawings and specifications for Metro review.
- Submit a contingency plan, show proof of insurance coverage, and issue current certificates.
- Provide documentation of contractor qualifications.
- Complete pre-construction surveys, perform baseline readings, and install movement instrumentation.
- Complete readiness review and perform practice run of transit service shutdown per contingency plan.
- Designate a ROW observer or other safety personnel and an inspector from the project's construction team.
- Establish a coordination process for access and work in or adjacent to ROW for the duration of construction.

Project teams will be responsible for the costs of adverse impacts to Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a Construction Monitoring fee may be assessed based on an estimate of required level of effort provided by Metro.

All projects adjacent to Metrolink infrastructure will require compliance with SCRRA Engineering Standards and Guidelines.





Metro may need to monitor development construction near Metro facilities.

3.2 Track Access and Safety

Permission from Metro is required to enter Metro property for rail construction and maintenance along, above, or under Metro ROW as these activities can interfere with Metro utilities and service and pose a safety hazard to construction teams and transit riders. Track access is solely at Metro's discretion and is discouraged to prevent electrocution and collisions with construction workers or machines.

RECOMMENDATION: Obtain and/or complete the following to work in or adjacent to Metro Rail ROW:

1. **Construction Work Plan:** Dependent on the nature of adjacent construction, Metro may request a construction work plan, which describes means and methods and other construction plan details, to ensure the safety of transit operators and riders.

2. **Safety Training:** All members of the project construction team will be required to attend Metro Rail Safety Training before commencing work activity. Training provides resources and procedures when working near active rail ROW.

3. **Right of Entry Permit/Temporary Construction Easement:** All access to and activity on Metro property, including easements necessary for construction of adjacent projects, must be approved through a Right-of-Entry Permit and/or a Temporary Construction Easement obtained from Metro Real Estate and may require a fee.

4. **Track Allocation:** All work on Metro Rail ROW must receive prior approval from Metro Rail Operations Control. Track Allocation identifies, reserves, and requests changes to normal operations for a specific track section, line, station, location, or piece of equipment to allow for safe use by a non-Metro entity. If adjacent construction is planned in close proximity to active ROW, flaggers must be used to ensure safety of construction workers and transit riders.



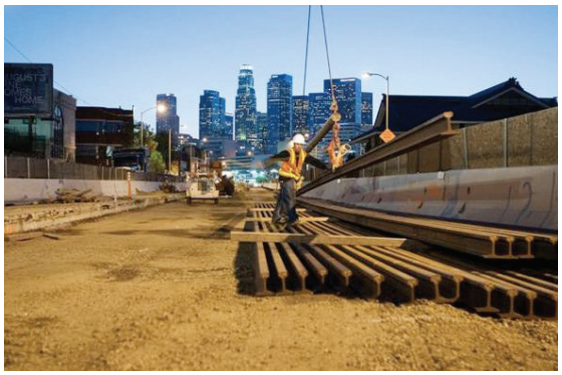
Trained flaggers ensure the safe crossing of pedestrians and workers of an adjacent development.

3.3 Construction Hours

Building near active Metro ROW poses safety concerns and may require limiting hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service. To maintain public safety and access for Metro riders, construction should be planned, scheduled, and carried out in a way to avoid impacts to Metro service and maintenance.

RECOMMENDATION: In addition to receiving necessary construction approvals from the local jurisdiction, all construction work on or in close proximity to Metro ROW must be scheduled through the Track Allocation Process, detailed in Section 3.2.

Metro prefers that adjacent construction with potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1am-4am) or during non-peak hours to minimize impacts to service. The developer may be responsible for additional operating costs resulting from disruption to normal Metro service.





Construction during approved hours ensures the steady progress of adjacent development construction and minimizes impacts to Metro's transit service.

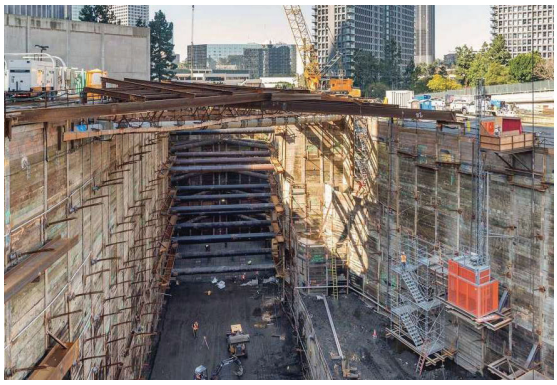
3.4 Excavation/Drilling Monitoring

Excavation is among the most hazardous construction activities and can pose threats to the structural integrity of Metro's transit infrastructure.

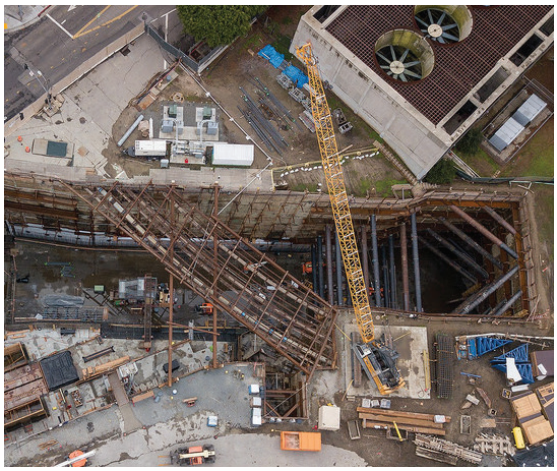
RECOMMENDATION: Coordinate with Metro Engineering to review and approve excavation and shoring plans during design and development, and well in advance of construction (see Sections 2.1 and 2.2).

Geotechnical instrumentation and monitoring will be required for all excavations occurring within Metro's geotechnical zone of influence, where there is potential for adversely affecting the safe and efficient operation of transit vehicles. Monitoring of Metro facilities due to adjacent construction may include the following as determined on a case-by-case basis:

- Pre- and post-construction condition surveys
- Extensometers
- Inclinometers
- Settlement reference points
- Tilt-meters
- Groundwater observation wells
- Movement arrays
- Vibration monitoring



Excavation and shoring plans must be reviewed by Metro to ensure structural compatibility with Metro infrastructure and safety during adjacent development construction.



A soldier pile wall used for Regional Connector station at 2nd/Hope.

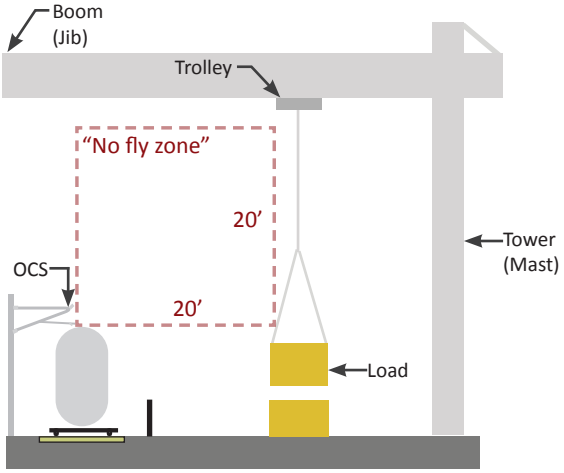
3.5 Crane Operations

Construction activities adjacent to Metro ROW may require moving large, heavy loads of building materials and machinery using cranes. Cranes referenced here include all power-operated equipment that can hoist, lower, and horizontally move a suspended load. To ensure safety for Metro riders, operators, and transit facilities, crane operations adjacent to Metro ROW must follow the safety regulations and precautions below and are subject to California Occupational Safety and Health Administration (Cal/OSHA) standards.

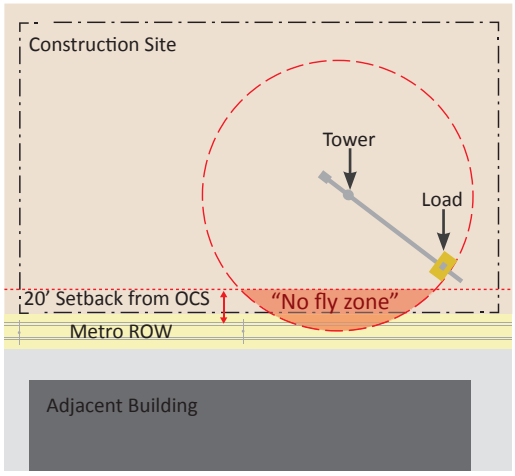
RECOMMENDATION:
Coordinate with Metro to discuss construction methods and confirm if a crane work plan is required. Generally, crane safety near Metro's ROW and facilities largely depends on the following factors: 1) Metro's operational hours and 2) swinging a load over or near Metro power lines and facilities. Note:

1. Clearance: A crane boom may travel over energized Metro OCS only if it maintains a vertical 20-foot clearance and the load maintain a horizontal 20-foot clearance.
2. Power: Swinging a crane boom with a load over Metro facilities or passenger areas is strictly prohibited during revenue hours. To swing a load in the "no fly zone" (see diagrams to right), the construction team must coordinate with Metro to de-energize the OCS.
3. Weathervaning: When not in use, the crane boom may swing 360 degrees with the movement of the wind, including over energized Metro OCS, only if the trolley is fully retracted towards the crane tower and not carrying any loads.
4. Process: Developers and contractors must attend Metro Track Allocation (detailed in Section 3.2) to determine if Metro staff support is necessary during crane erection and load movement.
5. Permit: Developers must apply for a Metro Right-of-Entry permit to swing over Metro facilities.

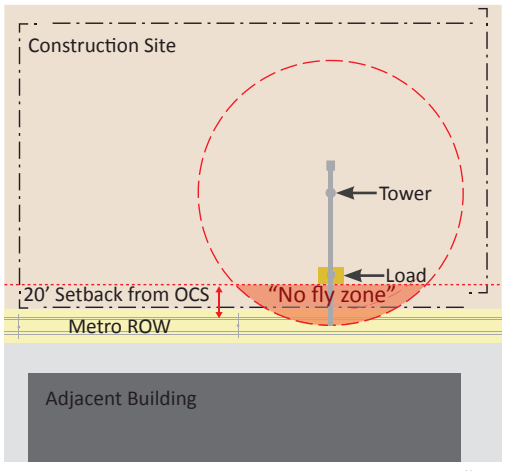
Project teams will bear all costs associated with impacts to Metro Rail operations and maintenance.



Cranes and construction equipment should be staged to avoid conflicts with the rail OCS.



Plan View: Crane swing and load are restricted near Metro ROW.



Plan View: While crane boom swings over "no fly zone," the trolley and load are retracted to maintain clearance from OCS.

3.6 Construction Barriers & Overhead Protection

During construction, falling objects can damage Metro facilities and pose a safety concern to the riders accessing them.

RECOMMENDATION: Erect vertical construction barriers and overhead protection compliant with Metro and Cal/OSHA requirements to prevent objects from falling into Metro ROW or areas designed for public access to Metro facilities. A protection barrier shall be constructed to cover the full height of an adjacent project and overhead protection from falling objects shall be provided over Metro ROW as necessary. Erection of the construction barriers and overhead protection for these areas shall be done during Metro non-revenue hours.



Overhead protection is required when moving heavy objects over Metro ROW or in areas designated for public use.



Constructed above is a wooden box over the entrance portal for overhead protection at the 4th/Hill Station.

3.7 Pedestrian & Emergency Access

Metro's riders rely on the consistency and reliability of access and wayfinding to and from stations, stops, and facilities. Construction on adjacent property must not obstruct pedestrian access, fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, riders, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained at all times.



Sidewalk access is blocked for a construction project, forcing pedestrians into the street or to use less direct paths to the Metro facility.

RECOMMENDATION: Ensure pedestrian and emergency access from Metro stations, stops, and transit facilities is compliant with the Americans with Disabilities Act (ADA) and maintained during construction:

- Temporary fences, barricades, and lighting should be installed and watchmen provided for the protection of public travel, the construction site, adjacent public spaces, and existing Metro facilities.
- Temporary signage should be installed where necessary and in compliance with the latest California Manual on Uniform Traffic Control Devices (MUTCD) and in coordination with Metro Art and Design Standards.
- Emergency exits shall be provided and be clear of obstructions at all times.
- Access shall be maintained for utilities such as fire hydrants, stand pipes/connections, and fire alarm boxes as well as Metro-specific infrastructure such as fan and vent shafts.

3.8 Impacts to Bus Routes & Stops

During construction, bus stop zones and routes may need to be temporarily relocated. Metro needs to be informed of activities that require stop relocation or route adjustments in order to ensure uninterrupted service.

RECOMMENDATION: During construction, maintain or relocate existing bus stops consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk areas must be compliant with the ADA and allow passengers with disabilities a clear path of travel to the transit service. Existing bus stops must be maintained as part of the final project. Metro Bus Operations Control Special Events Department and Metro Stops & Zones Department should be contacted at least 30 days before initiating construction activities.



Temporary and permanent relocation of bus stops and layover zones will require coordination between developers, Metro, and other municipal bus operators and local jurisdictions.

3.9 Utility Coordination

Construction has the potential to interrupt utilities that Metro relies on for safe operations and maintenance. Utilities of concern to Metro include, but are not limited to, condenser water piping, potable/fire water, storm and sanitary sewer lines, and electrical/ telecommunication services.

RECOMMENDATION: Coordinate with Metro Real Estate during project design to gauge temporary and permanent utility impacts and avoid conflicts during construction.

The contractor shall protect existing above-ground and underground Metro utilities during construction and coordinate with Metro to receive written approval for any utilities pertinent to Metro facilities that may be used, interrupted, or disturbed.

When electrical power outages or support functions are required, approval must be obtained through Metro Track Allocation in coordination with Metro Real Estate for a Right of Entry Permit.

To begin coordination with Metro Real Estate, visit www.metro.net/devreview and select the drop-down "Utility Project Coordination."



Coordination of underground utilities is critical to safely and efficiently operate Metro service.

3.10 Air Quality & Ventilation Protection

Hot or foul air, fumes, smoke, steam, and dust from adjacent construction activities can negatively impact Metro facilities, service, and users.

RECOMMENDATION: Ensure that hot or foul air, fumes, smoke, and steam from adjacent facilities are discharged beyond 40 feet from existing Metro facilities, including but not limited to ventilation system intake shafts and station entrances. Should fumes be discharged within 40 feet of Metro intake shafts, a protection panel around each shaft shall be required.



A worker breaks up concrete creating a cloud of silica dust.

Glossary

Cone of Visibility
A conical space at the front of moving transit vehicles allowing for clear visibility of travel way and/or conflicts.

Construction Work Plan (CWP)
Project management document outlining the definition of work tasks, choice of technology, estimation of required resources and duration of individual tasks, and identification of interactions among the different work tasks.

Flagger/Flagman
Person who controls traffic on and through a construction project. Flaggers must be trained and certified by Metro Rail Operations prior to any work commencing in or adjacent to Metro ROW.

Geotechnical Foul Zone
Area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast.

Guideway
A channel, track, or structure along which a transit vehicle moves.

Heavy Rail Transit (HRT)
Metro HRT systems include exclusive ROW (mostly subway) trains up to six (6) cars long (450') and utilize a contact rail for traction power distribution (e.g. Metro Red Line).

Joint Development (JD)
JD is the asset management and real estate development program through which Metro collaborates with developers to build housing, retail, and other amenities on Metro properties near transit, typically through ground lease. JD projects directly link transit riders with destinations and services throughout LA County.

Light Rail Transit (LRT)
Metro LRT systems include exclusive, semi-exclusive, or street ROW trains up to three (3) cars long (270') and utilize OCS for traction power distribution (e.g. Metro Blue Line).

Measure R
Half-cent sales tax for LA County approved in November 2008 to finance new transportation projects and programs. The tax expires in 2039.

Measure M
Half-cent sales tax for LA County approved in November 2016 to fund transportation improvements, operations and programs, and accelerate projects already in the pipeline. The tax will increase to one percent in 2039 when Measure R expires.

Metrolink
A commuter rail system with seven lines throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties governed by the Southern California Regional Rail Authority (SCRRA).

Metro Adjacent Construction Design Manual
Volume III of the Metro Design Criteria & Standards, which outlines the Metro adjacent review procedure as well as operational requirements when constructing over, under, or adjacent to Metro facilities, structures, and property.

Metro Bus
Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes.

Metro Bus Rapid Transit (BRT)
High quality bus service that provides faster and convenient service through the use of dedicated ROW, branded vehicles and stations, high frequency and intelligent transportation systems, all-door boarding, and intersection crossing priority. Metro BRT may run within dedicated ROW or in mixed flow traffic on streets.

Metro Design Criteria and Standards
A compilation of documents that govern how Metro transit service and facilities are designed, constructed, operated, and maintained.

Metro Rail
Urban rail system serving LA County consisting of six lines, including two subway lines and four light rail lines.

Metro Rail Design Criteria (MRDC)
Volume IV of the Metro Design Criteria & Standards which establishes design criteria for preliminary engineering and final design of a Metro Rail Project.

Metro Transit Oriented Communities
Land use planning and community development program that seeks to maximize access to transportation as a key organizing principle and promote equity and sustainable living by offering a mix of uses close to transit to support households at all income levels, as well as building densities, parking policies, urban design elements, and first/last mile facilities that support ridership and reduce auto dependency.

Noise Easement Deed
Easement granted by property owners abutting Metro ROW acknowledging noise due to transit operations and maintenance.

Overhead Catenary System (OCS)
One or more electrified wires situated over a transit ROW that transmit power to light rail trains via pantograph, a current collector mounted on the roof of an electric vehicle. Metro OCS is supported by hollow poles placed between tracks or on the outer edge of parallel tracks.

Right of Entry Permit
Written approval granted by Metro Real Estate to enter Metro ROW and property.

Right of Way (ROW)
Legal right over property reserved for transportation purposes to construct, protect, maintain and operate transit services.

Southern California Regional Rail Authority (SCRRA)
A joint powers authority made up of an 11-member board representing the transportation commissions of Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. SCRRA governs and operates Metrolink service.

Threat Assessment and Blast/Explosion Study
Analysis performed when adjacent developments are proposed within twenty (20) feet from an existing Metro tunnel or facility.

Track Allocation/Work Permit
Permit granted by Metro Rail Operations Control to allocate a section of track and perform work on or adjacent to Metro Rail ROW. This permit should be submitted for any work that could potentially foul the envelope of a train.

Wayfinding
Signs, maps, and other graphic or audible methods used to convey location and directions to travelers.

metro.net/projects/devreview/

Metro

CALIFORNIA AIR RESOURCES BOARD

Gavin Newsom, Governor
Yana Garcia, CalEPA Secretary
Liane M. Randolph, Chair

May 20, 2024

Jose Mendivil, Associate Planner, City of Culver City
9770 Culver Blvd.
Culver City, California 90232

Dear Mr. Mendivil,

I am writing to provide comments on the Culver City Draft Environmental Impact Report (DEIR) for the 5700 Hannum Mixed-Use Residential and Commercial Project (Project). The California Air Resources Board (CARB) works to support the State's long-term climate goals by engaging with local jurisdictions and lead agencies as they evaluate the greenhouse gas (GHG) impacts of new development during the California Environmental Quality Act (CEQA) process. Specifically, CARB has an interest in encouraging new residential and mixed-use development to demonstrate consistency with the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan).[1]

As noted in Appendix D, Local Actions, of the 2022 Scoping Plan (Appendix D), "[l]ocal government efforts to reduce greenhouse gas (GHG) emissions within their jurisdiction are critical to achieving the State's long-term climate goals." With this in mind, CARB staff submit the following comments regarding the residential portion of this project.

Overall, this project is well aligned with the State's climate goals and incorporates most of the recommendations by CARB included in the 2022 Scoping Plan. This letter includes two recommendations for further reducing vehicle miles traveled (VMT) and GHG emissions associated with the project.

Many aspects of the project currently align with Scoping Plan Appendix D Attributes

The project's GHG analysis uses thresholds of significance based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. Consequently, one of the thresholds in the analysis (GHG-2) specifies that the project would have a significant impact related to GHG emissions if it would "[c]onflict with any applicable plan, policy or regulation adopted to reduce the emissions of GHGs". As part of this analysis, the DEIR examines the project's consistency with the 2022 Scoping Plan.

The project incorporates many of the recommended project attributes for residential and mixed-use development listed in Appendix D, Local Actions, of the Scoping Plan. For example, the project's reuse of an existing developed site is characteristic of mixed-use development that is consistent with State GHG reduction goals. Table 1 compares the

[1] *https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents*

project attributes recommended in the Scoping Plan Appendix D, Table 3 to the design features included in the project.

Table 1. Appendix D Project Attributes Comparison Table

Project Attributes from Scoping Plan Appendix D, Table 3	Hannum Mixed-Use Residential and Commercial Project
Does not result in loss or conversion of natural or working lands	The project will redevelop a site within the city limits. No natural or working lands would be converted as a result of the project.
Electric Vehicle (EV) charging meeting most ambitious voluntary CA Green Building Code standard	20% of the residential parking provided will install conduit and panel capacity to accommodate electric vehicle charging stations. 10% of the spaces will be EV-ready and a further 10% will have EV charging stations installed.
Provision of on-site affordable housing	Of the 309 residential units developed by the project, 27 would be Very Low-Income units.
No net loss of existing affordable units	No housing will be removed as a result of the project.
Located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	The project will redevelop an existing two-story office building and associated surface parking. The project site is within the city limits and is surrounded by existing development.
New mixed-use or residential development includes transit-supportive densities, **or**; New mixed-use or residential development is in proximity to existing transit stops, **or**; More stringent criteria as specified in applicable SCS	Bus service exists on roadways adjacent to the site, with three bus stops either on or bordering the site. Additional bus lines exist within ¼ mile of the project boundary.
Reduces parking requirements by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or	The project would develop 399 parking spaces for use by the residential portion of the project for a parking ratio of approximately 1.3 spaces per residential unit.

For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit	

Below, CARB provides additional details on some of the more notable features of the project identified in Table 1.

The project has a strong infill component

The project will redevelop a site that is currently occupied by an office building and associated surface parking. The project would construct 309 residential units and approximately 5,600 square feet of retail space, in addition to publicly accessible and common open space. The project site is centrally located within the city and is surrounded by existing development.

The project repurposes a site that consists of uses that are already served by utilities such as water and sewer. Consequently, the project models many of the attributes of an infill project as recommended in Appendix D of CARB's Scoping Plan. By directing this residential and commercial development to an underused site, the city is also protecting existing natural and working lands that could be threatened by greenfield development.

The project makes good use of existing transit options

Appendix D of the Scoping Plan recommends that new residential projects be developed in proximity to existing or planned transit and consist of transit-supportive densities. The project will develop approximately 138 residential units per acre, which exceeds the minimum of 20 residential dwelling units per acre necessary to be considered transit-supportive.

Additionally, the project is in proximity to transit, and several existing bus lines adjacent to the project site will serve the project. Several more transit alternatives are within ¼ mile of the project site. The availability of transit for project residents can help to reduce overall VMT, with a corresponding reduction in GHG.

Opportunities exist to achieve additional VMT and GHG reductions

As noted above, the project incorporates many design features that are recommended in Appendix D of the State's Scoping Plan. Furthermore, the DEIR finds that the project's GHG impacts are less than significant. In addition to the elements already incorporated into the project, CARB identified some potential opportunities to further reduce operational GHG emissions associated with the project.

The project can reduce parking ratios

Appendix D recommends eliminating minimum parking requirements or establishing maximum allowable parking ratios, or supplying residential parking at a ratio of less than one parking space per dwelling unit as an additional project attribute that can reduce VMT

and GHG. For multifamily residential units, Appendix D also suggests that the cost of parking be unbundled from the costs to rent or own a residential unit. The project includes a parking ratio of approximately 1.3 spaces per residential unit, which exceeds the reduced parking recommendations for residential development in Appendix D that are consistent with low VMT and GHG development.

This ratio could lead to VMT above what would be expected with a lower parking ratio. Consequently, a lower parking ratio can help to further limit the project's VMT and GHG emissions. This is especially the case because of the project's proximity to existing transit options. In addition, unbundling parking costs from rental or ownership costs can encourage reduced vehicle ownership with a resulting decrease in VMT.

The project can provide additional EV charging infrastructure for residents

Another key project attribute listed in Appendix D of the Scoping Plan for residential and mixed-use development is the inclusion of infrastructure to promote transportation electrification. Appendix D recommends electric vehicle (EV) charging infrastructure that, at a minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.

The project would install conduit and panel capacity to accommodate EV charging stations at a minimum of 20% of the residential parking spaces. An additional 10% of the parking spaces would be EV-ready and a further 10% of the spaces would be improved with EV charging stations. This would meet the Tier 1 CalGreen voluntary standard.

The project could further support the goal of electrifying the state's light-duty vehicle fleet and reducing GHGs by meeting the California Green Building Standards Code Tier 2 voluntary standard and installing EV charging stations at a minimum of 15% of the overall residential parking spaces.

Conclusion

CARB appreciates the opportunity to review and comment on the DEIR for the 5700 Hannum Mixed-Use Residential and Commercial Project. The project includes many characteristics that are consistent with the 2022 Scoping Plan's recommendations for residential and mixed-use development.

Additional VMT and GHG reductions could also be realized by limiting parking to a maximum of one space per unit for residential development and charging for parking separately instead of bundling that cost in with the cost of rent, as well as by increasing the number of EV charging stations available for residential parking spaces.

CARB would like to commend the city and the project proponent for repurposing an underused site within the city to create a mixed-use development that allows for growth while being largely consistent with California's climate goals for such projects.

If you have any questions, please feel free to contact Pedro Peterson at (279) 208-7367 or by email at *Pedro.Peterson@arb.ca.gov*.

Sincerely,

Annalisa Schilla

Annalisa Schilla, Ph.D., Assistant Division Chief, Sustainable Transportation and Communities Division, California Air Resources Board
Annalisa.Schilla@arb.ca.gov

cc: Pedro Peterson, Manager, Sustainable Transportation and Communities Division, Transportation & Land Use Planning Branch, Local Planning Section

bcc: Jennifer Gress, Ph.D., Division Chief, Sustainable Transportation and Communities Division, California Air Resources Board

Carey Knecht, Branch Chief, Sustainable Transportation and Communities Division, Transportation & Land Use Planning Branch

Matt Jones, Air Pollution Specialist, Sustainable Transportation and Communities Division, Transportation & Land Use Planning Branch, Local Planning Section

Letter IND 1

-----Original Message-----
From: Karyn Marks <karynurse@yahoo.com>
Sent: Monday, May 20, 2024 10:23 AM
To: McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>; Mendivil, Jose <jose.mendivil@culvercity.org>

Subject: EIR for 5700 Hannum Avenue Mixed Use Development (309 UNITS)

To All Concerned,
As a resident of Fox Hills, I find it appalling that you would not consider ALL of the projects that you currently have slated for Fox Hills in an EIR for the area.
Since you are planning on "packing Fox Hills with units". The EIR's should be considered as a whole. You know what you are planning!
This is like operating on a patient with a complete disregard for the rest of the body!
You have multiple major projects planned that will impact our traffic, our flow of air, our pollution and you assess them one by one before any of them go up?
Why not a cumulative assessment? You are destroying where we live by putting so many new units and crowding our area way beyond the rest of Culver City.
We will never get out of our driveways when this is completed and our air quality with the 405 right here will be unbearable.
Spread these projects out evenly throughout Culver City.
Stop the discrimination of Fox Hills!

Do a cumulative assessment - That is the correct way to assess the impact on our community. To only look at the impact of 309 units when you are planning 3000 units is deceptive and inaccurate.
Why don't you care? As the City Council, you should care about this!

Stop the discrimination of Fox Hills! We are angry at your disregard for our welfare.
Sincerely,
Karyn Marks

Letter IND 2

From: Jeff Haas <jeff@haasentertainment.com>
Sent: Monday, May 20, 2024 1:08 PM
To: Mendivil, Jose <jose.mendivil@culvercity.org>
Cc: McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>
Subject: RE: DEVELOPMENT IN FOX HILLS

Jose,

Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development. These 2 omitted projects (listed above) must be fully analyzed for their impact on the proposed changes to the Fox Hills area streets.

Link to EIR:
https://www.culvercity.org/files/assets/public/v/2/documents/planning-amp-development/ceqa/5700-hannum-ave/00_5700-hannum-draft-eir.pdf

Regards,

Jeff

Jeff Haas | President / C.E.O.

Haas Entertainment
5774 Uplander Way, Culver City, CA 90230

tel: 310.641.4700

jeff@haasentertainment.com
http://www.haasentertainment.com

Letter IND 3

May 20, 2024

To Whom This May Concern:

The following are my comments regarding the EIR for the 5700 Hannum Avenue proposed mixed use project:

The EIR is incomplete as it does not address the **Cumulative Impact** of the other two proposed projects in close proximity to the 5700 Hannum Avenue proposed project. Of the 12 related projects listed in the EIR on page 82/Table 3.1, the proposed projects at 5757 Uplander Way and 5730 Uplander Way were not included. These 2 projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue project and their cumulative impact must be fully analyzed for this EIR to have any value in its results.

In addition, there is no documentation about the impact that this project will have on the natural breezes that the 26 residential complexes now have. This issue is important to fully address, as these present complexes do not have central air conditioning. A detailed effect of the blockage that the 5700 Hannum Avenue project will have was missing from this EIR as well. Please address.

Thank you.

Judi Sherman

Fox Hills resident and on the board of the Fox Hills Neighborhood Association.

Letter IND 4

From: Thomas O'Neill <thomasjudo@dslextreme.com>
Sent: Monday, May 20, 2024 5:07 PM
To: Mendivil, Jose <jose.mendivil@culvercity.org>; McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>
Subject: Comments: 5700 Hannum EIR

Re: The Environmental Impact of the 5700 Hannum Project

Is the land made for the people or were people made to serve the land?

Is the EIR to serve the planet or to serve the people living on it?

So much of what has undergirded land use policy for decades in California is pride in saving the environment for the environment's sake. The fundamental notion that the land was made for the people has been set aside.

It is essential to strike a balance in all things, however. So, the question that should be at the front of our collective mind when considering any new development is the effect that it will have ON THE PEOPLE already living in the space that is designated for that development.

There needs be space to move, easy access to essential services, preservation of existing gifts of nature that enhance the lives of the people including the natural flow of clean air, and life-giving air-purifying trees and open space, and basic efficient supplies of water and power to facilitate civilized living.

All these natural gifts and manmade services in balance with the size of the population that they can comfortably support.

The fact that the State has seen fit to block development for decades through the abuse of EIRs, throughout the State, is no excuse for now imposing overdevelopment in areas, like Fox Hills, that are in what has already been considered by the experts to be in line with their own nearer ideal criteria.

The State has tasked our City with creating 3,300 living spaces. And the projects that have been planned THUS FAR would drop 1,700 of those

dwellings in what is already the most densely populated part of our fair city, Fox Hills, thereby destroying a balance that has served the people living here well, for decades.

Why Fox Hills? Why now?

Because it's easy? Because it's cheap? Because it's a fast buck? Because it serves certain vested interests like Amazon, or Apple, or Google?

Why now, when a million people have left California and while thousands of existing units sit vacant, from here to San Francisco?

There must have been considerable thought given to the portion of the proposed essential housing burden imposed on each municipality. But who made the decisions and whose ox was being gored in the making? Whose ideology or pocketbook was being served?

These are of course, to some degree, rhetorical questions.

The mindset of urban planners is well known. "Save the Planet."

And while California remained shut down longer than any other State, who was buying up the shuttered businesses and vacated properties?

All in order to serve whom or what? Certainly not the people who live in Fox Hills or the rest of Culver City for that matter. Certainly not to bring balance where it already exists.

5700 Hannum is a foot in the door, and a slap in the face to the people of Fox Hills. The developers pitch "5700 Hannum" as a transition from the office buildings on Corporate Pointe.

Well, we already have that "transition." A street lined with large trees and other plant life and a quiet, low-density low-rise business park that provides a real transition from the hustle and bustle of the Mall and its neighboring businesses. The developer's "transition" is no transition at all, rather an intrusion.

California is BIG COUNTRY. Plenty of room to live and build. But some of those who have been elected to oversee the quality of life for the rest of us, and too many unelected bureaucrats, have a twisted vision of what that living should be like. Cram as many units into as small a space as possible. Take as many cars off the street as possible. Control where and how people come and go. There's a name for that, and it isn't America.

Gavin Newsom lives in a 12,000 square foot house on an 8.2 acre estate along the American River in Northern California. 6 bedrooms, 10 baths, pool, tennis court, jaccuzi, and wine cave. And that's not including his winery which remained open while he shut others down.

How about some EQUITY, here. Tell the Governor to drop 3,300 units on his 8 acre estate.

That seems a reasonable sacrifice for him to make for the people of Culver City and Fox Hills, a sacrifice by someone who has made none so far.

His mantra and that of the State Houses: Rules for thee but not for me.

Doesn't our City, Culver City, hold a higher moral and ethical standard than that?

Thomas O'Neill

Letter IND 5

From: Angelika <germangie@aol.com>
Sent: Monday, May 20, 2024 10:27 PM
To: Mendivil, Jose <jose.mendivil@culvercity.org>; McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>
Cc: yourfoxhills@fhnacc.org
Subject: 5700 Hannum Ave., Culver City (Incomplete Environmental Impact Report Analysis of Nearby Projects)

https://www.culvercity.org/files/assets/public/v/2/documents/planning-amp-development/ceqa/5700-hannum-ave/00_5700-hannum-draft-eir.pdf

Of the 12 related projects listed in the report link on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, would result in an **additional 1,396 units** in close proximity to the 5700 Hannum Avenue development.

Among utmost concern:

* Utilities (water, power, gas) - Supply & Resulting Pollution ...
We current neighboring residents were already forced to cut back on water usage in recent years, urged to operate appliances during off-hours to prevent outages. Each newly built unit will run A/C's, TV's and electronic devices at minimum, possibly washers, dryers, dish washers, electric vehicle charging stations etc. The resulting detrimental pollution impact also needs to be considered.

* Lack of sufficient parking per project
Most people have to share units to afford rent, so 2-3 occupants /unit would be the anticipated norm. L.A. is too wide spread and its public transportation system under-developed, one even needs a car to get to public transportation. Thus, 2 minimum parking space / unit, plus parking for guests, staff, service personnel, deliveries, commercial space traffic etc. would be needed. Drivers / cars will flood and pollute the entire neighborhood on approach, while circling for parking, and departure. Most alarming to me is that all street parking for us neighbors will be eliminated.

Respectfully,
Angelika Kischnick
5900 Canterbury Dr., Culver City, CA 90230

Letter IND 6A

From: Justin Ciampaglia <justin.ciampa@gmail.com>
Sent: Monday, May 20, 2024 11:22 PM
Cc: McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>; Jones, Stephen <stephen.jones@culvercity.org>
Subject: Re: Culver City Draft EIR comments

Dear City council and city staff,

Thank you for your efforts. Here are some recommendations for your review to balance the Affordable Housing Act with CEQA.

Our concerns with 5700 Hannum include:

The EIR states, "Air Quality Management Plan (Impact AIR-1): The Project would result in a potentially significant impact related to a conflict with or obstructing implementation of the applicable air quality plan due to growth that could exceed demographic assumptions for Culver City. While implementation of mitigation measures would serve to reduce the severity of the effects, impacts would remain significant and unavoidable." Please also include significant pollution from fossil fuel devices without any pollution controls such as leaf blowers and diesel generators at Fox Hills Park.

Most buildings in Fox Hills are older and have no capability of adding effective AC systems especially if SB 326 requires balcony replacements. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This would be an unknown increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. We request the EIR to study the ocean breeze effect based on all the projects that are in Fox Hills. Some argue they do not see the 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

The EIR shows "Unavoidable Significant Impact". Question: Why did this study not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS? Of the 12 related projects listed in the report link below on Page

82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

The city council can request an amended EIR including all the concerns brought up by the residents. 100 Fahrenheit temps inside our units without AC can become lethal. Here is a portion of the EIR: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts."

From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity."….. We can tell you, we live here, we have great air flow. The construction being higher and massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. " This is one more reason to study the air flow (ocean breeze) effects. It can cause air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have significant pollution from buildings, leaf blowers, diesel generators at Fox Hills Park, the 405, and high traffic streets.

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This is due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. Many people to be informed rely on advocacy groups that work for the neighborhood. The spirit of the law is not met with 500 ft. We must have at least 2000 ft notice requirement to make sure everyone affected by the change is notified. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice**. **The city can protect the residents facing the highest disproportionate burden from population density in our City.**

Thank you,

Justin Ciampaglia

Letter IND 6B

From: Justin Ciampaglia <justin.ciampa@gmail.com>
Sent: Tuesday, May 21, 2024 1:13 PM
To: Mendivil, Jose <jose.mendivil@culvercity.org>
Subject: Re: Culver City Draft EIR comments:

Thank you for your efforts. Here are some recommendations for your review to balance the Affordable Housing Act with CEQA.

A day-care Montessori school may still be in operation at Heather Village Condos and trigger the requirement Impact HAZ-3:

Emit Hazardous Materials Within One-Quarter Mile of a School (Impact HAZ-3): The Project would be required to comply with existing federal, State, and local regulations related to hazardous materials, which would ensure that future development allowed under the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the Project would result in a less than significant impact related to emitting hazardous materials within one mile of a school.

Our concerns with 5700 Hannum include:

The EIR states, "Air Quality Management Plan (Impact AIR-1): The Project would result in a potentially significant impact related to a conflict with or obstructing implementation of the applicable air quality plan due to growth that could exceed demographic assumptions for Culver City. While implementation of mitigation measures would serve to reduce the severity of the effects, impacts would remain significant and unavoidable." Please also include significant pollution from fossil fuel devices without any pollution controls such as leaf blowers and diesel generators at Fox Hills Park.

Most buildings in Fox Hills are older and have no capability of adding effective AC systems especially if SB 326 requires balcony replacements. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This would be an unknown increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. We request the EIR to study the ocean breeze effect based on all the projects that are in Fox

Hills. Some argue they do not see the 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here.

The EIR shows "Unavoidable Significant Impact". Question: Why did this study not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS? Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

The city council can request an amended EIR including all the concerns brought up by the residents. 100 Fahrenheit temps inside our units without AC can become lethal. Here is a portion of the EIR: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts."

From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity."….. We can tell you, we live here, we have great air flow. The construction being higher and massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. " This is one more reason to study the air flow (ocean breeze) effects. It can cause air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have significant pollution from buildings, leaf blowers, diesel generators at Fox Hills Park, the 405, and high traffic streets.

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This is due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. Many people to be

informed rely on advocacy groups that work for the neighborhood. The spirit of the law is not met with 500 ft. We must have at least 2000 ft notice requirement to make sure everyone affected by the change is notified. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice**. **The city can protect the residents facing the highest disproportionate burden from population density in our City.**

Thank you,

Justin Ciampaglia

Letter IND 7A

From: Tanya Ihnen <tanyaihnen@gmail.com>
Sent: Monday, May 20, 2024 3:05 PM
To: McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>; Jones, Stephen <stephen.jones@culvercity.org>
Subject: Concern with developments surrounding Fox Hills

Dear City council and city staff:

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. The only way people get to know is thru the advocacy groups that work for the neighborhood. Cemeteries, offices, park, are receiving notices and the residents are NOT. The spirit of the law is not met with 500 ft. We must have at least 2000 ft to make sure everyone affected by the change is notified. Also the notice is is given for transparency. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice**. **Not the law number, but in words that a common person can understand**. **The city must protect the residents and always have the residents BEST interest first!**

This is a response to the 5700 Hannum EIR. Here are our concerns:

1. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the all projects that are happening in Fox Hills. I do not see 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here. This is the minimum the city can do for the current residents.
2. The EIR shows "Unavoidable Significant Impact". Question: Why this study did not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. Not partial list. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS?: Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the

proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

3. Message to City Council: Did you read the EIRs that you are asking us the public to comment? Do you know the change that you are deciding to impose in an entire neighborhood? The minimum that the city council can do is to provide a full well done EIR including all the concerns brought up by the residents. Item 1 above is extremely important to the community. A change of 1 or 2 degrees inside our units in the hot summer without AC, can become lethal for the most vulnerable population. Here is a portion of the EIR, please at least read this part: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts. “ City Council, if your intention is to override our CEQA guidelines (protection that is in place for the public), you must understand and demand all the consequences you are going to impose in Fox Hills.
4. From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity.”….. We can tell you, we live here, we have great air flow. The construction being higher and a massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. “ This is one more reason to study the air flow (ocean breeze) affect. It can cause of air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have the 405 and major boulevards and high traffic street all around us. This neighborhood is ok now because we have a well balanced nature help but your construction can upset the balance we have now.
5. We ask for Alternative 1 or Alternative 3 (Reduced project alternative)
6. Lower height for every building. Do not exceed existing building height.

Tanya Ihnen

Fox Hills resident

Letter IND 7B

From: yumihomes@icloud.com <yumihomes@icloud.com>
Sent: Monday, May 20, 2024 3:05 PM
To: McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>; Jones, Stephen <stephen.jones@culvercity.org>
Subject: 5700 Hannum Ave - EIR response and message to City Council, please read

Dear City council and city staff,

For City Council and city staff:

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. The only way people get to know is thru the advocacy groups that work for the neighborhood. Cemeteries, offices, park, are receiving notices and the residents are NOT. The spirit of the law is not met with 500 ft. We must have at least 2000 ft to make sure everyone affected by the change is notified. Also the notice's is given for transparency. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice**. **Not the law number, but in words that a common person can understand**. **The city must protect the residents and always have the residents BEST interest first!**

This is a response to the 5700 Hannum EIR. Here are our concerns:

1. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the all projects that are happening in Fox Hills. I do not see 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here. This is the minimum the city can do for the current residents.
2. The EIR shows "Unavoidable Significant Impact". Question: Why this study did not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. Not partial list. HOW DO WE KNOW OF THIS INCOMPLETE

REPORT ANALYSIS?: Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

3. Message to City Council: Did you read the EIRs that you are asking us the public to comment? Do you know the change that you are deciding to impose in an entire neighborhood? The minimum that the city council can do is to provide a full well done EIR including all the concerns brought up by the residents. Item 1 above is extremely important to the community. A change of 1 or 2 degrees inside our units in the hot summer without AC, can become lethal for the most vulnerable population. Here is a portion of the EIR, please at least read this part: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts. “ City Council, if your intention is to override our CEQA guidelines (protection that is in place for the public), you must understand and demand all the consequences you are going to impose in Fox Hills.
4. From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity.”….. We can tell you, we live here, we have great air flow. The construction being higher and a massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. “ This is one more reason to study the air flow (ocean breeze) affect. It can cause of air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have the 405 and major boulevards and high traffic street all around us. This neighborhood is ok now because we have a well balanced nature help but your construction can upset the balance we have now.
5. We ask for Alternative 1 or Alternative 3 (Reduced project alternative)
6. Lower height for every building. Do not exceed existing building height.

Yumi Mandt-Rauch

Fox Hills Resident

Letter IND 7C

From: Eurana High <euranahigh@gmail.com>
Sent: Monday, May 20, 2024 3:37 PM
To: Culver City Advance Planning Division <advance.planning@culvercity.org>
Subject: Fox Hills

Dear City council and city staff,

For City Council and city staff:

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. The only way people get to know is thru the advocacy groups that work for the neighborhood. Cemeteries, offices, park, are receiving notices and the residents are NOT. The spirit of the law is not met with 500 ft. We must have at least 2000 ft to make sure everyone affected by the change is notified. Also the notice's is given for transparency. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice**. **Not the law number, but in words that a common person can understand**. **The city must protect the residents and always have the residents BEST interest first!**

This is a response to the 5700 Hannum EIR. Here are our concerns:

1. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the all projects that are happening in Fox Hills. I do not see 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here. This is the minimum the city can do for the current residents.
2. The EIR shows "Unavoidable Significant Impact". Question: Why this study did not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. Not partial list. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS?: Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in

an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

3. Message to City Council: Did you read the EIRs that you are asking us the public to comment? Do you know the change that you are deciding to impose in an entire neighborhood? The minimum that the city council can do is to provide a full well done EIR including all the concerns brought up by the residents. Item 1 above is extremely important to the community. A change of 1 or 2 degrees inside our units in the hot summer without AC, can become lethal for the most vulnerable population. Here is a portion of the EIR, please at least read this part: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts. " City Council, if your intention is to override our CEQA guidelines (protection that is in place for the public), you must understand and demand all the consequences you are going to impose in Fox Hills.
4. From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity."….. We can tell you, we live here, we have great air flow. The construction being higher and a massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. " This is one more reason to study the air flow (ocean breeze) affect. It can cause of air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have the 405 and major boulevards and high traffic street all around us. This neighborhood is ok now because we have a well balanced nature help but your construction can upset the balance we have now.
5. We ask for Alternative 1 or Alternative 3 (Reduced project alternative)
6. Lower height for every building. Do not exceed existing building height.

Eurana High

Fox Hills resident

Letter IND 7D

From: irene french <ifrench29@yahoo.com>
Sent: Monday, May 20, 2024 3:16 PM
To: McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; dan.obrein@culvercity.org <dan.obrein@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>; goran.erikkson@culvercity.org <goran.erikkson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>; Jones, Stephen <stephen.jones@culvercity.org>
Subject: Fox hills project

Dear City council and city staff,

For City Council and city staff:

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. The only way people get to know is thru the advocacy groups that work for the neighborhood. Cemeteries, offices, park, are receiving notices and the residents are NOT. The spirit of the law is not met with 500 ft. We must have at least 2000 ft to make sure everyone affected by the change is notified. Also the notice's is given for transparency. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice**. **Not the law number, but in words that a common person can understand**. **The city must protect the residents and always have the residents BEST interest first!**

This is a response to the 5700 Hannum EIR. Here are our concerns:

1. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the all projects that are happening in Fox Hills. I do not see 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here. This is the minimum the city can do for the current residents.
2. The EIR shows "Unavoidable Significant Impact". Question: Why this study did not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. Not

partial list. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS?: Of the 12 related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenuedevelopment.

3. Message to City Council: Did you read the EIRs that you are asking us the public to comment? Do you know the change that you are deciding to impose in an entire neighborhood? The minimum that the city council can do is to provide a full well done EIR including all the concerns brought up by the residents. Item 1 above is extremely important to the community. A change of 1 or 2 degrees inside our units in the hot summer without AC, can become lethal for the most vulnerable population. Here is a portion of the EIR, please at least read this part: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts. " City Council, if your intention is to override our CEQA guidelines (protection that is in place for the public), you must understand and demand all the consequences you are going to impose in Fox Hills.
4. From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity."….. We can tell you, we live here, we have great air flow. The construction being higher and a massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. " This is one more reason to study the air flow (ocean breeze) affect. It can cause of air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have the 405 and major boulevards and high traffic street all around us. This neighborhood is ok now because we have a well balanced nature help but your construction can upset the balance we have now.
5. We ask for Alternative 1 or Alternative 3 (Reduced project alternative)
6. Lower height for every building. Do not exceed existing building height.

Irene French

Fox Hills resident

Letter IND 7E

From: Gabriel Parhoti <gparhoti@gmail.com>
Sent: Monday, May 20, 2024 9:30 PM
To: McMorrin, Yasmine <Yasmine-Imani.Mcmorrin@culvercity.org>; O'Brien, Dan <Dan.O'Brien@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Vera, Albert <Albert.Vera@culvercity.org>; Eriksson, Goran <Goran.Eriksson@culvercity.org>; Culver City Advance Planning Division <advance.planning@culvercity.org>; Jones, Stephen <stephen.jones@culvercity.org>
Subject: Concern from Fox Hills (Gabriel Parhoti)

Dear City council and city staff,

For City Council and city staff:

Currently, not every resident in Fox Hills gets notice of the projects that affect us. This due to the 500 ft rule for notice. Depending on the location, NONE of the residents get notice about the projects. The only way people get to know is thru the advocacy groups that work for the neighborhood. Cemeteries, offices, park, are receiving notices and the residents are NOT. The spirit of the law is not met with 500 ft. We must have at least 2000 ft to make sure everyone affected by the change is notified. Also the notice's is given for transparency. If the developer is asking for an **exemption or exception** of a law that protects the public, that **should be in the notice**. **Not the law number, but in words that a common person can understand**.

The city must protect the residents and always have the residents BEST interest first!

This is a response to the 5700 Hannum EIR. Here are our concerns:

1. Fox Hills current buildings are older and have no capability of adding AC systems. The current cooling system for Fox Hills relies on natural ocean breeze. The most eco-friendly way to cool a unit. All the new development is west or south west of existing buildings and it has a potential of blocking or diverting our current ocean breeze. This could translate to several degrees of increase of heat for the current residents. Related to this issue is the excess height of the new development which will cause further blocking or diversion. Fox Hills asks to add to the EIR study the ocean breeze effect based on the all projects that are happening in Fox Hills. I do not see 5757 Uplander in your study as part of the other projects. There is another one that was not in your list. We need to know what happens to our ocean breeze, i.e. our cooling if you're building blocks or divert our air flow. The city of Culver City MUST do this study for the Fox Hills residents since the city is changing the density so excessively here. This is the minimum the city can do for the current residents.
2. The EIR shows "Unavoidable Significant Impact". Question: Why this study did not include the other projects in Fox Hills? One of them is 1106 units (577 Uplander) alone. If not, the city of Culver City MUST do a new study w/ all the current projects. Not partial list. HOW DO WE KNOW OF THIS INCOMPLETE REPORT ANALYSIS?: Of the 12

related projects listed in the report link below on Page 82/Table 3.1, (See page 81 that states EIR requirement), the proposed projects at 5757 Uplander Way and 5730 Uplander Way were NOT included. These 2 proposed projects, if built, will result in an additional 1396 units in close proximity to the 5700 Hannum Avenue development.

3. Message to City Council: Did you read the EIRs that you are asking us the public to comment? Do you know the change that you are deciding to impose in an entire neighborhood? The minimum that the city council can do is to provide a full well done EIR including all the concerns brought up by the residents. Item 1 above is extremely important to the community. A change of 1 or 2 degrees inside our units in the hot summer without AC, can become lethal for the most vulnerable population. Here is a portion of the EIR, please at least read this part: "Significant and unavoidable impact: A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts. " City Council, if your intention is to override our CEQA guidelines (protection that is in place for the public), you must understand and demand all the consequences you are going to impose in Fox Hills.
4. From the EIR "the regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity."….. We can tell you, we live here, we have great air flow. The construction being higher and a massive structures west and south west of us means less air flow. From EIR "The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. " This is one more reason to study the air flow (ocean breeze) affect. It can cause of air pollutants not moving away from the neighborhood. Remember, we need the ocean breeze that comes from the west to cool us down and move the air pollutants. We have the 405 and major boulevards and high traffic street all around us. This neighborhood is ok now because we have a well balanced nature help but your construction can upset the balance we have now.
5. We ask for Alternative 1 or Alternative 3 (Reduced project alternative)
6. Lower height for every building. Do not exceed existing building height.

Gabriel Parhoti

Fox Hills resident

Appendix B

Draft EIR Public Meeting Materials

PUBLIC MEETING ON THE DRAFT EIR

5700 Hannum Avenue Mixed-Use Residential and Commerical Project

April 30, 2024

7:00 p.m. – 8:00 p.m.

Culver CITY
PLANNING DIVISION

Draft EIR Meeting Objectives

- Provide information about the 5700 Hanum Avenue Mixed-Use Residential and Commercial Project
- Provide information on the CEQA process
- Identify the environmental topics evaluated in the Draft EIR
- Summarize impact findings provided in the Draft EIR
- Provide instructions on how to submit comments on the Draft EIR

All written comments received on the Draft EIR will be responded to in writing in the Final EIR.

Culver CITY
PLANNING DIVISION

Project Site and Vicinity

- Project Site:

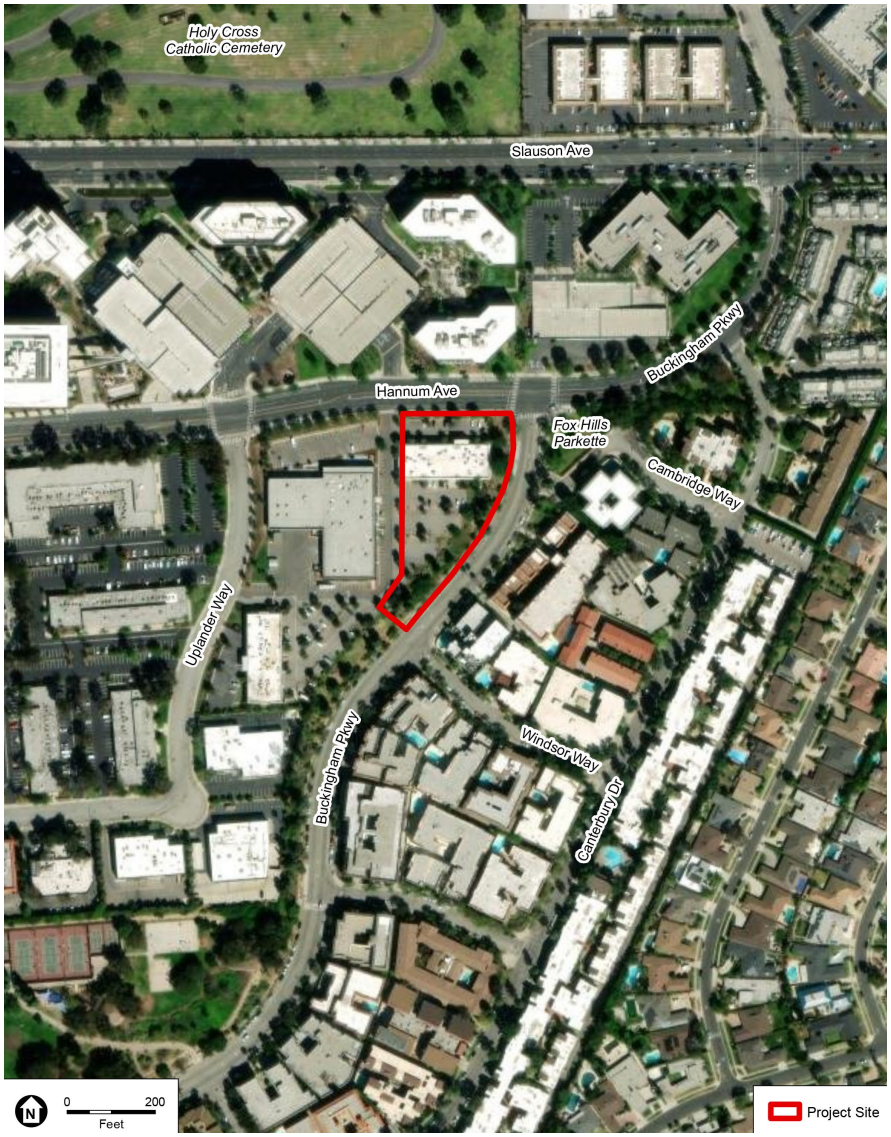
  5700 Hannum Avenue in Culver City, California, 90230

- 2.23-acres (97,264 square feet)
- Bounded:

  Hannum Avenue (North)
  Buckingham Parkway (East/SE)
  Existing commercial uses (West)

- Primary regional access:

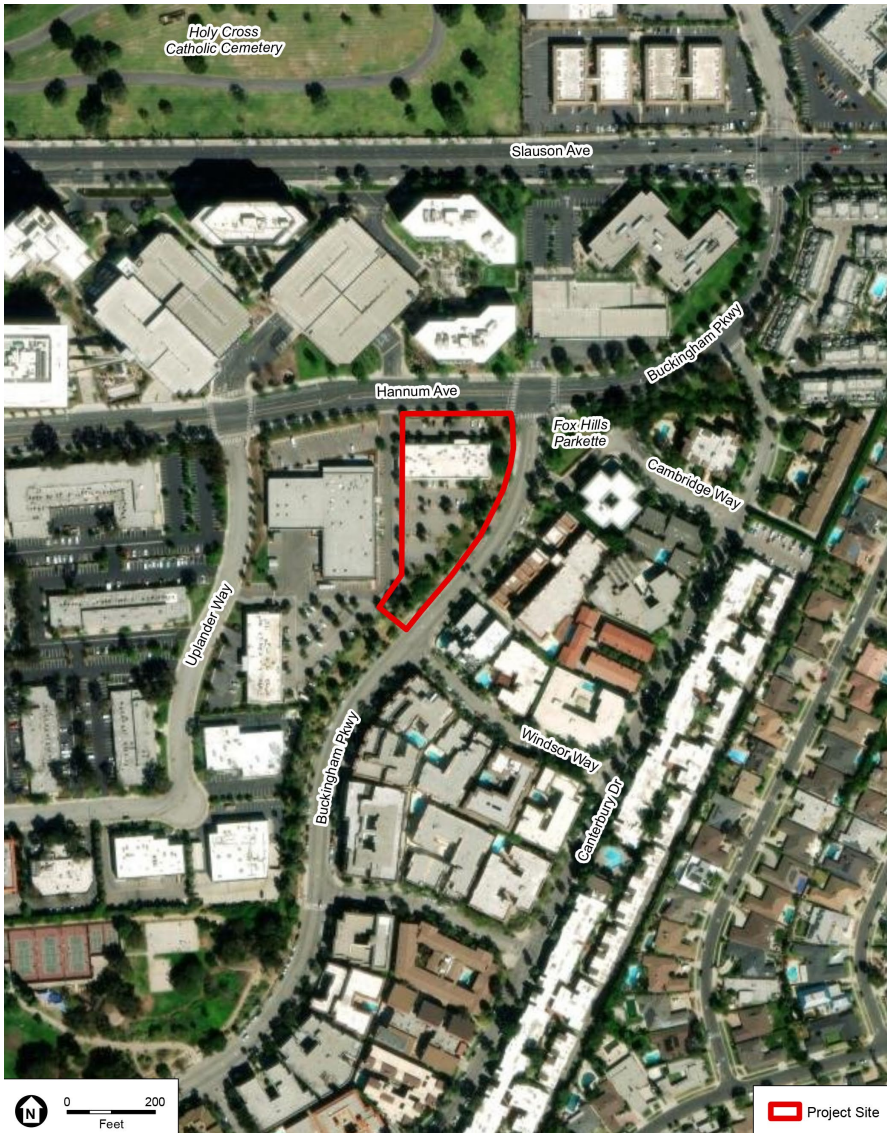
  I-405 Freeway 0.7 mile west



Culver CITY
PLANNING DIVISION

Existing Conditions

- Fully Developed
- Existing 30,672 square foot, 2-story office building.
- Surface Parking & On-Site Landscaping.
- Adjoining sidewalks are landscaped with street trees.



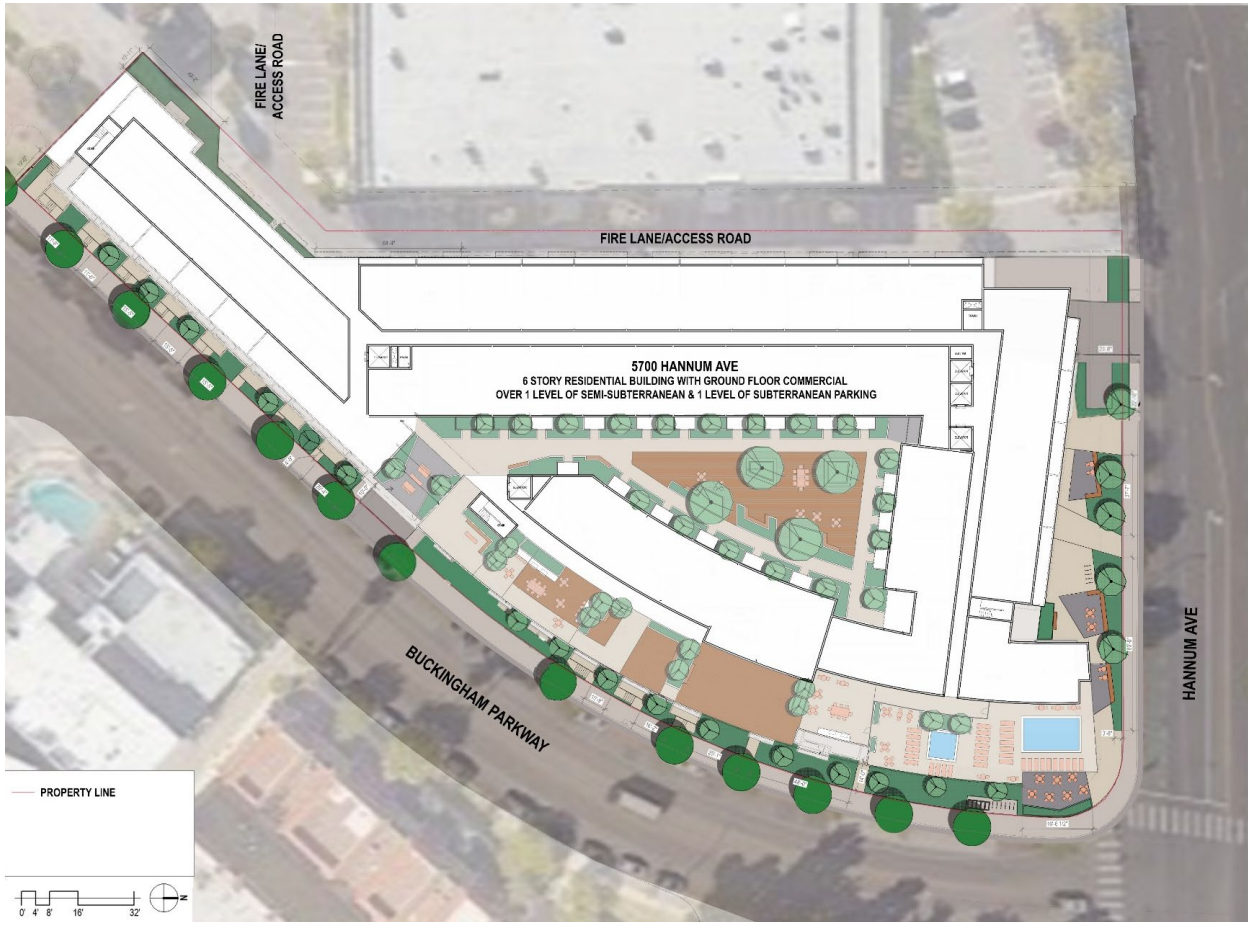
Culver CITY
PLANNING DIVISION

Project Description

- New 6-story, mixed-use building over two (2) semi-subterranean levels.
- 309 residential units (including 27 Very Low-Income units)
- 5,600 square feet of retail space.
- Building height
  70 feet along north property line adjacent to Hannum Avenue
  71 feet at the south property line along Buckingham Parkway.
- 7,507 square foot publicly accessible open space area (Hannum Plaza).
- Two primary driveways:
  Buckingham driveway for residential use
  Hannum driveway for resident, retail, delivery uses.
- 428 on-site vehicle parking spaces & 92 bicycle parking spaces.

Culver CITY
PLANNING DIVISION

Conceptual Site Plan



Culver CITY
PLANNING DIVISION

North Elevation



View looking south from Hannum Avenue

Culver CITY
PLANNING DIVISION

East Elevation



View looking west from Buckingham Parkway

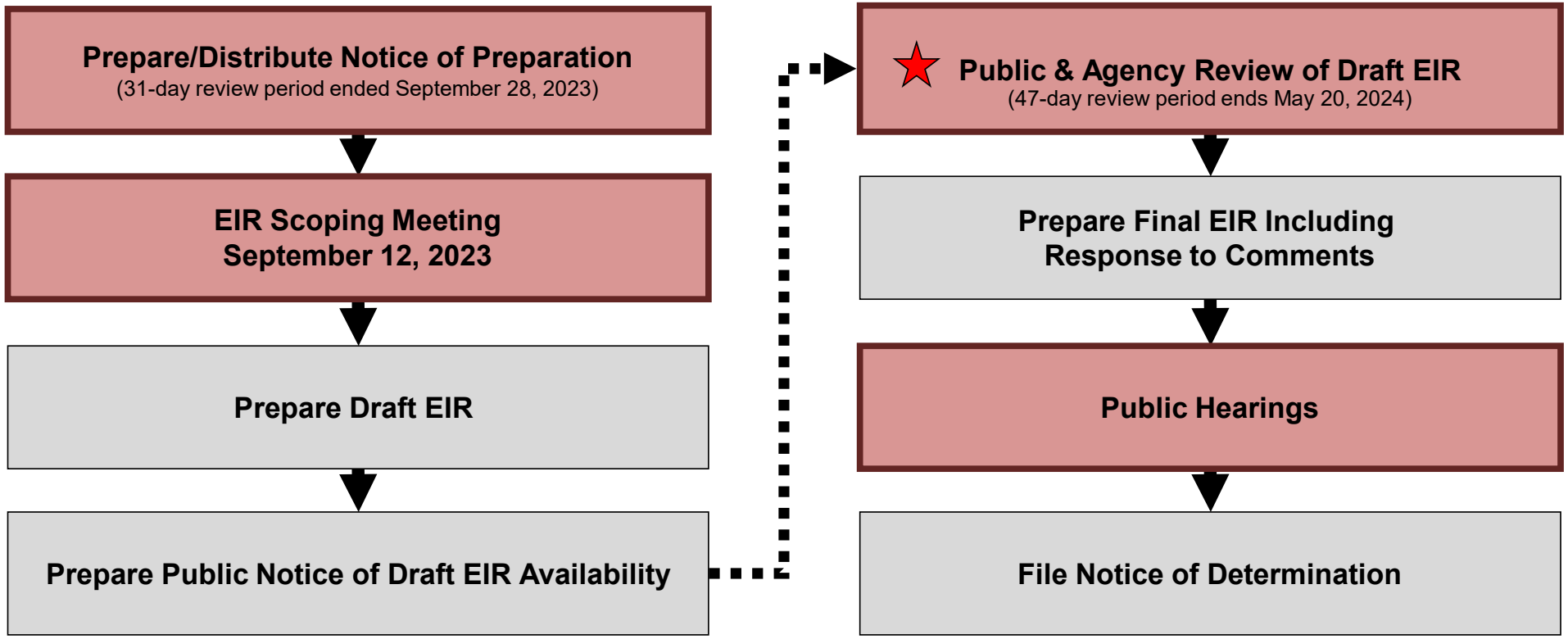
Culver CITY
PLANNING DIVISION

California Environmental Quality Act (CEQA)

Purpose of CEQA Review:

- To inform decision-makers and the public of a project's potential environmental effects
- Increases public understanding of and participation in environmental review process
- Discloses potential impacts on the environment
- Identifies ways to avoid or reduce potential environmental impacts through mitigation measures or alternatives

The EIR Process



= Opportunities for Public Input

= We are here in the process

Culver CITY
PLANNING DIVISION

Topics Not Evaluated in the Draft EIR

Topics Found to have no impacts or less than significant impacts in Initial Study

- Agriculture and Forestry Resources
- Biological Resources
- Hazards & Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Utilities and Service Systems (Telecommunications, Wastewater and Solid Waste)
- Wildfire

Topics Analyzed in the Draft EIR

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils (Paleontological Resources only)
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Population and Housing
- Public Services (Fire and Police Protection, Schools, and Parks/Recreation)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (Water Supply, Electricity and Natural Gas Facilities)

Draft EIR Topics with Less than Significant Impacts

- Aesthetics
- Air Quality (Operation)
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise and Vibration
  - Operational Noise
  - Construction/Operation Vibration
- Population and Housing
- Public Services (Fire and Police Protection, Schools and Parks/Recreation)
- Transportation
- Utilities and Service Systems – Water Supply, Wastewater, Solid Waste, Electricity and Natural Gas Facilities

Draft EIR Topics with Significant Impacts Requiring Mitigation Measures

After implementation of Mitigation Measures, impacts for these topics were reduced to less than significant levels:

- Air Quality – Construction Related Emissions
- Cultural Resources – Archaeological Resources
- Geology and Soils – Paleontological Resources
- Tribal Cultural Resources

Culver CITY
PLANNING DIVISION

Draft EIR Topics with Significant and Unavoidable Impacts – Construction Related Only

After implementation of Mitigation Measures, impacts for these topics were still significant and unavoidable:

- Noise – On-Site Construction Noise
  - Significant and unavoidable impact would occur during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction only if these construction activities occurred outside of the City's allowable construction hours and an extended hours construction permit was not obtained.
  - However, the construction noise impact would be less than significant if an extended hours construction permit is obtained.

Draft EIR Availability

The Draft EIR is currently available at the following locations:

- Online at: https://www.culvercity.org/Active-Projects/5700-Hannum-Ave-Proposed-Project
- In-person at: Culver City Current Planning Division counter

  Current Planning Division Office, City Hall, Second Floor
  9770 Culver Boulevard
  Culver City, CA 90232-0507

  Business hours are 7:30 A.M. – 5:30 P.M., Monday through Friday, except alternate Fridays

  Telephone in advance to assure staff availability at (310) 253-5710
- In-person at: Culver City Julian Dixon Library (see library website for address and hours of operation)

Culver CITY
PLANNING DIVISION

Submittal of Public Comments on the Draft EIR

Due date for public comments on the Draft EIR:

5:30 p.m. on Monday, May 20, 2024

Reference:

5700 Hannum Avenue Mixed-Use Residential and Commercial Project Draft EIR

Please direct public comments on the Draft EIR to:

Jose Mendivil, Associate Planner
City of Culver City Planning Division
9770 Culver Boulevard
Culver City, California 90230

Email: jose.mendivil@culvercity.org

Culver CITY
PLANNING DIVISION

Public Comment Period

Oral Comments:

Zoom

- Mouse over the bottom of the Zoom window
- Click “Raise Hand” button
- Wait until moderator calls your name and unmutes you





By Phone

- Dial ***9** to raise your hand and ***6** to unmute

NOTE: There will be a one minute time limit for oral comments. After you have had your turn to speak, your hand will be lowered and you will be placed back on mute.

Culver CITY
PLANNING DIVISION

Submittal of Public Comments on the Draft EIR

Due date for public comments on the Draft EIR:

5:30 p.m. on Monday, May 20, 2024

Reference:

5700 Hannum Avenue Mixed-Use Residential and Commercial Project Draft EIR

Please direct public comments on the Draft EIR to:

Jose Mendivil, Associate Planner
City of Culver City Planning Division
9770 Culver Boulevard
Culver City, California 90230

Email: jose.mendivil@culvercity.org

Culver CITY
PLANNING DIVISION

ATTACHMENT NO. 7

5700 HANNUM MIXED-USE RESIDENTIAL AND COMMERCIAL PROJECT

Draft Environmental Impact Report
State Clearinghouse No. 2023080709

Prepared for
City of Culver City
9770 Culver Blvd.
Culver City, CA 90232

April 2024

Culver City Case Nos:
P2023-0218-CP; -DOBI; -ZCMA; -GPMA; -EIR

ESA

5700 HANNUM MIXED-USE RESIDENTIAL AND COMMERCIAL PROJECT

Draft Environmental Impact Report
State Clearinghouse No. 2023080709

Prepared for
City of Culver City
9770 Culver Blvd.
Culver City, CA 90232

April 2024

Culver City Case Nos:
P2023-0218-CP; -DOBI; -ZCMA; -GPMA; -EIR

626 Wilshire Boulevard
Suite 1100
Los Angeles, CA 90017
213.599.4300
esassoc.com

ESA

Atlanta	Palm Beach County	San Diego
Bend	Pasadena	San Francisco
Irvine	Pensacola	San Jose
Los Angeles	Petaluma	Sarasota
Mobile	Portland	Seattle
Oakland	Rancho Cucamonga	Tampa
Orland	Sacramento	Thousand Oaks

OUR COMMITMENT TO SUSTAINABILITY | ESA helps a variety of public and private sector clients plan and prepare for climate change and emerging regulations that limit GHG emissions. ESA is a registered assessor with the California Climate Action Registry, a Climate Leader, and founding reporter for the Climate Registry. ESA is also a corporate member of the U.S. Green Building Council and the Business Council on Climate Change (BC3). Internally, ESA has adopted a Sustainability Vision and Policy Statement and a plan to reduce waste and energy within our operations. This document was produced using recycled paper.

TABLE OF CONTENTS

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Page

Executive Summary ES-1
- ES.1 Project Description ES-1
- ES.2 Issues Raised during Notice of Preparation Process and Areas of Controversy ES-2
- ES.3 Significant and Unavoidable Environmental Impacts ES-3
- ES.4 Alternatives that Would Reduce or Avoid Significant Impacts ES-3
  - ES.4.1 Alternative 1: No Project ES-3
  - ES.4.2 Alternative 2: Existing Zoning Alternative ES-4
  - ES.4.3 Alternative 3: Reduced Project Alternative ES-4
  - ES.4.4 Environmentally Superior Alternative ES-5
- ES.5 Summary of Environmental Impacts ES-6
  - ES.5.1 Project Design Features ES-11
  - ES.5.2 Mitigation Measures ES-17

Chapter 1, Introduction 1-1
- 1.1 Purpose of the Draft EIR 1-1
- 1.2 EIR Scoping Process 1-2
  - 1.2.1 Initial Study 1-2
  - 1.2.2 Notice of Preparation 1-3
  - 1.2.3 EIR Scoping Meeting/Community Meeting 1-4
  - 1.2.4 Comments Received 1-4
- 1.3 Format of the Draft EIR 1-4
- 1.4 Public Review of the Draft EIR 1-6

Chapter 2, Project Description 2-1
- 2.1 Introduction 2-1
- 2.2 Project Location and Surrounding Uses 2-1
- 2.3 Existing Conditions 2-4
- 2.4 General Plan Land Use and Zoning 2-5
- 2.5 Statement of Project Objectives 2-5
- 2.6 Description of Proposed Project 2-6
  - 2.6.1 Project Overview 2-6
  - 2.6.2 Architectural Design 2-9
  - 2.6.3 Building Floor Plans and Project Uses 2-15
  - 2.6.4 Building Elevations and Sections 2-21
  - 2.6.5 Open Space and Landscaping 2-21
  - 2.6.6 Vehicular and Bicycle Access, Circulation, and Parking 2-27
  - 2.6.7 Lighting and Signage 2-29
  - 2.6.8 Site Security 2-29

Page

2.6.9 Sustainability Features 2-30
2.6.10 Anticipated Construction Schedule/Activities 2-30
2.7 Project Design Features 2-31
2.8 Anticipated Project Approvals 2-36

Chapter 3, Environmental Setting 3-1
3.1 Overview of Environmental Setting 3-1
3.1.1 On-Site Conditions 3-1
3.1.2 Surrounding Uses 3-2
3.2 Related Projects 3-2

Chapter 4, Environmental Impacts Analysis 4-1
4.0 Environmental Impacts Analysis 4-1
4.0.1 Introduction 4-1
4.0.2 Environmental Impact 4-2
4.0.3 Terminology Used in This EIR 4-3
4.1 Aesthetics 4.1-1
4.1.1 Introduction 4.1-1
4.1.2 Environmental Setting 4.1-1
4.1.3 Project Impacts 4.1-9
4.2 Air Quality 4.2-1
4.2.1 Introduction 4.2-1
4.2.2 Environmental Setting 4.2-1
4.2.3 Project Impacts 4.2-25
4.3 Cultural Resources – Archaeological Resources 4.3-1
4.3.1 Introduction 4.3-1
4.3.2 Environmental Setting 4.3-1
4.3.3 Environmental Impacts 4.3-14
4.4 Energy 4.4-1
4.4.1 Introduction 4.4-1
4.4.2 Environmental Setting 4.4-1
4.4.3 Environmental Impacts 4.4-15
4.5 Geology and Soils – Paleontological Resources 4.5-1
4.5.1 Introduction 4.5-1
4.5.2 Environmental Setting 4.5-1
4.5.3 Environmental Impacts 4.5-7
4.6 Greenhouse Gas Emissions 4.6-1
4.6.1 Introduction 4.6-1
4.6.2 Environmental Setting 4.6-1
4.6.3 Project Impacts 4.6-37
4.7 Land Use and Planning 4.7-1
4.7.1 Introduction 4.7-1
4.7.2 Environmental Setting 4.7-1
4.7.3 Environmental Impacts 4.7-10
4.8 Noise 4.8-1
4.8.1 Introduction 4.8-1
4.8.2 Noise and Vibration Basics 4.8-1
4.8.3 Environmental Setting 4.8-7
4.8.4 Existing Conditions 4.8-13
4.8.5 Environmental Impacts 4.8-20

Page

4.9 Population and Housing 4.9-1
4.9.1 Introduction 4.9-1
4.9.2 Environmental Setting 4.9-1
4.9.3 Environmental Impacts 4.9-9
4.10.1 Public Services – Fire Protection 4.10.1-1
4.10.1.1 Introduction 4.10.1-1
4.10.1.2 Environmental Setting 4.10.1-1
4.10.1.3 Environmental Impacts 4.10.1-12
4.10.2 Public Services – Police Protection 4.10.2-1
4.10.2.1 Introduction 4.10.2-1
4.10.2.2 Environmental Setting 4.10.2-1
4.10.2.3 Environmental Impacts 4.10.2-5
4.10.3 Public Services – Schools 4.10.3-1
4.10.3.1 Introduction 4.10.3-1
4.10.3.2 Environmental Setting 4.10.3-1
4.10.3.3 Environmental Impacts 4.10.3-3
4.10.4 Public Services – Parks and Recreation 4.10.4-1
4.10.4.1 Introduction 4.10.4-1
4.10.4.2 Environmental Setting 4.10.4-1
4.10.4.3 Environmental Impacts 4.10.4-7
4.11 Transportation 4.11-1
4.11.1 Introduction 4.11-1
4.11.2 Environmental Setting 4.11-1
4.11.3 Environmental Impacts 4.11-13
4.12 Tribal Cultural Resources 4.12-1
4.12.1 Introduction 4.12-1
4.12.2 Environmental Setting 4.12-1
4.12.3 Project Impacts 4.12-7
4.13.1 Utilities and Service Systems – Water Supply 4.13.1-1
4.13.1.1 Introduction 4.13.1-1
4.13.1.2 Environmental Setting 4.13.1-1
4.13.1.3 Project Impacts 4.13.1-14
4.13.2 Utilities and Service Systems – Electric Power, Natural Gas, and Telecommunications Facilities 4.13.2-1
4.13.2.1 Introduction 4.13.2-1
4.13.2.2 Environmental Setting 4.13.2-1
4.13.2.3 Environmental Impacts 4.13.2-6

Chapter 5, Alternatives 5-1
5.1 Introduction 5-1
5.2 Objectives of the Project 5-2
5.3 Overview of Alternatives Selected for Analysis 5-3
5.4 Alternatives Considered and Rejected 5-3
5.4.1 Alternative Off-Site Location 5-4
5.4.2 Alternatives to Further Reduce or Avoid Significant Noise Impacts during Construction 5-5
5.5 Analysis Format 5-6
5.5.1 Alternative 1: No Project/No Build Alternative 5-7
5.5.2 Alternative 2: Existing Zoning Alternative 5-15
5.5.3 Alternative 3: Reduced Project Alternative 5-34
5.6 Environmentally Superior Alternative 5-52

Page

Chapter 6, Other CEQA Considerations 6-1
6.1 Significant Unavoidable Impacts 6-1
6.2 Reasons Why the Project Is Being Proposed, Notwithstanding Significant Unavoidable Impacts 6-1
6.3 Irreversible Environmental Changes 6-4
6.4 Growth-Inducing Impacts 6-6
6.5 Potential Secondary Effects Related to Project Mitigation Measures 6-7
6.5.1 Air Quality 6-7
6.5.2 Cultural Resources – Archaeological Resources 6-8
6.5.3 Geology and Soils – Paleontological Resources 6-8
6.5.4 Noise 6-8
6.5.5 Tribal Cultural Resources 6-8
6.6 Impacts Found Not to Be Significant 6-9

Chapter 7, References 7-1

Chapter 8, List of EIR Preparers and Organizations and Persons Contacted 8-1
8.1 Lead Agency 8-1
8.2 Project Applicant 8-1
8.3 Environmental Impact Report Preparation 8-1
8.4 Agencies Consulted 8-3

Chapter 9, Standard Terms, Acronyms, and Abbreviations 9-1

Figures

Figure 2-1 Regional and Project Vicinity Location 2-2
Figure 2-2 Project Location – Aerial Photograph 2-3
Figure 2-3 Conceptual Site Plan 2-7
Figure 2-4 Conceptual Project Rendering – Hannum Plaza Looking West 2-10
Figure 2-5 Conceptual Project Rendering – Hannum Plaza Looking East 2-11
Figure 2-6 Conceptual Project Rendering – Northeast Corner of Hannum Avenue and Buckingham Parkway 2-12
Figure 2-7 Conceptual Project Rendering – Looking West from Fox Hills Parkette 2-13
Figure 2-8 Conceptual Project Rendering – Looking North Along Buckingham Parkway 2-14
Figure 2-9 Level P1 Plan 2-16
Figure 2-10 Level P2 Plan 2-17
Figure 2-11 First Floor Plan 2-18
Figure 2-12 Second Floor Plan 2-19
Figure 2-13 Sixth Floor Plan 2-20
Figure 2-14 North and West Elevations 2-22
Figure 2-15 East Elevation 2-23
Figure 2-16 South Elevation 2-24
Figure 2-17 Building Sections 2-25
Figure 3-1 Related Projects Map 3-5
Figure 4.2-1 SCAQMD General Forecast Areas and Air Monitoring Areas 4.2-20
Figure 4.2-2 MATES Cancer Risk 4.2-21
Figure 4.2-3 Air Quality Sensitive Receptors 4.2-24
Figure 4.7-1 Project Site and Surrounding Land Use Designations 4.7-8
Figure 4.7-2 Zoning on the Project Site and in the Surrounding Area 4.7-9

Page

Figure 4.8-1 Decibel Scale and Common Noise Sources....4.8-3
Figure 4.8-2 Guidelines for Noise Compatible Land Use....4.8-10
Figure 4.8-3 Surrounding Land Uses and Noise Measurement Locations....4.8-16
Figure 4.10.1-1 Culver City Fire Department Stations....4.10.1-8
Figure 4.10.4-1 Culver City Parks and Recreational Facilities Located in the Vicinity of the Project Site....4.10.4-6
Figure 4.11-1 Existing Transit Service....4.11-12
Figure 4.11-2 Existing Bicycle Facilities....4.11-14

Tables

Table ES-1 Summary of Project Impacts, Project Design Features, and Mitigation Measures....ES-7
Table 2-1 Development Program Summary....2-8
Table 2-2 Summary of Project Design Features....2-31
Table 3-1 Related Projects List....3-4
Table 4.2-1 Ambient Air Quality Standards....4.2-8
Table 4.2-2 South Coast Air Basin Attainment Status (Los Angeles County)....4.2-17
Table 4.2-3 Ambient Air Quality Data....4.2-19
Table 4.2-4 Estimated Existing Emissions (pounds per day)....4.2-22
Table 4.2-5 SCAQMD Regional Emissions Thresholds (pounds per day)....4.2-26
Table 4.2-6 Estimated Maximum Unmitigated Regional Construction Emissions (pounds per day)....4.2-44
Table 4.2-7 Estimated Maximum Unmitigated Regional Operational Emissions (pounds per day)....4.2-45
Table 4.2-8 Estimated Maximum Unmitigated Localized Construction Emissions (pounds per day)....4.2-47
Table 4.2-9 Estimated Maximum Localized Operational Emissions – Project (pounds per day)....4.2-47
Table 4.2-10 Maximum Unmitigated Health Risk Impacts for Off-Site Sensitive and Commercial Receptors....4.2-49
Table 4.2-11 Maximum Mitigated Health Risk Impacts for Off-Site Sensitive Receptors....4.2-51
Table 4.2-12 Related Projects within 1,000 Feet of the Project Site....4.2-52
Table 4.3-1 Previously Recorded Cultural Resources....4.3-12
Table 4.4-1 Existing Annual Regional Energy Use....4.4-12
Table 4.4-2 Electric Power Mix Delivered to Retail Customers in 2021....4.4-13
Table 4.4-3 Existing Site Annual Energy Use....4.4-15
Table 4.4-4 Summary of Energy Use During Project Construction....4.4-20
Table 4.4-5 Summary of Annual Net New Energy Use During Project Operation....4.4-22
Table 4.6-1 Estimated Statewide Greenhouse Gas Emissions Reductions in the 2022 Scoping Plan....4.6-9
Table 4.6-2 Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan....4.6-10
Table 4.6-3 Description of Identified GHGs....4.6-29
Table 4.6-4 Atmospheric Lifetimes and GWPs....4.6-30
Table 4.6-5 State of California GHG Emissions....4.6-36
Table 4.6-6 Estimated Existing Project Site GHG Emissions....4.6-37

Page

Table 4.6-7 Consistency with Applicable SCAG Connect SoCal Actions and Strategies 4.6-62
Table 4.6-8 Project Construction GHG Emissions 4.6-65
Table 4.6-9 Estimated Annualized Unmitigated Project GHG Emissions 4.6-67
Table 4.7-1 Consistency of the Project with Applicable Goals of Connect SoCal 4.7-12
Table 4.7-2 Comparison of the Project to Applicable Policies of the Culver City General Plan 4.7-17
Table 4.7-3 Comparison of the Project to Applicable Policies of the Culver City Bicycle & Pedestrian Action Plan 4.7-25
Table 4.8-1 Construction Vibration Damage Criteria 4.8-8
Table 4.8-2 Groundborne Vibration and Groundborne Noise Impact Criteria for General Assessment 4.8-9
Table 4.8-3 City of Culver City Noise Standards 4.8-12
Table 4.8-4 Summary of Ambient Noise Measurements 4.8-17
Table 4.8-5 Predicted Existing Vehicular Traffic Noise Levels 4.8-19
Table 4.8-6 Construction Equipment Noise Levels 4.8-26
Table 4.8-7 Estimated Construction Noise Levels at Existing Off-Site Sensitive Receptors 4.8-28
Table 4.8-8 Estimated Construction Noise Levels at Commercial Land Uses 4.8-28
Table 4.8-9 Estimate of Off-Site Construction Traffic Noise Levels 4.8-29
Table 4.8-10 Mechanical Equipment Noise Levels at Noise Sensitive Receptors 4.8-31
Table 4.8-11 On-Site Parking Noise Levels at Noise Sensitive Receptors 4.8-32
Table 4.8-12 Loading Areas and Refuse Collection Noise Levels 4.8-33
Table 4.8-13 Offsite Traffic Noise Impacts – Existing Plus Project Conditions 4.8-33
Table 4.8-14 Offsite Traffic Noise Impacts – Future Plus Project Conditions 4.8-35
Table 4.8-15 Estimated Daytime Outdoor Open Space Noise Levels (Leq) 4.8-37
Table 4.8-16 On-Site Composite Noise Impacts 4.8-39
Table 4.8-17 Operational Noise Levels at Commercial Land Uses 4.8-39
Table 4.8-18 Estimated Mitigated Construction Noise Levels at Existing Off-Site Sensitive Receptors 4.8-40
Table 4.8-19 Vibration Source Levels for Construction Equipment 4.8-41
Table 4.8-20 Related Projects within 1,000 Feet of the Project Site 4.8-44
Table 4.9-1 Projected Population, Housing, and Employment Estimates 4.9-9
Table 4.9-2 Projected Increases in Population, Housing, and Employment 4.9-11
Table 4.9-3 Projected Population, Housing, and Employment Increases for the City 4.9-12
Table 4.9-4 Related Projects Housing, Population and Employment 4.9-15
Table 4.9-5 Cumulative Population, Housing and Employment Growth For City 4.9-16
Table 4.10.1-1 CCFD Fire Stations Located in the Vicinity of the Project Site 4.10.1-9
Table 4.10.1-2 CCFD Response Times 4.10.1-11
Table 4.10.2-1 Culver City 2022 Crime Statistics 4.10.2-5
Table 4.10.3-1 Enrollment of CCUSD Schools Serving the Project Site 4.10.3-3
Table 4.10.3-2 Estimated Number of Students Generated by the Project 4.10.3-5
Table 4.10.3-3 Cumulative Student Generation 4.10.3-8
Table 4.10.4-1 Culver City Parks and Recreation Master Plan - Park and Open Space Classifications 4.10.4-3
Table 4.10.4-2 Culver City Parks In a Two-Mile Radius of the Project Site 4.10.4-5

Page

Table 4.11-1 Consistency of the Project with Applicable Policies of the Circulation Element 4.11-22
Table 4.11-2 Consistency of the Project with Applicable Action of the Culver City Bicycle & Pedestrian Action Plan 4.11-24
Table 4.11-3 Consistency of the Project with Applicable Policies of the Complete Streets Policy 4.11-25
Table 4.13.1-1 Existing Estimated Water Consumption 4.13.1-11
Table 4.13.1-2 Project's Estimated Water Consumption 4.13.1-18
Table 4.13.1-3 Projected Normal Year Water Supply and Demand for Culver City Service Area 4.13.1-18
Table 4.13.1-4 Single Dry Year Water Supply and Demand for Culver City Service Area 4.13.1-18
Table 4.13.1-5 Multiple (Five) Consecutive Dry Years Water Supply and Demand through 2045 for Culver City Service Area 4.13.1-19
Table 4.13.1-6 Estimated Cumulative Water Generation by Related Projects 4.13.1-22
Table 5-1 Overview of the Project Alternatives 5-4
Table 5-2 Alternative 2 Student Generation 5-28
Table 5-3 Alternative 2 Estimated Water Consumption 5-32
Table 5-4 Alternative 3 Estimated Water Consumption 5-50
Table 5-5 Comparison of Impacts Associated with the Alternatives and the Project 5-53
Table 5-6 Ability of Alternatives to Meet Project Objectives 5-57

Appendices

Appendix A Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and Comments on the NOP
A-1 Notice of Preparation
A-2 Initial Study
A-3 Scoping Meeting Materials
A-4 Comments on the NOP
Appendix B Shadow Figures
Appendix C Air Quality and Greenhouse Gas Emissions Calculations
Appendix D Archeological Resources Report
Appendix E Energy Calculations
Appendix F Paleontological Resources Report
Appendix G Noise Calculations
Appendix H Public Services Correspondence
H-1 Culver City Fire Department Correspondence
H-2 Culver City Police Department Correspondence
H-3 Culver City Unified School District Correspondence
H-4 Culver City Parks, Recreation and Community Services Department Correspondence
Appendix I Transportation Impact Study
Appendix J Water Civil Technical Memorandum
Appendix K Alternatives Documentation

This page intentionally left blank

EXECUTIVE SUMMARY

This Draft Environmental Impact Report (Draft EIR) has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA, Public Resources Code Sections 21000 et. seq.) in accordance with CEQA Guidelines Section 15123. Accordingly, this chapter of the Draft EIR includes (1) a brief description of the Project; (2) issues raised during the Notice of Preparation (NOP) process, including areas of controversy known to the lead agency; (3) identification of potentially significant impacts and proposed mitigation measures or alternatives that would reduce or avoid those impacts; and (4) issues to be resolved, including the choice among alternatives and whether and how to mitigate the potential significant impacts.

ES.1 Project Description

This Draft Environmental Impact Report (EIR) has been prepared for the 5700 Hannum Project (Project). 5700 Hannum Owner, LLC c/o Lincoln Property Company, the Applicant, proposes to develop a mixed-use residential and commercial project on an approximately 2.23-acre (97,264 square feet [sf]) site (Project Site) located at 5700 Hannum Avenue within the Fox Hills neighborhood of the City of Culver City (City). The Project Site is currently developed with an existing two-story office building in the northern portion of the Project Site and associated surface parking. The Project would develop a new 6-story (up to a height 78-feet) mixed-use building with two (2) semi-subterranean levels, consisting of 309 residential units (including 27 Very Low Income units) and 5,600 square feet of retail space. The Project would provide a total of 7,507 square feet of publicly accessible open space, 19,526 square feet of private open space and 27,123 square feet of common open space (for residents) for a total of 54,156 square feet of open space. The building would be constructed atop two levels of semi-subterranean vehicular parking, with parking also provided on the first floor of the building. The Project would include a total of 428 vehicular parking spaces (399 residential, 6 guest and 23 commercial) within three parking levels. Two points of vehicular access would be provided to the Project Site, including a residential only driveway along Buckingham Parkway and a commercial and residential driveway along Hannum Avenue. The Project would also provide a total of 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces in compliance with Culver City Municipal Code (CCMC) requirements. The Project would also include private and publicly accessible open space. The Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza fronting Hannum Avenue. Common open space available to residents only would include a centrally located courtyard, a community room on the second floor; a gym, an amenity deck, and a community room on the sixth floor.

The Project is proposing to change the Project Site's zoning designation from Commercial Regional Business Park to Planned Development (PD) with adoption of a Comprehensive Plan that would serve as the overarching entitlement mechanism for the Project Site. To achieve the Project's

proposed density and mix of uses, a General Plan Amendment Map would be needed to designate the Project Site from Regional Center to General Corridor. The Project is also requesting Density and Other Bonus Incentives (DOBI) to allow for Increased Density with affordable units incorporated into the Project; and approval for Extended Hours of Construction (CCMC Section 9.07.035.C.1). In addition, the Project would require ministerial permits including but not limited to demolition, grading, building, haul route and engineering permits.

ES.2 Issues Raised during Notice of Preparation Process and Areas of Controversy

The following lists potential environmental issues or concerns raised in response to the NOP circulation, the comment period for which extended from August 29, 2023 through September 28, 2023, and during the virtual Community Meeting and EIR Scoping Meeting held on September 12, 2023. The NOP comments are contained in Appendix A-3 of this Draft EIR.

- Concerns regarding the population and allowable housing density on the Project Site (Refer to Chapter 2, *Project Description*, Section 4.7, *Land Use and Planning*, and Section 4.9, *Population and Housing*, of this Draft EIR.)
- Concerns regarding consistency with the Project's zoning and General Plan land use designations (Refer to Chapter 2, *Project Description*, and Section 4.7, *Land Use and Planning*, of this Draft EIR.)
- Concerns regarding aesthetics impacts of the Project, including those related to massing and scale and shading (Refer to Appendix A, *Initial Study*, which addresses aesthetic impacts and Section 4.1, *Aesthetics*, of this Draft EIR.)
- Concerns regarding lighting impacts (Refer to Appendix A, *Initial Study*, of this Draft EIR, which addresses aesthetic impacts associated with lighting.)
- Concerns regarding impacts related to air quality and greenhouse gas emissions, including impacts related to human health and carbon emissions (Refer to Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.)
- Concerns regarding energy and capacity of energy related infrastructure to accommodate the Project (Refer to Section 4.4, *Energy*, and 4.13.2, *Utilities and Service Systems - Electric Power, Natural Gas, and Telecommunications Facilities*, of this Draft EIR.)
- Concerns regarding noise impacts (Refer to Section 4.8, *Noise*, of this Draft EIR.)
- Concerns regarding impacts to public services, such as police, fire schools and parks (Refer to Sections 4.10.1 to 4.10.4, *Public Services*, of this Draft EIR.)
- Concerns regarding transportation, parking and traffic impacts (Refer to Section 4.11, *Transportation*, of this Draft EIR.)
- Concerns regarding impacts to tribal cultural resources (Refer to Section 4.12, *Tribal Cultural Resources*, of this Draft EIR.)
- Concerns regarding ability of existing utilities to accommodate the Project, such as water, sewer electric, gas, cable, etc. (Refer to Appendix A, *Initial Study*, of this Draft EIR, which addresses impacts to utilities, as well as Section 13.1*, Utilities and Service Systems - Water Supply*, and 4.13.2, *Utilities and Service Systems - Electric Power, Natural Gas, and Telecommunications Facilities*, of this Draft EIR.)

- Concerns regarding cumulative impacts (Refer to Sections 4.1 to 4.13 of this Draft EIR, all of which address cumulative impacts for each their respective issue areas.)
- Identification of alternatives that reduce the Project's environmental impacts (Refer to Chapter 5, *Alternatives*, of this Draft EIR)
- Concerns related to biological resources, including impacts to endangered species (Refer to Appendix A, *Initial Study*, of this Draft EIR, which addresses impact to biological resources.)
- Concerns regarding impacts to historical resources (Refer to Appendix A, *Initial Study*, of this Draft EIR, which addresses cultural resources impacts, including impacts to historic resources.)

ES.3 Significant and Unavoidable Environmental Impacts

CEQA Guidelines Section 15126.2(a) requires that an EIR describe significant environmental impacts of a project on the environment. Direct and indirect significant effects shall be clearly identified and described, giving due consideration to short-term and long-term effects. As evaluated in Section 4.8, *Noise*, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be mitigated with respect to Project-level on-site construction noise impacts.

Implementation of Mitigation Measures MM-NOI-1 (Sound Walls) and MM-NOI-2 (Construction Practices) would reduce the Project's on-site construction noise impacts at the off-site ground-level noise sensitive receptors, to the extent technically feasible.[1] With implementation of Mitigation Measures MM-NOI-1 and MM-NOI-2, the construction noise levels at all receptor locations would be reduced below the 5-dBA significance threshold. Therefore**,** with implementation of mitigation measures MM-NOI-1 and MM-NOI-2, impacts from on-site construction noise would be less than significant with approval of an extended hours construction permit. However, construction during off-hours (between 7:00 a.m. and 8:00 a.m. Monday to Friday and 7:00 a.m. to 9:00 a.m. on Saturdays) during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction would remain significant and unavoidable if an extended hours permit was not obtained by the Project because they would occur outside of the City's allowable construction hours.

ES.4 Alternatives that Would Reduce or Avoid Significant Impacts

ES.4.1 Alternative 1: No Project

In accordance with the CEQA Guidelines, the No Project/No Build Alternative (Alternative 1) for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, "in certain instances, Alternative 1 means 'no build' wherein the existing environmental setting is

[1] Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment. LAMC Chapter XI, Art. 1, Section 112.05.

maintained." Accordingly, for purposes of this analysis, Alternative 1 assumes that no new development would occur within the Project Site. As mentioned in Chapter 2, *Project Description*, of this Draft EIR, the Project Site is currently improved with an approximately 30,672 square foot, two-story office building built in the late 1970s. Under this alternative, the Project Site would continue to operate as an office building under existing conditions.

ES.4.2 Alternative 2: Existing Zoning Alternative

With development under the Existing Zoning Alternative (Alternative 2), the Project Site would be developed in accordance with the existing General Plan Land Use designation of Regional Center and existing zoning designation of Commercial Regional Business Park (CRB) for the Project Site. It is acknowledged that the draft Land Use Element under consideration as part of Culver City's General Plan 2045 Update includes a draft Land Use Map and Land Use designations with appropriate draft densities. The Project Site's draft land use designation and density is Mixed-Use High and 100 dwelling units per acre, consistent with the City's adopted 2021-2029 Housing Element preferred designation and density.

Under this Alternative, the existing 30,672 square foot two-story office building built in the 1970s would be replaced with a modern 190,000 square foot, 4-story (56 feet) office building. There would be 380 parking spaces for the office employees and guest parking. The amount and extent of excavation [approximately 51,400 cubic yards and 27 feet below ground surface (bgs)] required for subterranean parking would be generally similar to the Project. This Alternative would provide no retail uses or public open space as compared to the Project.

As with the Project, Alternative 2 would require the demolition of the existing office building and associated paved surface parking areas on the Project Site. Although demolition and excavation would be largely similar to the Project, with an approximate 47 percent reduction in overall building square footage (362,596 sf vs 190,000 sf) proposed under Alternative 2, the overall duration of the building construction phase would be reduced by approximately 50 percent from 17 months to 9 months. Thus, overall construction under Alternative 2 would be approximately 22 months, as opposed to 30 months under the Project.

ES.4.3 Alternative 3: Reduced Project Alternative

Under the Reduced Project Alternative (Alternative 3) and similar to the Project, the Project Site would be redeveloped under the PD zone with an aesthetically succinct and unified development. Alternative 3 contemplates a 28 percent reduction in residential units (density) by reducing the Project's 309 units to 223 units. With this reduction, Alternative 3 would include a total of 222,000 sf of residential square footage, compared to the Project's 356,996 square feet of residential space. Under Alternative 3, there would be no affordable units provided and as such, the Project's Density Bonus incentives related to additional units and building height would not be applicable to Alternative 3.

Alternative 3 would include the same 5,600 square feet of retail floor space as the Project. The building height would be 5-stories (over 1-level of subterranean parking) or 56 feet. There would be 312 parking spaces between the 1st floor and P1 level compared to the Project's 428 spaces. The

reduced parking would eliminate one of the Project's two subterranean parking levels, which would in turn reduce the amount of required soil excavation. Proposed vehicle circulation and loading area locations would be similar under the Project and Alternative 3. Publicly accessible open space on the ground level along Hannum would be reduced from 7,507 square feet under the Project to 2,500 square feet under Alternative 3. The retail space would be provided at the Project's northeastern corner adjacent to the Hannum Boulevard/Buckingham Parkway intersection. Under Alternative 3, unlike the Project, no residential units would be provided at the Buckingham Parkway street level. Instead there would be two levels of parking garage exposed along Buckingham Parkway.

As with the Project, Alternative 3 would require the demolition of the existing office building and associated paved surface parking areas on the Project Site. The amount and extent of excavation required for subterranean parking would be less than the Project. Under the Project there would be approximately 51,400 cubic yards of soil excavation reaching approximately 27 feet bgs. Although demolition and excavation would be largely similar to the Project, with an approximate 37 percent reduction in overall building square footage (362,593 sf vs 227,600 sf) and removal of one of the subterranean parking levels proposed under Alternative 3, the duration of the Project's excavation phase would be reduced from 4 months to 2.5 months and the building construction phase would be reduced by approximately 1.5 months from 17 months to 15.5 months. Thus, overall construction under Alternative 3 would be approximately 27 months, as opposed to 30 months under the Project.

ES.4.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an environmentally superior alternative is based on comparison of the alternatives to determine which among the alternatives would reduce or eliminate the impacts associated with the Project to the greatest degree. The comparative impacts of the Project and the Project alternatives are summarized in Table 5-5, *Comparison of the Impacts of the Project and Alternatives*, in Chapter 5, *Alternatives*, of the Draft EIR.. In addition, Table 5-6, *Ability of Alternatives to Meet Project Objectives*, is also provided in Chapter 5, *Alternatives*, of the Draft EIR to show a comparison of the ability of the analyzed alternatives to meet Project Objectives.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would be considered the environmentally superior because it would not involve new development and assumes the on-site office use would continue to operate similar to existing conditions. Alternative 1 would not meet any of the Project Objectives and would avoid all of the Project's potentially significant impacts and would have less impacts compared to the Project. However, because Alternative 1 has been identified as the environmentally superior alternative, identification of another environmentally superior alternative is required.

Alternative 2, the Existing Zoning Alternative, and Alternative 3, the Reduced Project Alternative, would both involve less development compared to the Project, and both alternatives would reduce, but not eliminate, the Project's significant unavoidable impacts related to Project-level on-site

construction noise. As shown in Table 5-5, Alternative 2 would result in four (4) "greater" impacts [Operational regional emissions, Consumption of Energy Resources, GHG, and Transportation-Vehicle Miles Travelled (VMT)] for the issue areas analyzed compared to the Project, and 16 "less" impacts compared to the Project. Alternative 3 would result in two (2) "greater" impacts (Land Use and Transportation-VMT) for the issue areas analyzed compared to the Project, and 21 "less" impacts compared to the Project. Alternative 3 is considered the environmentally superior alternative, as it would reduce the magnitude of overall impacts compared to the Project to a greater extent than Alternative 2 since it would require less building construction and result in reduced residential occupancy at the Project Site.

However, because Alternative 3 would develop a smaller mixed-use development, the number housing units would be reduced and no affordable units would be provided. As such, Alternative 3 would not meet or meet to a lesser extent than the Project most of the Project Objectives related to: providing housing, including affordable housing, in accordance with the City's Regional Housing Needs goals; provision of publicly available open space; and promoting an active, landscaped pedestrian environment.

ES.5 Summary of Environmental Impacts

This section provides a summary of impacts, mitigation measures, and impacts after implementation of the mitigation measures associated with implementation of the Project. The summary is provided by environmental issue area below in **Table ES-1**, *Summary of Project Impacts, Project Design Features and Mitigation Measures*. Table ES-1 provides the impact statement for each issue area evaluated in Chapter 4, *Environmental Impact Analysis*. The summary also includes any Project Design Features (PDFs) and mitigation measures, as applicable.

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
4.1 Aesthetics			
REGULATIONS GOVERNING SCENIC QUALITY	See Project Design Feature AES-PDF-1 (Screening of Utilities), below.	None required	Less Than Significant
4.2 Air Quality			
CONSISTENCY WITH APPLICABLE AIR QUALITY PLAN	See Project Design Features GHG-PDF-1 (Green Building Features) and TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
CUMULATIVELY CONSIDERABLE INCREASE OF CRITERIA POLLUTANTS IN NONATTAINMENT AREA			
Construction	Not applicable	None required	Less Than Significant
Operation	Not applicable	None required	Less Than Significant
SENSITIVE RECEPTOR EXPOSURE TO POLLUTANT CONCENTRATIONS			
Construction	Not applicable	See Mitigation Measure AQ-1, below	Less Than Significant with Mitigation (Project-level and Cumulative)
Operation	Not applicable	None required	Less Than Significant
4.3 Cultural Resources			
ARCHAEOLOGICAL RESOURCES	Not applicable	See Mitigation Measures ARCH-1 through ARCH-3, below.	Less Than Significant with Mitigation (Project-level and Cumulative)
4.4 Energy			
WASTEFUL, INEFFICIENT, AND UNNECESSARY CONSUMPTION OF ENERGY RESOURCES	See Project Design Features GHG-PDF-1 (Green Building Features) and TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
CONFLICT OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY	See Project Design Feature GHG-PDF-1 (Green Building Features), below.	None required	Less Than Significant
4.5 Geology and Soils			
PALEONTOLOGICAL RESOURCES	Not applicable	See Mitigation Measures GEO-1 through GEO-4, below.	Less Than Significant with Mitigation (Project-level and Cumulative)

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
4.6 Greenhouse Gas Emissions			
GHG EMISSIONS/ CONFLICT WITH ANY APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GHGS	See Project Design Features GHG-PDF-1 (Green Building Features), and TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
4.7 Land Use and Planning			
CONFLICT WITH ANY APPLICABLE LAND USE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT	See Project Design Features GHG-PDF-1 (Green Building Features and TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
4.8 Noise			
SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS			
Construction – On-Site	See Project Design Features NOI-PDF-1 (Project Construction Schedule), NOI-PDF-2 (Use of Impact Pile Driver), and NOI-PDF-3 (Construction Rules Sign), below.	See Mitigation Measures NOI-MM-1 (Sound Walls) and NOI-MM-2 9Construction Practices), below.	Significant and Unavoidable
Construction – Off-Site (Mobile Source)	NOI-PDF-4 (Neighborhoods Streets), below.	None required	Less Than Significant
Operation – On-Site	See Project Design Features NOI-PDF-5 (Mechanical Equipment Noise), and NOI-PDF-6 (Noise Control –Amplified Sound Systems), below.	None required	Less Than Significant
Operation – Off-Site	Note Applicable.	None required	Less Than Significant
VIBRATION			
Construction	Not applicable	None required	Less Than Significant
Operation	Not applicable	None required	Less Than Significant
4.9 Population and Housing			
INDUCE SUBSTANTIAL UNPLANNED POPULATION GROWTH	Not applicable	None required	Less Than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
4.10.1 Public Services – Fire Protection			
FIRE PROTECTION			
Construction	See Project Design Feature TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
Operation	Not Applicable	None required	Less Than Significant
4.10.2 Public Services – Police Protection			
POLICE PROTECTION			
Construction	See Project Design Features POL-PDF-1 (Project Site Security and Access During Construction) and TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
Operation	See Project Design Feature POL-PDF-2 (Project Site Security and Access During Operation), below.	None required	Less Than Significant
4.10.3 Public Services – Schools			
SCHOOLS	Not applicable	None required	Less Than Significant
4.10.4 Public Services – Parks and Recreation			
PARKS AND RECREATION			
Construction	Not applicable	None required	Less Than Significant
Operation	Not applicable	None required	Less Than Significant
4.11 Transportation			
CONFLICT WITH A PROGRAM, PLAN, ORDINANCE OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE AND PEDESTRIAN FACILITIES	See Project Design Feature TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B) - VEHICLE MILES TRAVELED (VMT)	See Project Design Feature TRAF-PDF-2 (TDM Program), below.	None required	Less Than Significant
GEOMETRIC HAZARDS	Not applicable	None required	Less Than Significant
EMERGENCY ACCESS	See Project Design Feature TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
4.13 Tribal Cultural Resources			
TRIBAL CULTURAL RESOURCES	Not applicable	See Mitigation Measures CUL-MM-2 and TCR-MM-1 through TCR-MM-3, below.	Less Than Significant with Mitigation
4.13.1 Utilities and Service Systems – Water Supply			
WATER INFRASTRUCTURE	See Project Design Feature TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
WATER SUPPLY	See Project Design Feature WATER-PDF-1 (Water Conservation), below.	None required	Less Than Significant
4.13.2 Utilities and Service Systems – Electric Power, Natural Gas, and Telecommunications Facilities			
ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS INFRASTRUCTURE	Not applicable.	None required	Less Than Significant

SOURCE: ESA, 2024

ES.5.1 Project Design Features

Aesthetics

AES-PDF-1: Screening of Utilities. Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances (such as rooftop elevator stops), will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way.

Greenhouse Gas Emissions

GHG-PDF-1: **Green Building Features.** The Project will include the following green building features:

- The Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Certified performance level or higher and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and Culver City's Green Building Program Requirements.
- The Project will include installation of a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 sf consistent with CCMC Chapter 15.02.1005 in order to achieve compliance with the City of Culver City's solar photovoltaic requirement, per the City's Green Building Ordinance and CALGreen standards.
- The Project will provide EV parking and charging for residential and commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. Forty-four (44) total spaces (41 residential + 3 commercial) would have EV charging stations.
- The Project will include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances.
- The Project will incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems.
- The Project will utilize only electricity and no natural gas in all land uses except for the retail space.

Noise

NOI-PDF-1: Project Construction Schedule. Prior to issuance of a building permit, notice of the Project construction schedule will be provided to adjacent property owners and occupants. Evidence of such notification will be provided to the City of Culver City Public Works Department. The notice will identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).

NOI-PDF-2: Use of Impact Pile Driver. The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating shoring piles to be drilled will be used.

NOI-PDF-3: Construction Rules Sign. During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers, with 24-hour availability, of the Applicant, Property Owner, construction contractor(s) will be posted on the Property in a location that is visible to the public. In addition, appropriate staff person at the City of Culver City will be notified for such incidences. These names and telephone numbers will also be made available to adjacent property owners and occupants to the satisfaction of the appropriate department (Planning Manager and/or Building Official) of Culver City.

NOI-PDF-4: Neighborhood Streets. No construction haul trucks, including concrete trucks, will be allowed to travel through neighborhood streets that are primarily residential uses.

NOI-PDF-5: Mechanical Equipment Noise. All building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Culver City General Plan Noise Element Regulation of Stationary Noise Sources through the use of quiet fans, duct silencers, parapets, or similar noise attenuation methods.

NOI-PDF-6: Noise Control – Amplified Sound Systems. If the Project installs permanent outdoor amplified sound systems, the systems will be located in discrete areas of the outdoor common opens space areas courtyard such that the sound would be mostly blocked by the proposed on-site building or walls from off-site residential receivers. Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions or providing entertainment which is audible at a distance of fifty (50) feet or beyond the subject's property line without first filing an application and obtaining a permit as set forth in Chapter 9.07, Noise Regulations, of the CCMC. The systems will at a minimum be designed so as not to result in a perceivable increase at the nearest noise sensitive residential receptor. Specifically, daytime outdoor amplified sound systems will not result in an increase of 5 dBA L_{eq} over existing ambient noise conditions at the nearest noise sensitive residential receptor. Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996). A qualified noise consultant will provide written documentation and submitted to appropriate department of City of Culver City that the design of the system(s) complies with the maximum noise levels at the property line of the nearest off-site sensitive receivers.

Police Services

POL-PDF-1 (Project Site Security and Access During Construction): During construction of the Project, the Project Site will be fenced and gated with surveillance cameras to monitor the site during off hours.

POL-PDF-2 (Project Site Security and Access During Operation): During operation of the Project, access to the parking structure will be controlled through gated entries, and the entry areas will be well illuminated. Project Site security would include controlled keycard access to office spaces, security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV).

Transportation

TRAF-PDF-1: Construction Management Plan. A Final Construction Management Plan (FCMP) will be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities covering the entire Project Site as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning manager for the City of Culver City, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments.

Prior to commencement of construction, the contractor will advise the City's public works inspector and building inspector (inspectors) of the construction schedule. As-needed construction management meetings shall be convened with appropriate Culver City staff and representatives of surrounding developments that may have overlapping construction schedules with the Project, to ensure that concurrent construction projects are managed in collaboration with one another. The FCMP will consider potential project construction disruptions to transportation facilities near the Project Site and provide effective strategies to limit the Project's use of the public right-of-way (streets and sidewalks) during peak traffic periods and will be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.

Prior to approval of the FCMP and grading permits, the Applicant will conduct one (1) community meeting pursuant to the notification requirements of the City of Culver City 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).
11. Community notification procedures.

The FCMP will at a minimum include the following:

1. The name and telephone number of a contact person who can be reached 24 hours a day via telephone regarding construction or construction traffic complaints or emergency situations.
2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Maps showing access to and within the site and to adjacent properties will be provided.
3. Construction plans and procedures to address community concerns the City of Culver City personnel notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures included in the Project's Mitigation Monitoring Program and best practices to reduce disturbances to adjacent and nearby land uses.
4. Procedures for the training and certification of flag persons.
5. To the extent known, identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for use of protective devices, warning signs, and staging or queuing areas.
6. The location of temporary power, portable toilet and trash and materials storage locations.
7. The timing and duration of any street, sidewalk and/or lane closures will be approved in advance by ethe City of Culver City. As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Culver City, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As applicable at the time of construction, such notices will be made available in digital format for posting on each City website and distribution via email alerts on electronic platforms such as the County of Los Angeles' "Gov Delivery" system. The FCMP will be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP will require that review and approval of any proposed lane closures include coordination with the Culver City Fire and Police Departments to minimize potential effects on traffic flow and emergency response.
8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and/or at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.

TRAF-PDF-2: Transportation Demand Management (TDM) Program. The Project will implement TDM measures that include, but are not limited to, those listed below subject to Culver City Transportation Department review and approval prior to issuance of the first Temporary Certificate of Occupancy (TCO) for the Project in order to reduce drive-alone vehicle trips to/from the Project Site by residents, visitors and employees, as well peak hour traffic. The TDM strategies necessary comply with the TDM and trip reduction requirements of City Municipal Code Section 07.05.015, as well as City's design requirements for the Project:

On-Site Enhancements - The Project design will incorporate mobility features to encourage alternative transportation modes. The features will be designed in accordance with the City Municipal Code requirements and standards.

- Pedestrian Connections. The Project will provide exclusive pedestrian access separate from vehicular driveways. The Project will provide internal walkways that connect the pedestrian access points to off-site pedestrian facilities, rideshare, and transit.
- Bicycle Parking and Amenities. The Project will provide both short-term and long-term bicycle parking spaces on-site in accordance with the City Municipal Code requirements. Short-term bicycle parking, which will include bicycle racks, will be located near the pedestrian entrance. Long-term bicycle parking, which will include bicycle lockers or secure bicycle enclosures, will be placed in an accessible weather protected location.

Electric Vehicle (EV) Parking. In accordance with City Municipal Code Section 17.320.035.O.3, at least 40% of the onsite parking supply will have EV capability, including EV Capable spaces (20%), EV Ready spaces (10%), and Full EV Charger/Charging Stations (10%).

Off-Site Enhancements - The Project will improve and contribute toward improvements to off-site mobility facilities to encourage alternative transportation modes.

- Mobility Fees. In accordance with City Municipal Code Section 05.06.015, the Project will be subject to contributing its fair share toward funding the City's mobility infrastructure and improvement projects intended to reduce VMT and support housing and job growth. Pursuant to Resolution No. 2021-R055, the total mobility fee for the Project will be based on a rate of $3,394 per multi-family unit and $14.92 per sf of commercial space.

Other TDM Strategies - The Project will implement TDM strategies to reduce peak hour vehicular traffic and air emissions to and from the Project Site. The following details the minimum TDM strategies necessary to comply with the TDM and trip reduction requirements of City Municipal Code Section 07.05.015, as well as City's design requirements for the Project:

- Transportation Information Center (TIC). The Project will provide a TIC, a commuter information center where residents, employees, and visitors can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile. A TIC provides information about transit schedules, commute planning, rideshare, telecommuting, bicycle routes and facilities, and facilities and resources for carpoolers, vanpoolers, bicyclists, transit riders, and pedestrians. The TIC can be provided via a bulletin board, display case, or kiosk, as well as virtually, providing every resident, employee, and visitor access to commuter information through a website portal.
- Bicycle Parking and Amenities. The Project will support bicycling to work through the provision of bike storage facilities throughout the Project site. Bicycle parking will be provided in accordance with the City Municipal Code requirements for the Project and will include short-term facilities (e.g., bicycle racks) and secure long-term bicycle parking (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner).
- Pedestrian-Friendly Environment. The Project is designed to be pedestrian-friendly and accessible to the local neighborhood. The Project's pedestrian access points will be located separate from vehicular access points. To promote walkability within and around the Project

site, internal pedestrian pathways will provide a safe and direct connection to external public pedestrian facilities. Safety measures will also be implemented at the Project driveway to ensure safe crossings to limit potential vehicular-pedestrian conflicts.

- Employee Parking. At least 10% of employee parking will be reserved, as signed on the spaces, for use by potential carpool or vanpool vehicles and located as close as practical to employee entrances. This preferential parking will be identified on the site plan accompanying the application for a building permit. Vanpool spaces will have a minimum parking space dimension of nine feet wide by 18 feet in length and provide a minimum interior vertical clearance of eight feet two inches. A safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers will also be provided.
- Bus Stop Improvements. If deemed necessary by the City, bus stop improvements will be provided to the satisfaction of the City Director of Transportation.

Plan/Program Management - The Project will take appropriate measures to help future residents and employees manage each TM Plan element and maximize program participation through consolidation of information and proactive engagement. The following will be provided as part of the TDM Plan:

- Project Transportation Coordinator. A Transportation Coordinator will be designated for the site and will be responsible for implementing, coordinating, and maintaining the elements of the TDM Plan. The identity and contact information for the Transportation Coordinator will be supplied to the City and kept current.
- Transportation Information Packet for New Residents and Employees. Each new resident and employee will receive an information packet summarizing the transit and transportation alternatives available to Project tenants. The packet will emphasize the location of the TIC and include the contact information of the Transportation Coordinator.

Mobility Hub Support and Alternative Transportation - The Project will incorporate measures and design elements to support first-mile/last-mile service connection for transit users and reduce reliance on personal automobiles. The following will be provided as part of the TDM Plan:

- Bike Repair Station. The Project will provide an on-site bike parking station for use by Project residents and employees that has a space and basic tool set for bike repairs.
- Subsidized Shared-Ride/Uber/Lift Service. Employees who arrive to work via a means other than a single-passenger vehicle or utilize the carpool matching service will automatically be registered in a Subsidized Shared-Ride/Uber/Lift Service by which, upon request to the Transportation Coordinator, the employee will be given a voucher to travel home or Uber/Lyft (or similar shared ride service) in case of illness or emergency. The Project will provide up to $750 in total for this program every year. The subsidy will be for two years after Certificate of Occupancy over a two-year period.
- Transit Passes. The Project will provide up to $500 per pass per year of subsidies for up to five Transit Access Passes (TAP) cards for a period of three years for employees who opt to take Metro instead of personal vehicles and will not be provided on-site parking accommodations and not receive a car share subsidy.

Utilities and Service Systems – Water Supply

WATER-PDF-1: Water Conservation. The Project will implement water conservation measures that include, but are not limited to, the following:

- **Landscape and Irrigation**
  - California Friendly® plants or native plants
  - Drip/ Subsurface Irrigation (Micro-Irrigation)
  - Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)

ES.5.2 Mitigation Measures

Air Quality

AQ-1: Construction Equipment. The Applicant shall implement the following requirements for construction equipment operating at each Project site. These requirements shall be included in applicable bid documents and contractor(s) must demonstrate the ability to supply such equipment. Construction equipment shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 25 horsepower (hp) or greater during Project construction where available within the Air Basin. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification, BACT documentation, and CARB or Southern California Air Quality Management District (SCAQMD) operating permit at the time of mobilization of each applicable unit of equipment shall be provided.
- Use electrified tower cranes in place of diesel-fueled equipment.

Cultural Resources

ARCH-1: Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work such as site demolition (e.g., building footings/foundations, subsurface utilities, surface parking lots, sidewalks, etc.), clearing/grubbing, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring 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. The frequency of monitoring 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 shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

ARCH-2: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, 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. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work within the buffer area shall only be allowed to continue after the evaluation and recovery efforts are completed. 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. If the Qualified Archaeologist determines the find 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 of Culver City (City) to develop a formal treatment plan that would serve to reduce impacts to the resources and that provides for or the adequate recovery of the scientifically consequential information contained in the resources along with subsequent laboratory processing, analysis, evaluation, and reporting. 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 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. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

ARCH-3: 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.

Geology and Soils

GEO-1: Prior to the issuance of grading permits, the Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting, and shall be responsible for

monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities.

GEO-2: Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments and undisturbed Baldwin Hills Paleosol. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting and wet screening sediment samples of promising horizons for smaller fossil remains. If significant vertebrate fossils are found by screening, it will be necessary to collect a 6,000-pound sample for screening from each producing geologic unit, per SVP Guidelines (2010). The sample(s) can be collected by construction machinery and stockpiled and processed in a safe location on site, or transported to another site for processing. The frequency of monitoring inspections shall be determined by the Qualified 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 Qualified Paleontologist. If a potential fossil is found, the Qualified Paleontologist and the monitor shall have authority to temporarily stop excavation activity or 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 by the Qualified Paleontologist 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 Qualified 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 Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location.

GEO-3: If the older Quaternary alluvium produces any mollusk fossils, a specimen shall be submitted for radiocarbon dating. If the Fox Hills Paleosol produces any pedogenic calcium carbonate, a sample shall be submitted for radiocarbon dating.

GEO-4: Any significant fossils recovered during Project-related excavations shall be prepared to the point of identification. The residue form sediment samples shall be dried and sorted with a binocular dissecting microscope. Both macrofossils and vertebrate microfossils shall be prepared to the point of identification, identified, and curated into an accredited repository. The Qualified Paleontologist shall prepare a final 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 accompany the specimens to the accredited repository. The report shall also be submitted by the Applicant to the City of Culver City to signify the satisfactory completion of the Project and required mitigation measures.

Noise

MM-NOI-1: Temporary noise barriers shall be installed along the southern and eastern Project boundary to shield the sensitive receptors from construction noise. The barrier shall have a minimum height of 6 to 15 feet (from south to north, with the top of the barrier at least 15 feet above the ground surface of the residences to the east along Buckingham Parkway) that is made of

sound blanket, plywood or other solid material capable of reducing on-site construction noise levels by 17 to 19 dBA.

MM-NOI-2: Since construction equipment operates intermittently, and the types of equipment change with the stage of construction, noise emitted during construction would be mobile and highly variable. The following features shall be implemented during Project construction to reduce noise levels:

- Maintain all construction tools and equipment in good operating order according to manufacturers' specifications.
- To the extent practicable, schedule construction activity during normal working hours between 8 a.m. and 5 p.m. on weekdays when higher sound levels are typically present and are found acceptable.
- Equip internal combustion engines with properly operating mufflers that are free from rust, holes, and leaks.
- For construction equipment that utilize internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible.

Tribal Cultural Resources

TCR-MM-1: Prior to the issuance of a demolition permit for the Project, the Applicant shall retain a Native American Monitor from the Gabrieliño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe). The Native American Monitor shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project, whether on the Project Site or in connection with Project off-site improvements (collectively "ground disturbing activities"). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils that have been monitored or observed prior to their disturbance and subsequently disturbed or displaced by Project-related construction. The Applicant shall prepare a monitoring agreement with the Kizh Nation that outlines the roles and responsibilities of the Native American Monitor and shall submit this agreement to the City of Culver City (City) prior to the issuance of demolition permit for the Project.

Prior to commencement ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor is not present at the Project Site on any given workday, the ground disturbing activities may continue if the workers involved in such activities attended the training session.

Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential

for impacting tribal cultural resources. Native American monitoring shall conclude no later than conclusion of ground disturbing activities.

TCR-MM-2: The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Applicant and the City upon written request to the Tribe. The Applicant shall not be deemed to be out of compliance with this measure if the Native American Monitor fails to complete or submit any such monitoring logs.

TCR-MM-3: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-MM-1 (after consultation with the Native American Monitor) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor and the Applicant, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the Qualified Archaeologist, the Tribe, and the City to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe, the Applicant, and the Qualified Archaeologist, the City determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe as necessary, and with the concurrence of the City's Planning Director. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources.

If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist (including, but not limited to, the size of the buffer set forth above), the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3)

require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant shall pay all costs and fees associated with the mediator.

The Applicant may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in the above paragraphs.

The recovered Native American resources may be placed in the custody of the Tribe, who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Tribe nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

Notwithstanding the above paragraph, any information determined to be confidential in nature by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code Section 6254(r).

CHAPTER 1
Introduction

This Draft Environmental Impact Report (EIR) has been prepared for the 5700 Hannum Project (Project). 5700 Hannum Owner, LLC c/o Lincoln Property Company, the Applicant, proposes to develop a mixed-use residential and commercial project on an approximately 2.23-acre (97,264 square feet [sf]) site (Project Site) located at 5700 Hannum Avenue within the Fox Hills neighborhood of the City of Culver City (City). The Project Site is currently developed with an existing two-story office building in the northern portion of the Project Site and associated surface parking. The Project would develop a mixed-use building consisting of a new 6-story (up to a height 78-feet) structure above two (2) semi subterranean levels; 309 residential units (including 27 Very Low-Income units) and 5,600 square feet of ground floor retail space. The Project would provide 7,507 square feet of publicly accessible open space,19,526 square feet of private open space, and 27,123 square feet of common open space (for residents) for a total of 54,156 square feet of open space. The Project would include a total of 428 vehicular parking spaces (399 residential, six (6) guest and 23 commercial) within three parking levels. Two points of vehicular access would be provided to the Project Site, including a residential only driveway along Buckingham Parkway and a commercial and residential driveway along Hannum Avenue. The Project would also provide a total of 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces in compliance with Culver City Municipal Code (CCMC) requirements. The Project is proposing to change the Project Site's zoning designation to Planned Development (PD) with adoption of a Comprehensive Plan that would serve as the overarching entitlement mechanism for the Project Site. To achieve the Project's proposed density and mix of uses, a General Plan Amendment Map would be needed to designate the Project Site as General Corridor.

1.1 Purpose of the Draft EIR

The purpose of this Draft EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the Project. The City is the Lead Agency under the California Environmental Quality Act (CEQA) responsible for preparing this Draft EIR. This Draft EIR has been prepared in conformance with CEQA (California Public Resources Code [PRC] Section 21000 et seq.), and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). The principal CEQA Guidelines sections governing content of this document are Sections 15120 through 15132 (Contents of an EIR), and Section 15161 (Project EIR).

The City is responsible for processing and approving the Project pursuant to CEQA Statute Section 21067. The City will consider the information in this Draft EIR, along with other information that may be presented during the CEQA process, including but not limited to the Initial Study and a Final EIR. The EIR will be used in connection with other permits and approvals necessary for the

construction and operation of the Project. The EIR will be used by the City's Current Planning Division, Building Safety Division, Public Works Department, and any other responsible public agencies that must approve activities undertaken with respect to the Project.

In accordance with CEQA Guidelines Section 15121, this Draft EIR is an informational document that will inform public agency decision-makers and the public generally of the environmental effects associated with the Project, and ways to minimize significant environmental effects through mitigation measures or reasonable alternatives to the Project. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant; in such cases, impacts are considered significant and unavoidable. In accordance with CEQA Guidelines Section 15093(b), if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts where impacts cannot be mitigated to less than significant levels), the agency must state in writing the specific reasons for approving the project, based on the Final EIR and any other information in the public record for the project. This is known as a "statement of overriding considerations."

This Draft EIR analyzes the environmental effects of the Project to the degree of specificity appropriate to the activities proposed by the Project, as required under CEQA Guidelines Section 15146. This analysis considers the activities associated with the Project, to determine the short-term and long-term effects associated with their implementation. This Draft EIR discusses both the direct and indirect impacts of this Project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects in the vicinity. CEQA requires the preparation of an objective, full disclosure document to inform agency decision-makers and the general public of the direct and indirect environmental effects of the proposed Project, including mitigation measures and reasonable alternatives that can reduce or eliminate any identified significant adverse impacts.

1.2 EIR Scoping Process

In compliance with the State CEQA Guidelines, the City has taken steps to provide opportunities to participate in the environmental review process. In association with preparation of the Draft EIR, efforts were made to contact various State, regional, and local government agencies and other interested parties to solicit comments and inform the public of the Project. As further described below, this included the distribution of an Initial Study and Notice of Preparation (NOP) of an Environmental Impact Report and EIR Scoping Meeting.

1.2.1 Initial Study

In accordance with CEQA Guidelines Section 15063(a), the City prepared an Initial Study to identify potential environmental impacts. The Initial Study determined that the Project had the potential to result in significant impacts associated with a number of environmental issues. As a result, the Initial Study led to a determination that a Draft EIR should be prepared to address those issues where the Project could result in significant environmental impacts, and to consider feasible mitigation measures and alternatives to the Project.

The Draft EIR focuses primarily on changes in the environment that would result from the Project, individually and cumulatively with other development projects. The Draft EIR identifies potentially significant direct and indirect impacts resulting from construction and operation of the Project and provides mitigation measures to reduce or avoid such effects. Based on public input and the results of the Initial Study, this Draft EIR addresses environmental effects in the following areas:

- Aesthetics
- Air Quality
- Cultural Resources
  - Archaeological Resources only
- Energy
- Geology and Soils
  - Paleontological Resources only
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
  - Fire Protection
  - Police Protection
  - Schools
  - Parks
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

Based on the Initial Study, issues for which no significant impacts are anticipated to occur are discussed briefly as a part of Chapter 6, *Other CEQA Considerations*, of this Draft EIR. The analyses supporting these determinations are provided in the Initial Study included as Appendix A-2 of this Draft EIR.

1.2.2 Notice of Preparation

Pursuant to the provision of CEQA Guidelines Section 15082, the City circulated a Notice of Preparation of an Environmental Impact Report and Community Meeting/EIR Scoping Meeting (NOP) to State, regional, and local agencies, and members of the public for a 30-day review period commencing August 29, 2023 and ending September 29, 2023. The purpose of the NOP was to formally notice that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. See Appendix A-1 of this Draft EIR for a copy of the NOP.

1.2.3 EIR Scoping Meeting/Community Meeting

The NOP included notification that a virtual Community Meeting and an EIR Scoping Meeting would be held. Consistent with City policy, but independent of the CEQA process, the purpose of the Community Meeting was for the Applicant to present the Project, solicit community comments, and receive feedback in association with the entitlement applications submitted to the City. In accordance with the CEQA Guidelines, the purpose of the EIR Scoping Meeting was for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the Draft EIR. The virtual Community Meeting and EIR Scoping Meeting was held on September 12, 2023, at 7:00 P.M. The EIR Scoping Meeting was held in an online format using zoom and provided interested individuals, groups, and public agencies the opportunity to view materials and ask questions regarding the scope and focus of the Draft EIR as described in the NOP and Initial Study. The presentation materials from the EIR Scoping Meeting are provided in Appendix A-3 of this Draft EIR.

1.2.4 Comments Received

During the public review period for the NOP, 10 commenters submitted responses to the NOP. Correspondence was received from the California Air Resources Board's (CARB), California Department of Transportation (Caltrans), County of Los Angeles Department of Public Works, the Native American Heritage Commission (NAHC), interested organizations, and interested parties. All written comments are provided in Appendix A-4, of this Draft EIR and summarized in the Executive Summary.

1.3 Format of the Draft EIR

The Draft EIR includes an Executive Summary, nine chapters, and appendices, which are organized as follows:

Executive Summary. This chapter of the Draft EIR provides an overview of the entire document in a concise, summarized format. It briefly describes the Project (location and key Project features), the CEQA review process and focus, identifies effects found to be significant and unavoidable, identifies areas of controversy, provides a summary of the Project alternatives (descriptions and conclusions regarding comparative impacts), and provides a summary of Project impacts, Project Design Features and mitigation measures, and the level of impact significance following implementation of mitigation measures.

1. **Introduction.** This chapter provides a summary of the Project, describes the purpose of the EIR, including CEQA compliance requirements, steps undertaken to date regarding implementation of the CEQA process, and also summarizes the Draft EIR's organization.

2. **Project Description.** This chapter describes the location, background and existing conditions, Project objectives, physical and operational characteristics of the Project, and requested entitlements.

3. **Environmental Setting.** This chapter presents an overview of the Project's environmental setting, including on-site and surrounding land uses. This section also provides a list and the mapped locations of past, present, and probable future related projects considered in the analysis of potential Project contributions to cumulative impacts.

4. **Environmental Impact Analysis.** This chapter contains the environmental setting, regulatory framework, methodology, thresholds to determine level of significance, Project Characteristics and/or Project Design Features, Project-specific and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the following environmental issues: 1) Aesthetics; 2) Air Quality; 3) Cultural Resources – Archaeological Resources; 4) Energy; 5) Geology and Soils – Paleontological Resources; 6) Greenhouse Gas Emissions; 7) Land Use and Planning; 8) Noise; 9) Population and Housing; 10) Public Services – Fire Protection, Police Protection, Schools, Recreation; 11) Transportation; 12) Tribal Cultural Resources; and 13) Utilities and Service Systems.

5. **Alternatives.** This chapter describes a reasonable range of alternatives to the Project, including the (1) No Project/No Build Alternative, (2) Existing Zoning/Office Alternative; and (3) Reduced Density Alternative. This chapter also evaluates the environmental effects of the alternatives for each issue area analyzed in the Draft EIR, though not at the same level of detail as analyzed for the Project.

6. **Other CEQA Considerations.** This chapter includes a discussion of issues required by CEQA that are not covered in other chapters. This includes irreversible environmental changes, significant unavoidable impacts, reasons why the Project is being proposed notwithstanding significant unavoidable impacts, growth-inducing impacts, potential secondary effects related to Project mitigation measures, effects found not to be significant in the Initial Study, and effects found to be less than significant in the Draft EIR (before mitigation).

7. **References.** This chapter lists the references and sources used in the preparation of this Draft EIR.

8. **List of EIR Preparers and Organizations and Persons Contacted.** This chapter lists the persons, public agencies, and organizations that were consulted or who contributed to the preparation of this Draft EIR.

9. **Standard Terms, Acronyms and Abbreviations.** This chapter provides a reference listing of the common terms, acronyms and abbreviations that are used throughout this document, as well as definitions of key terms.

The Environmental Analyses in this Draft EIR are supported by the following appendices:

- Appendix A – Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and Comments on the NOP
  - A-1 Notice of Preparation
  - A-2 Initial Study
  - A-3 Scoping Meeting Materials
  - A-4 Comments on the NOP

- Appendix B – Shadow Figures
- Appendix C – Air Quality and Greenhouse Gas Emissions Calculations
- Appendix D – Archeological Resources Report
- Appendix E – Energy Calculations
- Appendix F – Paleontological Resources Report
- Appendix G – Noise Calculations
- Appendix H – Public Services Correspondence
  - H-1 Culver City Fire Department Correspondence
  - H-2 Culver City Police Department Correspondence
  - H-3 Culver City Unified School District Correspondence
  - H-4 Culver City Parks, Recreation and Community Services Department Correspondence
- Appendix I – Transportation Impact Study
- Appendix J – Water Civil Technical Memorandum
- Appendix K – Alternatives Documentation

1.4 Public Review of the Draft EIR

The Draft EIR is subject to a 45-day review period in which the document is made available to responsible and trustee agencies and interested parties. In compliance with the provision of CEQA Guidelines Sections 15085(a) and 15087, the City, serving as the Lead Agency: (1) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (2) published a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for public review at the City's Current Planning Division; (3) provided copies of the NOA and Draft EIR to the Culver City Julian Dixon Library ; (4) posted the NOA and the Draft EIR on the City's Planning Division website: https://www.culvercity.org/Active-Projects/5700-Hannum-Ave-Proposed-Project; (5) sent a NOA to all property owners within 500 feet of the Project Site; (6) sent a NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project; and (7) filed the NOA with the County Clerk. Proof of publication is available at the Culver City Current Planning Division. The public review period commenced on April 4, 2024 and will end on May 20, 2023 for a total of 47 days.

Any public agency or members of the public desiring to comment on the Draft EIR must submit their comments in writing or send them via email to the following address prior to the end of the public review period:

Mail: Jose Mendivil
Associate Planner
City of Culver City Current Planning Division
9770 Culver Boulevard
Culver City, California 90232

Email: jose.mendivil@culvercity.org

Upon the close of the public review period, the City will proceed to evaluate and prepare responses to all relevant oral and written comments received from public agencies and other interested parties during the public review period. A Final EIR will then be prepared. The Final EIR will consist of the Draft EIR, any necessary revisions to the Draft EIR, comments submitted by responsible agencies or reviewing parties during the public circulation period for the Draft EIR, and City responses to those comments. After the Final EIR is completed and at least 10 days prior to its certification by the City Planning Commission[1], responses to comments made by public agencies on the Draft EIR will be provided to the commenting agencies.

[1] Prior to approval of the Project, the City, as Lead Agency and decision-making entity, is required to certify that the Final EIR has been completed in compliance with CEQA, that the Project has been reviewed and the information in the Final EIR has been considered, and that the Final EIR reflects the independent judgement of the City.

This page intentionally left blank

CHAPTER 2
Project Description

2.1 Introduction

5700 Hannum Owner, LLC c/o Lincoln Property Company, the Applicant, proposes to develop a mixed-use residential and commercial project on an approximately 2.23-acre (97,264 square feet [sf]) site (Project Site) located at 5700 Hannum Avenue within the Fox Hills neighborhood of the City of Culver City (City). The Project Site is currently developed with an existing two-story office building in the northern portion of the Project Site and associated surface parking. The Project would develop a new 6-story (up to a height 78-feet) mixed-use building with two (2) semi-subterranean levels, consisting of 309 residential units (including 27 Very Low Income units) and 5,600 square feet of retail space. The Project would provide a total of 7,507 square feet of publicly accessible open space, 19,526 square feet of private open space and 27,123 square feet of common open space (for residents) for a total of 54,156 square feet of open space. The building would be constructed atop two levels of semi-subterranean vehicular parking, with parking also provided on the first floor of the building. The Project would include a total of 428 vehicular parking spaces (399 residential, 6 guest and 23 commercial) within three parking levels. Two points of vehicular access would be provided to the Project Site, including a residential only driveway along Buckingham Parkway and a commercial and residential driveway along Hannum Avenue. The Project would also provide a total of 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces in compliance with Culver City Municipal Code (CCMC) requirements. The Project would also include private and publicly accessible open space. The Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza fronting Hannum Avenue. Common open space would be available to residents including a centrally located courtyard, a community room on the second floor; a gym, an amenity deck, and a community room on the sixth floor.

2.2 Project Location and Surrounding Uses

The Project Site is located at 5700 Hannum Avenue in the southeastern portion of the City with regional access provided by the San Diego Freeway (1-405) located approximately 0.7 mile west of the Project Site. Local access to the Project Site is provided via Hannum Avenue, Buckingham Parkway, and Uplander Way. The Project Site is located 0.6 mile east of the Culver City Transit Center and is not in one of the City's four key Transit Priority Areas (TPA) identified in the City's July 13, 2020 Transportation Study Criteria and Guidelines. See **Figure 2-1**, *Regional and Project Vicinity Location*, for the location of the Project Site. See **Figure 2-2**, *Project Location – Aerial Photograph*, for an aerial image of the Project Site and surrounding development.

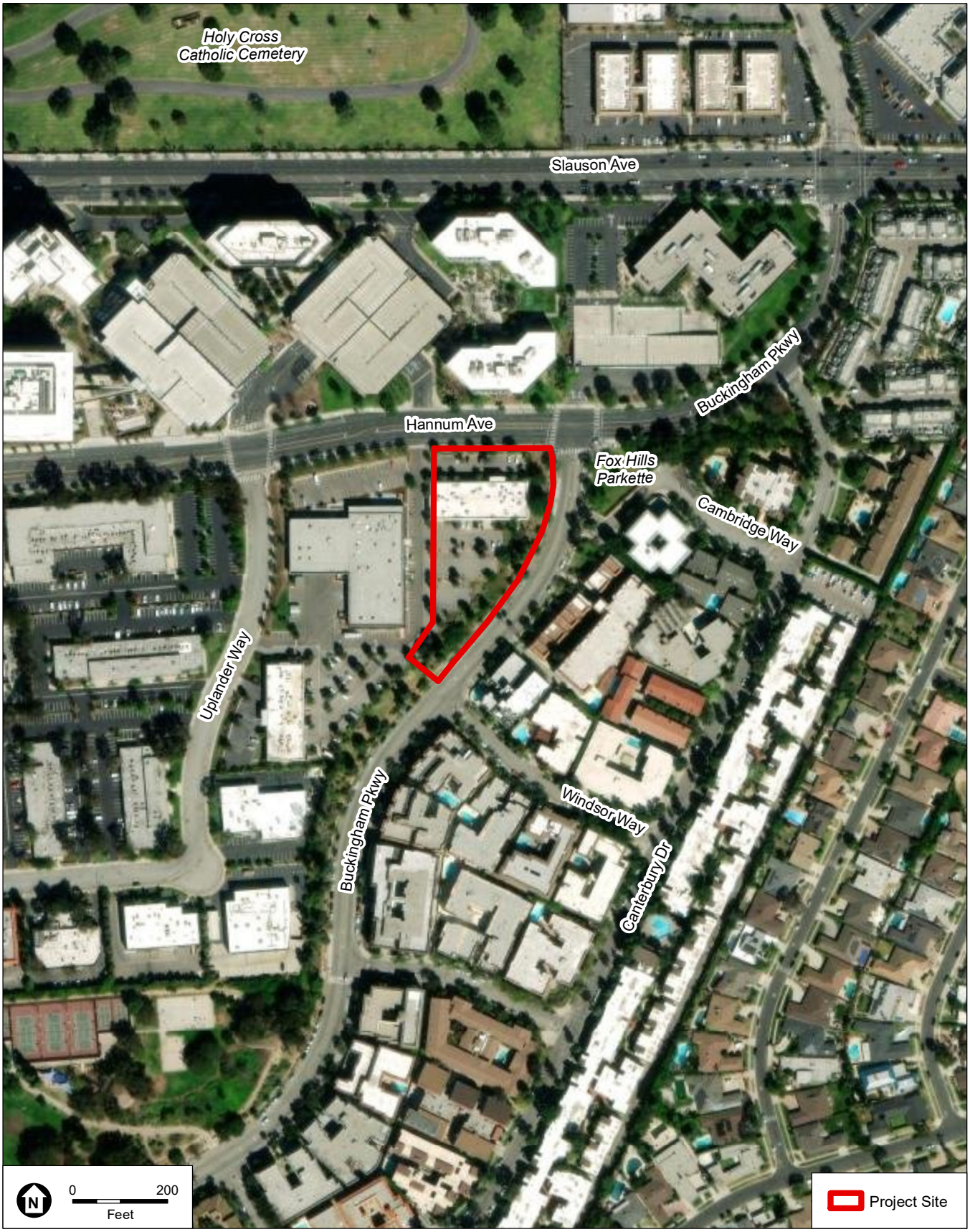


SOURCE: Open Street Map, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-1
Regional and Project Vicinity Location

ESA



Path: U:\GIS\GIS\Projects\2022xxx\D20220104 1_5700_Hannum_Ave\03_Project\Fig2-2_Proj Loc-Aerial.mxd, dkaneshiro 8/30/2023

SOURCE: ESA, 2022; ESRI Imagery, 2022

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-2

Project Location – Aerial Photograph

ESA

The area surrounding the Project Site is developed primarily with office, business park and residential uses. Land uses located adjacent to the Project Site include: a parking lot and an office building to the north (across Hannum Avenue), a business park building and a surface parking lot to the west, multi-family residential uses to the south/southeast (across Buckingham Parkway), and the Fox Hills Parkette to the east across Buckingham Parkway. The surrounding areas to the north of the Project Site across Hannum Avenue and west and south of the Project Site (east side of Buckingham Parkway) have a General Plan land use designation of Commercial - Regional Center. The multi-family uses across Buckingham Parkway to the east of the Project Site are designated by the General Plan for Planned Residential Development use, while the Fox Hills Parkette has an Open Space land use designation.

2.3 Existing Conditions

The Project Site is currently occupied by an approximately 30,672 square foot two-story office building built in the late 1970s. The remainder of the Project Site includes surface parking and associated landscaping. The sidewalks adjoining the Project Site to the north, east, and south are landscaped with street trees and trees are scattered throughout the existing surface parking lot. The office building and surface parking uses are on relatively flat graded land, however, Buckingham Parkway slopes downward from north to south, with the northernmost elevation (at its intersection with Hannum Avenue) at approximately 128 feet and the southernmost elevation (near Windsor Way) at approximately 103 feet. Thus, the topographical street elevation decreases by approximately 25 feet from north to south. A landscaped slope at varying widths up to approximately 50-feet wide and heights up approximately 17 feet high traverses along the Project Site's eastern edge along Buckingham Parkway.

Existing vehicle access to the Project Site is provided via two ingress and egress points, which are located along Hannum Avenue and Uplander Way. Hannum Avenue, an east-west roadway adjacent to the Project Site, abuts the northern boundary of the Project Site and includes bicycle lanes in both directions. Uplander Way to the east of the Project Site is separated from the Project Site by an intervening business park property but provides access to the Project Site via a driveway easement to the Project Site's surface parking area. Buckingham Parkway abuts the eastern and southeastern boundary of the Project Site (due to the curved nature of Buckingham Parkway) and contains limited curbside parking but does not currently provide direct access to the Project Site. Existing on-site surface parking includes 109 regular parking spaces and two handicapped parking spaces for a total of 111 parking spaces.

In addition to the existing building and associated surface parking, there is a mix of ornamental landscaping on the Project Site. There are 119 trees on the Project Site including carrotwood, Canary Island Pine, Brazilian pepper, olive, weeping bottlebrush, paperbark, and podocarpus. In addition, there are 14 carrotwood street trees along Buckingham Parkway adjacent to the Project Site.

2.4 General Plan Land Use and Zoning

The General Plan Land Use designation for the Project Site is Regional Center, which allows large-scale commercial uses and is intended to support existing and anticipated regional-serving commercial developments. The Regional Center land use designation does not support residential and/or residential mixed-use projects. Per the Culver City Zoning Code (Zoning Code), the Project Site is zoned Commercial Regional Business Park (CRB). The CRB Zoning District identifies areas appropriate for large-scale office and business park developments with shared parking, including specific light industrial uses and does not permit residential uses. The City adopted a 2021-2029 Housing Element on January 24, 2022. Pursuant to the adopted Housing Element, the Property's preferred land use designation is Mixed-Use High, which would allow for high-density residential uses including mixed-use developments. The 2022 Housing Element's preferred Mixed-Use High designation permits a residential density of 100 dwelling units per acre. In addition, the draft Land Use Element under consideration as part of Culver City's General Plan 2045 Update, includes the draft Land Use Map and Land Use designations with appropriate draft densities. The Project Site's draft land use designation and density is Mixed-Use High and 100 dwelling units per acre, consistent with the Housing Element preferred designation and density.

The Project is proposing to change the Project Site's zoning designation to Planned Development (PD) with adoption of a Comprehensive Plan that would create zoning and development standards for the Project Site. Per the Zoning Code, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site planning and design and to support more effective responses to the settings of such properties and other environmental considerations.[1] To permit this, a Comprehensive Plan regulates permitted uses, development standards, and permit requirements for a Project Site. To achieve the Project's proposed density and mix of uses, a General Plan Map Amendment would be needed to designate the Project Site as General Corridor. More units than permitted under the Housing Element preferred and draft Land Use density are proposed. The Applicant proposes a Density and Other Bonus Incentives density increase in return for reservation of a certain number of units as affordable for very low to moderate income households for a period of 55 years. The Project's unit count is consistent with the recently-adopted October 2021-2029 Housing Element's preferred Mixed-Use High Designation, the Draft General Plan 2045 update, and state density bonus law.

2.5 Statement of Project Objectives

Section 15124(b) of the CEQA Guidelines states that a project description shall contain "a statement of the objectives sought by the proposed project," and further states that "the statement of objectives should include the underlying purpose of the project."

The underlying purpose of the Project is to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, and retail uses, as well as publicly accessible open spaces, to revitalize the Project Site, promote

[1] City of Culver City Zoning Code, Title 17, Section 17.560, Comprehensive Plans, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-56855#JD_CHAPTER17.560. Accessed April 2023.

walkability, and enhance the City's economic base. As further required by the CEQA Guidelines, the specific objectives of the Project are provided below:

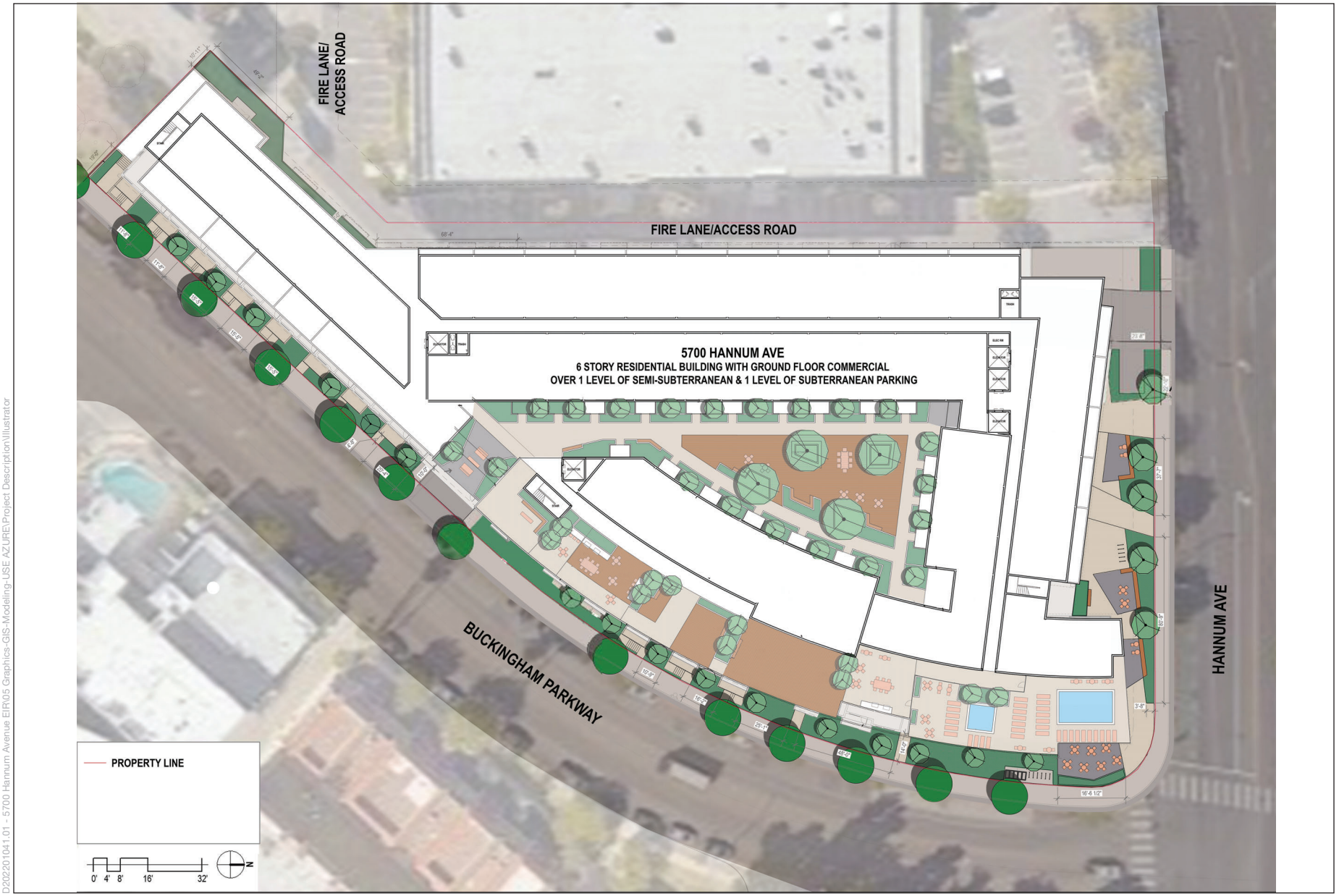
1. Develop new, high-quality infill housing with a diverse mix of residential dwelling types, containing both market-rate and affordable units.
2. Fulfill the City's housing goals by improving access to quality housing for all members of the community through the provision of affordable housing in proximity to open space and public transportation, while maintaining access to a wide range of services and goods.
3. Provide open space amenities that will enhance existing site conditions through publicly accessible open space (Hannum Plaza), as well as a unified landscape design with common open space areas for Project residents.
4. Provide for a mix of commercial and residential uses to promote pedestrian activity, reduce vehicle trips and vehicle miles traveled, and encourage active transportation while maintaining appropriate levels of vehicle parking.
5. Activate the Hannum Avenue and Buckingham Parkway frontages by providing street-oriented retail and residential uses, and a landscaping program that further enhances the pedestrian experience.
6. Utilize the state's Density Bonus laws to increase the permitted density at the Project Site in order to provide housing at a variety of income levels that will assist the City in meeting its Regional Housing Needs goals.
7. Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including a building form with vertical and horizontal breaks, generous setbacks, light materiality, landscape features, and active ground floor uses with open space amenities.
8. Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.

2.6 Description of Proposed Project

2.6.1 Project Overview

The Project would involve demolition of approximately 30,672 sf of existing surface parking and two-story office building on the Project Site to support the new mixed-use development. As shown in **Figure 2-3**, *Conceptual Site Plan*, the Project would consist of six stories of development over two semi-subterranean levels for vehicular parking and building infrastructure. The proposed six-story building would be a maximum of 78 feet in height due to the existing site topography. The Project's 356,996 square feet of residential floor area plus the 5,600 square feet of commercial floor area, which equates to a floor area ratio (FAR) of 3.73:1.

As shown in **Table 2-1**, *Development Program Summary*, and as further detailed below, the Project includes 356,996 sf of residential uses (including the residential lobby and community rooms) with 309 residential apartment units (including 27 Very Low Income units); 5,600 sf of commercial uses; three levels of vehicular parking (428 spaces), including two semi-subterranean levels; and public and private open space areas.



SOURCE: KFA, 2024

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-3
Conceptual Site Plan

D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\Project Description\Illustrator

ESA

TABLE 2-1
DEVELOPMENT PROGRAM SUMMARY

Use	Size/Units
Site Area (sf/ac)	97,264 sf/2.23 ac
Existing	
Office Use	30,672 sf
Proposed	
Residential Component	
Studios	39 units
1-Bedrooms	180 units
2-Bedrooms	90 units
Residential Lobby	5,169 sf
Subtotal Residential Units and Square Footage	*309 units (356,996 sf)*
Commercial Component	
Retail	5,600 sf
Subtotal Commercial Square Footage	*5,600 sf*
Total Residential and Commercial Square Footage	*362,596 sf*
Parking Floor Area	*165,843 sf*
Parking	
Residential Parking	405 spaces
Commercial Parking	23 spaces
Total Vehicle Parking Provided	*428 spaces*
Bicycle Parking Spaces (Long / Short-Term)	81 / 11 spaces
Open Space	
Publicly Accessible Open Space	
Hannum Plaza	7,507 sf
Total Publicly Accessible Open Space	*7,507 sf*
Common Open Space (for Residents)	
Courtyard	11,378 sf
Community Room (Second floor)	396 sf
Gym & Amenity Rooms (Sixth floor)	5,739 sf
Amenity Deck (Sixth Floor)	9,610 sf
Private Open Space (Balconies)	19,526 sf
Subtotal Open Space (for Residents)	*46,649 sf*
Total Open Space Provided	***54,156 sf***
Very Low Income Units (included in 309 total units)	
Studios	3 units
1-Bedrooms	16 units
2-Bedrooms	8 units
Total Low Income Units	*27 units*

sf = square feet; ac = acres
SOURCE: KFA, 2024.

2.6.2 Architectural Design

The Project is proposing a contemporary architectural design defined by simple lines, along with a neutral and unified color palette. **Figure 2-4**, *Conceptual Project Rendering – Hannum Plaza Looking West*, is a rendering of the Project's entrance and a westerly view along Hannum Avenue and illustrates the Hannum Plaza which includes outdoor seating areas for the public. **Figure 2-5**, *Conceptual Project Rendering – Hannum Plaza Looking East*, illustrates the Hannum Plaza looking east along Hannum Avenue. **Figure 2-6**, *Conceptual Project Rendering – Northeast Corner of Hannum Avenue and Buckingham Parkway*, provides a rendering of the Project as viewed from the intersection of Hannum Avenue and Buckingham Parkway. **Figure 2-7**, *Conceptual Project Rendering – Looking West from Fox Hills Parkette*, provides a rendering of the Project as viewed from the Fox Hills Parkette along Hannum Avenue. **Figure 2-8**, C*onceptual Project Rendering – Looking North along Buckingham Parkway*, is a northern view along Buckingham.

The Project design includes a curved facade along Buckingham Parkway and a distinct architectural volume anchoring the corner of Hannum Avenue and Buckingham Parkway. At the ground level, the corner retail component would include storefront glazing and a covered outdoor patio. Floating above the double height space, the facade would include textured corrugated and flat panels with large windows for the units. On the sixth floor, the building would become more transparent with a broad canopy and vertical fins framing the amenity deck.

A tripartite scheme along Buckingham Parkway would punctuate the massing along the longer lengths of the site. The middle portion of the building is defined as a solid frame with semi-recessed unit balconies and inset panels with windows. Along Buckingham Parkway, the top floor would be set back 30 to 40 feet with large unit patios and an expansive amenity deck with views out towards the hills, with a pool, lounge seating and smaller gathering spaces. A large opening into the second floor courtyard would divide the Buckingham Parkway facing facade into two separate masses while also providing more light and air into the courtyard. Another large opening in the frame closer to Hannum Avenue would provide a view into the courtyard. Units with front stoops would line the ground level facade along Buckingham Parkway, providing direct access to the street and planted areas in between patios, similar to the residential uses across Buckingham Parkway. The Project would follow Project-specific development standards (including setbacks) as provided in the Comprehensive Plan. The Comprehensive Plan includes 0 foot setback standards at the ground level and five-feet above the ground level along both Hannum Avenue and Buckingham Parkway. However, the Project aims to activate the ground level with pedestrian oriented design to enhance the neighborhood, as the area currently has minimal streetscape improvements. The first floor along Hannum Avenue would be setback between 20- to 35-feet to create a public plaza with landscaping and a variety of seating areas open to the community. Along Buckingham Parkway, as well as the southern and western boundaries, the building would be set back at least 10-feet from the property line.



D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-4
Conceptual Project Rendering – Hannum Plaza Looking West

ESA



D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-5
Conceptual Project Rendering – Hannum Plaza Looking East

ESA



D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-6
Conceptual Project Rendering - Northeast Corner of Hannum Avenue and Buckingham Parkway

ESA



D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-7
Conceptual Project Rendering – Looking West from Fox Hills Parkette

ESA



D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-8
Conceptual Project Rendering – Looking North along Buckingham Parkway

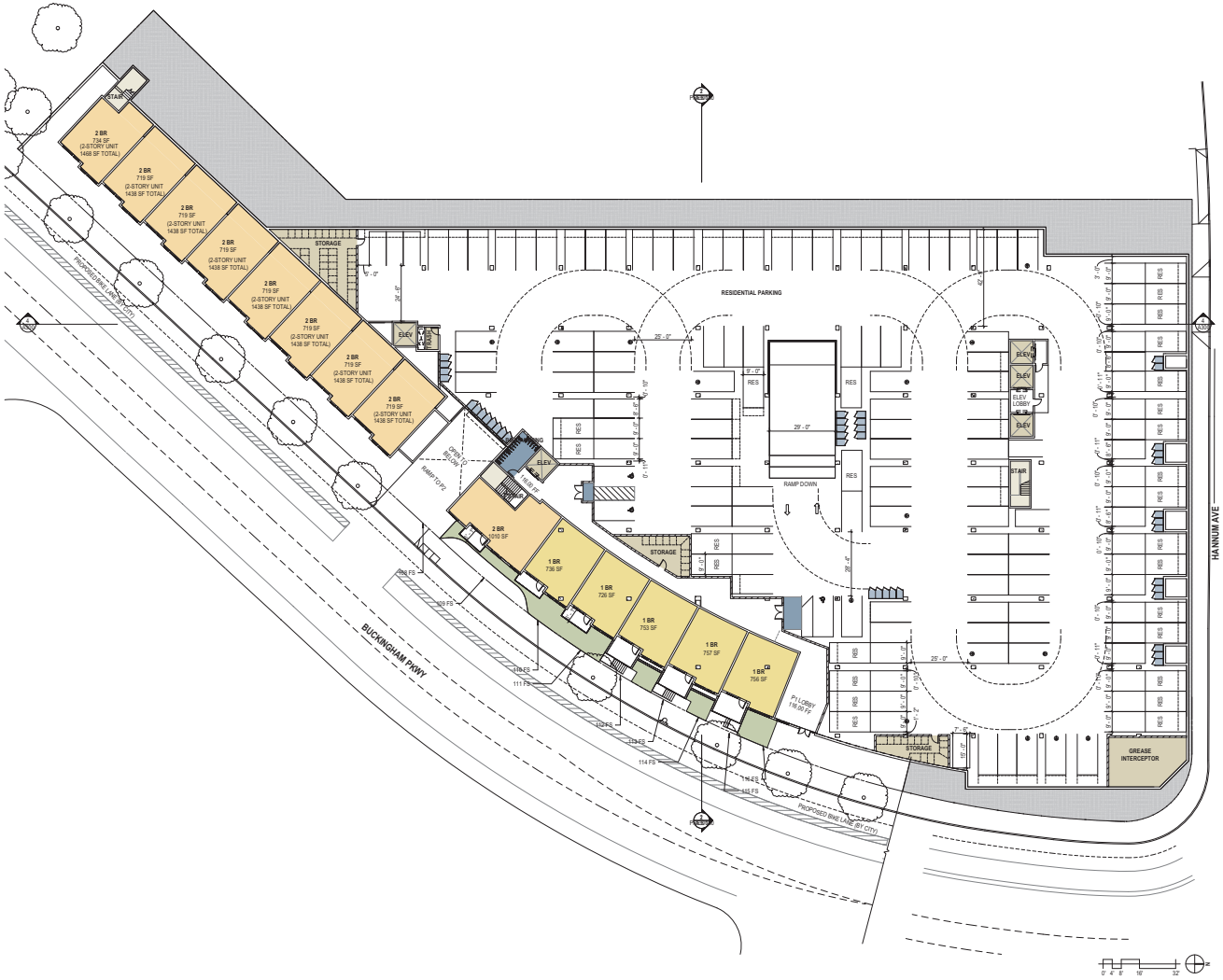
ESA

2.6.3 Building Floor Plans and Project Uses

As shown in **Figure 2-9**, *Level P1 Plan*, there would be 14 residential units along Buckingham Parkway. Due to the slope of Buckingham Parkway, the six (6) northernmost units shown on the figure would be at grade, while the eight (8) southernmost units would be on the 2nd level as viewed directly from Buckingham Parkway. The figure also illustrates the vehicular driveway/ramp from Buckingham Parkway to the P2 parking garage. Level P1 includes 166 subterranean parking spaces. **Figure 2-10**, *Level P2 Plan*, illustrates the eight (8) at grade residential units located south of the vehicular driveway/ramp to the P2 parking garage along Buckingham Parkway. Level P2 includes 177 subterranean parking spaces. **Figure 2-11**, *First Floor Plan*, illustrates the layout of the first floor which residential units along the Buckingham Parkway frontage and within the southern portion of the building. As shown in Figure 2-11, a 5,169 square foot residential lobby area would be located along Hannum Avenue in the north portion of the building, and the Project's 5,600 square feet of retail use would be located at the northwest corner of the building near the Hannum Avenue/Buckingham Parkway intersection. The first floor includes 85 parking spaces. Bicycle parking, commercial and residential trash rooms, a dog spa, and storage are also illustrated on the first floor plan. **Figure 2-12**, *Second Floor Plan*, illustrates a mix of residential units that surround an internal centrally located 11,378 square foot courtyard, which also opens to Buckingham Parkway in two locations. A 396 square foot community room would also be located on the second floor. Floor levels 3 to 5 would consist entirely of residential units. **Figure 2-13**, *Sixth Floor Plan*, provides an illustration of the 39 residential units on the sixth floor, as well as the pool, jacuzzi spa, gym and community rooms located in the northeastern portion of the building.

Residential Uses

The 309 residential units would be located on floors P2 through six of the proposed development. Level P2 would provide 8 two-bedroom two-story units. The first floor of the two-story units would be located on Level P2 and the second story would be located on Level P1. Level P1 would provide 6 residential units comprised of 1 two-bedroom unit and 5 one-bedroom units. The first floor would provide 22 residential units comprised of 3 studio units, 14 one-bedroom units, and 5 two-bedroom units. The second floor would provide 54 residential units comprised of 6 studio units, 34 one-bedroom units, and 14 two-bedroom units. The third floor would provide 59 residential units comprised of 8 studio units, 33 one-bedroom units, and 18 two-bedroom units. The fourth floor would provide 61 residential units comprised of 8 studio units, 35 one-bedroom units, and 18 two-bedroom units. The fifth floor would provide 60 residential units comprised of 8 studio units, 36 one-bedroom units, and 16 two-bedroom units. The sixth floor would provide 39 residential units comprised of 6 studio units, 23 one-bedroom units, and 10 two-bedroom units.



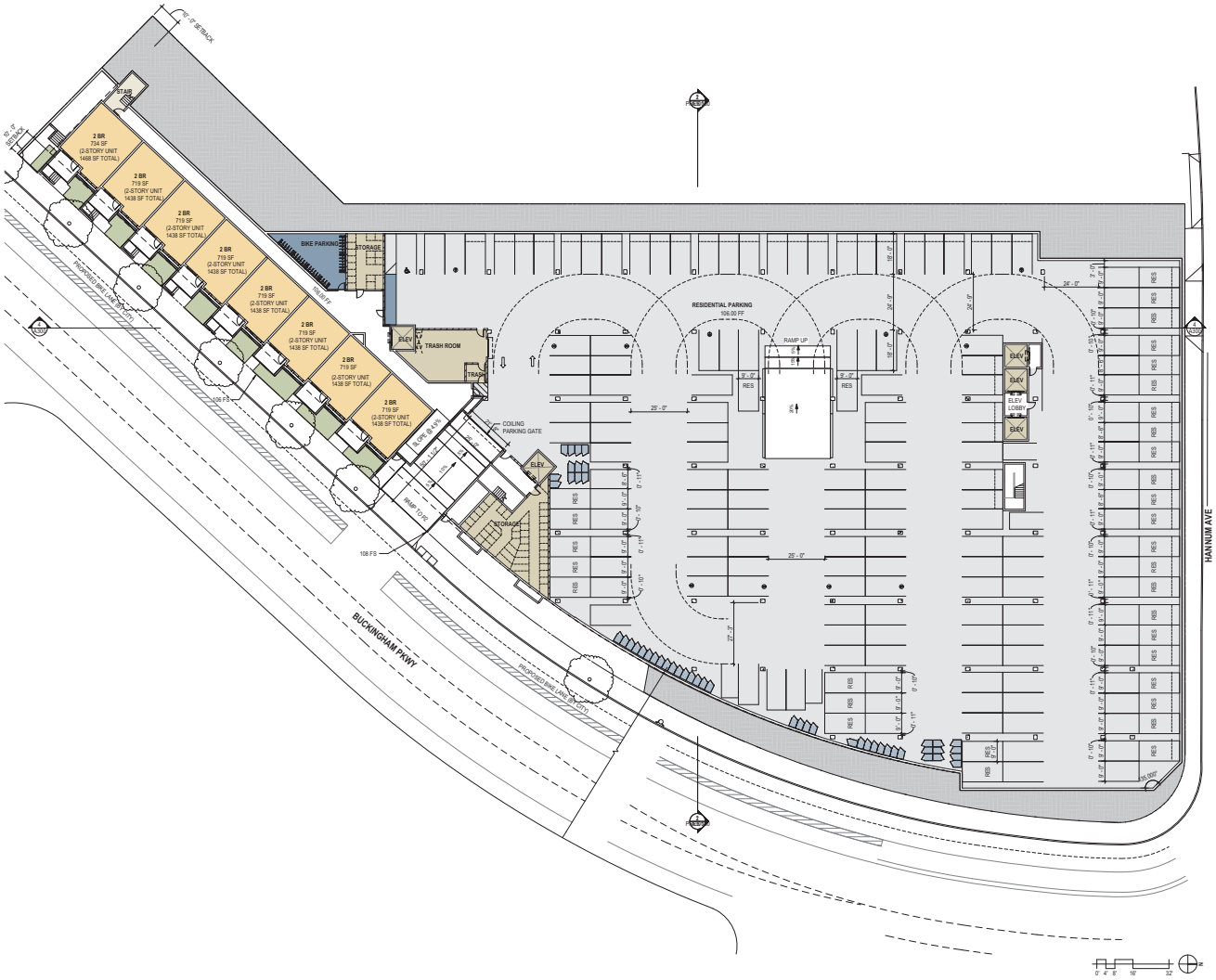
SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-9
Level P1 Plan

ESA

D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR



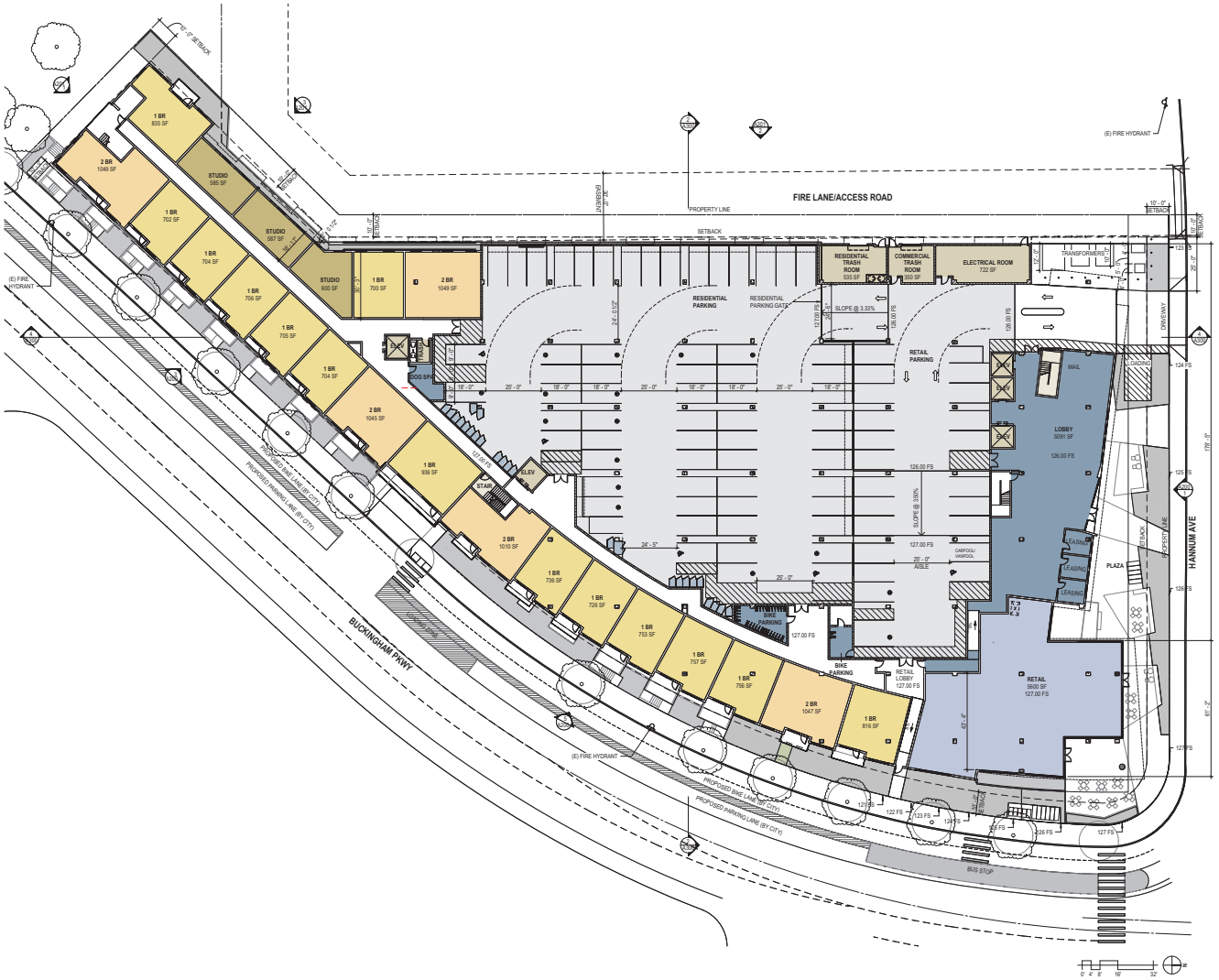
SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-10
Level P2 Plan

ESA

D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR



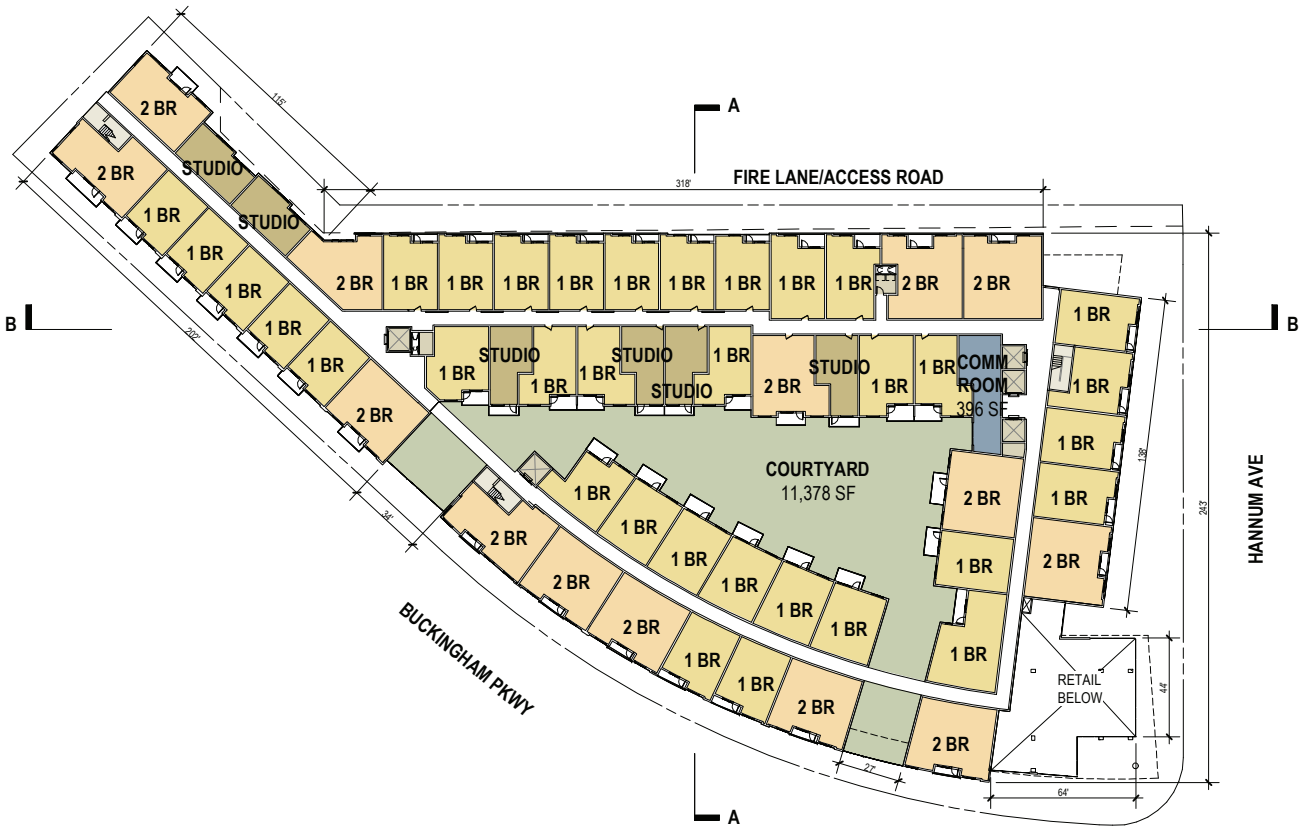
D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-11
First Floor Plan

ESA



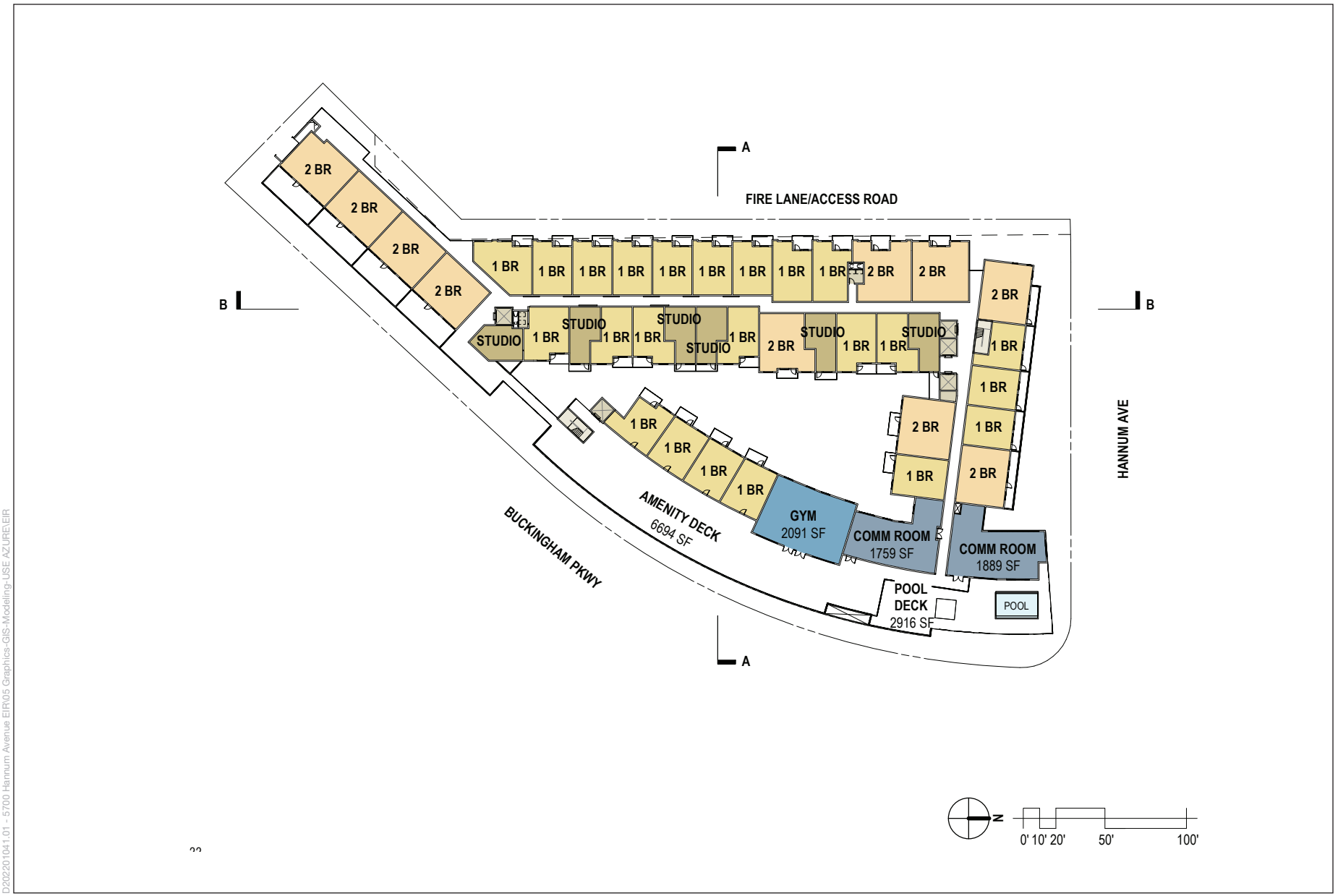
D2022010411.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-12
Second Floor Plan

ESA



SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-13
Sixth Floor Plan

ESA

D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

Per CCMC Section 17.400.065 Table 4-2, the maximum allowable height for the Project is 56 feet. However, the Project is proposing to include 27 units (12 percent of base density) of its residential units as Very Low Income affordable units. By doing so, consistent with the CCMC, State Density Bonus Law (Gov't Code §65915) and Assembly Bill (AB) 2345, the Project is entitled to receive development incentives including a height increase. The Project is requesting a height increase of 22 feet beyond the maximum allowable height as a development incentive for providing affordable units. With this incentive, the Project would have a height of up to 78 feet due to the existing site topography. In addition to a height incentive due to the Project's inclusion of affordable units, the Project would be available to receive up to a 50 precent density bonus per AB 2345. Per the City's 2021-2029 Housing Element, Mixed-Use High land uses are allowed to develop 100 units per acre. Thus, with the Project Site being 2.23 acres, up to 223 units could be developed. The Project includes 27 units (12 percent of base density) as Very Low Income affordable units. Providing this amount permits a 38.75 percent density increase under AB 2345. At 309 units, the Project would be within the allowed number of units with the density bonus incentives included.

Commercial Uses

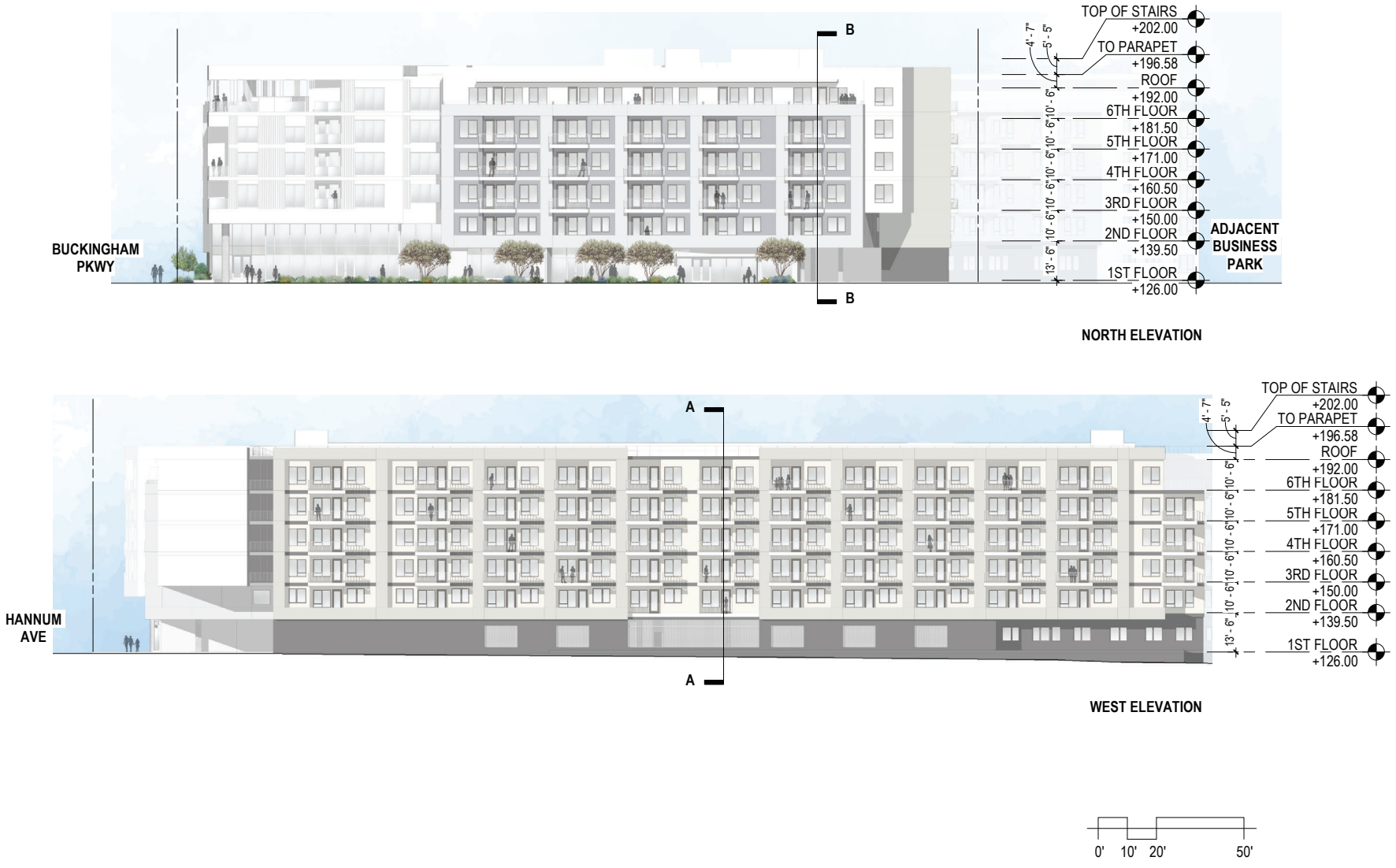
As previously stated, the commercial uses for the Project would be located on the first floor of the Project. The first floor level of the building would include 5,600 sf of retail space. As shown in Figure 2-11, the retail area would anchor the northeast corner of the Project Site.

2.6.4 Building Elevations and Sections

Figure 2-14, *North and West Elevations*, provides an illustration of the north elevation facing Hannum Avenue and the west elevation which faces adjacent business park uses. **Figure 2-15**, *East Elevation*, which provides an illustration of the east elevation that faces the adjacent residential uses along Buckingham Parkway and its sloping topography. **Figure 2-16**, *South Elevation*, provides an illustration of the south elevation adjacent to Buckingham Parkway. **Figure 2-17**, *Building Sections*, illustrates the Project's proposed uses and heights by floor/level. As described in Section 2.6.3, the Project is requesting a height increase of 22 feet beyond the maximum allowable height as a development incentive for providing affordable units. Design of the project is described in Section 2.6.2 and building facades along Hannum Avenue and Buckingham Parkway are illustrated in Figures 2-4 through 2-8.

2.6.5 Open Space and Landscaping

The Project would include a total of 54,156 square feet of open space. The Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza. The Hannum Plaza, located along Hannum Avenue, would feature drought tolerant landscaping and a variety of seating areas, open to the community.



SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-14
North and West Elevations

ESA

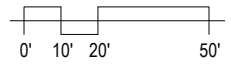
D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR



EAST ELEVATION 1



EAST ELEVATION 2



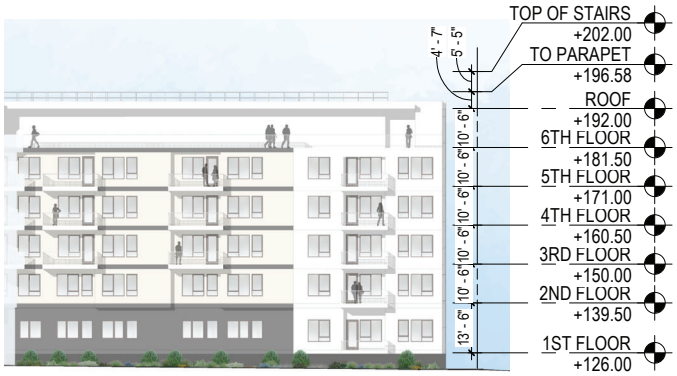
D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

SOURCE: KFA, 2023

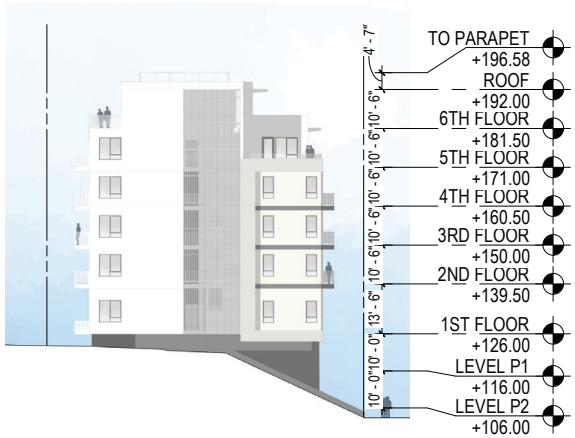
5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-15
East Elevation

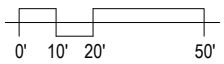
ESA



SOUTH WEST ELEVATION



SOUTH ELEVATION

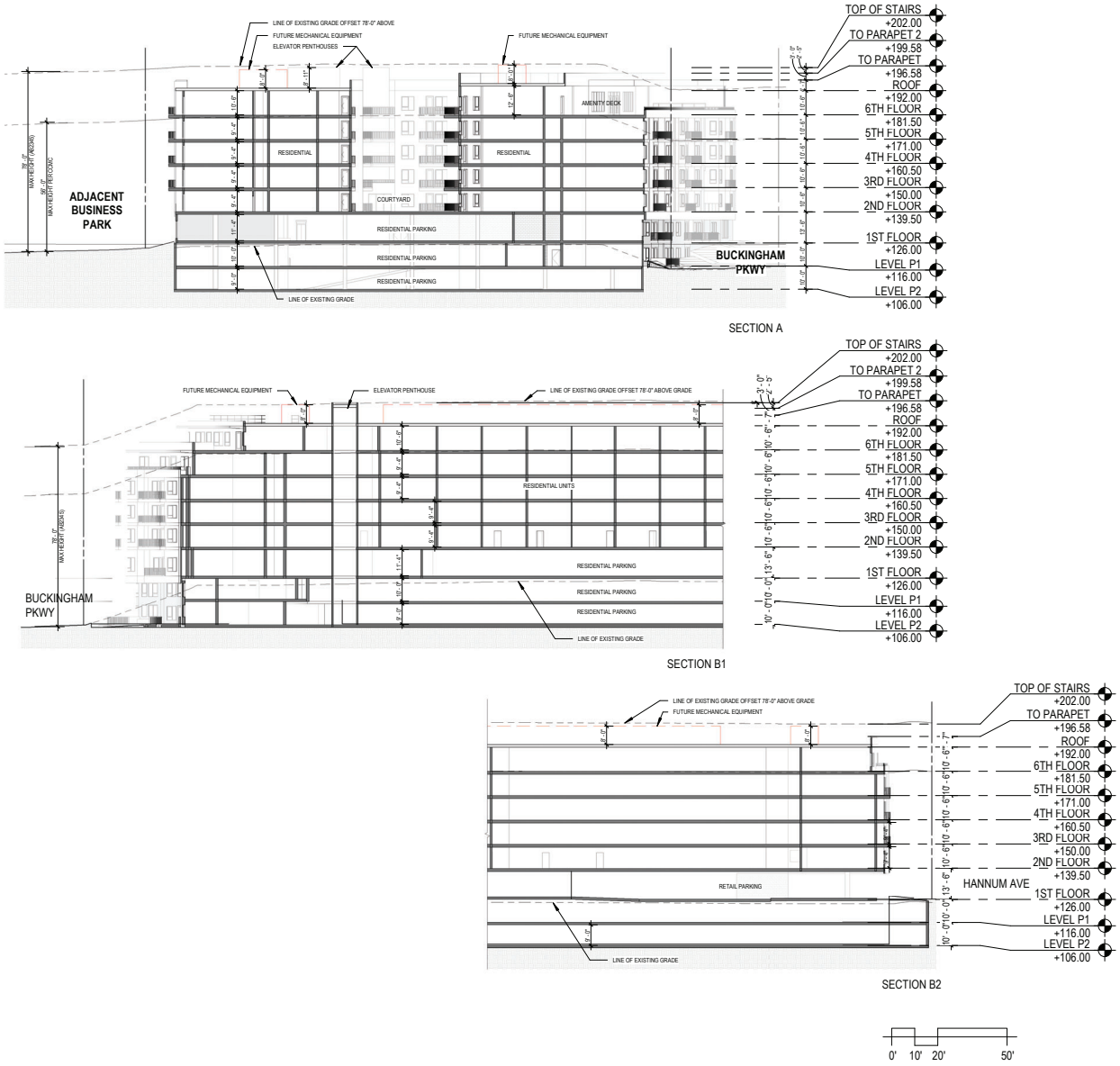


D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-16
South Elevation



SOURCE: KFA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 2-17
Building Sections

D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

Of the total amount of open space, 19,526 square feet would be provided as private open space within balconies or private yards distributed throughout the Project's eight levels (including the P1 and P2 levels). The remaining square footage would be common open space for residents. The Project would provide approximately 27,123 square feet of resident only open space. A 11,378 square foot centrally located courtyard and a 396 square foot community room would be located on the second floor. The central courtyard on the second floor would have a variety of seating areas, BBQs, and drought tolerant landscape.

A 9,610 square foot amenity deck, and 5,739 square feet of community room area and gym space would be located on the sixth floor. The sixth floor/roof level pool deck would include a pool and spa enclosed by a 3.5 foot perimeter amenity deck glass enclosure. The pool deck would open to the community room amenity space that would include open seating areas, private meeting areas, and a warming kitchen. The community room would be used for infrequent special events for residents.

Outdoor common spaces for residents would include lounge seating, gathering spaces, and small speakers installed in discreet areas to be used for low volume ambient sound and music. Occasional events for residents only would be held throughout the year within the courtyard or roof deck as an amenity for the residents. These events might include outdoor yoga, intimate food and beverage events, and/or outdoor movies. The property management team would have on-site staff, courtesy patrol, or hired service present at all times during such events. Additionally, on-site functions would require applicable insurance and executed event waivers.

Open space and landscaping would be provided in accordance with CCMC Requirements. The Project would incorporate public-facing landscaping along Hannum Avenue and Buckingham Parkway. The landscape design would be tailored for each of the landscaped open space areas with a compatible plant palette used throughout the Project Site. Planted perimeters at the ground level would buffer the Project site from Hannum Avenue and unit entrances along Buckingham Way while leaving openings for community facing mixed use. Two (2) new street trees and fifty-six (56) on-site trees are proposed. On-site, twenty-one (21) trees are proposed on Level P1, P2, and the first floor; twenty-four (24) trees are proposed within the second-floor courtyard, and eleven (11) trees proposed on the sixth floor amenity deck.

The first floor/ground level would feature planting areas, walkways, trees, and seating areas. Hannum Plaza, the first level outdoor area with seating outside the retail area at the intersection of Buckingham Parkway/ Hannum Avenue, would be open to the public, with the site's other first level areas available only to Project residents. Seating areas would be placed throughout Hannum Plaza to create spaces for rest, open to the community. Seating areas would range from smaller spaces for 2-8 people to larger open spaces that can accommodate more people and remain flexible as seating areas, a planted refuge, and outdoor co-working spaces. Planters at a height of 3' feet would be planted with dense low water use plants, including trees. Irrigation would be provided by high efficiency drip systems on weather-based smart controllers. Landscaping would emphasize native, Mediterranean, and drought tolerant plants (e.g., Agave, Aloe, ornamental grasses, leafy groundcovers, colorful shrubs, and soft textured vegetation). For the trees being removed from the Project Site, new replacement trees would be planted on the Project Site per Section 9.08.215 of the CCMC.

2.6.6 Vehicular and Bicycle Access, Circulation, and Parking

Vehicular Access

There is currently one driveway to access the Project Site along Hannum Avenue. Access is also available via Uplander Way. Vehicular access to the Project Site would be provided via two driveways, the Hannum Driveway and the Buckingham Driveway. Both driveways would provide access to the parking structure, with the Hannum Driveway accessible to residents, employees, and visitors. The Buckingham Driveway would be restricted to residential vehicles only on levels P1 and P2.

The driveway on Hannum Avenue would serve the proposed retail uses and would also provide access for resident and resident guest parking. Access for trucks and deliveries would be off of Hannum Avenue where the loading area is located in the north end of the Project Site near Hannum Avenue. The trash enclosures would be accessed from the access road/driveway to the west of the Project Site. A loading zone would be located along Buckingham Parkway for trash pick-up, passenger pickup, and residential move-in.

Bicycle Access

Bicycle access to the Project Site would be provided separately from the vehicular driveways via entrances along Buckingham Parkway to reduce potential vehicle-pedestrian and vehicle-bicycle conflicts. Hallway access doors would be located on each parking level (P2, P1, 1) and bicyclists would share the residential corridors connecting to long term bike storage rooms. The driveways on Hannum Avenue and Buckingham Parkway would be designed to provide maximum visibility between all roadway users. Bicycle parking amenities would also be provided for residents, employees, and visitors to the site. The Project will provide a total of 92 bicycle parking spaces, with 8 reserved for short term resident use, 78 for long term resident use, and 3 each for commercial short and long term use. Bicycle racks for residents and visitors would be available next to the retail lobby off of Buckingham Parkway, on Level P2, and on Level P1 next to the P1 lobby. Bicycle lockers would be provided for residents and employees. Long term spaces will be provided in enclosed rooms internal to the Project, accessed only by residents or employees. Short-term bike parking would be located on Buckingham Parkways near the corner of Hannum Avenue and within the Hannum Plaza, across from the residential lobby.

An existing Class II bike lane is provided on both sides of Hannum Avenue adjacent to the Project Site. Development of the Project would maintain the existing bike lane along Hannum Avenue; however, the Hannum Driveway would intersect with the eastbound bike lane on the south side of Hannum Avenue. To ensure maximum visibility, the Hannum Driveway would meet all applicable CCMC requirements to ensure adequate sight distance is provided for drivers of vehicles entering and leaving the Project Site as well as bicyclists and pedestrians wishing to cross the driveway. While no existing bicycle lanes are provided on Buckingham Parkway, *Culver City Bicycle & Pedestrian Action Plan* calls for a Class IV bike lane to be installed. The design for this bicycle lane has not been finalized. However, the Buckingham Driveway would intersect the southbound bicycle lane on the west side of Buckingham Parkway. Similar to the Hannum Driveway, the Buckingham Driveway would ensure maximum visibility by meeting all of the City's driveway

requirements and would provide adequate sight distance for drivers of vehicles entering and leaving the Project Site as well as bicyclists crossing the driveway. The Project would not preclude the installation of the bicycle lane on Buckingham Parkway.

Pedestrian Circulation

The Project Site is oriented such that residents would be able to walk through and around the Project Site with multiple access points and community connections to the development. The first floor retail use at the corner of Hannum Avenue and Buckingham Parkway would serve as a pedestrian point of interest on the Project Site. It will be accessible from the street level along Hannum Avenue. The Hannum Plaza, located along Hannum Avenue, would provide open space for people to gather and interact with the retail space. Pedestrians would also be able to easily access the retail area from Hannum Avenue or Buckingham Avenue.

Vehicle and Bicycle Parking

Structured parking containing 428 vehicular parking spaces on three levels would be provided on the Project Site with 405 spaces for residential uses (including 6 parking spaces for residential guests) and 23 spaces for commercial uses. The subterranean parking level one (P1) would include parking spaces for 166 spaces for residential use. The subterranean parking level two (P2) would include 177 parking spaces for residential use. The first floor parking level would include 62 vehicle parking spaces for residential uses and 23 parking spaces for retail uses. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. The vehicle parking spaces for residential guests would be clearly identified either by specific ground painting or wall signage/decals and would be located within the residential garage in the subterranean parking levels only. All subterranean parking would be secured under an access control system. There would be 81 long-term and 11 short-term bicycle parking spaces provided in the subterranean parking levels P1 and P2, on the first floor, and along Buckingham Parkway.

Public Transit

The Project Site is served by a variety of public transit options along Hannum Avenue and Buckingham Parkway provided by the Culver City Department of Transportation. Most significantly, the Project Site is located 0.6 mile east of the Culver City Transit Center which serves Los Angeles County Metro Bus Lines 108 and 110, as well as Culver City Bus Line 6. Other transit operations in the vicinity of the site include Culver City Bus Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site.

Transportation Demand Management Program

Transportation demand management (TDM) features would be implemented by the Project. Examples of the TDM features the Project would include, but are not limited to bicycle parking and amenities; employee parking; bus stop improvements; and a Transportation Information Center (TIC). A TIC is a centrally-located commuter information center where the Project residents and employees can obtain information regarding commute programs, and individuals can obtain real-time

information for planning travel without using an automobile. A TIC provides information about transit schedules, commute planning, rideshare, telecommuting, bicycle routes and facilities, and facilities and resources for carpoolers, vanpoolers, bicyclists, transit riders, and pedestrians. The TIC can be provided via a bulletin board, display case, or kiosk, as well as virtually, providing every resident, employee, and visitor access to commuter information through a website portal. In accordance with the California Green Building Standards Code (CALGreen Code), infrastructure for EV charging stations would be provided.

2.6.7 Lighting and Signage

Exterior lighting would incorporate low-level exterior lights on the buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Lighting for the Project is intended to minimize light trespass and glare from buildings and the Project Site onto adjacent properties, to provide comfort, safety, and nighttime visibility through shielded, focused and directed illumination. New street and pedestrian lighting within the public right-of-way would comply with applicable city regulations and would require approval from the City to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

All proposed lighting for the Project's residential and retail uses would be provided in accordance with CCMC Section 17.300.040, which provides the general standards for outdoor lighting to regulate lighting fixtures and design, energy use, light shielding, light intensity, and lighting placement. Additionally, the Project would comply with CCMC Section 15.02.110A.12, which requires that all new lighting installed in a garage or parking structure be motion-sensor controlled and that minimum base level lighting shall be permitted. Project materials would also be selected to avoid highly reflective surfaces that would result in adverse glare effects on motorists or adjacent uses.

Proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with the requirements of the CCMC. Proposed signage would include identity signage, building and tenant signage, residential address numbers and parking entry signage, and general ground level and wayfinding pedestrian signage. No off-site advertising signage is proposed. New signage would be architecturally integrated into the design of the proposed building and would establish appropriate identification for the proposed uses. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Signage may also be back-lit. Illumination used for Project signage would comply with light intensities set forth in the CCMC as measured at the property line of the nearest residentially zoned property.

2.6.8 Site Security

The Project would incorporate a security program to ensure the safety of Project residents, employees, and visitors. During construction of the Project, the Project Site would be fenced and gated with surveillance cameras to monitor the site during off hours. Access to retail uses and publicly accessible open space areas would be unrestricted during business hours. Facility operations would include staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. Site security would include the provision of 24-

hour video surveillance. Security cameras would be located to capture views at the perimeter of the proposed buildings; at main pedestrian and vehicular entries; and other outdoor locations as appropriate; and at stair/elevator lobbies. During operation of the Project, access to the parking structure would be controlled through gated entries, keycard access, and the entry areas, publicly accessible areas, parking areas, and common open space residential areas would be well illuminated.

2.6.9 Sustainability Features

Energy saving and sustainable design features would be incorporated into the Project as the proposed buildings would comply with the applicable Title 24 California Code of Regulations. The Project would include 1 kW solar photovoltaic panels, per CALGreen standards. Design features would include energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. EV parking and charging would be available for residential and commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. The Project would include 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces. As it relates to energy conservation, the Project would include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances. As it relates to water conservation, the Project would incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems.

2.6.10 Anticipated Construction Schedule/Activities

A Construction Management and Traffic Plan would be prepared which defines the scope and scheduling of planned construction activities as well as the Applicant's proposed construction site management responsibilities, to ensure minimal impacts to neighboring residents and land uses and to avoid interruption of pedestrian, vehicle, and alternative transportation modes and public transit. The Construction Management and Traffic Plan would facilitate communication and coordination with residents and others in the neighborhood. A final comprehensive Construction Traffic Management Plan would be subject to review and approval by the City prior to the start of any construction activity. The Plan would include but not necessarily be limited to: name and telephone number of a contact person regarding traffic complaints or emergency situations; community notification procedures; contact information for local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity; procedures for training the flag person(s) used in implementing the plan; the location, times, and estimated duration of any temporary lane closures; managing the approved haul route plan; timing of disruptive construction activities; and a construction parking management plan.

The CCMC prohibits construction between the hours of 8:00 P.M. and 8:00 A.M. Monday through Friday, 7:00 P.M. and 9:00 A.M. on Saturday, and 7:00 P.M. and 10:00 A.M. on Sunday. In order to ensure the highest level of quality for the concrete structure and to reduce the construction duration, the Project would request approval for extended construction hours to be considered in conjunction with the entitlement application for the Project. That is, the Project is requesting an approval for Extended Hours of Construction, as allowed by CCMC Section 9.07.035.C.1, to allow for a 7:00 AM daily start, Monday through Saturday during the excavation, hauling, and concrete

activities. The daily construction end times would remain consistent with those allowed by the CCMC. The extended construction hours are being requested over the course of approximately four (4) months during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction. The other construction phases would occur per the allowable standard CCMC permitted construction hours.

The Project would require excavation to accommodate subterranean parking, building foundations, utilities and other improvements. Up to approximately 51,400 cubic yards (cy) of earthwork would be excavated and exported from the Project Site. Construction staging would be entirely internal to the Project Site. The Project would excavate to a maximum depth of 27 feet below grade.

Project construction would occur in one phase and is anticipated to commence as early as the first quarter of 2025 and is expected to take approximately 30 months to complete. Full build-out is expected as early as the fourth quarter of 2027.

2.7 Project Design Features

The Project proposes to implement a number of Project Design Features (PDFs) that have been voluntarily incorporated into the Project that serve to minimize or avoid significant environmental effects. The Project Design Features will be included in the Mitigation Monitoring and Reporting Program required in association with certification of the Draft EIR. The Project Design Features are summarized in **Table 2-2**, *Summary of Project Design Features*, and are discussed in detail in the technical sections indicated in the table. The Project Design Features are taken into account in the analyses of potential Project impacts.

TABLE 2-2
SUMMARY OF PROJECT DESIGN FEATURES

Project Design Feature #	Project Design Feature Summary
AES-PDF-1: Screening of Utilities	Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances (such as rooftop elevator stops), will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way.
GHG-PDF-1: Green Building Features	The Project will include the following green building features: • The Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) rating system at a "certified" performance level or higher and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and Culver City's Green Building Program Requirements. • The Project will incorporate renewable energy features in the form of 1 kW solar photovoltaic panels per 10,000 sf in order to achieve compliance with the City of Culver City's solar photovoltaic requirement, per the City's Green Building Ordinance and CALGreen standards. • The Project will provide EV parking and charging for residential and commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. Forty-four (44) total spaces (41 residential + 3 commercial) would have EV charging stations. • The Project will include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances.

TABLE 2-2
SUMMARY OF PROJECT DESIGN FEATURES

Project Design Feature #	Project Design Feature Summary
	• The Project will incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems. • The Project will utilize only electricity and no natural gas in all land uses except for the retail space.
NOI-PDF-1: Project Construction Schedule	Prior to issuance of a building permit, notice of the Project construction schedule will be provided to adjacent property owners and occupants. Evidence of such notification will be provided to the City of Culver City Public Works Department. The notice will identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).
NOI-PDF-2: Use of Impact Pile Driver	The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating shoring piles to be drilled will be used.
NOI-PDF-3: Construction Rules Sign	During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers, with 24-hour availability, of the Applicant, Property Owner, construction contractor(s) will be posted on the Property in a location that is visible to the public. In addition, appropriate staff person at the City of Culver City will be notified for such incidences. These names and telephone numbers will also be made available to adjacent property owners and occupants to the satisfaction of the appropriate department (Planning Manager and/or Building Official) of Culver City.
NOI-PDF-4: Neighborhood Streets	No construction haul trucks, including concrete trucks, will be allowed to travel through neighborhood streets that are primarily residential uses.
NOI-PDF-5: Mechanical Equipment Noise	All building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Culver City General Plan Noise Element Regulation of Stationary Noise Sources through the use of quiet fans, duct silencers, parapets, or similar noise attenuation methods.
NOI-PDF-6: Noise Control – Amplified Sound Systems	If the Project installs permanent outdoor amplified sound systems, the systems will be located in discrete areas of the outdoor common opens space areas courtyard such that the sound would be mostly blocked by the proposed on-site building or walls from off-site residential receivers. Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions or providing entertainment which is audible at a distance of fifty (50) feet or beyond the subject's property line without first filing an application and obtaining a permit as set forth in Chapter 9.07, Noise Regulations, of the CCMC. The systems will at a minimum be designed so as not to result in a perceivable increase at the nearest noise sensitive residential receptor. Specifically, daytime outdoor amplified sound systems will not result in an increase of 5 dBA L_{eq} over existing ambient noise conditions at the nearest noise sensitive residential receptor. Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996). A qualified noise consultant will provide written documentation and submitted to appropriate department of City of Culver City that the design of the system(s) complies with the maximum noise levels at the property line of the nearest off-site sensitive receivers.
POL-PDF-1: Project Site Security and Access During Construction	During construction of the Project, the Project Site will be fenced and gated with surveillance cameras to monitor the site during off hours.
POL-PDF-2: Project Site Security and Access During Operation	During operation of the Project, access to the parking structure will be controlled through gated entries, and the entry areas will be well illuminated. Project Site security would include controlled keycard access to office spaces, security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV).

TABLE 2-2
SUMMARY OF PROJECT DESIGN FEATURES

Project Design Feature #	Project Design Feature Summary
TRAF-PDF-1: Construction Management Plan	A Final Construction Management Plan (FCMP) will be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities covering the entire Project Site as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning manager for the City of Culver City, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments. Prior to commencement of construction, the contractor will advise the City's public works inspector and building inspector (inspectors) of the construction schedule. As-needed construction management meetings shall be convened with appropriate Culver City staff and representatives of surrounding developments that may have overlapping construction schedules with the Project, to ensure that concurrent construction projects are managed in collaboration with one another. The FCMP will consider potential project construction disruptions to transportation facilities near the Project Site and provide effective strategies to limit the Project's use of the public right-of-way (streets and sidewalks) during peak traffic periods, and will be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare. Prior to approval of the FCMP and grading permits, the Applicant will conduct once (1) community meeting pursuant to the notification requirements of the City of Culver City 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). 11. Community notification procedures. The FCMP will at a minimum include the following: 1. The name and telephone number of a contact person who can be reached 24 hours a day via telephone regarding construction or construction traffic complaints or emergency situations. 2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Maps showing access to and within the site and to adjacent properties will be provided. 3. Construction plans and procedures to address community concerns the City of Culver City personnel notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures included in the Project's Mitigation Monitoring Program and best practices to reduce disturbances to adjacent and nearby land uses. 4. Procedures for the training and certification of flag persons.

TABLE 2-2
SUMMARY OF PROJECT DESIGN FEATURES

Project Design Feature #	Project Design Feature Summary
	5. To the extent known, identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for use of protective devices, warning signs, and staging or queuing areas. 6. The location of temporary power, portable toilet and trash and materials storage locations. 7. The timing and duration of any street, sidewalk and/or lane closures will be approved in advance by ethe City of Culver City. As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Culver City, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As applicable at the time of construction, such notices will be made available in digital format for posting on each City website and distribution via email alerts on electronic platforms such as the County of Los Angeles' "Gov Delivery" system. The FCMP will be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP will require that review and approval of any proposed lane closures include coordination with the Culver City Fire and Police Departments to minimize potential effects on traffic flow and emergency response. 8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and/or at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.
TRAF-PDF-2: Transportation Demand Management (TDM) Program	The Project will implement TDM measures that include, but are not limited to, those listed below subject to Culver City Transportation Department review and approval prior to issuance of the first Temporary Certificate of Occupancy (TCO) for the Project in order to reduce drive-alone vehicle trips to/from the Project Site by residents, visitors and employees, as well peak hour traffic. The TDM strategies necessary comply with the TDM and trip reduction requirements of City Municipal Code Section 07.05.015, as well as City's design requirements for the Project: **On-Site Enhancements** - The Project design will incorporate mobility features to encourage alternative transportation modes. The features will be designed in accordance with the City Municipal Code requirements and standards. • Pedestrian Connections. The Project will provide exclusive pedestrian access separate from vehicular driveways. The Project will provide internal walkways that connect the pedestrian access points to off-site pedestrian facilities, rideshare, and transit. • Bicycle Parking and Amenities. The Project will provide both short-term and long-term bicycle parking spaces on-site in accordance with the City Municipal Code requirements. Short-term bicycle parking, which will include bicycle racks, will be located near the pedestrian entrance. Long-term bicycle parking, which will include bicycle lockers or secure bicycle enclosures, will be placed in an accessible weather protected location. **Electric Vehicle (EV) Parking**. In accordance with City Municipal Code Section 17.320.035.O.3, at least 40% of the onsite parking supply will have EV capability, including EV Capable spaces (20%), EV Ready spaces (10%), and Full EV Charger/Charging Stations (10%). **Off-Site Enhancements** - The Project will improve and contribute toward improvements to off-site mobility facilities to encourage alternative transportation modes. • Mobility Fees. In accordance with City Municipal Code Section 05.06.015, the Project will be subject to contributing its fair share toward funding the City's mobility infrastructure and improvement projects intended to reduce VMT and support housing and job growth. Pursuant to Resolution No. 2021-R055, the total mobility fee for the Project will be based on a rate of $3,394 per multi-family unit and $14.92 per sf of commercial space.

TABLE 2-2
SUMMARY OF PROJECT DESIGN FEATURES

Project Design Feature #	Project Design Feature Summary
	Other TDM Strategies - The Project will implement TDM strategies to reduce peak hour vehicular traffic and air emissions to and from the Project Site. The following details the minimum TDM strategies necessary to comply with the TDM and trip reduction requirements of City Municipal Code Section 07.05.015, as well as City's design requirements for the Project: • Transportation Information Center (TIC). The Project will provide a TIC, a commuter information center where residents, employees, and visitors can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile. A TIC provides information about transit schedules, commute planning, rideshare, telecommuting, bicycle routes and facilities, and facilities and resources for carpoolers, vanpoolers, bicyclists, transit riders, and pedestrians. The TIC can be provided via a bulletin board, display case, or kiosk, as well as virtually, providing every resident, employee, and visitor access to commuter information through a website portal. • Bicycle Parking and Amenities. The Project will support bicycling to work through the provision of bike storage facilities throughout the Project site. Bicycle parking will be provided in accordance with the City Municipal Code requirements for the Project and will include short-term facilities (e.g., bicycle racks) and secure long-term bicycle parking (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner). • Pedestrian-Friendly Environment. The Project is designed to be pedestrian-friendly and accessible to the local neighborhood. The Project's pedestrian access points will be located separate from vehicular access points. To promote walkability within and around the Project site, internal pedestrian pathways will provide a safe and direct connection to external public pedestrian facilities. Safety measures will also be implemented at the Project driveway to ensure safe crossings to limit potential vehicular-pedestrian conflicts. • Employee Parking. At least 10% of employee parking will be reserved, as signed on the spaces, for use by potential carpool or vanpool vehicles and located as close as practical to employee entrances. This preferential parking will be identified on the site plan accompanying the application for a building permit. Vanpool spaces will have a minimum parking space dimension of nine feet wide by 18 feet in length and provide a minimum interior vertical clearance of eight feet two inches. A safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers will also be provided. • Bus Stop Improvements. If deemed necessary by the City, bus stop improvements will be provided to the satisfaction of the City Director of Transportation. **Plan/Program Management** - The Project will take appropriate measures to help future residents and employees manage each TDM Plan element and maximize program participation through consolidation of information and proactive engagement. The following will be provided as part of the TDM Plan: • Project Transportation Coordinator. A Transportation Coordinator will be designated for the site and will be responsible for implementing, coordinating, and maintaining the elements of the TDM Plan. The identity and contact information for the Transportation Coordinator will be supplied to the City and kept current. • Transportation Information Packet for New Residents and Employees. Each new resident and employee will receive an information packet summarizing the transit and transportation alternatives available to Project tenants. The packet will emphasize the location of the TIC and include the contact information of the Transportation Coordinator.

TABLE 2-2
SUMMARY OF PROJECT DESIGN FEATURES

Project Design Feature #	Project Design Feature Summary
	Mobility Hub Support and Alternative Transportation - The Project will incorporate measures and design elements to support first-mile/last-mile service connection for transit users and reduce reliance on personal automobiles. The following will be provided as part of the TDM Plan: • Bike Repair Station. The Project will provide an on-site bike parking station for use by Project residents and employees that has a space and basic tool set for bike repairs. • Subsidized Shared-Ride/Uber/Lift Service. Employees who arrive to work via a means other than a single-passenger vehicle or utilize the carpool matching service will automatically be registered in a Subsidized Shared-Ride/Uber/Lift Service by which, upon request to the Transportation Coordinator, the employee will be given a voucher to travel home or Uber/Lyft (or similar shared ride service) in case of illness or emergency. The Project will provide up to $750 in total for this program every year. The subsidy will be for two years after Certificate of Occupancy over a two-year period. • Transit Passes. The Project will provide up to $500 per pass per year of subsidies for up to five Transit Access Passes (TAP) cards for a period of three years for employees who opt to take Metro instead of personal vehicles and will not be provided on-site parking accommodations and not receive a car share subsidy.
WATER-PDF-1: Water Conservation	The Project will implement water conservation measures that include, but are not limited to, the following: • Landscape and Irrigation o California Friendly® plants or native plants o Drip/ Subsurface Irrigation (Micro-Irrigation) o Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)

SOURCE: ESA, 2024.

2.8 Anticipated Project Approvals

Discretionary entitlements, reviews, and approvals required or requested for the Project may include, but would not necessarily be limited to, the following:

- General Plan Map Amendment from Regional Center to General Corridor;
- Zone Change Map Amendment from Commercial Regional Business Park to Planned Development;
- Adoption of a Comprehensive Plan for the Project to develop standards for the new PD Zone District;
- Density and Other Bonus Incentives (DOBI) to allow Increased Density with affordable units incorporated into the Project; and
- Approval for Extended Hours of Construction (CCMC Section 9.07.035.C.1).

In addition, the Project would require ministerial permits including but not limited to demolition, grading, building, haul route and engineering permits.

CHAPTER 3
Environmental Setting

3.1 Overview of Environmental Setting

CEQA Guidelines Section 15125 requires that an EIR include a description of the existing environment. This chapter provides a general overview of the environmental setting for the Project, however, detailed information on existing conditions for each environmental resource area evaluated in this Draft EIR is provided in Chapter 4, *Environmental Impact Analysis*. This chapter also provides an overview of related projects that are considered in the Draft EIR in evaluating cumulative impacts that could result from the Project together with other projects.

3.1.1 On-Site Conditions

The approximately 2.23-acre (97,264 square feet [sf]) Project Site is located at 5700 Hannum Avenue within the Fox Hills neighborhood of the City of Culver City (City). Primary regional access is provided by the San Diego Freeway (1-405) located approximately 0.7 mile west of the Project Site. Local access to the Project Site is provided to the Project Site via Hannum Avenue, Buckingham Parkway, and Uplander Way.

The Project Site is currently occupied by an approximately 30,672 square foot two-story office building built in the late 1970s. The remainder of the Project Site includes surface parking and associated landscaping. The sidewalks adjoining the Project Site to the north, west, and south are landscaped with street trees and trees are scattered throughout the existing surface parking lot. The office building and surface parking uses are on relatively flat graded land, however, Buckingham Parkway slopes downward from north to south, with the northernmost elevation (at its intersection with Hannum Avenue) at approximately 128 feet and the southernmost elevation (near Windsor Way) at approximately 103 feet. Thus, the topographical street elevation decreases by approximately 25 feet from north to south. A landscaped slope at varying widths up to approximately 50-feet wide and heights up approximately 17 feet high traverses along the Project Site's eastern edge along Buckingham Parkway.

Existing vehicle access to the Project Site is provided via two ingress and egress points, which are located along Hannum Avenue and Uplander Way. Hannum Avenue, an east-west roadway adjacent to the Project Site, abuts the northern boundary of the Project Site and includes bicycle lanes in both directions. Uplander Way to the east of the Project Site is separated from the Project Site by an intervening business park property but provides access to the Project Site via a driveway to the Project Site's surface parking area. Buckingham Parkway abuts the eastern and southeastern boundary of the Project Site (due to the curved nature of Buckingham Parkway) and contains limited curbside parking but does not provide direct access to the Project Site. Existing on-site

surface parking includes 109 regular parking spaces and two handicapped parking spaces for a total of 111 parking spaces.

In addition to the existing building and associated surface parking, there is a mix of ornamental landscaping on the Project Site. There are 119 trees on the Project Site including carrotwood, Canary Island Pine, Brazilian pepper, olive, weeping bottlebrush, paperbark, and podocarpus. In addition, there are 14 carrotwood street trees along Buckingham Parkway adjacent to the Project Site.

The General Plan Land Use designation for the Project Site is Regional Center, which allows large-scale commercial uses and is intended to support existing and anticipated regional-serving commercial developments. The Regional Center land use designation does not support residential and/or residential mixed-use projects. As a result, the Project's requested approvals include a General Plan Amendment to change the Property's land use designation to General Corridor. Per the Culver City Zoning Code (Zoning Code), the Project Site is zoned Commercial Regional Business Park (CRB). The CRB Zoning District identifies areas appropriate for large-scale office and business park developments with shared parking, including specific light industrial uses and does not permit residential uses. The City adopted a 2021-2029 Housing Element on January 24, 2022. Pursuant to the City's adopted Housing Element, the Project Site's preferred land use designation is Mixed-Use High, which would allow for high-density residential uses including mixed-use development. In addition, the draft Land Use Element under consideration as part of Culver City's General Plan 2045 Update, includes the draft Land Use Map and Land Use designations with appropriate draft densities. The Project Site's draft land use designation and density is Mixed-Use High which permits 100 dwelling units per acre, consistent with the Housing Element preferred designation and density.

3.1.2 Surrounding Uses

The area surrounding the Project Site is developed primarily with office, business park and residential uses. Land uses located adjacent to the Project Site include: a parking lot and an office building to the north (across Hannum Avenue), a business park building and a surface parking lot to the west, multi-family residential uses to the south/southeast (across Buckingham Parkway), and Fox Hills Parkette to the east across Buckingham Parkway. The surrounding areas to the north of the Project Site across Hannum Avenue and west and south of the Project Site (east side of Buckingham Parkway) have a General Plan land use designation of Regional Center. The multi-family uses across Buckingham Parkway to the east of the Project Site are designated by the General Plan for Planned Residential Development use, while the Fox Hills Parkette has an Open Space land use designation.

3.2 Related Projects

CEQA requires that EIRs analyze cumulative impacts. As defined in CEQA Guidelines Section 15355, a cumulative impact would result from the combination of the project evaluated in the EIR together with other projects that would cause related impacts. CEQA Guidelines Section 15130(a) states that an EIR must discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065(a)(3). Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead

agency need not consider that effect significant but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if a project is required to implement or fund its fair share of mitigation measures designed to alleviate the cumulative impact. A lead agency must identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.

In addition, CEQA Guidelines Section 15130(b) states that the analysis of cumulative impacts shall reflect the severity of the impacts and the likelihood of occurrence, but the discussion need not provide as great of detail as provided for the effects attributable to the project alone. Instead, the discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of the other projects which do not contribute to the cumulative impact.

Under CEQA Guidelines Section 15065(a)(3), a project has "cumulatively considerable" or significant cumulative impacts, when its incremental effects "are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

For an adequate discussion of significant cumulative impacts, the CEQA Guidelines (Section 15130(b)(1)(A) and (B)) allow an EIR to determine cumulative impacts and reasonably foreseeable growth based on either of the following methods:

Cumulative impacts are anticipated impacts of the proposed project along with reasonably foreseeable growth. Reasonably foreseeable growth may be based on either:

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

For the Project's cumulative impacts analysis, a list of related projects is used as the primary basis for evaluation. Consistent with CEQA Guidelines Section 15130(b)(3), the City has determined in its independent judgement, based on the size and scale of the Project analysis and related projects in the area, 1 mile is the appropriate radius applied for the identification of related projects for this Project. This distance includes a portion of the City of Los Angeles and areas within the County of Los Angeles. The list is based on information obtained from the Culver City Engineering Division and Planning Division, City of Los Angeles Department of Transportation (LADOT), and the County of Los Angeles. The list of 12 related projects is provided in **Table 3-1**, *Related Projects List*, with their locations identified in **Figure 3-1**, *Related Projects Map*. Of the 12 related projects, eight are located within the City of Culver City and four are located within the City of Los Angeles.

TABLE 3-1
RELATED PROJECTS LIST

No. [a]	Location	Jurisdiction	Land Use	Size	Unit
1 [b]	5800 Bristol Pkwy / 5801 Hannum Ave	City of Culver City	Office	281,400	SF
2	6221 Bristol Pkwy	City of Culver City	Residential	712	DU
			Live/Work Office	50	DU
			Retail	20,767	SF
3	6101 Slauson Ave	City of Culver City	Showroom	8,046	SF
4	6001 Centinela Ave	City of Culver City	Conversion of maintenance yards to burial plots	-	-
5	5645 Sepulveda Blvd	City of Culver City	Medical Office	38,712	SF
			Retail	3,193	SF
6	5840 Uplander Way	City of Culver City	Conversion from Office to School	16,128	SF
7	6161 Centinela Blvd	City of Culver City	Creative Office	281,194	SF
8	11469 Jefferson Blvd	City of Culver City	Hotel	183	Rooms
9	6733 Sepulveda Blvd	City of Los Angeles	Residential	176	DU
10	6711 Sepulveda Blvd	City of Los Angeles	Residential	180	DU
11	5208 Centinela Ave	City of Los Angeles	Restaurant	4,642	SF
12	6501 Sepulveda Blvd	City of Los Angeles	Residential	362	DU
			Restaurant	3,700	SF

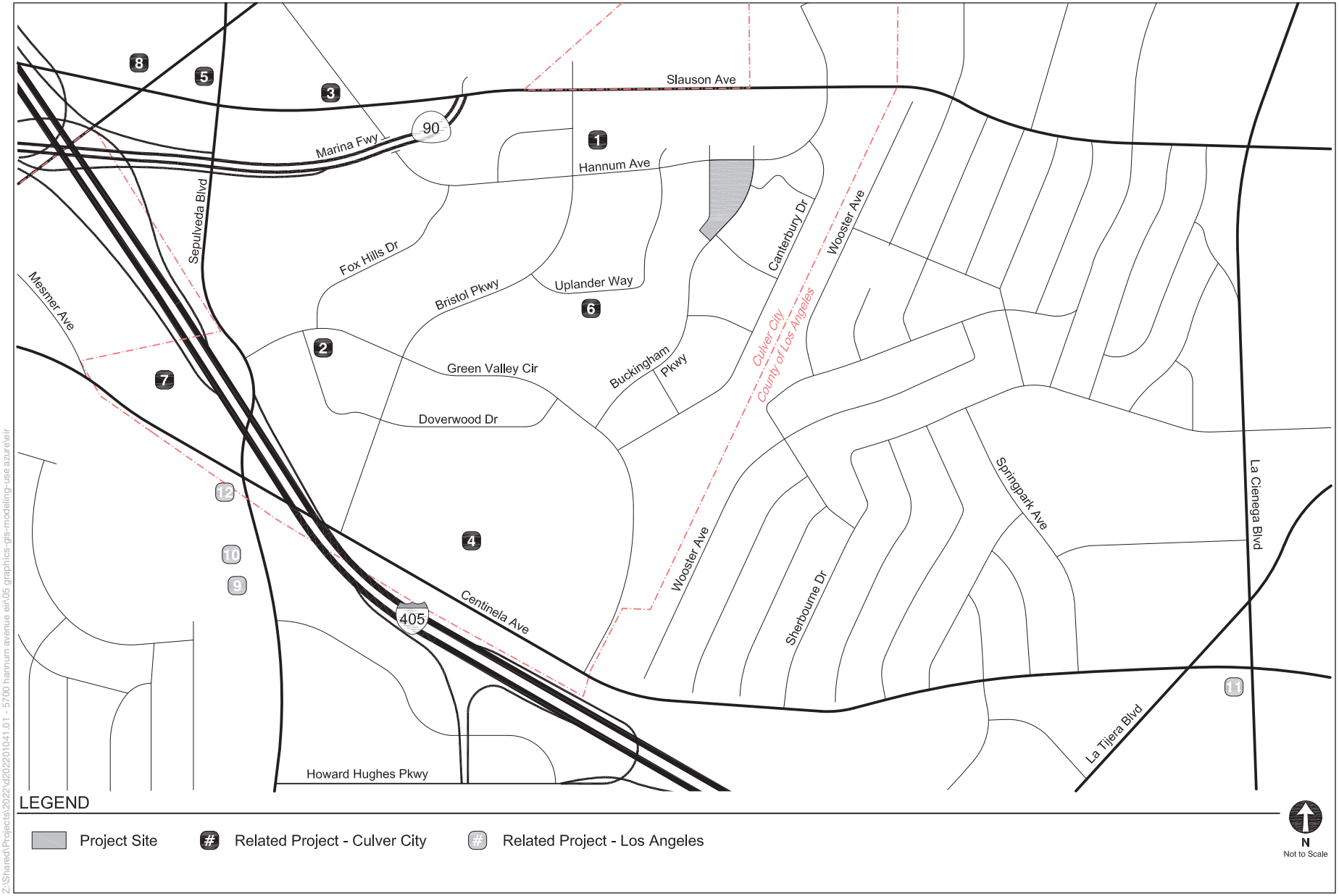
NOTES: du = dwelling units

[a] Related projects list based on information from City of Culver City (January 2023), City of Los Angeles (May 2023), and the County of Los Angeles (May 2023).

[b] Related Project No. 1 has already been constructed. Thus, Project construction-related cumulative impacts would not occur with Related Project No. 1. Only operational cumulative impacts could occur between the Project and Related Project No. 1.

SOURCE: Gibson Transportation Consulting, 2023

Although the projects listed in Table 3-1 serve as the primary basis for evaluation of cumulative impacts, the related projects or methodology used to address cumulative impacts may vary among certain environmental issues and topics due to their unique characteristics. The cumulative analyses for each environmental issue, including the identification of relevant related projects are provided in their applicable sections in Chapter 4, *Environmental Impact Analysis*, of this Draft EIR.



SOURCE: Gibson Transportation Consulting, Inc., 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 3-1
Related Projects Map

ESA

This page intentionally left blank

CHAPTER 4
Environmental Impacts Analysis

4.0 Environmental Impacts Analysis

4.0.1 Introduction

The focus of Chapter 4 is on the potential impacts that could occur as a result of the Project. The sections included are those that have the potential to result in significant adverse impacts to the physical environment. The following sections are included in this chapter:

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Cultural Resources: Archaeological Resources (Section 4.3)
- Energy (Section 4.4)
- Geology and Soils - Paleontological Resources (Section 4.5)
- Greenhouse Gas Emissions (Section 4.6)
- Land Use and Planning (Section 4.7)
- Noise (Section 4.8)
- Population and Housing (Section 4.9)
- Public Services: Fire Protection, Police Protection, Schools, and Parks (Sections 4.10.1 through 4.10.4)
- Transportation (Section 4.11)
- Tribal Cultural Resources (Section 4.12)
- Utilities and Service Systems: Water Supply and Energy Infrastructure (Sections 4.13.1 and 4.13.2)

Based on the Initial Study, which is contained in Appendix A-2 of this EIR, public comments received during the NOP circulation period, and input received during the EIR Scoping Meeting, it was determined that several issue areas would not be subject to significant impacts due to implementation of the Project. Generally, these issue areas include Agricultural and Forestry Resources, Air Quality (Odor), Biological Resources, Cultural Resources (Historical Resources and Human Remains), Geology and Soils (all except Paleontological Resources), Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use (Physically Divide and Established Community), Mineral Resources, Public Services (Libraries), Utilities and Service Systems (Wastewater and Solid Waste), and Wildfire. Please see Subsection 6.5, *Effects Found Not to be*

Significant, of Chapter 6, *Other CEQA Considerations,* of this Draft EIR for a discussion of those issue areas for which a detailed analysis is not included and the basis for those determinations.

4.0.2 Environmental Impact

Each section in this chapter addresses a specific environmental issue area as listed above and includes the following components:

- **Existing Setting:** This subsection describes the physical characteristics and existing environmental conditions within and in the vicinity of the Project area.
- **Regulatory Setting:** This subsection presents information on the laws, regulations, plans, and policies that relate to the issue area being discussed. Regulations originating from federal, State, regional, and local levels are discussed as appropriate.
- **Methodology:** This subsection provides a description of the methodology used for the analysis of the environmental issue addressed in the section.
- **Thresholds of Significance:** This subsection presents the criteria established by the Lead Agency to identify at what level an impact would be considered significant and require implementation of mitigation measures.
- **Project Design Features:** This subsection presents any relevant Project Design Features (PDFs) applicable to the environmental issue addressed in the section. PDFs are specific design elements or Project commitments that have been voluntarily incorporated into the Project that serve to minimize or avoid significant environmental effects. Because PDFs have been incorporated into the Project, they are accounted for in determining the significance of Project, and do not constitute mitigation measures, as defined by CEQA Guidelines Section 15126.4. However, the PDFs will be included in the Mitigation Monitoring and Reporting Program (MMRP) for the EIR to ensure their implementation is tracked and confirmed as the Project is carried out.
- **Analysis of Project Impacts:** This subsection provides an analysis of the nature and extent of potential Project impacts. These analyses address direct (or primary) effects of the Project as well as the indirect (or secondary) impacts. This subsection also provides any mitigation measures (beyond the PDFs) used to reduce or eliminate Project impacts that have been determined significant based on the established thresholds of significance.
- **Cumulative Impacts:** A discussion of the effects of the Project when combined with the effects of related projects, which include other past, present and future probable projects is provided. The approach to addressing cumulative impacts, including a list of related projects, is described in Chapter 3, *Environmental Setting*, of this Draft EIR.
- **Mitigation Measures:** This subsection provides mitigation measures, if necessary, to reduce significant impacts identified in the analysis of the Project.
- **Level of Significance after Mitigation:** A discussion of the significance of each impact after mitigation is provided.

4.0.3 Terminology Used in This EIR

In evaluating the impacts of the Project, the impact is determined by applying the evaluation criteria, or threshold of significance, presented for each resource area. The following terms are used to describe the effect:

- **Threshold of significance:** A threshold of significance is a criterion applied by the Lead Agency to identify significant adverse environmental impacts. A threshold is defined by a Lead Agency based on guidance found in CEQA or the CEQA Guidelines, scientific and factual data relative to the Lead Agency jurisdiction, views of the public in affected areas, the policy/regulatory environment of affected jurisdictions, and other factors.
- **Less than significant impact:** A less than significant impact does not result in a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (see CEQA Guidelines Section 15382). Impacts determined to be less than significant do not require mitigation measures.
- **Significant impact:** Public Resources Code (PRC) Section 21068 defines a significant impact as "a substantial, or potentially substantial, adverse change in the environment." The environmental checklist included as Appendix G of the CEQA Guidelines provides additional guidance for determining which impacts would be regarded as significant. This EIR applies the thresholds contained within Appendix G and identified in each section's "Thresholds of Significance," and uses the CEQA definition of "significant impact." Feasible mitigation measures or alternatives to the Project must be identified and adopted if they would avoid or substantially reduce the significant impact.
- **Significant and unavoidable impact:** A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts.

As indicated above, the proposed Project includes a number of PDFs which are features or commitments voluntarily committed to as part of the Project that serve to reduce or avoid environmental impacts. PDFs are accounted for in the Draft EIR analyses prior to determining the significance of Project impacts on a given environmental issue area. Table 2-2, which is provided in Chapter 2, *Project Description*, of this Draft EIR provides a summary of the PDFs. The PDFs in their entirety are provided within each section of the applicable environmental issue area.

Mitigation measures are measures identified to avoid or reduce a significant impact that has been identified through environmental analysis. Mitigation measures generally include provisions for:

- Avoiding the impact by not taking a certain action or parts of an action;
- Minimizing the impact by limiting the degree or magnitude of the action and its implementation;
- Rectifying the impact by repairing, rehabilitating or restoring the affected environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and
- Compensating for the effect by replacing or providing substitute resources or environments.

Both PDFs and mitigation measures will be adopted as part of the MMRP so that their implementation can be tracked by the City to ensure compliance.

4.1 Aesthetics

4.1.1 Introduction

This section provides information relative to aesthetic effects that could result from the Project and describes the existing visual setting of the Project Site and vicinity within the context of the surrounding community. This section, in addition, identifies applicable laws, regulations, guidelines and policies relating to aesthetics, and evaluates potential aesthetic impacts related to implementation of the Project.

The CEQA Guidelines specifically require the evaluation of a project's impacts on scenic vistas, scenic resources, visual character and quality, and light and glare. These issue areas with respect to the Project are discussed and evaluated below, as applicable based on the findings of the Project's Initial Study (see Appendix A of this Draft EIR). Although not a CEQA requirement, this section also discusses shade/shadow effects of the Project.

4.1.2 Environmental Setting

Regulatory Framework

State

California Scenic Highways

Appendix G of the CEQA Statute & Guidelines identifies substantial damage to a scenic resource within a California Scenic Highway as a potentially significant impact on the environment. As such the regulations for the establishment and maintenance of State Scenic Highways are set forth in Streets & Highways Code, section 260 et seq. The intent of the system is to establish the State's responsibility for the protection and enhancement of California's natural scenic beauty by identifying those portions of the State highway system which, together with the adjacent scenic corridors, require special scenic conservation treatment. By designating scenic highways, the California Legislature assigns responsibility for the development of such scenic highways and for the establishment and application of specific planning and design standards and procedures appropriate to the location and extent of routes and areas requiring continuing and careful coordination of planning, design, construction, and regulation of land use and development, by State and local agencies, in order to protect the social and economic values provided by the State's scenic resources. Streets & Highways Code, Section 263 establishes the system of State Scenic Highways and composes a list of the highways specified under the system. There are no State Scenic Highways within the City of Culver City. The nearest designated State Scenic Highway within the City of Los Angeles to the Project Site includes portions of the Topanga Canyon State Scenic Highway (State Route [SR] 27, between mile markers 1.0 and 3.5) whose boundaries lie within Topanga State Park and is over 12 miles to the northwest of the Project Site. There are eligible State Scenic Highway sections of SR-1 in Los Angeles and Santa Monica to the west, with nearest segment approximately 4 miles west of the Project Site. Note that road segments within the City of Los Angeles that are listed as "eligible" for scenic highway designation in the Scenic Highway System List, such as the Pacific Coast Highway, do not fit the CEQA criteria for State Scenic Highways.

California Historic Parkways

Streets & Highways Code, Section 280 regulates the designation and maintenance of the system of California Historic Parkways. To be designated as a Historic Parkway, a freeway must have: (1) original construction completed prior to 1945; (2) features of historical significance as recognized by the State Office of Historic Preservation, including notable landmarks, historical sites, or natural or human achievements that exist or have occurred during the original construction of the parkway or in the immediately adjacent land area through which the parkway currently passes; (3) any portion of the highway or corridor bound on one or both sides by federal, State, or local parkland, Native American lands or monuments, or other open space, greenbelt areas, natural habitat, or wildlife preserves, or similar acreage used for or dedicated to historical or recreational uses; and (4) any portion of the highway traversed, at the time of designation and by Caltrans's best count or estimate using existing information, by not less than 40,000 vehicles per day on an annual daily average basis.

No designated Historic Parkways are located in the City of Culver City. The only designated Historic Parkway, the Arroyo Seco Parkway (SR-110), is located within the City of Los Angeles. This highway runs northeasterly from the four-level interchange with U.S. 101 just outside of downtown Los Angeles (mile post 23.69) to East Glenarm Street in the City of Pasadena (mile post 31.89).

California's Density Bonus Law

Originally enacted in 1979, California's Density Bonus Law (Gov. Code Sections 65915 - 65918) allows a developer to increase density on a property above the maximum set under a jurisdiction's General Plan land use plan. In exchange for the increased density, a certain number of the new affordable dwelling units must be reserved at below market rate (BMR) rents. Qualifying applicants can also receive reductions in required development standards. Greater benefits are available for projects that reach higher percentages of affordability (with unlimited density available for certain transit-adjacent, 100-percent BMR projects).

Besides granting rights to housing and mixed-used developments to increase density, the law provides three provisions that require local governments to grant qualifying projects: 1) incentives (or concessions) that provide cost reductions; 2) waivers of development standards that would physically preclude the development of a project at the density permitted and with the incentives granted, and; 3) reductions in parking requirements. With regard to waivers of development standards pertaining to aesthetics, increases to maximum allowable height restrictions are permitted under Sections 65915(b) and 65915(d) as an incentive for the inclusion of affordable housing.

Local

Culver City General Plan

The Culver City General Plan Land Use, Circulation, and Open Space Elements include objectives and policies that address the visual environment, urban forest, urban design, and pedestrian amenities. A discussion of applicable objectives and policies is provided in the impact analysis below.

Culver City Urban Forest Master Plan

The Culver City Urban Forest Master Plan (UFMP) was adopted in 2015 to foster a robust and resilient urban forest. The UFMP articulates a clear vision for the future of Culver City's urban forest based on analysis of the City's historical and existing urban forest, as well as on synthesis of current research, best management practices and community input. The Plan provides guiding principles for both long-term and day-to-day management, comprehensive tree designations, technical standards, and resources for City and community members today and for the future. The UFMP provides recommendations for the City's urban forest as well as a structured framework of five Action Areas and related Strategies to support achievement of this vision. The recommendations also address important functions of the urban forest including wayfinding and placemaking. It also identifies a "Tree Palette" of recommended tree species for Culver City, as a process for selecting certain species for each location in the City. Areas of greatest need are described as "Places of Priority." In the Project area, Sepulveda Boulevard south of Ballona Creek is defined as a "Place of Priority." Along with the other recommendations related to habitat and existing conditions, the UFMP's Tree Palette and Designations provide a plan for creating a more resilient urban forest in The UFMP designates specific tree species for both the 5700-6099 block of Hannum Avenue and the 5800-5899 block of Buckingham Parkway. *Podocarpus gracilior* is designated for Hannum Avenue and *Ginkgo biloba* is designated for Buckingham Parkway. The Project's consistency with applicable policies of the UFMP are evaluated below.

Culver City Residential Parkways Standards and Guidelines

The goal of the Culver City Residential Parkways Standards and Guidelines (Parkway Guidelines), adopted in 2016 is to support the creation and maintenance of parkways in Culver City that are safe, accessible, resource efficient, ecologically responsible, beautiful, and that preserve the health of City trees. A parkway is defined as the portion of a public street right-of-way lying between the curb and sidewalk. Parkway Guidelines specifically address parkways in residential areas. Trees that are located in the parkway are owned and maintained by the City. However, it is the responsibility of property owners to maintain the rest of the parkway in good condition. Buckingham Parkway is located within the City's residential parkways and subject to the requirements of the Parkway Guidelines.

Culver City Municipal Code

Culver City Municipal Code (CCMC) Titles 15 and 17 include regulations related to the aesthetics and visual character including landscaping, lighting, building heights, and setbacks, as described below. However, as discussed below, per CCMC Section 17.560.015.B, Comprehensive Plans set forth development standards such as height as well as landscape plans, lighting, and signage plans, which allow for flexibility in the application of zoning code standards to proposed development.

Landscaping

CCMC Section 17.310. This section of the CCMC provides landscaping regulations and standards to enhance landscaping, conserve water, provide landscape area requirements and general landscaping and irrigation requirements. CCMC Section17.310.030 requires the preparation and submittal of a Preliminary Landscape Plan and Final Landscape Plan. The Preliminary Landscape Plan includes such features as proposed and existing buildings and structures; proposed parking areas; proposed landscaped areas; a calculation of total hardscape and planted areas; and preliminary

list of plant materials. The Final Landscape Plan identifies such features as plant materials; hardscaped and landscaped areas; water features and fences; existing and proposed buildings and structures; planting and installation details; irrigation design; and maintenance specifications.

Building Height

CCMC Section 17.240.015.E. This section provides that no building or structure in the Planned Development (PD) Zone may exceed 56 feet in height, unless a height exception is granted pursuant to § 17.300.025 (Height Measurement and Height Limit Exceptions).

CCMC Section 17.300.025.C, Exceptions to Height Limits, allows non-habitable design elements, such as spires, turrets, towers, and similar architectural features to extend up to 13 feet, 6 inches above the height of the building.

CCMC Section 17.300.035.C.1, Screening of Utilities, requires mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts), loading docks, refuse and recyclable materials storage areas, and utility services to be screened from public view from adjoining public streets and rights-of-way.

CCMC Section 17.300.035.C.2 requires the method of screening to be architecturally compatible with other on-site development in terms of colors, materials, and architectural style as determined by the Director.

Lighting

CCMC Section 17.300.040, Outdoor Lighting. This section provides that exterior lighting shall comply with the following requirements:

1. All lighting fixtures shall be architecturally integrated with the character of the structure.
2. All lighting shall be energy-efficient and shielded or recessed so that direct glare and reflections are confined to the maximum extent feasible within the boundaries of the site and shall be directed downward and away from adjoining properties and public rights-of-way.
3. Permanently installed lighting shall not blink, flash, or be of unusually high intensity or brightness.
4. Timers, where acceptable, shall be used to turn off lights during hours when they are not needed.
5. Uniformity or, where appropriate, compatibility of lighting type (i.e., height, wattage, energy efficiency, base support, finish material, texture, color and style of poles and luminaires) shall be provided.
6. Landscaping and pedestrian walkway lights shall be low profile.
7. Freestanding light poles and luminaires shall not exceed a maximum height of 18 feet, or a lesser height determined by the Director, to mitigate any impacts to adjoining properties.
8. Security lighting shall be provided at all entrances/exits, except in a residential zone.

Signage

CCMC Section 17.330, Signs, provides a comprehensive system for the regulation of signs in the City in order to address community aesthetics, vehicular and pedestrian safety, property values, and the visual environment. Section 17.330.020.B, Table 3.5, and Section 17.330.025 identify the types of signs allowed in non-residential zoning districts and the corresponding maximum sign area, maximum sign height, maximum number of signs, location, and additional requirements. Section 17.330.030, General Requirements for All Signs, includes requirements for sign area measurement, sign height measurement, sign location requirements, aesthetic design standards, sign illumination, installation, and maintenance standards.

CCMC Section 17.330.050, Review Process and Appeals, identifies permit requirements, sign-related decisions and appeals, and other requirements for Comprehensive Sign Programs.

Art in Public Places

CCMC Section 15.06.100 et seq. establishes an Art in Public Places Program (APPP) to fund and develop cultural and artistic outlets to improve the environment, image, and character of the community. All new residential development of five or more units, and all commercial, industrial, and public building development projects, with a building valuation of $500,000 or more are subject to this requirement. The APPP allocation can be placed into a Cultural Trust Fund; used to commission original, site-specific artwork; used to donate artwork to the City; used to incorporate a Cultural Facility; or used to designate a building or portion thereof as "Architecture as Art;" as specified in this section.

Density Bonuses and Other Bonus Incentives

Chapter 17.580, Density Bonuses and Other Bonus Incentives, of the CCMC implements the requirements of State law for density bonuses and other bonus incentives, pursuant to Cal. Gov't Code Section 65915, or as may be amended, and the goals and policies of the Housing Element of the City's General Plan. Consistent with the State's Density Bonus Law, the City allows development incentives, such as the waiver of certain development standards, for projects that provide affordable housing. With regard to waivers of development standards pertaining to aesthetics, increases to maximum allowable height restrictions are permitted under Chapter 17.580 as an incentive for the inclusion of affordable housing.

Comprehensive Plan

CCMC Section 17.560, Comprehensive Plans, provides procedures for reviewing Comprehensive Plans, which allow for flexibility in the application of Zoning Code standards to proposed development. Per the Zoning Code, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site planning and design and to support more effective responses to the settings of such properties and other environmental considerations.

Existing Conditions

Scenic Vistas and Scenic Resources

The Project Site is currently a component of an existing business park and is surrounded to the north (north of Hannum Avenue), south, and west by commercial buildings. The Project Site is not located in the vicinity of a City of Culver 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 or designated historic buildings.[1] Four-story multi-family residential uses are located to the east (east of Buckingham Parkway). The fully developed area, specifically the dense buildout of the area between Slauson Avenue and Hannum Avenue with multi-story office buildings and above grade parking garages does not provide any expansive scenic vistas, such as mountain views, views across the expansive Holy Cross Catholic Cemetery (to the north of Slauson Avenue) or views of unique urban settings across the Project Site from Hannum Avenue or Buckingham Parkway. The surrounding area is also completely developed and does not contain any natural scenic resources or historical buildings that would comprise scenic resources. For the above reasons, the Project Site and its surroundings are not a prominent component of a scenic vista as may be viewed from a distant scenic highway.

Aesthetic Character of the Project Site and Surrounding Area

Aesthetic Character of the Project Site

As discussed in Chapter 2, *Project Description*, of this Draft EIR, the Project Site is currently occupied by an approximately 30,672 square foot two-story office building. As discussed in the Project's historical resources memorandum prepared by Architectural Resources Group (ARG) in September 2022 for the Project (provided in Appendix B of the Initial Study), the office building is located in the Fox Hills Business Center, a 55-acre complex constructed between 1978-1982. Constructed between 1978-1980, the subject office building is a modest, vernacular office building, and one of dozens of office buildings constructed in Culver City during the late 1970s and early 1980s. While the business center represents a development of architecturally cohesive office buildings that housed a number of notable technology companies by the early 1980s, the complex is only 40 years old and is not considered a historic district, nor is the Project's office building considered a historic resource. Generally, the office building is not considered to possess a high aesthetic value or positively contribute in a substantial manner to the aesthetic character of the area.

The remainder of the Project Site includes surface parking and associated landscaping. There are 14 carrotwood street trees along Buckingham Parkway, in addition to landscaped areas and other mature trees scattered throughout the existing surface parking lot areas. There are 119 trees on the Project Site including carrotwood, Canary Island Pine, Brazilian pepper, olive, weeping bottlebrush, paperbark, and podocarpus. The office building and surface parking uses are on relatively flat graded land, however, Buckingham Parkway slopes downward from north to south, with the northernmost elevation (at its intersection with Hannum Avenue) at approximately 128 feet and the southernmost elevation (near Windsor Way) at approximately 103 feet. Thus, the topographical street elevation decreases by approximately 25 feet from north to south. A

[1] City of Culver City, Historic Preservation, https://www.culvercity.org/Explore/Arts-Culture/Preservation#section-2. Accessed April 5, 2023.

landscaped slope at varying widths up to approximately 50-feet wide and heights up approximately 17 feet high traverses along the Project Site's eastern edge along Buckingham Parkway.

Aesthetic Character of the Surrounding Area

Area to the North of the Project Site

The area to the north of the Project Site between Hannum Avenue and Slauson Avenue is highly developed with a solid street frontage of multi-story office buildings and parking structures along both of these roadways. Both sides of Hannum Avenue, including along the Project Site, are lined with Podocarpus gracilior trees. The exit driveway from a two-story (above grade) and multiple below-grade stories parking structure is located directly north of the Buckingham Parkway terminus as the fourth leg of the Hannum Avenue/Buckingham Parkway intersection. Several 5- to 12-story buildings are located along Hannum Avenue between Buckingham Parkway and Bristol Parkway to the north of the Project Site. The various buildings have a variety of commercial tenants, and also include several above-ground parking structures up to at least six levels. The Holy Cross Catholic Cemetery is located directly to the north of the Antioch University building to the north of Slauson Avenue, further north of the Project Site.

Area to the East of the Project Site

Three- and four-story multi-family residential buildings are located directly to the east of the Project Site across Buckingham Parkway. Fox Hills Parkette, a deep, landscaped setback is located at the intersection of Buckingham Parkway and Hannum Avenue. The 0.33 acre landscaped open area is a passive park that tapers to a narrower parkway along Buckingham Parkway in the vicinity of Windsor Way. The park includes an open plaza area and benches for area residents. Three large, multi-family complexes built in the late 1960s and early 1970s with varied architectural styles are located between Hannum Avenue and Windsor Way and a large multi-family development built in the late 1960s is located to the south of Windsor Avenue. Buckingham Parkway, which curves in a downhill gradient to the south/southwest from Hannum Avenue, features an approximately 70-foot-wide roadway, with sidewalks, several varieties of street trees, and on-street parking.

Area to the South of the Project Site

The area directly to the south of the Project Site is a continuation of the business park in which the Project Site is a component. Buildings directly to the south/southwest are the US Veterans Affairs Department benefits office, the Hass Entertainment studios, and TOMS Corporate Offices. These are stand alone, large single- and two-story buildings with surface parking and landscaped parking lots. Developed between 1978-1982, the surrounding buildings have similar architectural elements to the exiting Project Site, including flat roofs, stone aggregate wall panels separated by smooth stucco and concrete bands and concrete block pilasters, and grouped, fixed metal windows with tinted glass. The 10-acre Fox Hills Park, which provides a grassy lawn, play yard, and tennis and basketball courts fronting Buckingham Parkway, is located to the south/southwest of the TOMS Corporate Offices building.

Area to the West of the Project Site

The area to the west of the Project Site is a continuation of the business park of which the Project Site forms the northeast corner. The entire business park, which extends to the Westfield Culver City Mall just east of the I-405 Freeway, features street trees, landscaped parking lots, uniform

design streetlights, and underground utility lines. Uses include, for example, professional offices, corporate headquarters, light manufacturing, studios, law offices, architectural and engineering services, film studios, and research and development labs. A large business park building is located directly to the west of the Project Site. The building's surface parking lot and loading docks are concealed within an "L" formed by the building at the back (south side) of the building. Uplander Way is located to the west of the business park building. Uplander Way, which features an approximately 50-foot-wide roadway, sidewalks, landscaped parkways, and on-street parking begins at Hannum Avenue as a north-south street and makes a 90 degree turn to the west to terminate at Bristol Parkway. The intersection of Uplander Way and Hannum Avenue is signalized and marked with continental crosswalks, which are high visibility crosswalks consisting of wide bars spaced and placed perpendicular to the path of travel. The intersection of Uplander Way and Bristol Parkway has a single stop sign and marked (not continental) pedestrian crossing at Uplander Way. The Westfield Culver City Mall is located approximately 0.5 miles to the west of the Project Site at the west edge of the business park.

Light and Glare

The Project Site is located in an urbanized setting characterized by streetlights, stoplights, building security and architectural lighting, surface parking lot lights, vehicle lights and interior building lighting from the multi-story residential buildings. The existing business park and adjacent multi-family residential uses generate relatively low ambient light because of the absence of retail signage and other illuminated signs.

Daytime glare is generally associated with sunlight reflected from buildings with large continuous expanses of highly reflective materials. Activities that would be sensitive to daytime glare from reflected sunlight include motorists traveling on the adjacent roadways and people working in adjacent buildings. The existing buildings that are visible from the adjacent roadways and other sensitive uses are partially screened by street trees and other landscaping and do not generate substantial glare. Landscaping and trees within surface parking lots around the existing business park subdues any glare from parked vehicles. Therefore, under existing conditions, there are no notable sources of daytime glare from or around the Project Site.

Nighttime glare is associated with the degree of contrast occurring between the darkened environment and the light source, or the direct visibility of the light source. In the Project area sources of nighttime glare include streetlights, parking lot lighting, and car headlights. Most streetlights and parking lot lights are directed onto the surface intended to be illuminated and are not a significant source of glare. The most notable source of nighttime glare from the Project Site and area is the movement of motor vehicles on public streets or from surface parking lots. However, in the current urban setting, vehicle headlights would be set primarily at "low beam," in which the light source is also directed to the roadway. As such, under existing conditions, there are no notable sources of nighttime glare from or around the Project Site.

Shading can occur when shade-sensitive uses are located to the north, east, or west of a tall building. No shade sensitive uses are located to the north or west of the Project Site. However, the residential buildings, including yards, patios, balconies, courtyards, and swimming pools, to the east of Buckingham Parkway are considered to be shade sensitive areas. In addition, the Fox Hills Parkette

could be considered a shade sensitive area, however, it is acknowledged that large street trees along Buckingham Parkway and internal trees within the central seating area, currently provide shading to much of the Parkette. The existing buildings on the Project Site do not create any shadows across Buckingham Parkway that affect the existing residential uses or Parkette across Buckingham Parkway.

4.1.3 Project Impacts

Thresholds of Significance

The following threshold of significance is based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in significant adverse impact related to aesthetics if it would:

- **AES-1**: In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Potentially significant impacts related to the Project's potential to conflict with applicable zoning and other regulations governing scenic quality are discussed and analyzed further below.

The City determined in the Initial Study that the following environmental issue areas would result in no impacts or less-than-significant impacts and, therefore, are scoped out of this Draft EIR. Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding the following issue areas:

Would the Project:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

As detailed in the Initial Study, the Project Site is located in an urbanized area, with a mix of office, business park, and residential uses in the nearby vicinity. The Project Site is not located in a scenic vista or area with protected views designated by the City. The Project Site is not located in the vicinity of a City of Culver 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 or designated historic buildings which qualify as a scenic resources within a state scenic highway. The Project Site is characterized by moderate ambient nighttime lighting levels due to the developed nature of the area, existing building and parking lot on-site, as well as from adjacent properties. 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 and as included in the Project's Comprehensive Plan, as applicable. Compliance with these regulations would ensure that impacts regarding Project lighting are less than significant.

Methodology

Under Threshold AES-1, for projects in nonurbanized areas, an evaluation must be made to determine if the project would substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). Since the Project Site is in an urbanized setting, an evaluation is provided to determine whether the Project would conflict with applicable zoning and other regulations governing scenic quality. Specifically, the City of Culver City has several plans and regulations that govern scenic quality. These include the Culver City Municipal Code, the Culver City General Plan, the Culver City Urban Forest Master Plan, and the Culver City Residential Parkways Standards and Guidelines.

Importantly, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. As provided in CEQA Guidelines Section 15126.2 "an EIR shall identify and focus on the significant effects of the proposed project on the environment." An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

> *"An inconsistency between a proposed project and an applicable plan is a legal determination not a physical impact on the environment. ...if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor."*

Under the Planning and Zoning law (Government Code Section 65000 et seq.) strict conformity with all aspects of a plan is not required. Plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Generally, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

To determine if the Project would conflict with such plans and regulations, the features and characteristics of the Project are compared to individual policies and regulations discussed below. The analyses are based on the Project's Comprehensive Plan, graphics/renderings of the Project, and descriptions of the Project in the Project Description.

In addition, although the CEQA Guidelines do not provide a threshold pertinent to shade/shadow, the analysis also takes into account the effects of shade and shadow as a visual character and quality effect. Shadow figures prepared for the Project are included as Appendix B – Shadow Study, of this Draft EIR.

Project Design Features

The following project design feature related to aesthetics will be implemented as part of the Project:

> **AES-PDF-1: Screening of Utilities.** Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances (such as rooftop elevator stops), will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way.

Analysis of Project Impacts

Threshold AES-3: In nonurbanized areas, the Project could have a significant impact if it would substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, the Project could have a significant impact if it would conflict with applicable zoning and other regulations governing scenic quality.

Impact Analysis

The Project is located within an urbanized area and, as such, the concern of this threshold is whether the Project would conflict with regulations that govern scenic quality. Such regulations pertinent to the Project site are set forth in the Culver City General Plan, the Culver City Urban Forest Master Plan, the Culver City Residential Parkways Standards and Guidelines, and in the CCMC. Section 4.7, *Land Use and Planning*, of this Draft EIR includes detailed analysis of the Project's consistency with applicable plans and specific relevant policies governing scenic quality, which are summarized herein.

The Project would not conflict with General Plan Land Use Objective 10 (Visual Open Space) to increase visual open space through landscaping of sidewalks, and provision of a 11,378-sf internal courtyard (available to Project residents), which would be landscaped. The Project would also not conflict with Land Use Objective 11 (Urban Forest) to create a sustainable urban forest that would enhance Culver City's image and quality of life. For the trees being removed from the Project Site, new replacement trees would be planted on the Project Site per Section 9.08.215 of the CCMC.

The Project would not conflict with Land Use Objective 12 (Urban Design) to ensure that new construction and streetscapes are accomplished with the highest quality of architectural and site design. As shown in renderings of the future buildings, including Figure 2-4*, Conceptual Project Rendering – Hannum Avenue*; Figure 2-5, *Conceptual Project Rendering – Northeast Corner of Hannum Avenue and Buckingham Parkway*; Figure 2-6, *Conceptual Project Rendering – Buckingham Parkway*; Figure 2-12, *North and West Elevations*; Figure 2-13, *East Elevation*; and Figure 2-14, *South Elevation,* in Chapter 2, *Project Description*, of this Draft EIR, the Project would change the character and quality of the existing office building and parking lot site with a new, modern high-quality architecturally design building. The Project is proposing a contemporary architectural design defined by simple lines, along with a neutral and unified color palette. The first story of the building would be buffered from the sidewalks by landscaped planters along Buckingham Parkway, as shown in Figure 2-8, C*onceptual Project Rendering – Looking North along*

Buckingham Parkway. The Project design includes a curved facade along Buckingham Parkway and a distinct architectural volume anchoring the corner of Hannum Avenue and Buckingham Parkway as shown in Figure 2-6, *Conceptual Project Rendering – Northeast Corner of Hannum Avenue and Buckingham Parkway* and Figure 2-7, *Conceptual Project Rendering – Looking West from Fox Hills Parkette*. At the ground level, the corner retail component would include storefront glazing and a covered outdoor patio. Floating above the double height space, the facade would include textured corrugated and flat panels with large windows for the units. On the sixth floor, the building would become more transparent with a broad canopy and vertical fins framing the amenity deck.

A tripartite scheme along Buckingham Parkway would punctuate the massing along the longer lengths of the site to create a varied visual effect and break up the buildings' sense of mass. The middle portion of the building is defined as a solid frame with semi-recessed unit balconies and inset panels with windows. Along Buckingham Parkway, the top floor would be set back 29 to 40 feet with large unit patios and an expansive amenity deck with views out towards the hills, with a pool, lounge seating and smaller gathering spaces. The exterior overhangs would provide for shading and cooling of the buildings' common area interiors, as well as contributing to the visual character of the Project. A large opening into the second-floor courtyard would divide the Buckingham Parkway facing facade into two separate masses while also providing more light and air into the courtyard. Another large opening in the frame closer to Hannum Avenue would provide a view into the courtyard. Units with front stoops would line the ground level facade along Buckingham Parkway, providing direct access to the street and planted areas in between patios, similar to the residential uses across Buckingham Parkway. As noted above, under CCMC Section 17.560.015.B, the Comprehensive Plan sets forth development standards including setbacks. The Project would follow Project-specific development standards (including setbacks) as provided in the Comprehensive Plan. The Comprehensive Plan includes 0 foot setback standards at the ground level and five-feet above the ground level along both Hannum Avenue and Buckingham Parkway. However, the Project aims to activate the ground level with pedestrian oriented design to enhance the neighborhood, as the area currently has minimal streetscape improvements. The first floor along Hannum Avenue would be setback between 20- to 35-feet to create a public plaza (the Hannum Plaza) with landscaping and a variety of seating areas open to the community. Along Buckingham Parkway, as well as the southern and western boundaries, the building would be set back at least 10-feet from the property line. The Project would also not conflict with Open Space Element Objective 3 (Passive Recreation) by providing 7,507 sf of publicly accessible, privately maintained open space with direct access off Hannum Avenue, where it would have ready access to visitors from surrounding land uses, pedestrians, and cyclists.

As discussed in Section 4.7, *Land Use and Planning*, of this Draft EIR, the Project would not conflict with the policies of the UFMP. The Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza, located along Hannum Avenue. In addition, new replacement trees would be planted on the Project Site per Section 9.08.215 of the CCMC. The selected street tree species would meet the UFMP Tree Palette as and meet the UFMP's performance criteria.

Under CCMC Section 17.220.020, Table 2-7, building setback requirements for Commercial Regional Business Park (CRB) zone are 5 feet at the front yard (which apply to both Hannum Avenue and Buckingham Parkway) with no side yard or rear yard building setback requirements. As noted above, under CCMC Section 17.560.015.B, the Comprehensive Plan sets forth development standards including setbacks. The Project would follow Project-specific development standards (including setbacks) as provided in the Comprehensive Plan. The Comprehensive Plan includes minimum setback development standards of 0-feet at the ground level and five-feet above the ground level along both Hannum Avenue and Buckingham Parkway. However, the Project aims to activate the ground level with pedestrian oriented design to enhance the neighborhood, as the area currently has minimal streetscape improvements. The first floor along Hannum Avenue would be setback between 10- to 35-feet to create a public plaza with landscaping and a variety of seating areas open to the community. Along Buckingham Parkway, as well as the southern and western boundaries, the building would be set back at least 10-feet from the property line. With the provision of the Comprehensive Plan, the Project would be consistent with the current setback criterion.

In order to provide an aesthetically succinct and unified development, the Project is seeking to redevelop the Project Site under the PD zone. CCMC Sections 17.240.010 and 17.240.015 describe the purpose and requirements of the PD Zoning District as allowing large scale commercial complexes within a physically integrated and contiguous area. Within the PD zone, no building may exceed 56 feet in height. However, the Project is proposing to include 27 units (12 percent of base density) of its residential units as Very Low Income affordable units. By doing so, consistent with the CCMC, State Density Bonus Law (Gov't Code §65915), the Project is entitled to receive development incentives including a height increase. The Project is requesting a height increase of 22 feet beyond the maximum allowable height as a development incentive for providing affordable units. With this incentive, the Project would have a maximum building height of 78 feet. Even with this height increase, given that no views of scenic vistas or scenic resources occur across or through the Project Site, the Project would not substantially alter scenic views from surrounding areas.

CCMC Section 17.300.035.C.1 requires the screening of utilities, including mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts), loading docks, refuse and recyclable materials storage areas, and utility services, from public view from adjoining public streets and rights-of-way. CCMC Section 17.300.035.C.2 requires the method of screening to be architecturally compatible with other on-site development in terms of colors, materials, and architectural style as determined by the Director. The Project would screen all utilities from public view. Any utilities located on the building roof would be screened by fencing, the design of which would be coordinated with the building's architectural materials, color, and design. This regulation would be further implemented under Project Design Feature AES-PDF-1, which requires mechanical, electrical, and roof top equipment [including heating, ventilation, and air conditioning (HVAC) systems], as well as building appurtenances, to be integrated into the Project's architectural design (e.g., placed behind parapet walls) and will be screened from view from public rights-of-way. Plans related to rooftop screening would be submitted to the current Planning Division for review. Other utility areas, such as refuse and recyclable storage loading areas would be located in the parking garage and would not be visible from the public streets and highways.

CCMC Section 15.06.100.A (Art in Public Places) requires the inclusion of visual artwork, performing and architectural resources to enhance the quality of life for individuals living in, working in, and visiting the City. The Project would feature high quality architecture, distinguished by a curved facade along Buckingham Parkway and a distinct architectural volume anchoring the corner of Hannum Avenue and Buckingham Parkway; street-accessible and inviting main entrances; coordinated use of building materials and structural design; and neutral and unified color palette with textured corrugated and flat panels with large windows for the units, thus, resulting in distinctive and creative building exteriors. The Project would provide public art or pay in lieu fees for public art to the City's requirements. With compliance with CCMC regulations that govern scenic character, such as building heights, setbacks, and screening, the Project would not conflict with the policies of the CCMC that regulate scenic quality.

Based on the above, the Project would not conflict with zoning and other regulations governing scenic quality. Therefore, impacts would be less than significant.

Supplemental Shading Analysis

Potential shading effects could occur when shadow-sensitive uses are located in proximity to new structures. The potential for shading is highest when a shadow-sensitive use is immediately adjacent to a new structure and 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. As the sun moves from the east to the west throughout the day, shadow lengths and direction move accordingly. Shadows are longest during the winter, with the maximum length occurring during the Winter Solstice (December 22). During the spring, fall, and summer, shadow lengths are shorter than winter shadows. The maximum shadow lengths during the spring, fall, and summer are approximately 2.18 times the height of a building.[2] The Project would be up to 78 feet tall.[3] As such, it could cast a maximum shadow of approximately 170 feet during the spring, fall, and summer.

Shadow sensitive uses that could potentially be affected by Project shadows during these times of the year are the routinely usable outdoor spaces associated with the multi-family residential uses and the Fox Hills Parkette to the east across Buckingham Parkway. These properties are located approximately 50 feet from the Project at their closest point.

Project shadows are illustrated in Appendix B of this Draft EIR, and are shown during the Winter Solstice, Summer Solstice and Fall/Spring Equinox between the hours of 10:00 A.M. and 4:00 P.M. The shadows figure identifies that the Project would add no shading on any shade sensitive uses to the west, north, or south of the Project Site. During the Summer Solstice, Project shadows would

[2] City of Los Angeles, L.A. CEQA Thresholds Guide, Exhibit A.3-1, 2006. Exhibit A 3-1 is sourced to Planning Consultants Research, 1995.

[3] The height of the along the north property line adjacent to Hannum Avenue, would be 70 feet and up to 78 feet at the south property line along Buckingham Parkway due to the existing site topography. Although the bulkhead would rise to a height of 78 feet, it would be substantially set back from the edges of the building and would not contribute to shadow length.

not extend across Buckingham Parkway to the east. During the Spring/Fall Equinox, shadows would not reach the residential properties across Buckingham, but would extend minimally into the western portion of Fox Hills Parkette along Buckingham Parkway after approximately 3:00 P.M. However, the existing street trees and Parkette trees already shade the majority of this area, so there would be only an incremental change in shading to the Parkette during these late afternoon hours of the Spring/Fall Equinox. During the Winter Solstice, shadows would reach only a small, landscaped area just south of Cambridge Way near the adjacent residential properties across Buckingham Parkway after approximately 3:00 P.M. No portion of any individual residential property would be shaded by the Project. Also, after approximately 3:00, the Fox Hills Parkette would be entirely shaded by the Project. However, the existing street trees and Parkette trees already shade the majority of the Parkette at this time of year and the sun sets at roughly 5:00 P.M., so there would be only an incremental change in shading to the Parkette during these late afternoon hours of the Winter Solstice.

Based on the above, the Project would add limited incremental shadows to the Fox Hills Parkette during the winter season in the afternoon hours, and not shade any portion of the residential uses across Buckingham Parkway year around. Given the Project's limited shading of off-site routinely usable outdoor spaces, shading would not be an adverse effect of the Project's implementation.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Project-specific impacts related to conflicts with applicable zoning and other regulations governing scenic quality would be less than significant.

Cumulative Impacts

Chapter 3, *Environmental Setting*, of this Draft EIR, provides the list of the 12 related projects planned or are under construction within an approximately 1.0-mile radius of the Project Site. Of these 12 related projects, eight (8) are located within the City of Culver City and four (4) are located within the City of Los Angeles. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3.

The related projects list primarily reflects infill development within existing, built out Culver City and Los Angeles communities. As such, the related projects contribute to a variety of local urban settings with varied aesthetic characteristics. The majority of the related projects are located in different viewsheds from the Project when viewed at the pedestrian level within the flatter, urban area, and thus do not allow for panoramic views of the area. From more distant locations at higher elevations, the related projects and Project would contribute cumulatively to visual changes in the area's urban composition. Project 1 located along Hannum Avenue west of the Project Site would be visible from the Project. Areas east of the Project Site could potentially have views of the Project and related Project 1. However, views, if any, would be very limited and largely obscured by the Project, topographical variations and/or intervening development. Any such views would not obstruct views of a scenic vista or scenic resource within a state designated scenic highway. Further,

any such combined views would not substantially change the urbanized nature of the view together with the Project and its surroundings.

Related projects, as with the Project, are expected to comply with regulations governing scenic quality, including CCMC regulations regarding street trees, exterior lighting, and illuminated signage, as applicable, as well as building height, setbacks, open space, lot coverage, and landscaping requirements. Additionally, the related projects would be required, as applicable, to demonstrate compliance with other plans governing scenic quality, which may include, but are not limited to the following: Culver City General Plan, the Culver City Redevelopment Plan, the Culver City Urban Forest Master Plan, and the Citywide Design Guidelines.

Because the Project and related projects would be required to comply with applicable policies and regulations governing scenic quality, the Project and related projects would not cumulatively conflict with policies and regulations governing scenic quality. Therefore, cumulative impacts with respect to regulations governing scenic quality would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Cumulative impacts related to aesthetics would be less than significant.

4.2 Air Quality

4.2.1 Introduction

This section evaluates the Project's potential air quality impacts, including potential cumulative impacts generated by construction and operation of the Project. This section estimates the air pollutant emissions generated by Project construction and operation and assesses whether Project emissions would conflict with or obstruct implementation of the air quality policies set forth within the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP); result in a cumulatively considerable net increase of any criteria pollutant in non-attainment of federal or State ambient air quality standard; or, expose sensitive receptors to substantial pollutant concentrations. This section relies on the information, data, assumptions, calculation worksheets, and model outputs are provided in Appendix C of this Draft EIR.

4.2.2 Environmental Setting

Air Quality Background

Air Quality and Public Health

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of an overall endeavor to prevent further deterioration and to facilitate improvement in air quality. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been set at levels considered safe to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly with a margin of safety, and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.[1] As the scientific methods for the study of air pollution health effects have progressed over the past decades, adverse effects have been shown to occur at lower levels of exposure. For some pollutants, no clear thresholds for effects have been demonstrated. New findings over time have, in turn, led to the revision and lowering of NAAQS which, in the judgment of the U.S. Environmental Protection Agency (USEPA), are necessary to protect public health. Ongoing assessments of the scientific evidence from health studies continue to be an important part of setting and informing revisions to federal and state air quality standards.[2] The NAAQS and CAAQS are listed in Table 4.2-1 in the *Regulatory Framework* subsection.

At the regional level, the SCAQMD is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside and San Bernardino Counties, including the Coachella Valley.[3] Culver City is located within the South Coast Air Basin (Air Basin) which is a distinct geographic subarea within the SCAQMD's jurisdiction. The SCAQMD, together with the Southern California Association of Governments (SCAG), has the

1 USEPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table. Accessed October 30, 2023.

2 South Coast Air Quality Management District (SCAQMD), 2022 Air Quality Management Plan, 2022. Appendix I-154.

3 SCAQMD, Map of Jurisdiction, 1999.

responsibility for ensuring that national and State ambient air quality standards are achieved and maintained for the Air Basin. Failure to comply with these standards puts State and local agencies at risk for penalties in the form of lawsuits, fines, a federal takeover of state implementation plans, and a loss of funds from federal agencies such as the Federal Highway Administration and Federal Transit Administration.

To meet the air quality standards, regional plans are developed, including the SCAQMD's AQMP, which incorporates regional demographic projections and integrated regional land use and transportation strategies from SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), known as Connect SoCal. These plans work together to examine multiple pollutants, cumulative effects, and transport issues related to attaining healthful air quality in the region. In addition, a host of regulatory standards at the federal, State, regional, and local level function to identify and limit exposure of air pollutants and toxic air contaminants (TACs).

Local Air Quality and Air Pollution Sources

As mentioned previously, Culver City is located South Coast Air Basin, which is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and San Diego County to the south. The Air Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the Coachella Valley area in Riverside County. The regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Air Basin is primarily influenced by meteorology and a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry.

The Air Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific high. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid to late afternoons on hot summer days. Winter inversions frequently break by midmorning.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino Counties. In the winter, the greatest pollution problem is the accumulation of carbon monoxide (CO) and nitrogen oxides (NO_X) due to low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and the brighter sunshine combine to cause a reaction between hydrocarbons and NO_X to form photochemical smog.

Air pollutant emissions within the Air Basin are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack.

Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Air Pollutant Types

Criteria Pollutants

The six principal pollutants for which national and State criteria and standards have been promulgated, known as "criteria pollutants", and which are most relevant to current air quality planning and regulation in the Air Basin include O_3, respirable and fine particulate matter (PM10 and PM2.5, respectively), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them.

Ozone (O_3): Ozone is a gas that is formed when volatile organic compounds (VOCs) and NO_X - both byproducts of internal combustion engine exhaust - undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

Particulate Matter (PM10 and PM2.5): Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Respirable and fine particulate matter, PM10 and PM2.5, consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, such as pollen and windstorms, are naturally occurring. However, in dense urban areas, such as the City of Culver City most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. The human body naturally prevents the entry of larger particles into the body. However, small particles can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM10 and PM2.5. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Carbon Monoxide (CO): Carbon monoxide (CO) is a colorless, odorless gas primarily emitted from combustion processes and motor vehicles due to incomplete combustion of carbon-containing fuels, such as gasoline or wood. In dense urban areas, such as Culver City where the Project is located, automobile exhaust accounts for the majority of CO emissions. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O_3, motor vehicles operating at slow speeds are the primary source of CO in the Air Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Nitrogen Dioxide (NO_2) and Nitrogen Oxides (NO_X): NO_2 is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of NO_X compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic areas, particularly in dense urban areas, such as where the Project is located, may be exposed to higher concentrations of NO_2 than those indicated by regional monitors. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM10. NO_X irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of O_3.

Sulfur Dioxide (SO_2): Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the predominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. Emissions of SO_2 aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Lead (Pb): Pb is a metal found naturally in the environment as well as in manufactured products. The highest levels of Pb in air are usually found near Pb smelters. The major sources of Pb emissions to the air are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Pb is also emitted from the sanding or removal of old lead-based paint (LBP). Pb emissions are primarily a regional pollutant. Pb affects the brain and other parts of the body's nervous system. Exposure to Pb in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

Additional Criteria Pollutants (California Only)

In addition to the national standards, the State of California regulates State-identified criteria pollutants, including sulfates (SO_4^2), hydrogen sulfide (H_2S), visibility-reducing particles, and vinyl chloride. With respect to the State-identified criteria pollutants, most land use development projects either do not emit them (i.e., H_2S [nuisance odor] and vinyl chloride), or otherwise account for these pollutants (i.e., $SO_4^2$and visibility reducing particles) through other criteria pollutants. For example, $SO_4^2$are associated with SO_X emissions, and visibility-reducing particles are associated with particulate matter emissions. A description of the health effects of the State-identified criteria air pollutants is provided below.

Sulfates (SO_4^2): SO_4^2 are the fully oxidized ionic form of sulfur. SO_4^2 occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to SO_4^2 in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. SO_4^2 are particularly effective in degrading visibility, and, due to the fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H_2S): H_2S is a colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing, and natural emissions from geothermal fields. Industrial sources of H_2S include petrochemical plants and kraft paper mills. H_2S is also formed during bacterial decomposition of human and animal wastes, and is present in emissions from sewage treatment facilities and landfills.[4] Exposure to H_2S can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting; additional health effects of eye irritation have only been reported with exposures greater than 50 parts per million (ppm), which is considerably higher than the odor threshold.[5] H_2S is regulated as a nuisance based on its odor detection level; if the standard were based on adverse health effects, it would be set at a much higher level.[6]

Visibility-Reducing Particles: Visibility-reducing particles come from a variety of natural and manmade sources and can vary greatly in shape, size and chemical composition. Visibility reduction is caused by the absorption and scattering of light by the particles in the atmosphere before it reaches the observer. Certain visibility-reducing particles are directly emitted to the air, such as windblown dust and soot, while others are formed in the atmosphere through chemical transformations of gaseous pollutants (e.g., SO_4^2, nitrates, organic carbon particles) which are the major constituents of particulate matter. As the number of visibility-reducing particles increases, more light is absorbed and scattered, resulting in less clarity, color, and visual range.[7] Exposure to

4 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed October 30, 2023.

5 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed October 30, 2023.

6 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed October 30, 2023.

7 CARB, Visibility-Reducing Particles & Health. Last reviewed https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health. Accessed October 30, 2023

some haze-causing pollutants have been linked to adverse health impacts similar to PM10 and PM2.5, as discussed above.[8]

Vinyl Chloride: Vinyl chloride is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products and is generally emitted from industrial processes. Other major sources of vinyl chloride have been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.[9] Short-term health effects of exposure to high levels of vinyl chloride in the air include central nervous system effects, such as dizziness, drowsiness, and headaches while long-term exposure to vinyl chloride through inhalation and oral exposure causes liver damage and has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans.[10] Most health data on vinyl chloride relate to carcinogenicity and control methodologies applied to industrial facilities generally prevent emissions to the ambient air. There are no known sources of vinyl chloride emissions outside of occupational or industrial settings.[11]

Volatile Organic Compounds and Toxic Air Contaminants

Although the SCAQMD's primary mandate is attaining the NAAQS and the CAAQS for criteria pollutants within the Air Basin, SCAQMD also has a general responsibility to control emissions of air contaminants and prevent endangerment to public health. As a result, the SCAQMD has regulated pollutants other than criteria pollutants such as VOCs, TACs, greenhouse gases (GHGs), and stratospheric O_3-depleting compounds.

VOCs: VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, VOCs are a prime component (along with NO_X) of the photochemical processes by which such criteria pollutants as O_3, NO_2, and certain fine particles are formed. They are therefore regulated as "precursors" to formation of these criteria pollutants. Some are also identified as TACs and have adverse health effects. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (e.g., architectural coatings).

TACs: TACs is a term used to describe airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health, and includes both carcinogens and non-carcinogens. The California Air Resources Board (CARB) and the California Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. CARB has listed approximately 200 toxic substances, including those identified by the USEPA, which are identified on the California Air Toxics Program's TAC List. TACs are also not classified as "criteria" air pollutants. The greatest potential for TAC emissions during construction is related to

8 CARB, Visibility-Reducing Particles & Health. Last reviewed https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health. Accessed October 30, 2023

9 CARB, Visibility-Reducing Particles & Health. Last reviewed https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health. Accessed October 30, 2023

10 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed October 30, 2023.

11 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed October 30, 2023.

diesel particulate matter (DPM) emissions associated with heavy-duty equipment. During long-term operations, sources of DPM may include heavy duty diesel-fueled delivery trucks and stationary emergency generators. The effects of TACs can be diverse and their health impacts tend to be local rather than regional; consequently ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and exposure levels.

Regulatory Framework

Federal

Federal Clean Air Act

The Federal Clean Air Act (CAA) was enacted in 1970 and has been amended numerous times in subsequent years, with the latest amendments occurring in 1990.[12] The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.[13] The USEPA is responsible for the implementation and enforcement of the CAA, which establishes NAAQS, specifies future dates for achieving compliance, and requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS. The SIP includes pollution control measures that demonstrate how the standards for those pollutants will be met. The sections of the CAA most applicable to land use development projects include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).[14]

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. **Table 4.2-1**, *Ambient Air Quality Standards*, shows the NAAQS currently in effect for each criteria air pollutant. The Air Basin fails to meet national standards for O_3 and PM2.5 and, therefore, is considered a federal "non-attainment" area for these pollutants.

Title II pertains to mobile sources, which includes on-road vehicles (e.g., cars, buses, motorcycles) and non-road vehicles (e.g., aircraft, trains, construction equipment). Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

The NAAQS, and the CAAQS for the California criteria air pollutants (discussed below), have been set at levels considered safe to protect public health, including the health of sensitive populations and to protect public welfare.

12 42 United States Code Section 7401 et seq. (1970).
13 USEPA, Clean Air Act, 1963.
14 USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, Last Updated January 3, 2017.

TABLE 4.2-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
Ozone (O_3)	1-hour	—	0.09 ppm (180 µg/m^3)	—	Non-Attainment
	8-hour	0.070 ppm (137 µg/m^3)	0.07 ppm (137 µg/m^3)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM10)	24-hour	150 µg/m^3	50 µg/m^3	Attainment	Non-Attainment
	Annual	—	20 µg/m^3		
Fine Particulate Matter (PM2.5)	24-hour	35 µg/m^3	—	Non-Attainment (Serious)	Non-Attainment
	Annual	12 µg/m^3	12 µg/m^3		
Carbon Monoxide (CO)	1-hour	35 ppm (40 mg/m^3)	20 ppm (23 mg/m^3)	Attainment	Attainment
	8-hour	9 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)		
Nitrogen Dioxide (NO_2)	1-hour	0.10 ppm (188 µg/m^3)	0.18 ppm (339 µg/m^3)	Unclassified/ Attainment	Attainment
	Annual	0.053 ppm (100 µg/m^3)	0.030 ppm (57 µg/m^3)		
Sulfur Dioxide (SO_2)	1-hour	0.075 ppm (196 µg/m^3)	0.25 ppm (655 µg/m^3)	Unclassified/ Attainment	Attainment
	3-hour	0.5 ppm (1,300 µg/m^3)	—		
	24-hour	0.14 ppm (365 µg/m^3)	0.04 ppm (105 µg/m^3)		
	Annual	0.03 ppm (80 µg/m^3)	—		
Lead (Pb)	30-day average	—	1.5 µg/m^3	Partial Non-Attainment[e]	Attainment
	Rolling 3-month average	0.15 µg/m^3	—		
Sulfates	24-hour	—	25 µg/m^3	—	Attainment
Hydrogen Sulfide (H_2S)	1-hour	—	0.03 ppm (42 µg/m^3)	—	Unclassified

NOTES: ppm = parts per million by volume; µg/m3 = micrograms per cubic meter

[a] An ambient air quality standard is a concentration level expressed in either ppm or µg/m3and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a concentration that is not to be exceeded. Others are expressed as a concentration that is not to be equaled or exceeded.

[b] Ambient Air Quality Standards set by USEPA and CARB as displayed in the 2022 AQMP.

[c] "Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made.

[d] California and Federal standard attainment status as determined by USEPA and CARB as displayed in SCAQMD's 2022 AQMP and 2022 updates from CARB. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.

[e] An attainment re-designation request is pending.

SOURCES: USEPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table. March 2023
CARB, Ambient Air Quality Standards May 4, 2016.

State

California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the CAAQS by the earliest practicable date. (CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both State and federal air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Table 4.2-1 includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the state. As shown in Table 4.2-1, the CAAQS include more stringent standards than the NAAQS. The Air Basin fails to meet State standards for O_3, PM10, and PM2.5 and, therefore, is considered "non-attainment" for these pollutants.

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. In addition, Section 93115 in Title 17 of the CCR states that operations of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emissions standards.

State Programs for Toxic Air Contaminants

The California Air Toxics Program is an established two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air. In the risk identification step, CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of Airborne Toxic Control Measures (ATCMs), both for stationary and mobile sources, including On-Road and Off-Road Vehicle Rules. These ATCMs include measures such as limits on heavy-duty diesel motor vehicle idling and emission standards for off-road diesel construction equipment in order to reduce public exposure to DPM and other TACs. These actions are also supplemented by the Assembly Bill (AB) 2588 Air Toxics "Hot Spots" program and Senate Bill (SB) 1731, which require facilities to report their air toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce their risk through implementation of a risk management plan. SCAQMD has further adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

Diesel Risk Reduction Program

CARB identified particulate emissions from diesel-fueled engines as TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which moved us into the risk management phase of the program. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines* and the *Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines*. The Diesel Advisory Committee approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

Regional

South Coast Air Quality Management District

The SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the South Coast Air Basin. The Air Basin is a subregion within the western portion of the SCAQMD jurisdiction, as the SCAQMD also regulates portions of the Salton Sea Air Basin and Mojave Desert Air Basin within Riverside County.

Air Quality Management Plan and Regional Transportation Plan/Sustainable Communities Strategy

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs), which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the Air Basin into attainment with the standards in a timely manner. The most current AQMP is the *2022 Air Quality Management Plan* (2022 AQMP)[15], which was adopted on December 2, 2022. The goal of the 2022 AQMP is to provide a regional roadmap to help the Air Basin achieve the USEPA's NAAQS 2015 8-hour ozone standard (70 parts per billion).

On January 26, 2023, CARB adopted Resolution 23-4, which directs the CARB Executive Officer to submit the 2022 AQMP to the USEPA for inclusion in the California SIP to be effective, for purposes of federal law, after notice and public hearing as required by Section 110(l) of the Clean Air Act and 40 Code of Federal Regulations Section 51.102 and approval by the USEPA. USEPA approval has not yet occurred.

The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard.

The 2022 AQMP incorporates the transportation strategy and transportation control measures from SCAG's Connect SoCal (2020-2045 *Regional Transportation Plan/Sustainable Communities*

[15] SCAQMD, 2022 Air Quality Management Plan, 2022.

Strategy [2020-2045 RTP/SCS]).[16] SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. Connect SoCal includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP.

The 2022 AQMP forecasts future emissions inventories with growth based on SCAG's Connect SoCal. According to the 2022 AQMP, the South Coast Air Basin is projected to see a 12 percent growth in population, 17 percent growth in housing units, 11 percent growth in employment, and an 8 percent growth in VMT between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, state and federal levels.[17]

Noteworthy control strategies for mobile sources in the AQMP with potential applicability to reducing short-term emissions from construction activities associated with the Project include strategies denoted in the 2022 AQMP as MOB-06, MOB-11, and MOB-15, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment.[18] Descriptions of measures MOB-06, MOB-11, and MOB-15 are provided below:

- **MOB-06 – Accelerated Retirement of Older On-Road Heavy-Duty Vehicles:** This measure seeks additional emission reductions from existing heavy-duty vehicles with GVWR greater than 8,500 lbs through an accelerated vehicle replacement program with zero or low NO_X emission vehicles.
- **MOB-11 – Emission Reductions from Incentive Programs:** This control measure seeks to quantify and take credit for the emission reductions achieved through the implementation of SCAQMD administered incentive programs for SIP purposes. The South Coast AQMD has been implementing a variety of incentive programs including, but not limited to, Carl Moyer Memorial Air Quality Standards Attainment Program, Proposition 1B, Lower Emission School Bus, Community Air Protection Program, and Volkswagen Environmental Mitigation Trust. Examples of projects funded by these programs include heavy-duty vehicle/equipment replacements, installation of retrofit units, and engine repowers. These incentive programs result in substantial emission reductions that are typically not eligible for credit in plans to attain ozone standards because they are not required by regulation. However, actual emission reductions that are realized and quantified may qualify for credit.

16 SCAG, Final 2020-2045 RTP/SCS (Connect SoCal), 2020.
17 SCAQMD, 2022 Air Quality Management Plan, Table 3-3, 2022.
18 SCAQMD, 2022 Air Quality Management Plan, pages 4-21 through 4-30, 2022.

- **MOB-15 – Zero Emission Infrastructure for Mobile Sources:** This control measure is intended to support and accelerate the deployment of zero emission infrastructure needed for the widespread adoption of zero emission vehicles and equipment. AB 2127 estimated that the State will need 157,000 electric vehicle charging stations for medium and heavy-duty vehicles by 2030. AB 8 assessed the fueling needs for hydrogen fuel cell vehicles and found that 1,700 hydrogen stations will be needed to support 1.8 million fuel cell electric vehicles (FCEVs) statewide by 2035. The proposed measure seeks to address these concerns and identify the unique challenges and opportunities for zero emission infrastructure development in the South Coast Air Basin, particularly as it relates to zero emission medium and heavy vehicle deployments.

SCAQMD Air Quality Guidance Documents

The SCAQMD published the *CEQA Air Quality Handbook* (approved by the SCAQMD's Governing Board in 1993) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[19] The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses. The SCAQMD has also provided supplemental guidance on the SCAQMD website to assist the CEQA practitioners in conducting an air quality analyses, such as the *Final Localized Significance Threshold Methodology*, which is discussed below.[20]

The SCAQMD has also adopted land use planning guidelines in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, which considers impacts to sensitive receptors from facilities that emit TAC emissions.[21] SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity to freeways and high-traffic roads, and the same siting criteria for distribution centers and dry-cleaning facilities). The SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMDs guidelines are voluntary initiatives recommended for consideration by local planning agencies.

The SCAQMD has published a guidance document called the *Final Localized Significance Threshold Methodology* for CEQA evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during construction or operation of a project.[22] The SCAQMD adopted additional guidance regarding PM2.5 emissions in a document called *Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds*.[23] The latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology.*

[19] SCAQMD, CEQA Air Quality Handbook 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed October 30, 2023.

[20] SCAQMD, Air Quality Analysis Guidance, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#. Accessed October 30, 2023.

[21] SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 2005.

[22] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 (Revised July 2008).

[23] SCAQMD, Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds, 2006.

SCAQMD Rules and Regulations

The SCAQMD has adopted several rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards for land use development projects, which include, but are not limited to the following:

Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events. The following list of rules which apply to the Project:

- **Rule 401 – Visible Emissions**: This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
- **Rule 402 – Nuisance**: This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to the Project:

- **Rule 1113 – Architectural Coatings**: This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- **Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_X emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.
- **Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations:** This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

Regulation XIII – New Source Review (NSR): Regulation XIII sets requirements for preconstruction review required under both federal and state statutes for new and modified sources located in areas that do not meet the Clean Air Act standards ("non-attainment" areas). NSR applies

to both individual permits and entire facilities. Any permit that has a net increase in emissions is required to apply Best Available Control Technology (BACT). Facilities with a net increase in emissions are required to offset the emission increase by use of Emission Reduction Credits (ERCs). The regulation provides for the application, eligibility, registration, use and transfer of ERCs. For low emitting facilities, the SCAQMD maintains an internal bank that can be used to provide the required offsets. In addition, certain facilities are subject to provisions that require public notice and modeling analysis to determine the downwind impact prior to permit issuance.

Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other non-criteria pollutants. The following is a list of rules which may apply to the Project:

- **Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities:** This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.
- **Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule applies to stationary compression ignition (CI) engines greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

Local

City of Culver City

Culver City General Plan

The Culver City General Plan includes nine elements that have been updated at various points between 1968 and 2014. The current General Plan does not have an Air Quality Element. However, the Circulation Element of the General Plan contains objectives and policies focused on public transit (Objective #2), bikeways (Objective #3), pedestrian access (Objective #4), participating in regional system improvements (Implementation Measure #1), and roadway improvement (Implementation Measure #2). Consistency with these goals and policies have the potential to reduce single occupancy vehicle trips and VMT, thus reducing air pollutants from mobile sources. The growth projections within the General Plan inform the development of SCAQMD's AQMP.

Culver City Green Building Program

In 2009, the City of Culver City adopted the Mandatory Green Building Program which contains a number of features that would indirectly reduce air pollutant emissions such as enhanced building insulation, low-flow fixtures, efficient lighting and heating, ventilation, and air conditioning (HVAC) systems.[24] The City of Culver City Mandatory Green Building Program also includes a specific feature for parking garages which requires all new lighting to be motion sensor controlled and efficient minimum base level lighting.

[24] City of Culver City, Municipal Code Chapter 15.02.1100, Green Building Program and Requirements.

Existing Conditions

Regional Air Quality

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific that leads to mild climate, moderated by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle) play a major role in degree and severity of the air pollution problem in the Air Basin where factors, such as wind, sunlight, temperature, humidity, rainfall, and topography, affect the accumulation and dispersion of air pollutants throughout the Air Basin, making it an area of high pollution potential.

The greatest air pollution throughout the Air Basin occurs from June through September that is generally attributed to light winds, shallow vertical atmospheric mixing, as well as the large amount of pollutant emissions. This frequently reduces pollutant dispersion, resulting in elevated air pollution levels. In addition, pollutant concentrations in the Air Basin vary with location, season, and time of day. For instance, O_3 concentrations tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert. While substantial progress has been made in reducing air pollution levels in Southern California, the Air Basin still fails to meet the national standards for O_3 and PM2.5 and, therefore, is considered a federal "non-attainment" area for these pollutants. In addition, Los Angeles County still fails to meet the national standard for Pb and, therefore, is considered a federal "non-attainment" area for Pb.

As described above, at the regional level, SCAQMD is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside and San Bernardino Counties. Specifically, the SCAQMD has the responsibility for ensuring that all national and State ambient air quality standards are achieved and maintained throughout the Air Basin. To meet the standards, SCAQMD has adopted a series of AQMPs. The 2022 AQMP builds upon measures already in place from previous AQMPs and includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies and low NOx technologies), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard by 2037. However, the 2037 NO_X limit is 60 tons per day and emissions from federal and international sources are estimated to be 85 tons per day in 2037; thus, federal sources alone would emit more than the 60 tons per day limit in 2037. The SCAQMD and CARB cannot sufficiently reduce NO_X emissions to meet the standard without federal action.

The 2022 AQMP states that despite the projected growth in the region, air quality has improved substantially over the years. This is largely due to the effects of local, State and federal air quality control programs as described above. As seen in Figure 1-4 on page 1-9 of the AQMP, the percent change in air quality is shown along with demographic data for the 4-county region from the 2022 AQMP where in particular, the trends since 1995 of the 8-hour O_3 levels, the 1-hour O_3 levels, and annual average PM2.5 concentrations (since 2001), compared to the regional gross domestic product, total employment and population. In addition, the O_3 and particulate matter levels continue

to trend downward as the economy and population increase, demonstrating that it is possible to maintain a healthy economy while improving public health through air quality improvements.[25]

Attainment Status

The extent and severity of pollutant concentrations in the Air Basin are a function of the area's natural physical characteristics (weather and topography) and man-made influences (development patterns and lifestyle). Factors, such as wind, sunlight, temperature, humidity, rainfall, and topography, all affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential. The Air Basin's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of ozone, which is a secondary pollutant that forms through photochemical reactions in the atmosphere. California Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. **Table 4.2-2**, *South Coast Air Basin Attainment Status (Los Angeles County)*, provides a summary of the attainment status of the Los Angeles County portion of the Air Basin with respect to the federal and State standards. The Air Basin is designated as attainment for the California standards for sulfates and unclassified for hydrogen sulfide and visibility-reducing particles.[26] The Air Basin is currently in non-attainment for O_3, PM10, and PM2.5 under the CAAQS and O_3, and PM2.5 under the NAAQS. Since vinyl chloride is a carcinogenic toxic air contaminant, CARB does not classify attainment status for this pollutant. Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria.

The Los Angeles County portion of the Air Basin is designated as nonattainment for the federal lead standard; however, this is due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating.[27]

Trace amounts of hydrogen sulfide may be emitted by common municipal solid waste such as household food wastes. Vinyl chloride is used in the process of making polyvinyl chloride (PVC) plastic and vinyl products and is primarily emitted from industrial processes.[28] Vinyl chloride generally is not emitted directly during operations or during construction of a land use development project. The proposed Project does not include vinyl chloride emitting processes. Land developments only emit trace amounts or otherwise account for sulfates and visibility-reducing particles through other criteria pollutants. As previously stated, sulfates are associated with SO_2 emissions and visibility-reducing particles are associated with particulate matter emissions. Therefore, these pollutants will not independently be evaluated as they are associated with other criteria pollutants.

25 SCAQMD, 2022 AQMP, December 2022, page 1-9.

26 Unclassified is the category designation of an area for a pollutant with insufficient data. CARB, Proposed 2017 Amendments to Area Designations for State Ambient Air Quality Standards, December 19, 2017 (release date).

27 SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

28 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed October 30, 2023.

TABLE 4.2-2
SOUTH COAST AIR BASIN ATTAINMENT STATUS (LOS ANGELES COUNTY)

Pollutant	Federal Standards	California Standards
O_3 (1-hour standard)	N/A[a]	Non-attainment
O_3 (8-hour standard)	Non-attainment – Extreme	Non-attainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
PM10	Attainment	Non-attainment
PM2.5	Non-attainment – Serious	Non-attainment
Lead	Non-attainment (Partial, Los Angeles County)[b]	Attainment
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride	N/A	N/A[c]

NOTES: N/A = not applicable.

[a] The NAAQS for 1-hour ozone was revoked on June 15, 2005, for all areas except Early Action Compact areas.

[b] Partial Nonattainment designation – Los Angeles County portion of the Air Basin only for near-source monitors.

[c] In 1990, CARB identified vinyl chloride as a TAC and determined that it does not have an identifiable threshold. Therefore, CARB does not monitor or make status designations for this pollutant.

SOURCES: USEPA, The Green Book Non-Attainment Areas for Criteria Air Pollutants. Accessed October 2023. https://www.epa.gov/green-book.
CARB, Area Designations Maps/State and National. Accessed April 2022. http://www.arb.ca.gov/desig/adm/adm.htm.

Sources of Emissions

As detailed in the AQMP, the major sources of air pollution in the Air Basin are divided into four major source classifications: point stationary sources, area stationary sources, on-road mobile sources, and off-road mobile sources. Point and area sources are the two major subcategories of stationary sources.[29] Point sources are permitted facilities that contain one or more emission sources at an identified location (e.g., power plants, refineries, emergency generator exhaust stacks). Area sources consist of many small emission sources (e.g., residential water heaters, architectural coatings, and consumer products), which are distributed across the region. Mobile sources consist of two main subcategories: On-road sources (such as cars and trucks), and off-road sources (such as heavy construction equipment).

Local Air Quality

Existing Criteria Pollutants Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. As shown in **Figure 4.2-1**, *SCAQMD General Forecast Areas and Air Monitoring Areas*, the Project Site is located in SCAQMD Source Receptor Area (SRA) 3; therefore, the monitoring station most representative of the Project Site is the Southwest Coastal LA County Monitoring Station. Criteria pollutants monitored at this station

[29] SCAQMD, 2022 Air Quality Management Plan, p. 3-1.

include ozone, NO_2, CO, SO_2, lead, and PM10. Since the Southwest Coastal LA County Monitoring Station does not monitor PM2.5, The next closest station, the Central LA station was used for PM2.5 monitoring data. The most recent data available from the SCAQMD for these monitoring stations are from years 2019 to 2022. The pollutant concentration data for these years are summarized in **Table 4.2-3**, *Ambient Air Quality Data.*

Toxic Air Contaminants

In August 2021, the SCAQMD released the Final Multiple Air Toxics Exposure Study V (MATES V).[30] The MATES V study includes a fixed site monitoring program with ten stations, an updated emissions inventory of TACs, and a modeling effort to characterize risk across the Air Basin. The purpose of the fixed site monitoring is to characterize long-term regional air toxics levels in residential and commercial areas. In addition to new measurements and updated modeling results, several key updates were implemented in MATES V. MATES V estimates cancer risks by taking into account multiple exposure pathways, which includes inhalation and non-inhalation pathways. This approach is consistent with how cancer risks are estimated in SCAQMD's programs such as permitting, Air Toxics Hot Spots (AB 2588), and CEQA. Previous MATES studies quantified the cancer risks based on the inhalation pathway only. Along with cancer risk estimates, MATES V includes information on the chronic noncancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic noncancer risks from MATES II through IV measurements have been re-examined using current OEHHA and CalEPA risk assessment methodologies and modern statistical methods to examine the trends over time. This has led to a reduction of the Basin Average Air Toxics Cancer Risk in MATES V, 455 in a million, from MATES IV, 997 in a million.[31] The key takeaways from the MATES V study are as follows: air toxics cancer risk has decreased by about 50 percent since MATES IV based on modeling data, MATES V Basin average multi-pathway air toxics cancer risk is 455 in a million, with the highest risk locations being near Los Angeles International Airport, downtown and the ports areas, DPM is the main risk driver for air toxics cancer risk, goods movement and transportation corridors have the highest air toxics cancer risks, and the chronic noncancer risk was estimated for the first time with a chronic hazard index of approximately 5 to 9 across the ten fixed stations. As shown in **Figure 4.2-2**, *MATES Cancer Risk*, the Project Site has an average background cancer risk of 464 in 1 million in zip code 90230 (Culver City).[32]

[30] SCAQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v. Accessed October 30, 2023.

[31] SCAQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v. Accessed July 8, 2022.

[32] SCAQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v. Accessed October 30, 2023.

TABLE 4.2-3
AMBIENT AIR QUALITY DATA

Pollutant/Standard[a,b]	2019	2020	2021
O_3 (1-hour)			
Maximum Concentration (ppm)	0.082	0.117	0.059
Days > CAAQS (0.09 ppm)	0	1	0
O_3 (8-hour)			
Maximum Concentration (ppm)	0.067	0.074	0.049
4th High 8-hour Concentration (ppm)	0.060	0.066	0.047
Days > CAAQS (0.070 ppm)	0	2	0
Days > NAAQS (0.075 ppm)	0	0	0
NO_2 (1-hour)			
Maximum Concentration (ppm)	0.057	0.060	0.063
98th Percentile Concentration (ppm)	0.049	0.051	0.048
NO_2 (Annual)			
Annual Arithmetic Mean (0.030 ppm)	0.010	0.010	0.007
CO (1-hour)			
Maximum Concentration (ppm)	1.8	1.6	1.7
CO (8-hour)			
Maximum Concentration (ppm)	1.3	1.3	1.3
SO_2 (1-hour)			
Maximum Concentration (ppm)	0.008	0.006	0.008
99th Percentile Concentration (ppm)	0.004	0.003	0.004
SO_2 (24-hour)			
Maximum Concentration (ppm)	--	--	--
PM10 (24-hour)			
Maximum Concentration (µg/m^3)	62	43	33
Samples > CAAQS (50 µg/m^3)	2	0	0
Samples > NAAQS (150 µg/m^3)	0	0	0
PM10 (Annual Average)[c]			
Annual Arithmetic Mean (20 µg/m^3)	19.2	22.5	17.7
PM2.5 (24-hour)			
Maximum Concentration (µg/m^3)	43.5	47.3	61.0
98th Percentile Concentration (µg/m^3)	28.3	28.0	44.8
Samples > NAAQS (35 µg/m^3)	1	2	12
PM2.5 (Annual)[d]			
Annual Arithmetic Mean (12 µg/m^3)	10.85	12.31	12.77
Lead			
Maximum 30-day average (µg/m^3)	0.004	0.008	0.003

NOTES ppm = parts per million; µg/m^3 = micrograms per cubic meter

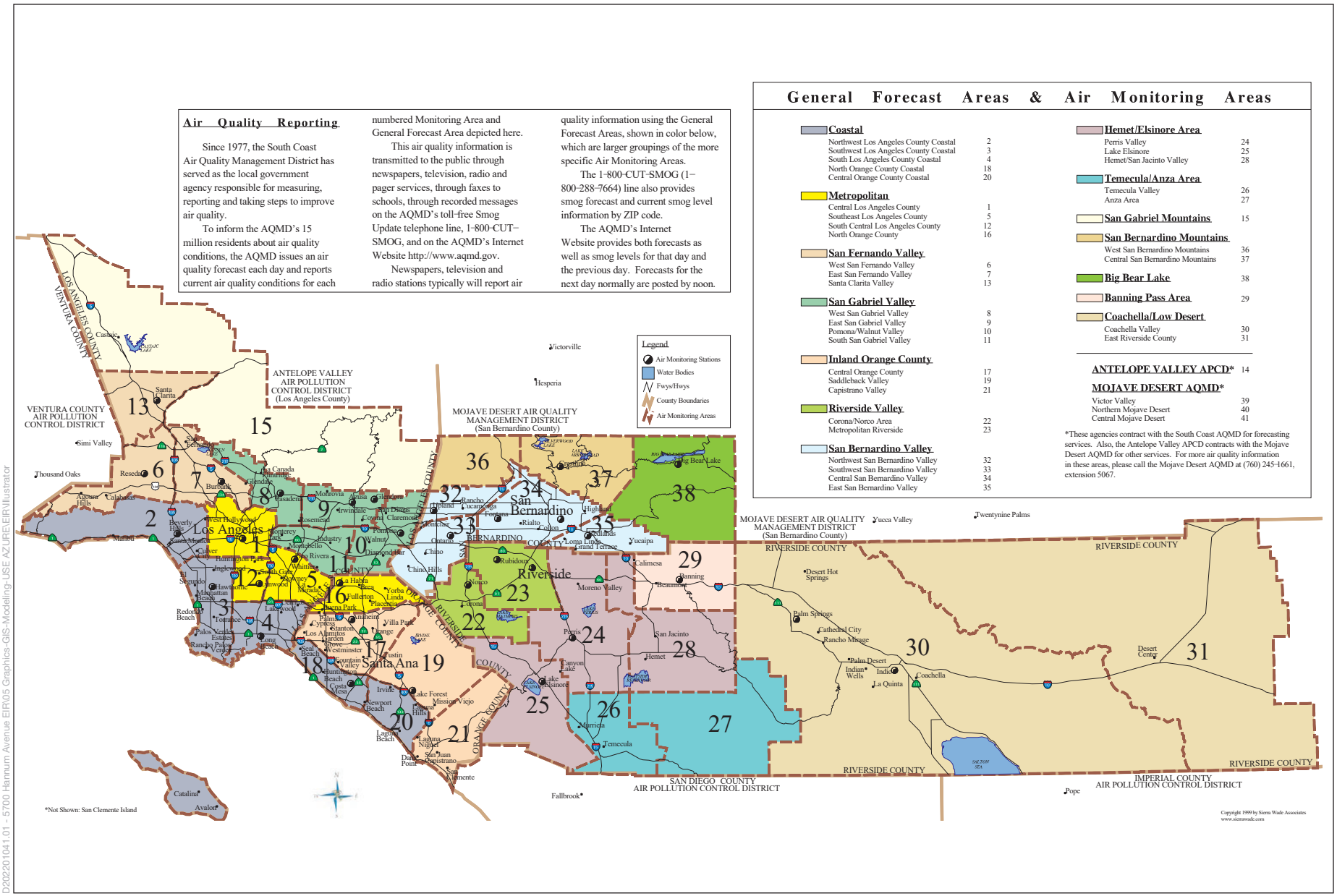
[a] The monitoring station most representative of the Project Site the Southwest Coastal LA County Monitoring Station and Criteria pollutants monitored at this station include ozone, NO_2, CO, SO_2, lead, and PM10. The Central LA Station was used to report data for PM2.5 The most recent data available from SCAQMD for these monitoring stations are from years 2019 to 2021.

[b] CAAQS are based on a not to exceed standard. NAAQS are based on a 3-year average of the annual 4th highest daily maximum 8-hour concentration for ozone; 98th percentile of 1-hour daily maximum concentrations averaged over 3 years for 1-hr NO_2; and not to be exceeded more than once per year on average over 3 years for 24-hr PM.

[c] State annual average (AAM) PM10 standard is > 20 µg/m^3. Federal annual PM10 standard (AAM > 50 µg/m3) was revoked in 2006.

[d] Both Federal and State standards are annual average (AAM) > 12.0 µg/m^3.

SOURCE: SCAQMD, Historical Data by Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year; USEPA, AirData, www.epa.gov/airdata/ad_rep_mon.html. Accessed October 2023.

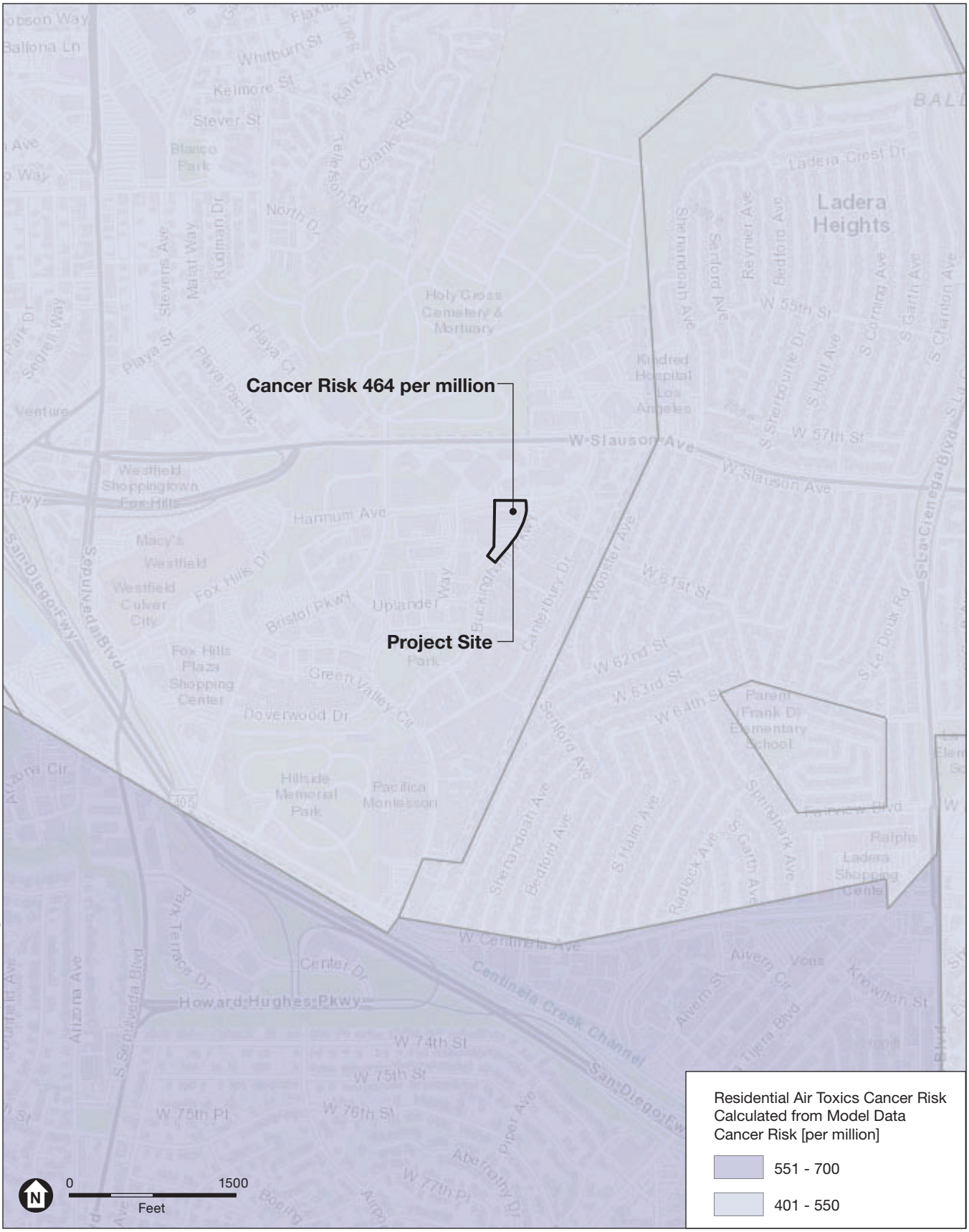


SOURCE: South Coast Air Quality Management District, 1999

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.2-1
SCAQMD General Forecast Areas and Air Monitoring Areas

ESA



D2022010411.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR\Illustrator

SOURCE: South Coast Air Quality Management District, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.2-2
MATES Cancer Risk

ESA

Existing Project Site Emissions

The Project Site is currently developed with a 30,672 square foot two-story office building with associated landscaping and surface parking, which would be demolished and removed to support development of the Project. Existing emissions are associated with vehicle trips to and from the Project Site, on-site combustion of natural gas for heating, and fugitive emissions of volatile organic compounds (VOCs) from consumer product usage and architectural coatings. Existing emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1 software, an emissions inventory software program recommended by the SCAQMD. CalEEMod 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 greenhouse gas (GHG) emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional 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. CalEEMod is considered to be an accurate and comprehensive tool for quantifying air quality and GHG emissions impacts from land use projects throughout California.[33]

CalEEMod was used to estimate the existing site emissions from vehicle trips, natural gas combustion, consumer products usage, and architectural coatings. Mobile source emissions estimates were calculated outside of CalEEMod and were based on the California Air Resource Boards (CARB) latest on-road vehicle EMissions FACtor (EMFAC) model, EMFAC2021, and daily VMT for existing conditions was provided by the Project's Traffic Consultant where VMT analysis used the City's VMT analysis procedures and Culver City VMT Tool.[34] Existing criteria pollutant emissions are presented in **Table 4.2-4,** *Estimated Existing Emissions (pounds per day),* identifies the emissions from the site's existing usage and emissions removed due to the Project. These existing emissions are subtracted from the regional operational emissions from the Project in Table 4.2-6 Detailed assumptions and emissions calculations are provided in Appendix C of this Draft EIR.

TABLE 4.2-4
ESTIMATED EXISTING EMISSIONS (POUNDS PER DAY)[a]

Source	VOC	NOX	CO	SO2	PM10	PM2.5
Existing Emissions						
Area (Consumer products, Landscaping)	1	<1	1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	1	1	7	<1	1	<1
Total Existing Operational Emissions[a]	2	1	8	<1	1	<1

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C of this Draft EIR.

SOURCE: ESA, 2023.

33 See: http://www.caleemod.com.

34 Gibson Transportation Consulting, Inc provided existing use and Project VMT outputs using the City's VMT Calculator Tool. The existing use outputs are included in Appendix C of this Draft EIR, while the Project VMT outputs are within the Project's Transportation Study. Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR.

Air Quality Sensitive Receptors and Locations

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others.[35] As a result, certain land uses that are occupied by these population groups, such as residences, schools, playgrounds and childcare center, hospitals, rehabilitation centers, convalescent centers, and retirement homes are considered to be air quality sensitive land uses (i.e., air quality–sensitive receptors). Sensitive land uses within 1,000 feet of the Project Site are shown in **Figure 4.2-3**, *Air Quality Sensitive Receptors*, and include the following:

1. Multi-family residential uses to the south of the Project Site, east of Buckingham Parkway and south of Windsor Way, approximately 450 feet from the Project boundary.
2. Fox Hills Park to the south/southwest of the Project Site, west of Buckingham Parkway, approximately 670 feet from the Project boundary.
3. Multi-family residential uses to the south of the Project Site, on the east side of Buckingham Parkway between Cambridge Way and Windsor Way, approximately 50 feet from the Project boundary.
4. Multi-family residential uses and Fox Hills Parkette to the east of the Project Site, on the east side of Buckingham Parkway north of Cambridge Way, approximately 50 feet to the south of the Project Site.
5. Multi-family residential uses to the east of the Project Site, on the east side of Buckingham Parkway and north of Canterbury Drive, approximately 550 feet from the Project boundary.

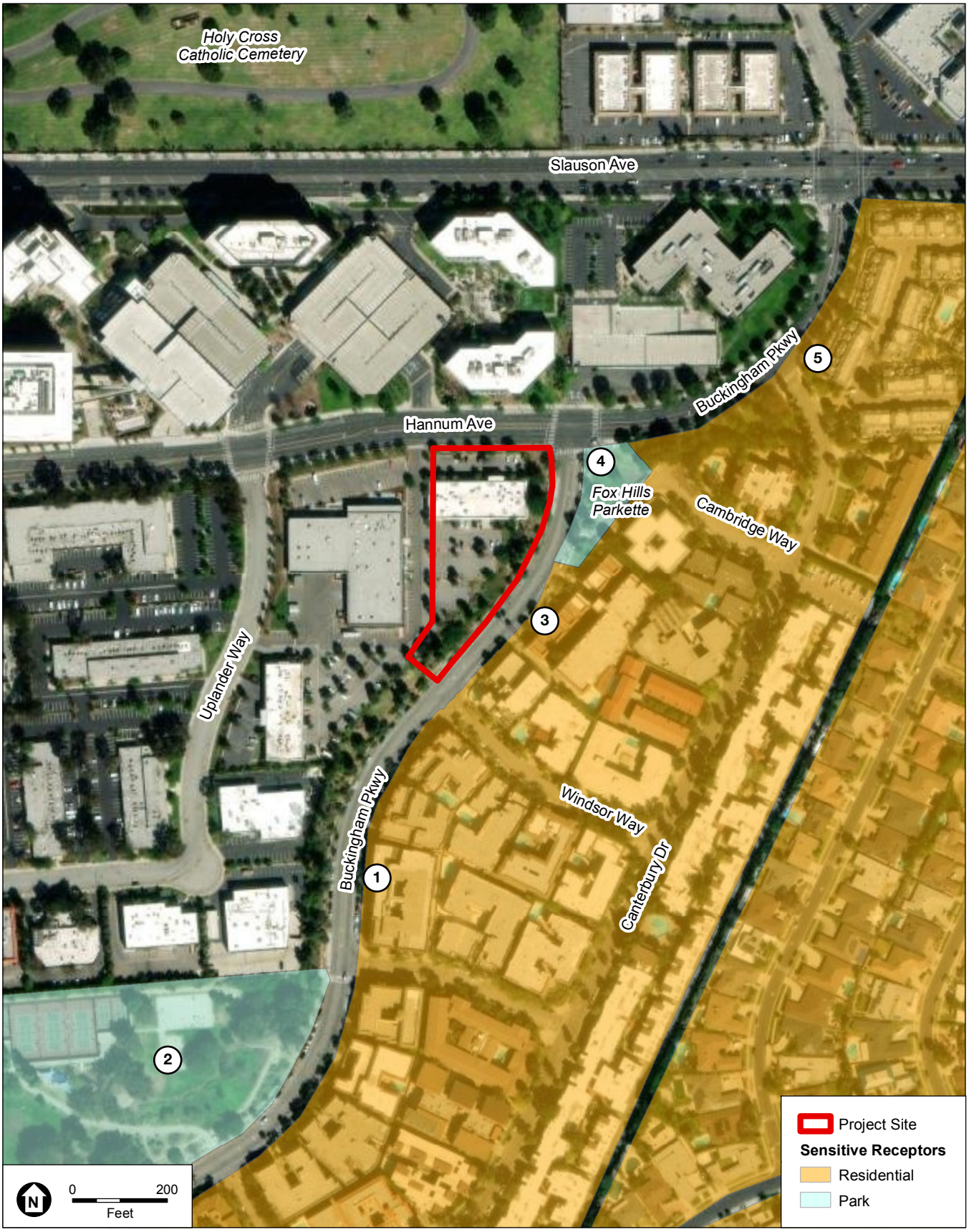
All other air quality sensitive receptors are located at greater distances from the Project Site, and would be less impacted by Project emissions. Impacts are quantified for the sensitive receptors listed here.

Commercial Land Uses

Commercial land uses, such as retail and office, are not considered sensitive receptors. However, for informational purposes only, the following commercial land uses near the Project Site were evaluated where warranted:

- Commercial land uses north of the Project Site, approximately 100 feet from the Project boundary.
- Commercial land uses west of the Project Site, approximately 50 feet from the Project boundary.
- Commercial land uses south/southwest of the Project Site, approximately 250 feet from the Project boundary.

[35] SCAQMD, CEQA Air Quality Handbook 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed October 30, 2023.



Path: U:\GIS\GIS\Projects\2022xxx\D20220104 1_01_5700HannumAvenue_EIR\03_Project\Fig4.2-3_AQ_Sensitive_Receptors.mxd, dkaneshiro 11/3/2023

SOURCE: ESA, 2022; ESRI Imagery, 2022

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.2-3

Air Quality Sensitive Receptors

ESA

4.2.3 Project Impacts

Thresholds of Significance

The following significance thresholds below are based on the Environmental Checklist contained in Appendix G of the CEQA Guidelines. A project would have a significant impact related to air quality if it would:

- **AIR-1:** Conflict with or obstruct implementation of the applicable air quality plan;
- **AIR-2:** Result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;[36] or
- **AIR-3:** Expose sensitive receptors to substantial pollutant concentrations.

Potentially significant impacts related to air quality are discussed and analyzed further below.

The City determined in the Initial Study that the following environmental issue areas would result in no impacts or less-than-significant impacts and, therefore, are scoped out of this Draft EIR. Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding the following issue area:

Would the Project:

- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

As detailed in the Initial Study, impacts related to other emissions, such as those leading to odors, were determined to be less than significant, and therefore are not addressed in this Draft EIR.

Pursuant to the CEQA Guidelines (Section 15064.7), a lead agency may consider using, when available, significance thresholds established by the applicable air quality management district or air pollution control district when making determinations of significance. For purposes of this analysis, the City has determined to assess the potential air quality impacts of the Project in accordance with the latest thresholds adopted by the SCAQMD in connection with its CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook, and subsequent SCAQMD guidance. While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, Project construction and operation would not include sources of lead emissions and would therefore not exceed the significance thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from mixed-use land use projects such as the Project. As a result, lead emissions are not further evaluated in this Draft EIR.

Consistency with Applicable Air Quality Plan

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD's CEQA Air Quality

[36] For the purposes of this Draft EIR, the City of Culver City has included analysis of all regulated criteria pollutants, regardless of attainment status, for exceedances of applicable federal or state ambient air quality standards.

Handbook, the following criteria were used to evaluate the Project's consistency with the SCAQMD's 2022 AQMP:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations; or
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP?

Construction and Operational Emission Air Quality Standards

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or State non-attainment pollutant. The Air Basin is currently in non-attainment for O_3, PM10, PM2.5, and lead (which is only in non-attainment for the Los Angeles County portion of the Basin).[37] SCAQMD methodology recommends that significance thresholds be used to determine the potential cumulative impacts to regional air quality along with a project's consistency with the current AQMP.

SCAQMD has established numerical significance thresholds for construction and operational activities. The numerical thresholds are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.[38] Given that construction impacts are temporary and limited to the construction phase, SCAQMD has established numerical significance thresholds specific to construction activity. Based on the thresholds in the SCAQMD CEQA Air Quality Handbook, the Project would potentially result in a significant impact of a federal or State non-attainment pollutant if emissions of O_3 precursors (VOC and NOx), PM10, or PM2.5 would exceed the values shown in **Table 4.2-5**, *SCAQMD Regional Emissions Thresholds (pounds per day)*.[39]

TABLE 4.2-5
SCAQMD REGIONAL EMISSIONS THRESHOLDS (POUNDS PER DAY)

Activity	VOC	NOx	CO	SO2	PM10	PM2.5
Construction	75	100	550	150	150	55
Operation	55	55	550	150	150	55

SOURCE: SCAQMD, SCAQMD Air Quality Significance Thresholds, March 2023.

37 SCAQMD has the Partial Nonattainment designation – Los Angeles County portion of the Basin resulted from localized emissions from the two sources in the City of Vernon and the City of Industry that are no longer in operation. It is expected that this area would receive redesignation to attainment based on current monitoring data. SCAQMD, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin.

38 SCAQMD, CEQA Air Quality Handbook 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed October 30, 2023.

39 SCAQMD, Air Quality Significance Thresholds, March 2023.

Localized Significance Thresholds

In addition, SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards or ambient concentration limits. Impacts would be considered significant if the following would occur:

- Maximum daily localized emissions of NO_X and/or CO during construction or operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for NO_2 and/or CO.[40]
- Maximum daily localized emissions of PM10 and/or PM2.5 during construction are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 10.4 $\mu g/m^3$ over 24 hours (SCAQMD Rule 403 control requirement).
- Maximum daily localized emissions of PM10 and/or PM2.5 during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 2.5 $\mu g/m^3$ over 24 hours (SCAQMD Rule 1303 allowable change in concentration).
- The following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The Project would cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively.
  - Where the CO standard is exceeded at the intersection, a project would result in a significant impact if the incremental increase due to the project is equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard.

SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards or ambient concentration limits without project-specific dispersion modeling.[41] This analysis uses the screening criteria to evaluate impacts from localized emissions where applicable.

Toxic Air Contaminants

Based on criteria set forth by the SCAQMD, the Project would expose sensitive receptors to substantial concentrations of toxic air contaminants if any of the following were to occur:[42]

- The Project would expose sensitive receptors to substantial concentrations of TACs if it emits carcinogenic materials or TACs that exceed the maximum incremental cancer risk of 10 in one

40 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

41 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

42 South Coast Air Quality Management District, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants), (1993); SCAQMD Air Quality Significance Thresholds, (March 2011), http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2. Accessed October 2022.

million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to one in one million) or an acute or chronic hazard index of 1.0.

As discussed further below, *Methodology,* construction impacts from TACs are evaluated quantitatively in a construction Health Risk Assessment (HRA) due to the use of heavy-duty, diesel equipment. For operations, the impacts are analyzed qualitatively due to the limited and minimal sources of TACs associated with operation of the proposed land uses.

Methodology

The evaluation of potential impacts to regional and local air quality that may result from the construction and long-term operations of the Project is discussed below. Additional details are provided in the Air Quality and Greenhouse Gas Emissions Calculations in Appendix C of this Draft EIR.

SCAQMD Air Quality Guidance Documents

The SCAQMD published the CEQA Air Quality Handbook to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[43] The CEQA Air Quality Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. SCAQMD is currently in the process of replacing the CEQA Air Quality Handbook with the Air Quality Analysis Guidance Handbook.

Supplemental guidance/information to assist lead agencies is provided on the SCAQMD website (www.aqmd.gov/ceqa/hdbk.html) and includes: (1) EMission FACtor model (EMFAC) on-road vehicle emission factors; (2) background CO concentrations; (3) localized significance thresholds; (4) mitigation measures and control efficiencies; (5) mobile source toxics analysis; (6) off-road mobile source emission factors; (7) $PM_{2.5}$ significance thresholds and calculation methodology; and (8) updated SCAQMD Air Quality Significance Thresholds. The SCAQMD also recommends using approved models to calculate emissions from land use projects, such as the CalEEMod software, which is a model developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California Air Districts. CalEEMod 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 from a variety of land use projects.

The SCAQMD has published a guidance document called the Final Localized Significance Threshold Methodology for CEQA Evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during construction.[44] The SCAQMD adopted additional guidance regarding PM2.5 emissions in a document called Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds.[45] This latter document

[43] SCAQMD, CEQA Air Quality Handbook, April 1993.
[44] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.
[45] SCAQMD, Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds, 2006.

has been incorporated by the SCAQMD into its CEQA significance thresholds and Final Localized Significance Threshold Methodology.

Consistency with Air Quality Management Plan

The SCAQMD's 2022 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving NAAQS related to these pollutants, including transportation control strategies from SCAG's Connect SoCal designed to reduce VMT.[46] The 2022 AQMP control strategies was developed, in part, based on regional growth projections prepared by SCAG through 2045.[47] For this reason, projects whose growth is consistent with the assumptions used in Connect SoCal will be deemed to be consistent with, and therefore not conflict with, nor obstruct implementation of the 2022 AQMPs because their growth has already been included in the growth projections utilized in the formulation of the control strategies in the 2022 AQMP. Thus, emissions from projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the 2022 AQMP would not jeopardize attainment of the air pollutant reduction goals identified in the AQMPs even if their emissions exceed the SCAQMD's thresholds of significance.[48] As noted above, the 2022 AQMPs have been adopted by the SCAQMD and CARB. Therefore, this analysis considers whether the Project would be in conflict with the 2022 AQMPs based on the Project's consistency with applicable growth projections and emission control strategies developed for the AQMP. Therefore, this analysis considers whether the Project (see Chapter 2, *Project Description*, of this Draft EIR for additional details) would conflict with the 2022 AQMP based on the Project's consistency with applicable growth projections and emission control strategies.

Existing Project Site Emissions

Existing operational site emissions were estimated using CalEEMod Version 2022.1, as described below. For mobile sources, the daily vehicle miles traveled were obtained for the existing uses from the Project's transportation consultant, Gibson Transportation.[49]

As discussed in the CalEEMod User's Guide, emissions from on-site natural gas combustion were based on usage data from the CEC's (2020, 2021) 2018–2030 Uncalibrated Commercial Sector Forecast (Commercial Forecast) and the 2019 Residential Appliance Saturation Survey (RASS).[50]

Other sources of emissions from existing uses include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod software uses landscaping equipment emission factors from CARB's Small Off-Road Engines Model v1.1 (SORE2020). The CalEEMod software assumes that landscaping equipment operates for 250 days per year in the Air Basin. Fugitive VOC

46 SCAQMD, 2022 Air Quality Management Plan (AQMP), 2022.

47 SCAQMD, 2022 AQMP, 2022.

48 SCAQMD, CEQA Air Quality Handbook, April 1993, p. 12-1.

49 Gibson Transportation Consulting, Inc provided existing use and Project VMT outputs using the City's VMT Calculator Tool. The existing use outputs are included in Appendix C of this Draft EIR, while the Project VMT outputs are within the Project's Transportation Study. Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR.

50 https://caleemod.com/documents/user-guide/01_User%20Guide.pdf

emissions are based on consumer product usage factors provided by the SCAQMD within CalEEMod and architectural coating emission factors based on SCAQMD Rule 1113.

Project Construction Emissions Methodology

Construction air quality impacts were assessed based on the incremental increase in emissions compared to baseline conditions. Project construction activities that would have the potential to create regional air quality impacts include the use of heavy-duty construction equipment, such as excavators, backhoes, loaders, tractors, pavers, forklifts, vehicle trips generated by construction workers, vendor trucks, and haul trucks traveling to and from the Project Site and building activities, such as the application of paint and other surface coatings. The Project's daily regional criteria pollutant emissions during construction have been estimated by assuming a conservative scenario for construction activities (i.e., assuming all construction occurs at the earliest feasible date, given that regulatory requirements will improve future emissions associated with fleet, vehicle, and equipment mixes) and applying the mobile source and fugitive dust emissions factors. The emissions have been estimated using the CalEEMod software (Version 2022.1), an emissions inventory software program recommended by the SCAQMD, and the CARB on-road vehicle EMFAC2021 model. The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule based on information provided by the Project's construction representative. When information was unknown, CalEEMod defaults were used. Emissions from off-road equipment and off-road vehicles were estimated through CalEEMod since CalEEMod is based on outputs from the CARB off-road emissions factor (OFFROAD), which is the emissions estimation model developed by CARB and used to calculate emissions from construction activities, including off-road vehicles. Worker trip, concrete truck, vendor truck and haul truck trip estimates were provided by the Project's construction representative. Emissions from construction vehicles including worker vehicles, haul trucks, vendor trucks, and concrete trucks were also estimated outside of CalEEMod using EMFAC2021 emission factors for haul, vendor and concrete trucks because CalEEMod assumes that the number of heavy-duty trucks input into the model occurs across the entire length of the applicable construction phases. However, since the applicable construction phases would not have the same number of haul trucks, vendor trucks, and concrete trucks on-site every day within each particular phase, the emissions calculations performed outside of CalEEMod are able to account for the varying maximum numbers of daily haul truck and concrete truck trips within each of the demolition, grading/excavation and foundations phases. Haul truck trip estimates were based on excavation volumes obtained from the Project's construction representative and 40 cubic yard demolition debris capacity haul trucks for the demolition phase and 14 cubic yard soil capacity haul trucks for the grading/excavation phase; cement truck trip estimates were based on the Project's construction representative and 9 cubic yard concrete capacity concrete trucks. Emissions from worker trips, haul truck trips, concrete truck trips, and vendor truck trips were estimated using the CARB EMFAC2021 model. These values were applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions values for each construction activity. The Project would export approximately 57,000 cubic yards (CY) of soil during the grading/excavation phase, all of which would be exported from the Project Site. Emissions from these activities were estimated by construction phase. As discussed in Chapter 2, *Project Description*, of this Draft EIR, the extended construction hours are being requested over the course of approximately four (4) months during the

grading/excavation and foundation phases of construction. The maximum daily emissions were estimated based on maximum construction activity conditions for heavy-duty off-road construction equipment and on-road mobile sources and do not represent the emissions that would occur every day during Project construction. The maximum daily emissions were compared to the SCAQMD daily regional thresholds of significance. A detailed discussion of the Project's construction phasing and equipment list is available in Appendix C of this Draft EIR.[51]

The localized effects from the on-site portion of construction emissions are evaluated at nearby sensitive receptor locations potentially impacted by the Project according to the SCAQMD's Localized Significance Threshold Methodology.[52] The localized significance thresholds are only applicable to NO_X, CO, PM10, and PM2.5. The SCAQMD has established screening criteria for projects that disturb five acres or less that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The localized analysis is based on this SCAQMD screening criteria. The screening criteria depend on: (1) the area in which the Project is located SRA, (2) the size of the Project Site, and (3) the distance between the Project Site and the nearest sensitive receptor. The Project Site is located in the SCAQMD SRA 3 and could disturb up to approximately 2.23 acres on a given day. The nearest off-site air quality sensitive receptors include the residences located approximately 50 feet to the east and southeast and park uses located approximately 50 feet east of the Project Site. The maximum net daily emissions from construction of the Project were compared to the screening levels from SRA 3 with sensitive receptors located within 25 meters of the Project Site.[53]

As stated above, fugitive dust emissions would result from demolition and various soil-handling activities during construction of the Project. Construction contractors are required to comply with the applicable provision of SCAQMD Rule 403 (Fugitive Dust). As discussed in subsection, *Regulatory Framework*, above, SCAQMD Rule 403 requires construction activities to control fugitive dust emissions during construction by complying with best available control measures, such as ensuring sufficient freeboard height for haul vehicles, covering loose material on haul vehicles, applying water or non-toxic soil stabilizers in sufficient quantities to prevent the generation of visible dust plumes on disturbed or unpaved road surfaces, and limiting vehicle speeds to 15 miles per hour on unpaved surfaces. Applicable fugitive dust control measures are incorporated into the construction emissions modeling within the SCAQMD-approved CalEEMod software.

Project construction is anticipated to commence in 2025 and require up to 30 months. If construction commences at a later date, construction emissions would be lower than those estimated below due to the use of a more energy-efficient and cleaner burning construction vehicle fleet mix,

51 Impacts from asbestos and lead-based paint from Project demolition are expected to be less than significant with compliance with regulations. For additional details please refer to the Project's Initial Study, included in Appendix A-2 of this Draft EIR.

52 South Coast Air Quality Management District, Localized Significance Thresholds, (2003, revised 2008), http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed October 2022.

53 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008, page 3-3. "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters."

pursuant to State regulations that require vehicle fleet operators to phase-in less polluting trucks. As a result, should Project construction commence at a later date than analyzed in this Draft EIR, air quality impacts would be lower than the impacts disclosed herein.

Project Operational Emissions Methodology

Project operational emissions were estimated using CalEEMod Version 2022.1 to forecast the daily regional criteria pollutant emissions from on-site area and stationary sources that would occur during long-term Project operations.

Operation of the Project has the potential to generate criteria pollutant emissions through vehicle and truck trips traveling to and from the Project Site. For mobile sources, the estimated vehicle trips and maximum daily VMT were provided for the Project uses in the Project's Transportation Study where the VMT analysis used the City's VMT analysis procedures and Transportation Study Criteria and Guidelines.[54] Therefore, the Project's mobile source operational emissions represent a maximum day with the highest estimated VMT. The EMFAC2021 model was run in the emissions mode (also referred to as the "Burden" mode) and used to generate County-specific vehicle fleet emission factors in units of grams or metric tons per mile. These emission factors were then applied to the daily VMT to obtain daily mobile source emissions. The Project's operational emissions were estimated using the CalEEMod software. CalEEMod was used to forecast the daily regional criteria pollutant emissions from on-site areas and stationary sources that would occur during long-term Project operations. Emissions would result from area sources located on-site, such as landscaping equipment, architectural coating, and use of consumer products. The Project is not expected to contain any large stationary combustion equipment, such as large boilers or combustion turbines. CalEEMod generates default natural gas usage factors based on the California Energy Commission (CEC) Electricity Demand Forecast Zone (EDFZ) and based on energy consumption estimates from the CEC's (2020, 2021) 2018–2030 Uncalibrated Commercial Sector Forecast and 2019 Residential Appliance Saturation Survey. The Project would be required to meet the Title 24 standards in effect at the time of building permit application. For example, the Project would be required to comply with the 2022 Title 24 Building Energy Efficiency Standards (which are effective for building permit applications that are applied for on or after January 1, 2023). CalEEMod includes building energy efficiency factors for the 2019 Title 24 Building Energy Efficiency Standards but does not include correction factors for the 2022 standards.[55] As described in GHG-PDF-1, the Project will utilize only electricity and no natural gas in all land uses except for the retail space, supporting local and State sustainability goals and decarbonization strategies consistent with the City's All -Electric Building Ordinance and CARB's 2022 Climate Change Scoping Plan for Achieving Carbon Neutrality (see Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for additional details). While building electrification would result in higher electricity usage, it would eliminate the use of a fossil fuel and the associated criteria pollutant emissions (i.e., natural gas combustion) from building energy demand.

[54] Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR

[55] This would be considered conservative because the Project would be required to comply with newer and more stringent 2022 Title 24 standards compared to the default 2019 Title 24 standards incorporated in CalEEMod version 2022.1.

Operational air quality impacts were assessed based on the incremental increase in emissions compared to baseline conditions. As discussed previously, the Project Site is currently developed with a 30,672 square foot two-story office building with associated landscaping and surface parking, which would be demolished and removed to support development of the Project. Existing site emissions are associated with vehicle trips to and from the Project Site, landscaping equipment, on-site combustion of natural gas for heating, and fugitive emissions of VOCs from the use of aerosol products and coatings. Therefore, the net change in operational emissions is based on the difference between the existing Project Site emissions and the emissions of the Project Site at full buildout. The maximum daily net emissions from operation of the Project are compared to the SCAQMD daily regional significance thresholds.

The localized effects from the on-site portion of the maximum daily net emissions from Project operation were evaluated at the nearby sensitive receptor locations that would be potentially impacted by operation of the Project according to the SCAQMD's *Final Localized Significance Threshold Methodology*.[56] The localized impacts from operation of the Project were assessed similar to the construction emissions, as discussed previously. For further explanation, please see the *Air Quality and Greenhouse Gas Emissions Technical Documentation* in Appendix C of this Draft EIR.

Operational impacts were assessed for the Project buildout year (i.e., as early as 2027 assuming construction begins at the earliest possible time in 2025). If the onset of Project operations is delayed to a later date than assumed in the modeling analysis, operational impacts would be less than those analyzed here in 2027 due to the improving vehicle technology that would be more fuel-efficient and lead to a cleaner vehicle fleet mix traveling to and from the Project Site as reflected in EMFAC mobile source emission factors. As a result, Project buildout at a later date than analyzed in emissions modeling would result in air quality emission impacts that would be lower than the impacts disclosed herein.

Carbon Monoxide Hotspots

Emissions of CO are generated in greatest quantities from motor vehicle combustion of fossil fuels, 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. Localized areas where ambient concentrations exceed State and/or federal standards are termed CO hotspots. The potential for the Project to cause or contribute to the formation of offsite CO hotspots are evaluated based on prior dispersion modeling of the four busiest intersections in the Air Basin that has been conducted by SCAQMD for its CO Attainment Demonstration Plan in the conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin that include: Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; La Cienega Boulevard and Century Boulevard; and Long Beach Boulevard and Imperial Highway.[57] In the 2003 AQMP, 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 approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to

[56] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.
[57] The 2003 AQMP is the most current AQMP that provides modeling and attainment demonstration for CO.

Interstate (I) 405 in Westwood. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations. As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. If a project would potentially result in a CO hotspot based on the initial screening, detailed modeling may be performed using California LINE Source Dispersion Model, version 4 (CALINE4), which is a model used to assess air quality impacts near transportation facilities (i.e., roadways, intersections, street canyons, and parking facilities).

Toxic Air Contaminants Impacts

The SCAQMD has also adopted land use planning guidelines in the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, which considers impacts to sensitive receptors from facilities that emit TAC emissions. SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity of freeways and high-traffic roads, and the same siting criteria for distribution centers and dry-cleaning facilities). The SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

Construction

The greatest potential for TAC emissions during construction would be related to DPM emissions associated with heavy-duty equipment during demolition, excavation and grading activities. Construction activities associated with the Project would be sporadic, transitory, and short term in nature (approximately 30 months). Although Project construction would be temporary, construction impacts associated with TACs are addressed quantitatively in a refined HRA. OEHHA is responsible for developing and revising guidelines for performing health risk assessments (HRAs) under the State's the Air Toxics Hot Spots Program Risk Assessment (AB 2588) regulation. In March 2015, OEHHA adopted revised guidelines that update the previous guidance by incorporating advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (ASF). The construction HRA was performed in accordance with the revised OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidance).[58] The analysis incorporates the estimated construction emissions, as previously discussed, and dispersion modeling using the USEPA AERMOD model with meteorological data from the closest SCAQMD monitoring station.

Operations

During long-term operations, TACs could be emitted as part of periodic maintenance operations, from routine cleaning, from periodic painting, etc., and from periodic visits from delivery trucks and service vehicles, and from maintenance. However, these events are expected to be occasional

[58] California Environmental Protection Agency, Office of Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, 2015.

and result in minimal emissions exposure to off-site sensitive receptors. As the Project consists only of residential and retail uses, the Project would not include sources of substantial TAC emissions identified by the SCAQMD or CARB siting recommendations.[59, 60] For operations, the impacts are analyzed qualitatively due to the limited and minimal sources of TACs associated with operation of the proposed land uses.

Project Design Features

No specific project design features are proposed with regard to air quality. However, the Project would incorporate project design features to support and promote environmental sustainability as discussed under Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR (refer to Project Design Features GHG-PDF-1 and TRAF-PDF-2). While these features are designed primarily to reduce GHG emissions, they would also serve to reduce criteria air pollutants discussed herein.

Analysis of Project Impacts

Threshold AIR-1: The Project would result in a significant impact if it would conflict with or obstruct the implementation of the applicable air quality plan.

Impact Analysis

SCAQMD CEQA Air Quality Handbook Policy Analysis

The following analysis addresses the Project's consistency with applicable SCAQMD and SCAG policies, inclusive of regulatory compliance. In accordance with SCAQMD's CEQA Air Quality Handbook, Chapter 12, the following criteria are required to be addressed to determine the Project's consistency with applicable SCAQMD and SCAG policies:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations; or
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP control measures?

The Project's potential impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's 2022 AQMP and other applicable plans and policies.

[59] SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 2005, Table 2-3.

[60] CARB, Air Quality and Land Use Handbook: A Community Health Perspective, 2005, Table 1-1.

Criterion 1

With respect to the first criterion, as discussed in more detail under the analysis for Threshold AIR-2 below, regional concentrations of NO_2 as NO_X, VOC, SO_2, CO, PM10, and PM2.5 have been analyzed for the Project. As shown in Table 4.2-6 in Threshold AIR-2 below, regional maximum daily Project construction emissions would not exceed the SCAQMD regional construction emissions thresholds. As shown in Table 4.2-7 in Threshold AIR-2 below, regional maximum daily Project operations emissions would not exceed the SCAQMD regional operations emissions thresholds. Therefore, the Project would not increase in the frequency or severity of existing air quality violations, cause or contribute to new air quality violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

As discussed under the analysis for Threshold AIR-3 below, localized concentrations of NO_2 as NO_X, CO, PM10, and PM2.5 have been analyzed for the Project. SO_2 emissions would be negligible during construction and long-term operations and, therefore, would not have the potential to cause or effect a violation of the SO_2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. However, due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

The Project's NO_X, CO, PM10, and PM2.5 emissions during construction and operations were analyzed: (1) to ascertain potential effects on localized concentrations; and (2) to determine if there is a potential for such emissions to cause or effect a violation of the ambient air quality standards for NO_2, CO, PM10, and PM2.5. As shown in Table 4.2-8, the increases in localized emissions of NO_2, CO, PM10, and PM2.5 during construction would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. As shown in Table 4.2-9, the increases in localized emissions of NO_X, CO, PM10, and PM2.5 emissions during operation of the Project would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site.

The 2022 AQMP is the current SCAQMD-adopted management plan for continued progression toward clean air and compliance with State and federal requirements (it is not yet adopted by the USEPA for inclusion in the State Implementation Plan). It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources, and area sources. It builds upon measures already in place from previous AQMPs and includes a variety of new strategies (e.g., regulation, accelerated deployment of available cleaner technologies, best management practices, co-benefits from existing programs, incentives, etc.) to achieve the NAAQS. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD so as not to potentially increase the frequency or severity of an existing violation or cause or contribute to a new violation. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP and therefore would not delay attainment of the air quality standards.

The Project would not introduce any substantial stationary sources of emissions; therefore, CO is the appropriate benchmark pollutant for assessing local area air quality impacts from post-

construction motor vehicle operations.[61] As indicated below in Threshold AIR-3, no intersections would result in a CO hotspot in excess of the ambient air quality standards, and impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

Therefore, in response to Criterion 1, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for ozone or other criteria pollutants. Impacts regarding the timely attainment of air quality standards or interim emission reductions specified in the AQMP and impacts would be less than significant.

Criterion 2

With respect to the second criterion for determining consistency with 2022 AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in Connect SoCal regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the 2022 AQMP involves the evaluation of consistency with applicable population, housing, and employment growth projections and appropriate incorporation of 2022 AQMP control measures. The following discussion provides an analysis with respect to these criteria.

Conflict with Air Quality Management Plan

Construction and operation of the Project would comply with applicable required fleet rules and control strategies to reduce on-road truck emissions (i.e., 13 CCR, Section 2025 [CARB Truck and Bus regulation]), and other applicable SCAQMD rules specified and incorporated in the 2022 AQMP. As discussed under *Air Quality - Methodology*, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP even if their emissions exceed the SCAQMD's thresholds of significance. As discussed below, compliance with the applicable required fleet rules and control strategies and requirements would render it consistent with, and meet or exceed, the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Thus, the Project's construction-related and operations-related criteria pollutant emissions would not cause the Air Basin's criteria pollutant emissions to worsen so as to impede the SCAQMD's efforts to achieve attainment with respect to any criteria pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM10, and PM2.5),[62] or to cause the Air Basin to deteriorate from its current attainment status with respect to any other criteria pollutant emissions.

With respect to the determination of consistency with or potential conflicts with the 2022 AQMP growth assumptions, the projections in the 2022 AQMP for achieving air quality goals are based on assumptions in Connect SoCal regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of

61 SCAQMD, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, April 1993.

62 The Los Angeles County portion of the Air Basin is designated as nonattainment for the federal lead standard; however, this was due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating. For reference see SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

three criteria: (1) consistency or conflict with applicable population, housing, and employment growth projections; (2) project mitigation measures (discussed under Section 2, Mitigation Measures, below); and (3) appropriate incorporation of AQMP land use planning strategies (discussed under Subsection (ii), Operations, below).

- Is the Project consistent with or would the Project conflict with the population and employment growth projections upon which AQMP forecasted emission levels are based?

Construction Growth Projections

The Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region since construction workers are typically drawn from an existing regional pool of construction workers who travel among construction sites within the region as individual projects are completed, and are not typically brought from other regions to work on developments such as the Project. Moreover, these jobs would be relatively small in number and temporary in nature, lasting at a maximum of approximately 30 months for the entire duration of the construction period, but would likely be shorter due to varying construction phases. Therefore, the Project's construction jobs would not conflict with the employment or population projections upon which the 2022 AQMP forecasted emissions levels are based.

Operation Growth Projections

As stated above, for purposes of the air quality modeling, the Project is assumed to be operational in 2027 to provide a conservative estimate of emissions. However, if the Project buildout occurs at a later time, the emissions would be less than disclosed herein. As discussed in Chapter 4.9, *Population and Housing*, of this Draft EIR, the Project's growth would fall within the growth projections contained in Connect SoCal, which forms the basis of the growth projections in the 2022 AQMP. As discussed in Section 4.9, *Population and Housing*, of this Draft EIR, based on Connect SoCal growth projections, the Project's proposed 309 units would comprise approximately 36 percent of SCAG's year 2045 estimated increase of 862 households within the City, relative to 2020.[63] Based on Connect SoCal growth projections, the Project's projected 733 resident population would comprise approximately 57 percent of SCAG's year 2045 estimated increase of 1,293 population within the City, relative to 2020.[64] Based on Connect SoCal growth projections, the Project would result in an decrease in the number of employees on the Project Site of approximately 127 net new employees, compared to existing uses which would comprise a decrease of less than 1 percent of SCAG's year 2045 estimated increase of 4,138 employees within the City, relative to 2020.[65] Therefore, the Project's contribution to population, households and employment would be consistent with SCAG population and employment projections for the City and would be

63 SCAG, 2020 RTP/SCS: Demographics and Growth Forecast (Technical Report), September 2020, page 34, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579. Accessed July 3, 2023. Refer to Section 4.9, *Population and Housing*, of this Draft EIR for additional information.

64 SCAG, 2020 RTP/SCS: Demographics and Growth Forecast (Technical Report), September 2020, page 34, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579. Accessed July 3, 2023. Refer to Section 4.9, *Population and Housing*, of this Draft EIR for additional information.

65 SCAG, 2020 RTP/SCS: Demographics and Growth Forecast (Technical Report), September 2020, page 34, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579. Accessed July 3, 2023. Refer to Section 4.9, *Population and Housing*, of this Draft EIR for additional information.

consistent with SCAG's Connect SoCal goals and with the growth projections contained in Connect SoCal. Accordingly, the Project's generation of population, households and employees would not conflict with employment generation projections contained in Connect SoCal. Furthermore, as discussed in Section 4.9, *Population and Housing*, of this Draft EIR, the Culver City October 2021-2029 Housing Element, which is based on the SCAG's 6th Cycle Regional Housing Needs Assessment (RHNA)[66] allocations, indicates the total housing growth need for the City during this planning period through 2029 is 3,341 units. Accordingly, the Project's proposed housing would constitute 9.2 percent of the 6th Cycle RHNA allocations between 2021 and 2029 (refer to Section 4.9, *Population and Housing*, of this Draft EIR for additional details). Therefore, the Project would promote fulfillment of the City's future updated Housing Element goals and is consistent with SCAG and the City's 6th Cycle RHNA allocations. Refer to Section 4.7, *Land Use and Planning*, and 4.9, *Population and Housing*, of this Draft EIR, for additional information regarding consistency with Connect SoCal. As discussed above under *Air Quality - Methodology*, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the 2022 AQMP would not jeopardize attainment of the air quality reductions identified in the 2022 AQMP, even if their emissions exceed the SCAQMD's thresholds of significance.[67] The Project would not obstruct implementation of the 2022 AQMP, as discussed below under Thresholds AIR-2 and AIR-3, since its regional construction and operational emissions would be less than significant, and its localized construction and operational emissions would be less than significant. As a result, the Project would not conflict with the growth projections and control strategies used in the development in the 2022 AQMP. Impacts would be less than significant.

- Does the Project include air quality mitigation measures?

As further discussed below, see under Threshold AIR-2 and Threshold AIR-3, and as shown in Table 4.2-6 through Table 4.2-9, regional and localized maximum daily Project construction and operations emissions would not be expected to exceed the SCAQMD numerical indicators of significance and the Project would not require implementation of mitigation measures during construction and operations. As such the Project would not conflict with this AQMP criterion.

- To what extent is Project development consistent with the AQMP control measures?

Control Strategies

Construction

During its construction phase, the Project is required to comply with CARB's requirements to reduce short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations, such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. The Project is also required to utilize construction contractors in compliance with State on-road and off-road vehicle rules, including the ATCM that limits heavy-duty diesel motor vehicle idling to five minutes at any location (Title 13 CCR, Section

66 SCAG's 6th Cycle Regional Housing Needs Assessment focused on existing need (current housing shortages and overcrowding) plus projected growth, which takes into account factors beyond what was used to determine the 2020 RTP/SCS's (Connect SoCal) projected growth. Therefore, the 6th Cycle RHNA allocation for the City results in a higher allocation of housing than what is represented in Connect SoCal, which is focused solely on projected or future growth (see Section 4.9, *Population and Housing*, of this Draft EIR, for additional details).

67 SCAQMD, CEQA Air Quality Handbook, April 1993, page 12-1.

2485), the Truck and Bus regulation that reduces NO_X, PM10, and PM2.5 emissions from existing diesel vehicles operating in California (13 CCR, Section 2025), and the In-Use Off-Road Diesel Fueled Fleets regulation that reduces emissions by the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR, Section 2449). The Project's construction contractor would be required to comply with these regulatory control measures. As discussed above, the Project regional and localized maximum daily Project construction emissions would not exceed the SCAQMD regional construction emissions thresholds and would not conflict with or obstruct implementation of the applicable AQMP. Therefore, Project impacts would be less than significant. As the achievement and maintenance of NAAQS and CAAQS is the goal of the 2022 AQMP, the Project would therefore not interfere with air pollution control strategies listed in the 2022 AQMP. Compliance with these regulatory control measures would ensure the Project would not conflict with 2022 AQMP control strategies intended to reduce emissions from construction equipment and activities.

Operations

The Project's location, design, and land uses would be consistent with the 2022 AQMP during operations. As discussed above, the 2022 AQMP includes land use and transportation strategies from Connect SoCal that are intended to reduce VMT and resulting regional mobile source emissions. The majority of these strategies are to be implemented by cities, counties, and other regional agencies, such as SCAG and SCAQMD, although some can be furthered by individual development projects.

The Project's location, design, and land uses would support transportation control strategies related to reducing vehicle trips for patrons and employees by increasing residential and retail density near public transit. The Project Site is served by several public transit options, including Metro Bus Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site. In addition, the Project Site is located 0.6 mile east of the Culver City Transit Center which serves Los Angeles County Metro Bus Lines 108 and 110, as well as Culver City Bus Line 6. Furthermore, the Project would also implement transportation demand management (TDM) measures in the Project's Transportation Demand Management (TDM) Program (see Project Design Feature TRAF-PDF-2) which includes Transportation Information Center (TIC); Bicycle Parking and Amenities, which includes 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015; EV parking and charging would be available for residential and commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready in accordance with City Municipal Code Section 17.320.035.O.3. Forty-four (44) total spaces (41 residential + 3 commercial) would have EV charging stations. Pedestrian-Friendly Environment; Employee Parking; Bus Stop Improvements that would reduce Project-related VMT (refer to Section 4.11, *Transportation*, of this Draft EIR, for additional details regarding the TDM Program). The Project is an infill project that provides increased opportunities to use alternative transportation modes by co-locating complementary residential and retail land uses on an infill Project Site that is in close proximity to existing off-site commercial and residential uses, being located within a quarter-mile of off-site commercial and residential uses, and would occupy a location that is highly accessible by existing public transit options along Hannum Avenue and Buckingham Parkway in a highly walkable area well served by

public transportation for visitors, residents, employees and patrons, the Project would reduce vehicle trips and VMT, and achieve a corresponding reduction in air pollutant emissions.

The Project's mobile source emissions are calculated based on the VMT generated by the Project, as obtained from the Project's Transportation Study.[68] While the Project would also implement transportation demand management (TDM) measures in the Project's Transportation Demand Management (TDM) Program (see Project Design Feature TRAF-PDF-2) that would reduce Project-related VMT (refer to Section 4.11, *Transportation*, of this Draft EIR, for additional details regarding the TDM Program), these TDM measures in TRAF-PDF-2 were conservatively not credited to the GHG analysis as the exact amount of VMT reduction associated the measures are not precisely quantifiable and are qualitatively discussed in the analysis in Section 4.11, *Transportation*. Thus, Project development would not conflict with the 2022 AQMP with respect to transportation control strategies from Connect SoCal that are intended to reduce VMT and resulting regional mobile source emissions.

Based on the above, the Project would not conflict with the criteria identified in SCAQMD's CEQA Air Quality Handbook and would not conflict with or obstruct the implementation of both the 2022 AQMP. Therefore, Project impacts related to the 2022 AQMP would be less than significant.

The City of Culver City General Plan and Mandatory Green Building Program

Although the City's General Plan does not have an Air Quality Element, the project would be consistent with General Plan and the Circulation Element of the General Plan. The Project Site is located within the Fox Hills neighborhood. The Project Site's Land Use designation of Regional Center has a corresponding Zone of Regional Business Park (CRB). The Project is proposing to change the Project Site's zoning designation to Planned Development (PD) with adoption of a Comprehensive Plan that would serve as the overarching entitlement mechanism for the Project Site. Per the Zoning Code, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site planning and design and to support more effective responses to the settings of such properties and other environmental considerations.[69] To permit this, a Comprehensive Plan regulates permitted uses, development standards, and conditions of approval on a Project Site. To achieve the Project's proposed density and mix of uses, a General Plan Amendment Map would be needed to designate the Project Site as General Corridor. The Project's unit count is consistent with the recently-adopted October 2021-2029 Housing Element's Mixed-Use High Designation and state density bonus law. Refer to Draft EIR, Section 4.7, *Land Use and Planning*, for additional details regarding requested zoning actions for the Project.

The Project would be consistent with the Circulation Element of the General Plan through encouraging pedestrian-oriented design where the Project design allows residents to be able to walk through and around the Project Site with multiple access points and community connections to the development.

[68] Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR.

[69] City of Culver City Zoning Code, Title 17, Section 17.560, Comprehensive Plans, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-56855#JD_CHAPTER17.560. Accessed April 2023.

In addition, the first floor retail use at the corner of Hannum Avenue and Buckingham Parkway would serve as a pedestrian point of interest on the Project Site where the Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza fronting Hannum Avenue, which would provide open space for both residents and visitors. Furthermore, as discussed previously, the Project is served by several public transit options, including Metro Bus Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site. In addition, the Project Site is located 0.6 mile east of the Culver City Transit Center which serves Los Angeles County Metro Bus Lines 108 and 110, as well as Culver City Bus Line 6.

Per CCMC Section 7.05.015, the Project proposes a TDM Program as described in Project Design Feature TRAF-PDF-2. The Project's TDM Program (TRAF-PDF-2) includes TDM measures to reduce peak hour vehicular traffic and air emissions to and from the Project Site (see 4.11, *Transportation*, of this Draft EIR, for additional details). The Project's TDM Program (TRAF-PDF-2) includes TDM measures to reduce peak hour vehicular traffic and air emissions to and from the Project Site. The Project's TDM Program (TRAF-PDF-2) includes a comprehensive program of measures, design features, transportation services, education programs, and incentives intended to reduce the effect of Project traffic from residents, employees, and visitors to the Project Site during the most congested time periods of the day. The TDM measures include, but are not limited to, the following: Transportation Information Center (TIC); bicycle parking and amenities, which includes 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015; and EV parking and charging would be available for residential and commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready in accordance with City Municipal Code Section 17.320.035.O.3. The Project would provide pedestrian connections; employee parking; and bus stop improvements (if deemed necessary by the City). Additional TDM strategies that will be provided by the Project to further reduce VMT and reliance on single-passenger vehicles, and help future residents and employees manage each TDM element and maximize program participation include: Project Transportation Coordinator; Transportation Information Packet for New Residents and Employees; bike repair station; subsidized shared-ride/Uber/Lift service; and transit passes (see Section 4.11, *Transportation*, of this Draft EIR for a detailed explanation of all TDM measures contained in TRAF-PDF-2). Thus, the Project would implement strategies and action plans as part of a comprehensive TDM Program (TRAF-PDF-2) in compliance with the requirements set forth in CCMC Section 07.05.015 to reduce single occupancy vehicle trips while promoting the use of alternative transportation modes, thereby reducing Project VMT. Providing pedestrian and bicycle access that minimizes barriers and links the Project Site with external streets encourages people to walk, bike and take public transit, instead of driving reduces VMT. Therefore, the Project would support a land use pattern that encourages reduced vehicle trips and transportation air pollutant emissions.

As described in Section 4.6, *Greenhouse Gas Emissions*, the Project would be designed with Project Design Feature GHG-PDF-1 and be required to comply with the Culver City Green Building Program and ordinances where the Project would achieve the USGBC LEED Certified performance level or higher or equivalent performance level to improve building energy efficiency, and design features would include energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. EV parking and charging would be available for residential and

commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. Forty-four (44) total spaces (41 residential + 3 commercial) would have EV charging stations. The Project would include 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces. As it relates to energy conservation, the Project would include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances. As it relates to water conservation, the Project would incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems. In addition, the Project would include installation of a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 sf in order to achieve compliance with the City of Culver City's solar photovoltaic requirement, per the City's Green Building Ordinance and CALGreen standards. In addition, as part of Project Design Feature GHG-PDF-1, the Project would directly support building electrification as the Project will utilize only electricity and no natural gas in all land uses except for the retail space. These features would indirectly reduce air pollutant emissions from the Project.

Based on the above analysis, the Project would not conflict with applicable goals, objectives, and policies of the City of Culver City General Plan and the Culver City Mandatory Green Building Program pertaining to air quality, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Impacts regarding consistency with the applicable air quality plan would be less than significant.

Threshold AIR-2: The Project would result in significant impact if it would 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.

Impact Analysis

Construction

Construction of the Project has the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities, such as the application of paint and other surface coatings. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Construction emissions, primarily NO_X, would result from the use of construction equipment, such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions.[70]

[70] Impacts from asbestos and lead-based paint from Project demolition are expected to be less than significant with compliance with regulations. For additional details please refer to Section 4.7, *Hazards and Hazardous Materials*, of this Draft EIR.

The maximum daily construction emissions for the Project were estimated for each construction phase. The maximum daily emissions are predicted values for a representative worst-case day, and do not represent the actual emissions that would occur for every day of construction, which would likely be lower on many days. As stated above, in order to provide a conservative emissions analysis, for modeling purposes, construction emissions were modeled beginning in 2025. Detailed emissions calculations are provided in Appendix C of this Draft EIR.

The results of the criteria pollutant calculations are presented in **Table 4.2-6**, *Estimated Maximum Unmitigated Regional Construction Emissions.* As previously stated, within CalEEMod, fugitive dust emissions include the application of water as a control measure consistent with SCAQMD Rule 403. Therefore, emissions include dust control measures as required by SCAQMD Rule 403 (Control of Fugitive Dust). Emissions also include fugitive VOC control measures to be implemented by architectural coating emission factors required by SCAQMD Rule 1113 (Architectural Coatings). As shown in Table 4.2-6, construction-related daily emissions would not exceed the SCAQMD thresholds of significance. Therefore, the Project's regional construction emissions impacts would be less than significant.

TABLE 4.2-6
ESTIMATED MAXIMUM UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY)

Construction Phases	VOC	NO_x	CO	SO_2	PM10[b]	PM2.5[b]
Demolition - 2025	1	11	15	<1	1	1
Grading - 2025	2	43	37	<1	7	2
Foundations - 2025	2	23	28	<1	3	1
Foundations - 2026	2	15	23	<1	2	1
Building Construction - 2026	2	19	28	<1	3	1
Finishing/Painting - 2026	14	5	15	<1	4	1
Finishing/Painting - 2027	14	5	14	<1	4	1
Paving/Sitework - 2027	1	6	12	<1	2	1
Maximum Daily Construction Emissions[a]	**14**	**43**	**37**	**<1**	**7**	**2**
SCAQMD Regional Significance Threshold	75	100	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

NOTES:

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA 2023

Operation

Operational criteria pollutant emissions were calculated for mobile, area, and energy sources for the Project operational year, 2027. Operational emission estimates include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings. Daily vehicle miles traveled were obtained from the Transportation Study.[71] Natural gas usage factors are based on recreational and retail data from the CEC, and landscape equipment emissions are based on off-road emission factors from CARB. Emissions from the use of consumer products and the reapplication of architectural coatings are based on data provided in CalEEMod. As discussed previously, operational emissions are reduced based on the estimated operational emissions of the existing uses on the Project Site.

The results of the regional criteria pollutant emission calculations for VOC, NO_X, CO, SO_X, PM10, and PM2.5 for the Project are presented in **Table 4.2-7,** *Estimated Maximum Unmitigated Regional Operational Emissions (pounds per day).* The Project's operational-related daily emissions would not exceed the SCAQMD thresholds of significance. Therefore, the Project's regional operational emissions impacts would be less than significant.

TABLE 4.2-7
ESTIMATED MAXIMUM UNMITIGATED REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Area (Consumer Products, Landscaping)	12	<1	28	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile Vehicles	3	4	27	<1	8	2
Project Maximum Daily Operational Emissions	**15**	**4**	**55**	**<1**	**8**	**2**
Existing Site Emissions Removed	2	1	8	<1	1	<1
Net Maximum Regional Operational Emissions[a]	**15**	**4**	**55**	**<1**	**8**	**2**
SCAQMD Significance Threshold	55	55	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C

SOURCE: ESA 2023

Mitigation Measures

Construction

No mitigation measures are required as impacts would be less than significant.

Operation

No mitigation measures are required as impacts would be less than significant.

[71] Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR.

Level of Significance After Mitigation

Not applicable. Project-specific impacts regarding construction and operational regional air quality impacts were determined to be less than significant.

Threshold AIR-3: The Project would expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis

Localized Emissions

Construction

As explained above, the localized construction air quality analysis was conducted using the methodology prescribed in the SCAQMD *Final Localized Significance Threshold Methodology*.[72] The SCAQMD screening criteria provided in the *Final Localized Significance Threshold Methodology* were used to determine localized construction emissions thresholds for the Project. The maximum daily localized construction emissions for the Project were estimated for each construction phase and analyzed using screening criteria applicable to a 2.23-acre site in the SCAQMD SRA 3 (Southwest Coastal LA County) with sensitive receptors located 25 meters away, which accounts for all adjacent off-site sensitive receptors.[73] The maximum daily localized emissions for each of the construction phases and the localized significance thresholds are presented in **Table 4.2-8,** *Estimated Maximum Unmitigated Localized Construction Emissions (pounds per day).* The Project's maximum localized operational emissions would be below the localized significance thresholds, and localized construction emissions impacts to existing sensitive receptors would be less than significant.

Operation

The localized operational air quality analysis was conducted using the methodology prescribed in the SCAQMD Localized Significance Threshold Methodology.[74] The screening criteria provided in the Localized Significance Threshold Methodology were used to determine the localized operational emissions numerical indicators of significance for the Project. The Project would comply with the Title 24 (2022) building energy efficiency standards, CALGreen Building Code, and the Culver City Mandatory Green Building Program. The maximum daily localized emissions and the localized significance thresholds are presented in **Table 4.2-9,** *Estimated Maximum Localized Operational Emissions – Project (pounds per day).* The Project's maximum localized operational emissions would be below the localized significance thresholds, and localized operational emissions impacts to existing sensitive receptors would be less than significant.

[72] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008. Referenced for Source Receptor Area 3 (Northwest Los Angeles County Coastal) for a 2.23-acre site interpolating from LST values from 1-acre and 5-acre sites.

[73] SCAQMD, Final Localized Significance Threshold Methodology, "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.", June 2003 and revised July 2008, p. 33.

[74] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

TABLE 4.2-8
ESTIMATED MAXIMUM UNMITIGATED LOCALIZED CONSTRUCTION EMISSIONS
(POUNDS PER DAY)

Construction Phases	NO_X	CO	PM10[b]	PM2.5[b]
Demolition - 2025	9.4	12.9	0.7	0.4
Grading - 2025	13.9	19.3	0.5	0.5
Foundations - 2025	14.1	18.8	0.6	0.5
Foundations - 2026	13.2	18.8	0.5	0.5
Building Construction - 2026	16.0	19.3	0.4	0.4
Finishing/Painting - 2026	1.8	2.5	0.1	0.1
Finishing/Painting - 2027	1.7	2.5	0.1	<0.1
Paving/Sitework - 2027	4.6	6.5	0.2	0.2
Maximum Daily Construction Emissions[a]	**16.0**	**19.3**	**0.7**	**0.5**
SCAQMD Localized Significance Threshold[c]	136.1	1,030.6	8.5	5.2
Exceeds Threshold?	**No**	**No**	**No**	**No**

NOTES:

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

[c] The SCAQMD LSTs are based on Source Receptor Area 3 (Southwest Los Angeles County Coastal) for a 2.23-acre site with sensitive receptors conservatively assumed to be 25 meters to the construction area.

SOURCE: ESA 2023

TABLE 4.2-9
ESTIMATED MAXIMUM LOCALIZED OPERATIONAL EMISSIONS – PROJECT (POUNDS PER DAY)

Source	NO_X	CO	PM10	PM2.5
Area	0.3	27.6	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1
Total Localized Project Operational Emissions	**0.3**	**27.6**	**<0.1**	**<0.1**
Localized Existing Site Emissions Removed	0.2	1.5	<0.1	<0.1
Net Maximum Localized Operational Emissions[a]	**0.1**	**26.1**	**<0.1**	**<0.1**
SCAQMD Significance Threshold[b]	136.1	1030.6	2.2	1.1
Exceeds Thresholds?	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C.

[b] The SCAQMD LSTs are based on Source Receptor Area 3 (Southwest Los Angeles County Coastal) for a 2.23-acre site with sensitive receptors conservatively assumed to be 25 meters to the Project Site.

SOURCE: ESA 2023

Carbon Monoxide Hotspots

The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project-

impacted intersections would remain well below the threshold one-hour and eight-hour ambient air quality standards (CAAQS) of 20 or 9.0 parts per million (ppm), respectively within one-quarter mile of a sensitive receptor, and that no further CO analysis is warranted or required.

As shown previously in Table 4.2-3, above, CO levels in the Project area are substantially below the federal and the State standards. Maximum CO levels in recent years (2019-2021) were 1.8 ppm (one-hour average) and 1.3 ppm (eight-hour average) as compared to the criteria of 20 ppm (CAAQS one-hour average) or 35 ppm (NAAQS one-hour average) and 9.0 ppm (eight-hour average). No exceedances of the CO standards have been recorded at monitoring stations in the Air Basin since 2003,[75] and the Air Basin is currently designated as a CO attainment area for both the CAAQS and the NAAQS.

As noted above, the 2003 AQMP estimated that the 1-hour concentration for the intersection of Wilshire Boulevard and Veteran Avenue was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations. As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis, and impacts would be considered less than significant. Based on the Project's Transportation Study,[76] under Future plus Project (2027) conditions, the segment of Slauson Avenue between the Marina Freeway and Bristol Parkway would have a traffic volume of approximately 53,450 average daily trips (ADT),[77] which is below the daily traffic volumes of 400,000 vehicles per day that would be expected to generate CO exceedances as evaluated in the 2003 AQMP. This daily trip estimate is based on the peak hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the segment of Slauson Avenue between the Marina Freeway and Bristol Parkway would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP. In addition, CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP primarily due to ongoing fleet turnover of older on-road light duty vehicles and use of cleaner fuels. In 2003, the 1-hour background CO concentration was 5.0 ppm and as seen in Table 4.2-3 has decreased to 1.7 ppm in 2021.[78] Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. The Project off-site operational activities, including the highest average daily trips, would

75 SCAQMD, 2022 AQMP, 2022, p. 2-42.

76 Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR.

77 The traffic volume of approximately 53,450 ADT was estimated based on the peak hour intersection volumes under Future plus Project conditions and the general assumption that peak hour trips represent approximately 10 percent of daily trip volumes (the Federal Highway Administration considers 10 percent to be a standard assumption; see Travel Model Improvement Program Time-of-Day Modeling Procedures: State-of-the-Practice, State-of-the-Art (2.0 Standard Approaches, http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm).

78 The monitoring station most representative of the Project Site the Southwest Coastal LA County Monitoring Station. SCAQMD, Historical Data by Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year; USEPA, AirData, www.epa.gov/airdata/ad_rep_mon.html. Accessed October 2023.

not expose sensitive receptors to substantial CO concentrations. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

Toxic Air Contaminants

Construction

The Project's health risk calculations were performed using a spreadsheet tool consistent with the OEHHA guidance, which incorporates the algorithms, equations, and a variable described above as well as in the OEHHA guidance, and incorporates the results of the AERMOD dispersion model. As shown in **Table 4.2-10**, *Maximum Unmitigated Health Risk Impacts for Off-Site Sensitive and Commercial Receptors*, unmitigated results of the HRA cancer risk for residential land uses exceed the SCAQMD significance threshold of 10 per million; therefore, this impact is potentially significant, and mitigation would be required. Also, as seen in Table 4.2-10, the HRA cancer risk for commercial land uses does not exceed the SCAQMD significance threshold of 10 per million Hazard index values for all receptor types were below the SCAQMD significance threshold of 1.0, therefore, chronic impacts would be less than significant.

TABLE 4.2-10
MAXIMUM UNMITIGATED HEALTH RISK IMPACTS FOR OFF-SITE SENSITIVE AND COMMERCIAL RECEPTORS

Sensitive Receptor	Maximum Cancer Risk (# in one million)	Hazard Index
Residential Land Use	34.6	0.06
Commercial (Worker)	4.8	0.07
Maximum Health Impact Thresholds	10	1.0
Exceeds Threshold?	**Yes**	No

SOURCE: ESA, 2023.

Operations

The SCAQMD recommends that operational health risk assessments be conducted for substantial sources of operational DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[79] The Project does not consist of any of these land uses. With implementation of the Project, two truck loading and unloading parking spaces would be provided. Thus, the Project is not anticipated to generate a substantial number of daily truck trips. As previously discussed, trucks would be subject to the five-minute regulatory idling limitation and would project trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing diesel trucks. Therefore, Project operations would not be considered a substantial source of diesel particulates.

79 SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003, http://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc?sfvrsn=2.

With respect to the use of consumer products and architectural coatings, the residential and retail uses associated with the Project would be expected to generate minimal TAC emissions from these sources. The Project's residential and retail land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program (CalARP).

Project operations would only result in minimal emissions of TAC from maintenance or other ongoing activities, such as from the maintenance and use of architectural coatings and other products. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled. Therefore, operation of the Project would not expose sensitive and commercial receptors to substantial TAC concentrations, and operational impacts would be less than significant.

Mitigation Measures

Construction

AQ-1: Construction Equipment. The Applicant shall implement the following requirements for construction equipment operating at each Project site. These requirements shall be included in applicable bid documents and contractor(s) must demonstrate the ability to supply such equipment. Construction equipment shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 25 horsepower (hp) or greater during Project construction where available within the Air Basin. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification, BACT documentation, and CARB or Southern California Air Quality Management District (SCAQMD) operating permit at the time of mobilization of each applicable unit of equipment shall be provided.
- Use electrified tower cranes in place of diesel-fueled equipment.

Operations

Impacts regarding localized operational air quality emissions during operation were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation Construction

As shown in **Table 4.2-11**, *Maximum Mitigated Health Risk Impacts for Off-Site Sensitive and Commercial Receptors* with implementation of Mitigation Measure AQ-1 (MM-AQ-1) as described below, the maximum cancer risk and hazard index for sensitive receptors would be below the SCAQMD significance thresholds. Therefore, the impact related to health risks would be less than

significant with mitigation. The calculated cancer risk is estimated for outdoor exposure and assumes that sensitive receptors (residential uses) would not have any mitigation such as mechanical filtration and that residential uses would have continuously open windows. As shown in Table 4.2-10 and 4.2-11, maximum cancer risk and hazard index for commercial receptors would be below the SCAQMD significance thresholds without mitigation, but would be further reduced with the implementation of Mitigation Measure AQ-1 (MM-AQ-1). As the maximum cancer risk and non-cancer impacts would be less than the SCAQMD significance thresholds, impacts would be less than significant.

TABLE 4.2-11
MAXIMUM MITIGATED HEALTH RISK IMPACTS FOR OFF-SITE SENSITIVE RECEPTORS

Sensitive Receptor	Maximum Cancer Risk (# in one million)	Hazard Index
Residential Land Use	7.0	0.01
Worker (offsite)	1.0	0.02
Maximum Health Impact Thresholds	10	1.0
Exceeds Threshold?	No	No

SOURCE: ESA, 2023.

The process of assessing health risks and impacts includes a degree of uncertainty, which is dependent on the availability of data and the extent to which assumptions are relied upon in cases where the data are incomplete or unknown. All HRAs rely upon scientific studies to reduce the level of uncertainty; however, it is not possible to completely eliminate uncertainty from the analysis. Where assumptions are used to substitute for incomplete or unknown data, it is standard practice in performing HRAs to err on the side of health protection to avoid underestimating or underreporting the risk to the public by assessing risk on the most sensitive populations, such as children and the elderly. As shown in Table 4.2-11, cancer risk for nearby sensitive receptors would remain below significance thresholds with the implementation of Mitigation Measure AQ-1. Furthermore, as described above, the maximum cancer risk and hazard index for commercial receptors would be below the SCAQMD significance thresholds without mitigation, but would be further reduced with the implementation of Mitigation Measure AQ-1 (MM-AQ-1). These short-term emissions would not substantially contribute to a significant construction health risk. No residual emissions and corresponding individual cancer risk are anticipated after Project construction. Thus, construction activities would not expose sensitive and commercial receptors to substantial toxic air contaminant concentrations, and construction-related health impacts would be mitigated to less than significant with Implementation of Mitigation Measure AQ-1. Therefore, no additional mitigation measures are required or included, and the impact level would remain less than significant with mitigation.

Operations

Impacts regarding the exposure of substantial pollutant concentrations on sensitive and commercial receptors during operation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Cumulative Impacts

Chapter 3, *Environmental Setting*, of this Draft EIR, there are 12 related projects identified in the vicinity of the Project Site. The related projects within approximately 1,000 feet of the Project Site are listed in **Table 4.2-12,** *Cumulative Projects within 1,000 feet of the Project Site*.

TABLE 4.2-12
RELATED PROJECTS WITHIN 1,000 FEET OF THE PROJECT SITE

No.[a]	Location	Jurisdiction	Land Use	Size (sf)	Distance to Project Site (ft)
1	5800 Bristol Pkwy / 5801 Hannum Ave	City of Culver City	Office	281,400	750
6	5840 Uplander Way	City of Culver City	Conversion from Office to School	16,128	950

[a] Related projects list based on information from City of Culver City (January 2023), City of Los Angeles (May 2023), and the County of Los Angeles (May 2023).

SOURCE: Gibson Transportation Consulting, 2023

The SCAQMD recommends using two methodologies to assess the cumulative impact of air quality emissions: (1) a project's consistency with the current AQMP be used to determine its potential cumulative impacts or (2) that project-specific air quality impacts be used to determine the project's potential cumulative impacts to regional air quality.[80]

Consistency with Air Quality Management Plan

The SCAQMD recommends assessing a project's cumulative impacts based on whether the project is consistent with the current AQMP. CEQA Guidelines Section 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, CEQA Guidelines 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…"*

[80] SCAQMD, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, Appendix D, 1993, page D-3 ("As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.").

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's cumulative air quality impacts are determined not to be significant based on its consistency with the SCAQMD's adopted 2022 AQMP, as discussed above. As is also discussed above, the Project's increase in population, housing and employment would be consistent with Connect SoCal growth projections, upon which the 2022 AQMP is based. Related projects would also be required to assess consistency with the 2022 AQMP transportation control strategies, as well as with population, housing, and employment growth projections in Connect SoCal and provide mitigation measures if significant impacts are identified. As discussed in Threshold AIR-1, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for ozone. Therefore, the Project would be consistent with and would not conflict with or obstruct implementation of the applicable AQMP. Accordingly, Project air quality impacts are not cumulatively considerable and cumulative impacts are less than significant.

Project-Specific Impacts

The SCAQMD CEQA Air Quality Handbook states that the "Handbook is intended to provide local governments, project proponents, and consultants who prepare environmental documents with guidance for analyzing and mitigating air quality impacts of projects."[81] The SCAQMD CEQA Air Quality Handbook also states that "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District."[82] The SCAQMD has provided guidance on addressing the cumulative impacts for air quality. as discussed below:[83]

> *"As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

The SCAQMD recommends evaluating cumulative impacts for individual projects based on whether the project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts for those pollutants for which the Air Basin is in non-attainment. Thus, the cumulative analysis of air quality impacts follows SCAQMD's guidance such that construction or operational Project emissions would be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended significance threshold.

The City relies on thresholds established by the SCAQMD (refer to CEQA Guidelines Section 15064.7) to assess the Project's cumulative impacts. Regional emissions from a project have the potential to affect the Air Basin as a whole, and, unlike other environmental issues areas, such as aesthetics or noise, it is not possible to establish a geographical radius from a specific project site

81 SCAQMD, CEQA Air Quality Handbook, April 1993, page iii.

82 SCAQMD, CEQA Air Quality Handbook, April 1993, page 6-1.

83 SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution, 2003, Appendix D.

where potential cumulative impacts from regional emissions would be limited. Meteorological factors, such as wind, can disperse pollutants, often times tens of miles downwind from a project site. Therefore, consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the potential for the Project to result in cumulative impacts from regional emissions is assessed based on the SCAQMD thresholds.

For construction, as shown in Table 4.2-6 and Table 4.2-8, the Project would not result in an exceedance of regional and localized significance thresholds for construction. For construction health risk impacts, as shown in Table 4.2-10 and Table 4.2-11, the Project would not result in an exceedance of applicable significance thresholds with implementation of Mitigation Measure AQ-1. Therefore, cumulative impacts related to regional and localized construction emissions would be less than significant with mitigation.

For operations, as shown in Table 4.2-7 and 4.2-9, the Project would not result in an exceedance of regional or localized significance thresholds. Therefore, cumulative impacts related to regional and localized operational emissions would be less than significant.

Mitigation Measures

Construction

Cumulative impacts regarding regional and localized construction air pollutant emissions were determined to be less than significant. Therefore, no mitigation measures are required.

Refer to Mitigation Measure AQ-1, which would reduce cumulative health risk impacts during construction. No additional mitigation measures are required.

Operations

Cumulative impacts regarding regional and localized operational air pollutant emissions were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Construction

Implementation of Mitigation Measure AQ-1 would reduce construction health risk impacts to below applicable significance thresholds. Cumulative air quality impacts would be less than significant with mitigation. Therefore, with implementation of Mitigation Measure AQ-1 no additional mitigation measures are required or included, and the impact level would be less than significant with mitigation.

Operations

Cumulative impacts regarding operational air pollutant emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4.3 Cultural Resources – Archaeological Resources

4.3.1 Introduction

This section evaluates potential impacts on archaeological resources. As noted in Chapter 6, *Other CEQA Considerations, of this Draft EIR*, the City of Culver City (City) determined in the Initial Study, provided in Appendix A-2 of this Draft EIR, that the Project would result in less than significant impacts related to cultural resources, with the exception of archaeological resources. The analysis is based on the *5700 Hannum Avenue Mixed-Use Residential and Commercial Project – Archaeological Resources Assessment Report* (Assessment Report) prepared by ESA,[1] provided in Appendix D of this Draft EIR.

4.3.2 Environmental Setting

Regulatory Framework

Federal

National Historic Preservation Act of 1966

The principal federal law addressing historic properties is the National Historic Preservation Act (NHPA), as amended (54 USC 300101 et seq.), and its implementing regulations (36 CFR Part 800). Section 106 of the NHPA requires a federal agency with jurisdiction over a proposed federal action (referred to as an "undertaking") to take into account the effects of the undertaking on historic properties, and to provide the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on the undertaking.

The term "historic properties" refers to "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register" (36 CFR Part 800.16(*l*)(1)). The implementing regulations (36 CFR Part 800) describe the process for identifying and evaluating historic properties, for assessing the potential adverse effects of federal undertakings on historic properties, and seeking to develop measures to avoid, minimize, or mitigate adverse effects. The Section 106 process does not require the preservation of historic properties; instead, it is a procedural requirement mandating that federal agencies take into account effects to historic properties from an undertaking prior to approval.

The steps of the Section 106 process are accomplished through consultation with the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, local governments, and other interested parties. The goal of consultation is to identify potentially affected historic properties, assess effects to such properties, and seek ways to avoid, minimize, or mitigate any adverse effects on such properties. The agency also must provide an opportunity for public involvement (36 CFR 800.1(a)). Consultation with Indian tribes regarding issues related to Section 106 and other authorities (such as NEPA and Executive Order No. 13007) must recognize the government-to-government relationship between the Federal Government and Indian tribes, as set forth in

[1] Environmental Science Associates, *5700 Hannum Mixed-Use Residential and Commercial Project, Culver City, California, Archaeological Resources Assessment Report,* prepared for Lincoln Property Company West, LLC, October 2023. Provided in Appendix D of this Draft EIR.

Executive Order 13175, 65 FR 87249 (November 9, 2000), and Presidential Memorandum of November 5, 2009.

Under NHPA, the Secretary of Interior is responsible for establishing professional standards and for providing guidance on the preservation of the nation's historic properties. See below discussion of these standards.

National Register of Historic Places

The National Register of Historic Places (National Register) was established by the NHPA of 1966, as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment" (36 CFR 60.2) (U.S. Department of the Interior 2002). The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. As noted above, a resource that is listed in or eligible for listing in the National Register is considered "historic property" under Section 106 of the NHPA.

To be eligible for listing in the National Register, a property must be significant in American history, architecture, archaeology, engineering, or culture. Properties of potential significance must meet one or more of the following four established criteria:

A. Are associated with events that have made a significant contribution to the broad patterns of our history
B. Are associated with the lives of persons significant in our past
C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction
D. Have yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting one or more of the criteria of significance, a property must have integrity. Integrity is defined as the ability of a property to convey its significance. The National Register recognizes seven qualities that, in various combinations, define integrity, including location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity, a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.

Ordinarily, religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years are not considered eligible for the National Register unless they meet one of the Criteria Considerations (A-G), in addition to meeting at least one of the four significance criteria and possessing integrity.

Archaeological Resources Protection Act of 1979

The Archaeological Resources Protection Act of 1979 (ARPA) (16 USC 470aa-470mm) was enacted to "secure, for the present and future benefit of the American people, the protection of archaeological resources and sites which are on public lands and Indian lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals." Under this Act, archaeological resources are defined as material remains of past human life or activities that are of archaeological interest and are over 100 years old. The primary focus of the Act is to protect archaeological resources on public and Indian lands, and to prevent looting and destruction of archaeological resources. The statute provides for stiff civil and criminal penalties, including fines up to $100,000 and/or 5 years in prison for second-time offenders. The Act also governs archaeological excavation and disposition of collections from sites on public and Indian lands, and requires researchers to obtain a permit prior to excavating or removing any archaeological materials on federal lands. The Act further requires that the nature and location of archaeological resources be kept confidential unless providing the information would further the purposes of the statute and not create a risk of harm to such resources.

Native American Graves Protection and Repatriation Act of 1990

Requirements for responding to discoveries of Native American human remains and associated funerary objects on federal land are addressed under the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) (25 USC 3001–3013) and its implementing regulations (43 CFR Part 10). If human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered on federal or tribal lands, the federal agency must determine and consult with the lineal descendants and culturally affiliated Indian tribes, and carry out appropriate treatment and disposition of the discovered remains, including transfer of custody. An *Indian tribe* is defined as any tribe, band, nation, or other organized group or community of Indians that is recognized as eligible for the special programs and services provided by the U.S. to Indians because of their status as Indians. NAGPRA does not require federal agencies to consult with non-federally recognized tribes. However, there are some cases in which non-federally recognized tribes may be appropriate claimants for cultural items. Federal agencies that wish to return Native American human remains and cultural items to non-federally recognized tribes may do so after review and approval by the NAGPRA Review Committee.

NAGPRA also requires permitting of the intentional removal from, or excavation of, Native American cultural items from federal or tribal lands for purposes of discovery, study, or removal; establishes criminal penalties for trafficking in human remains or cultural objects; and requires agencies and museums that receive federal funding to inventory those items in their possession, identify the descendants of and repatriate those items.

Secretary of the Interior's Standards

The Secretary of the Interior's Standards (36 Code of Federal Regulations [CFR] Part 68) were originally designed for use by the National Park Service and intended for application in a federal context. The stated intent of the Standards is to "set forth standards for the treatment of historic properties containing standards for preservation, rehabilitation, restoration, and reconstruction" (36 CFR 68.1). One set of standards – preservation, rehabilitation, restoration or reconstruction – will

apply to a property undergoing treatment, depending upon the property's significance, existing physical condition, the extent of documentation available and interpretive goals, when applicable, and are to be applied in a reasonable manner, taking into consideration economic and technical feasibility (36 CFR 68.3). The Standards for Rehabilitation (as defined under 36 CFR 68.3(b)) are most applicable to projects where compatibility with historic building alterations or alterations to a building's environment is being evaluated and can pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and the interior, related landscape features and the building's site and environment as well as attached, adjacent, or related new construction.

The Standards were subsequently incorporated into Public Resources Code (PRC) Section 15164.5(b) as a gauge against which lead agencies complying with the California Environmental Quality Act (CEQA) could measure project impacts to historical resources. As stated under the prior CEQA subsection, generally a project that complies with the Standards is considered to have mitigated its impacts to historical resources to a less-than-significant level (CEQA Guidelines Section 15064.5(b)(3); see also *League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland* (1997) 52 Cal.App.4th 896. Although not prescriptive and as suggested by the term "generally" as used in the PRC, the appropriate application of the Standards, or a subset thereof, requires careful consideration by a lead agency of the specific significance, characteristics, and condition of the historical resource for which impacts are being evaluated.

State

California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at PRC Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Guidelines Section 21084.1, a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

The CEQA Guidelines (Title 14 California Code of Regulations [CCR] Section 15064.5) recognize that historical resources include: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is a historical resource, the provisions of CEQA Guidelines Sections 21084.1 and 15064.5 apply. If an archaeological site does not meet the

criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of Section 21083, which is as a unique archaeological resource. As defined in CEQA Guidelines Section 21083.2(g), a "unique" archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in Section 21083.2(g), then the site is to be treated in accordance with the provisions of Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (Section 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. CEQA Guidelines Section 15064.5(c)(4) notes that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). As defined in CEQA Guidelines Section 15064.5(b)(1)), substantial adverse change is "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired." According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
B. Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, pursuant to CEQA Guidelines Section 15064.5(b)(3), a project that complies with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for*

Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Standards)[2] is considered to have mitigated its impacts to historical resources to a less-than-significant level.

California Register of Historical Resources

The California Register is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for eligibility for the California Register are based upon National Register criteria (PRC Section 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

[2] Grimmer, E. Anne. 2017. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.* Washington, D.C.: U.S. Department of the Interior National Park Services: Technical Preservation Services.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historical resources contributing to historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone. (PRC Section 5024.1(d)-(e).)

California Government Code Sections 6254(r) and 6254.10

These sections of the California Public Records Act were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to "Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission." Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency."

Local

City of Culver City

The City's General Plan does not include policies, goals, and objectives for archaeological resources or human remains.

Prehistoric Setting

The chronology of Southern California is typically divided into three general time periods: the Early Holocene (9,600 cal[3] B.C. to 5,600 cal B.C.), the Middle Holocene (5,600 cal B.C. to 1,650 cal B.C.), and the Late Holocene (1,650 cal B.C. to cal A.D. 1769). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

While it is not certain when humans first came to California, their presence in Southern California by about 9,600 cal B.C. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 9,150 and 9,000 cal B.C. During the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the climate of Southern California became warmer and more arid and the human populations, who were represented by small hunter gathers until this

[3] The word 'cal' is used to signify a calibrated date.

point and resided mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources.[4]

During the Late Holocene (1,650 cal B.C. to cal A.D. 1769), many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred.[5],[6],[7] The native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources.[8] Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants.[9] Between about A.D. 800 and A.D. 1350, there was an episode of sustained drought, known as the Medieval Climatic Anomaly (MCA).[10] While this climatic event did not appear to reduce the human population, it did lead to a change in subsistence strategies in order to deal with the substantial stress on resources.

Given the increasing sedentism and growing populations during the Late Holocene, territorial conscription and competition became acute. Primary settlements or village sites were typically established in areas with available freshwater, and where two or more ecological zones intersected. This strategic placement of living space provided a degree of security in that when subsistence resources associated with one ecological zone failed, the resources of another could be exploited. Villages typically claimed and carefully defended fixed territories that may have averaged 30-square miles in size encompassing a variety of ecological zones that could be exploited for subsistence resources.[11]

The Late Holocene marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended. Trade during this period reached its zenith as asphaltum (tar), seashells, and steatite were traded from Catalina Island (*Pimu* or *Pimugna)* and coastal Southern California to the Great Basin. Major technological changes appeared as well,

4 Byrd, Brian F., and Mark L. Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium. In *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp 215-227.

5 Erlandson, Jon M. 1994. *Early Hunter-Gatherers of the California Coast*, Plenum Press, New York.

6 Wallace, William J. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11:214-230.

7 Warren, Claude N. 1968. Cultural Tradition and Ecological Adaptation on the Southern California Coast. In Archaic Prehistory in the Western United States, C. Irwin-Williams, ed, pp. 1-4. *Eastern New Mexico University* Contributions *in Anthropology*. Portales.

8 Erlandson, Jon M. 1994. *Early Hunter-Gatherers of the California Coast*, Plenum Press, New York.

9 Byrd, Brian F., and Mark L. Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium. In *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp 215-227.

10 Jones, Terry L., Brown, Gary M., Raab, Mark L., Janet L. McVickar. 1999. Environmental Imperatives Reconsidered: Demographic Crises in Western North America during the Medieval Climatic Anomaly, in Current Anthropology, Vol. 40, No. 2 (April 1999), pp. 137-170.

11 McCawley, William.1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*, Malki Museum Press, Banning, California.

particularly with the advent of the bow and arrow sometime after cal A.D. 500, which largely replaced the use of the dart and atlatl.[12]

Ethnographic Setting

The Project Site is located in a region traditionally occupied by the Gabrielino. The term "Gabrielino" is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina.[13] Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino language was part of the Takic branch of the Uto-Aztecan language family.

The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison.[14] The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period.[15]

The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the Gabrielino.[16] Coming ashore near Malibu Lagoon or Mugu Lagoon in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino Indians. The Gabrielino are reported to have been second only to their Chumash neighbors in terms of population size, regional influence, and degree of sedentism.[17]

Maps produced by early explorers indicate that at least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably

12 Byrd, Brian F., and Mark L. Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium. In *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp 215-227.

13 Kroeber, A. L. 1925. *Handbook of the Indians of California*. Bureau of American Ethnology, Bulletin 78. Smithsonian Institution, Washington, D.C.

14 Bean, Lowell J., and Charles R. Smith. 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

15 Kroeber, A. L. 1925. *Handbook of the Indians of California*. Bureau of American Ethnology, Bulletin 78. Smithsonian Institution, Washington, D.C.

16 Wallace, William J. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11:214-230.

17 Bean, Lowell J., and Charles R. Smith. 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

close to the river.[18] The closest named settlements to the Project Site are *Saa'anga* and *Waachnga.* Review of a map titled *Gabrielino Communities Located on the Los Angeles-Santa Ana Plain* by William McCawley[19] indicates that the settlement of *Saa'anga* was located approximately 1 mile north of the Project Site, while the settlement of *Waachnga* was situated approximately 1.25 miles south. Both of these settlements are depicted as located close to Ballona Creek.

Historic Setting

History and Early Development of Culver City

Harry H. Culver (1880 -1946), the founder of Culver City, was born in Milford, Nebraska on January 22, 1880. The middle child of five, Culver was raised on a farm along with three brothers and a sister. His father, Jacob Hazel Culver, was a brigadier general in the National Guard and a strict disciplinarian. Culver followed in his father's footsteps, enlisting in the military during the Spanish-American War. He studied at Doane College before spending three years at the University of Nebraska. In 1901, Culver traveled to the Philippines where he began working in the mercantile business, worked as a reporter for the Manila Times, and served as a special agent for the customs department. After more than three years in the Philippines, Culver returned to the United States, performing his customs duties in Detroit and Saint Louis. He resigned from the customs department in 1910 when he moved to California and began working for real estate giant I.N. Van Nuys. "As the story goes, after Van Nuys offered to make him a manager because of his exemplary work, Culver decided to venture out on his own. After intense study, Harry Culver pinpointed the area between Los Angeles and Abbot Kinney's resort of Venice for his city".[20]

At the California Club in 1913, Harry Culver announced his plans to develop a city west of downtown Los Angeles. Culver saw an opportunity to capitalize on the excitement generated by Abbot Kinney's Venice of America development along the California coast south of Santa Monica. Between Venice and Los Angeles sat open land, originally part of Rancho La Ballona, and as the relationship between Los Angeles and Venice took shape, Culver saw a spot in between that was ideal for a new town site. "If you draw a line from the Story Building to the Ocean Front at Venice, at the halfway mark you will find three intersection electric lines—the logical center for what we propose to develop a town-site." Soon after Culver's speech, the city of Culver City was established. Culver promoted his new community by holding special events like "prettiest baby contests" and an annual marathon race. Newspaper advertisements exclaimed "All Roads Lead to Culver City!".

Culver City continued to grow and finally incorporated in 1917.[21] The city grew outward from the downtown commercial area and adjacent film studios. This area saw commercial development along Culver Boulevard in the 1920s and 1930s, and spread to Washington Boulevard in the 1940s and 1950s, and was surrounded by residential neighborhoods. Downtown Culver City was centered on a main street (Washington Boulevard) anchored by a six-story hotel, Fire and Police

18 Gumprecht, Blake. 2001. *Los Angeles River: Its Life, and Possible Rebirth,* The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

19 McCawley, William.1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*, Malki Museum Press, Banning, California.

20 Cerra, Julie Lugo. 2013. *Culver City Chronicles.* Charleston, History Press.

21 Cerra, Julie Lugo. 2013. *Culver City Chronicles.* Charleston, History Press.

Departments, a city hall, banks, restaurants, and stores. The early economics of Culver City were supported by movie studios. Industry came in the form of Western Stove in 1922, then the Helms Bakeries in 1930, and then the Hayden Industrial Tract was established in the 1940s. During the 1950s Washington Boulevard would be improved with a number of car dealerships. Over the years, more than forty annexations increased the size of the city from 1.2 square miles to about five square miles.[22]

At the heart of Screenland, the economic health of the city has always been strongly tied to the movie industry. Following the closure of MGM Studios, the city was looking for ways to spur economic development. To spur development and create a new flow of money, the city created the Redevelopment Agency. One of the first projects undertaken by the newly formed agency was the Fox Hills redevelopment. This development would open up more than 300 acres of land just southwest of the city to residential, commercial, and industrial growth.[23]

Archival Research

SCCIC Records Search

A records search for the Project Site was conducted on July 14, 2023, at the California Historical Resources Information Center-South Central Coastal Information Center (CHRIS-SCCIC). The records search included a review of all recorded cultural resources and previous studies within the Project Site and a 0.50-mile radius. The records search results indicate that seven cultural resources studies have been conducted within a 0.50-mile radius of the Project Site. Approximately 15 percent of the 0.50-mile records search radius has been included in previous cultural resources assessments. Of the eight previous studies, none overlap the Project Site. The records search results indicate that no cultural resources have been recorded within the 0.50-mile radius of Project Site. However, a total of six prehistoric archaeological resources have been recorded in the immediate vicinity of the 0.50-mile radius (see **Table 4.3-1**, *Previously Recorded Cultural Resources*).

Other Research

Additional archaeological resources (the report for which has not yet been archived at the CHRIS-SCCIC, as it is still in progress) were identified approximately 2.3 miles from the Project Site during ground disturbing activities in connection with a development project in Downtown Culver City.[24] These include two isolated prehistoric metates that were recovered in the upper six feet of disturbed fill sediments in an area of the property that had been previously developed with a large warehouse building. This property had a similar land use history as the Project Site.

[22] Cerra, Julie Lugo. 2004. *Images of America: Culver City*, Arcadia Publishing, Charleston.

[23] Culver City Historical Society. n.d. "Culver City Timeline: A Work in progress", https://www.culvercityhistoricalsociety.org/about/culver-city-timeline/

[24] ESA. 2022. (in progress) Archaeological and Paleontological Monitoring Report for the Culver Studios Innovation Plan Project, City of Culver City, California. Report on file with ESA, Irvine, CA.

TABLE 4.3-1
PREVIOUSLY RECORDED CULTURAL RESOURCES

P-Number (P-19-)	Permanent Trinomial (CA-LAN-)	Other Designation	Description	Recording Events
59	59	Malcom Farmer's Playa del Rey Site No. 1	Prehistoric archaeological site: village or camp site, including artifacts (steatite bowl, quartz crystal point, "arrowpoints", mortar and steatite fragments, manos, pestles, shell, hammerstones, scrapers, etc. Site reportedly destroyed.	1950
60	60	Malcom Farmer's Playa del Rey Site No. 1	Prehistoric archaeological site: shell midden, "chips", mortar fragments, hammerstones, "chopper", and steatite pieces. Human remains (cranium pieces) and pieces of burned deer bone. Site reportedly destroyed.	1950
67	67	Malcom Farmer's Baldwin Hills Site No. 1	Prehistoric archaeological site: described as a possible temporary dwelling on a small wash. Small amount of shell reported.	1950
213	213	LA-31	Prehistoric archaeological site: metates	1953
216	216	LA-34	Prehistoric archaeological site: mortars	1953
2768	2768	SR 20	Prehistoric archaeological site: subsurface midden deposits	2000

SOURCE: SCCIC 2023

Sacred Lands File Search

The Native American Heritage Commission (NAHC) maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on July 11, 2023, to request a search of the SLF. The NAHC responded to the request in a letter dated August 11, 2023, indicating that the results were negative. However, the NAHC noted that the absence of site information does not mean the absence of cultural resources in a project area. The City is conducting consultation with appropriate tribes per AB 52 and the results of this consultation will be summarized in the Tribal Cultural Resources Section of the Draft EIR.

Land Use History

Historic maps and aerial photographs were examined to provide historical information about land uses of the Project Site and to contribute to an assessment of the Project Site's archaeological sensitivity. By 1896, the Project Site was undeveloped, Centinela Creek was located approximately 0.65 miles south of the Project Site, while Ballona Creek was situated approximately 1.25 miles to the west. The 1923 and 1938 aerials continue showing the Project Site as undeveloped with an intermittent stream crossing the central portion of the Project Site on a northeast to southwest axis. As observed in the aerial photographs from 1938 through 1970, the Project Site is developed with a golf course. The 1976 aerial shows the Project Site as undeveloped. By 1983, the Project Site

observed as developed with the current building and parking lot. No changes to the Project Site are observed in the subsequent 1994, 2002, 2012, 2016, and 2023 aerials.[25],[26],[27]

Geologic Map and Geotechnical Report Review

There is disagreement over the geologic mapping of the Project Site by geologists. Poland et al.[28] show the Project Site geology as the San Pedro Sand Formation from the lower or early Pleistocene. This geologic unit is a nearshore marine deposit. Dibblee and Minch[29] map the Project Site as Qop (Fox Hills paleosol), Qoa (older alluvium), and Qa (Holocene-age alluvium). Qa is surficial alluvium of Holocene age, "derived mostly from Santa Monica Mountains". Dibblee and Minch[30] assign a late Pleistocene age to the Qoa and the Qop. Geotechnologies, Inc.[31] reproduced the mapping of Poland et al.[32], but describe the soils in the northern portion of the Project Site as (marine) terrace deposits. That could be compatible with the San Pedro Sand Formation. Geotechnologies, Inc. (2022) also mention that during geotechnical exploration (consisting of placing two borings within the Project Site; one in the northern portion and another in the southern portion), fill materials were encountered from the surface down to depths of 1 and 3 feet bgs. Under the fill soils, marine terrace deposits (as mentioned above) were found, followed by bedrock (siltstone).

Subsurface Sensitivity

Prehistoric Archaeological Analysis

Results of the records search have indicated that although no resources have been recorded within the Project Site or 0.50-mile radius, a total of six prehistoric archaeological resources (including village sites with human remains and associated artifacts, shell midden deposits, metates, mortars, etc) have been recorded in the immediate vicinity of the 0.50-mile radius. Review of historic maps indicate that Centinela Creek and Ballona Creek are located in the vicinity of the Project Site, which would have attracted prehistoric inhabitants to the area since they would have provided them with fresh water sources, along with floral and faunal resources. Additionally, two Native American villages (*Saa'anga* and *Waachnga*) are situated approximately 1.0 to 1.25 miles away from the Project Site. The Geotechnical Report review indicates that fill soils (likely brought in during construction of the golf course and/or the existing building) occur within the Project Site from

25 Bing Maps. 2023. Aerial photograph of 5700 Hannum Avenue Project Site. https://www.bing.com/maps/?cp=33.987088%7E-118.383063&lvl=16.4&style=a, accessed August 2023.

26 Ramboll US Consulting, Inc. 2022. Phase I Environmental Site Assessment, 5700 Hannum Avenue, Culver City. Prepared on behalf of: LPC West, Inc.

27 TopoView. 2023. Topographic maps including 5700 Hannum Avenue Project Site, including 1896 Redondo15-minute quadrangle and the 1924 Inglewood 7.5-minute quadrangle. https://ngmdb.usgs.gov/topoview/viewer/#15/33.9871/-118.3831, accessed in August 2023.

28 Poland, J.F., A. A. Garrett, and A. Sinnot, 1959, Geology, hydrology, and chemical character of ground waters in the Torrance-Santa Monica area, California: U.S. Geological Survey Water Supply Paper 1461, 425 p.

29 Dibblee and Minch, 2007, Geologic map of the Venice and Inglewood Quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. Scale 1:24000

30 Dibblee and Minch, 2007, Geologic map of the Venice and Inglewood Quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. Scale 1:24000

31 Geotechnologies, Inc. 2022. Preliminary Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 5700 Hannum Avenue, Culver City, California. Prepared for: LPC West, Inc., 915 Wilshire Boulevard, Suite 2050, Los Angeles, CA 90017. Prepared by: Geotechnologies, Inc., 439 Western Avenue, Glendale, CA 91201. 47 pp.

32 Poland, J.F., A. A. Garrett, and A. Sinnot, 1959, Geology, hydrology, and chemical character of ground waters in the Torrance-Santa Monica area, California: U.S. Geological Survey Water Supply Paper 1461, 425 p.

surface down to depths of 1 and 3 feet bgs, followed by older sediments consisting of marine terrace deposits and then bedrock. In cases where later development does disturb native sediments, prehistoric archaeological materials can become intermixed within historic fill such as in the case with the two prehistoric metate artifacts encountered during monitoring (in the upper six feet of disturbed fill sediments) in connection with a development project in Downtown Culver City that had similar existing uses as the Project Site. For these reasons, there is at least a *moderate to high* potential for prehistoric archaeological materials to exist in the underlying soils.

Historical Archaeological Analysis

Review of historic maps and aerial photographs indicate that the Project Site was undeveloped until a golf course was constructed in the Project Site by at least 1938. The existing building was also developed by at least 1983. Based on the lack of previous historic uses within the Project Site and the fact that no historic-period archaeological resources have been previously recorded within the Project Site or 0.50-mile radius, the potential to encounter historic-period archaeological resources within the Project Site is considered *low*.

4.3.3 Environmental Impacts

Thresholds of Significance

The following threshold of significance is based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in a significant adverse impact to archaeological resources and human remains if it would:

- **ARCH-1:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or

Potentially significant impacts related to archaeological resources are discussed and analyzed further below.

The City determined in the Initial Study that the following environmental issue areas would result in no impacts or less-than-significant impacts and, therefore, are scoped out of this Draft EIR. Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding the following issue area:

Would the Project:

- Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5
- Disturb any human remains, including those interred outside of dedicated cemeteries.

As detailed in the Initial Study, a historic resource memorandum was prepared by Architectural Resources Group (ARG) in September 2022 for the Project to determine if the existing building on the Project Site qualifies as a historic resource. As discussed therein, the existing building is not a historic resource and thus, no impacts to historic resources would occur under the Project.

As further detailed in the Initial Study, a number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code (PRC) Section 5097.98, and CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event of the discovery of unrecorded human remains during construction, excavations shall be halted and the County Coroner shall be notified. If the human remains are determined to be Native American, the California Native American Heritage Commission (NAHC) would be notified within 24-hours and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory protocols would ensure that impacts on human remains would be less than significant. No further analysis of this issue is therefore included in this Draft EIR.

Methodology

The analysis of archaeological resources is based in part on the Assessment Report, which included a cultural resources records search through the CHRIS-SCCIC, a SLF search through the NAHC, land use history research (including review of historic topographic maps and aerial photographs), geologic map review and review of the geotechnical report prepared for the Project. A subsurface archaeological sensitivity assessment was also conducted to determine the potential to encounter buried archaeological resources (prehistoric and historic-period) and human remains during construction based on the results of the record searches, subsurface geological conditions, on-site disturbances, land use history, and the proposed excavation parameters. Because the Project Site is entirely developed and lacks any visible native ground surface or potential for surface exposure of resources, an archaeological field survey was not undertaken.

Project Design Features

There are no Project Design Features associated with archaeological resources.

Analysis of Project Impacts

Threshold ARCH-1: The Project would have a significant impact if it were to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Impact Analysis

The subsurface archaeological sensitivity assessment indicates that the potential for encountering prehistoric archaeological resources is moderate to high based on the fact that six prehistoric archaeological resources (village sites with human remains and associated artifacts, shell midden deposits, metates, mortars, etc.), water sources (which would have provided fresh water sources to prehistoric inhabitants), and Native American villages (Saa'anga and Waachnga) are situated in the vicinity of the Project Site. Additionally, fill soils occur within the Project Site (from surface down to 3 feet below ground surface) and a previous development project in Downtown Culver City (that had similar existing uses as the Project Site) yielded two prehistoric metates in disturbed fill sediments. The subsurface archaeological sensitivity assessment for historic archaeology indicates that no previous historic uses have existed within the Project Site and that no historic-period archaeological resources have been previously recorded within the Project Site or 0.50-mile radius.

Based on these results, the potential to encounter historic-period archaeological resources within the Project Site is considered low.

Based on the above, Project excavations, which are anticipated to reach depths of 27 feet bgs, have potential for encountering buried prehistoric archaeological resources. Therefore, construction activities associated with the Project could potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 and impacts would be potentially significant.

Operation of the new facilities and uses on the Project Site would not result in any further ground disturbing activities such as grading or excavation; therefore, there is no potential to encounter, alter, or disturb archaeological resources. No operational impacts would occur.

Mitigation Measures

ARCH-1: Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work such as site demolition (e.g., building footings/foundations, subsurface utilities, surface parking lots, sidewalks, etc.), clearing/grubbing, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring 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. The frequency of monitoring 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 shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

ARCH-2: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, 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. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work within the buffer area shall only be allowed to continue after the evaluation and recovery efforts are completed. 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. If the Qualified Archaeologist determines the find 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 of Culver City (City) to develop a formal treatment plan that would serve to reduce impacts to the resources and that provides for or the adequate recovery of the scientifically consequential information contained in the resources along with subsequent laboratory processing, analysis, evaluation, and reporting. 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 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. If no institution accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

ARCH-3: 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.

Level of Significance After Mitigation

With implementation of Mitigation Measures ARCH-1 to ARCH-3, potentially significant impacts to archaeological resources during construction activities would be reduced to a less-than-significant level.

Cumulative Impacts

Many of the related projects identified in Chapter 3, *Environmental Setting*, of this Draft EIR, would require excavation that could potentially expose or damage potential archaeological resources. However, these related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures would be required for related projects that have the potential to cause significant impacts to undiscovered archaeological resources, including existing regulations for undiscovered human remains. Implementation of such mitigation measures and regulations would avoid significant impacts. State requirements regarding impacts on archaeological resources and CEQA compliance require monitoring of excavation activities and treatment and/or curation of discovered resources where appropriate (Public Resources Code Section 15064.5). Such standard construction practices, particularly over a range of project sites, provide for protection, recovery and curation of discovered resources and preserve their contributions to the knowledge base of past population activity in the area. For those projects not subject to CEQA review, there would be some potential for impacts on archaeological resources and human remains in the event there are excavations that extend into soils conducive to retaining resources, however,

regulations contained in the California Health and Safety Code and Penal Code would apply in some instances, and circumstances involving a loss of such resources are expected to be limited. Therefore, the cumulative effects from cumulative projects are considered less than significant.

The Project is required to comply with the Mitigation Measures ARCH-1 through ARCH-3 and regulations cited above in the event resources are found, thus ensuring proper identification, treatment and preservation of any resources, and reducing significant impacts on archaeological resources and human remains to less than significant levels. These regulations require excavation monitoring, and treatment and curation of discoveries. Therefore, to the extent impacts on archaeological resources from cumulative projects may occur, further contribution from the Project would not be cumulatively considerable, and the cumulative impacts of the Project would be less than significant.

Mitigation Measures

Refer to Mitigation Measures ARCH-1 to ARCH-3. No additional mitigation measures are required.

Level of Significance after Mitigation

With implementation of Mitigation Measures ARCH-1 to ARCH-3, cumulative impacts to archaeological resources would be less than significant.

4.4 Energy

4.4.1 Introduction

This section analyzes effects on energy resources due to construction and operation of the Project. The Project's anticipated energy use is estimated, the potential for impacts due to inefficient or unnecessary consumption, or conflicts with energy related plans are assessed, and conservation measures are considered to address significant impacts if identified. Information found herein, as well as other aspects of the Project's energy implications, are discussed elsewhere in this Draft EIR, including in Chapter 2, *Project Description*, and Sections 4.1, *Air Quality*; 4.6, *Greenhouse Gas Emissions*; 4.7, *Land Use and Planning*; and 4.11, *Transportation*. Details regarding the energy calculations are provided in energy consumption worksheets provided in Appendix E of this Draft EIR.

4.4.2 Environmental Setting

Regulatory Framework

Federal

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national greenhouse gas (GHG) emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting mandatory Renewable Fuel Standards (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the U. S. Environmental Protection Agency (USEPA) and the National Highway Traffic Safety Administration (NHTSA) actions described above (refer to Corporate Average Fuel Economy Standards, above) (i) establishing miles per gallon targets for cars and light trucks and (ii) directing NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[1]

[1] A "green job," as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

Corporate Average Fuel Economy Standards

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks. NHTSA and USEPA jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy. When these standards are raised, automakers respond by creating a more fuel-efficient fleet. In 2012, NHTSA established final passenger car and light truck CAFE standards for model years 2017 through 2021, which the agency projects will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 miles per gallons (mpg). Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by USEPA and NHTSA. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[2] USEPA and NHTSA have also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[3]

In March 2020, U.S. Department of Transportation (USDOT) and USEPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.[4] These standards set a combined fleet wide average of 36.9 to 37 miles per gallon (mpg) for the model years affected.[5] On January 20, 2021, President Biden issued Executive Order 13990 ''Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis'' directing USEPA to consider whether to propose suspending, revising, or rescinding the standards previously revised under the SAFE Vehicles Rule for Model Years 2021–2026. In February 2022, USEPA issued the Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.[6] This final rule revises current GHG standards beginning for vehicles in model year 2023 and through model year 2026 and establish the most stringent GHG standards ever set for the light-duty vehicle sector that are expected to result in average fuel economy label values of 40 mpg, while the standards they replace (the SAFE rule standards) would achieve only 32 mpg in model year 2026 vehicles.[7]

2 U. S. Environmental Protection Agency (USEPA), Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, 2011.

3 USEPA, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, 2018.

4 USEPA, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.

5 National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.

6 USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

7 USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, December 2021.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for carbon dioxide (CO_2) emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.

Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 (EPCA) is a United States Act of Congress that responded to the 1973 oil crisis by creating a comprehensive approach to federal energy policy. The primary goals of EPCA are to increase energy production and supply, reduce energy demand, provide energy efficiency, and give the executive branch additional powers to respond to disruptions in energy supply. Most notably, EPCA established the Strategic Petroleum Reserve, the Energy Conservation Program for Consumer Products, and Corporate Average Fuel Economy regulations.

State

Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code [PRC] Sections 25300–25323; SB 1389) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (PRC Section 25301[a]). The 2019 Integrated Energy Policy Report provides the results of the CEC's assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emission vehicles (ZEV), energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.

California's Renewable Portfolio Standard

First established in 2002 under SB 1078, California's Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030.[8]

On September 10, 2018, Governor Jerry Brown signed SB 100, which further increased California's RPS and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. It also requires the California Air Resources Board (CARB) to plan for 100 percent eligible renewable energy resources and zero-

[8] California Public Utilities Commission (CPUC), California Renewable Portfolio Standards (RPS), https://www.cpuc.ca.gov/rps/. Accessed October 2023.

carbon resources by December 31, 2045. The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC and the CEC jointly implement the RPS program. The CPUC's responsibilities include (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.[9] Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for details regarding this regulation.

California Building Standards Code (Title 24)

California Building Energy Efficiency Standards (Title 24, Part 6)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The 2019 Title 24 standards became effective on January 1, 2020.[10] The 2019 Title 24 standards continue to improve upon the 2016 Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings which include efficiency improvements to the residential standards for attics, walls, water heating, and lighting, and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2017 national standards.[11]

California Green Building Standards (Title 24, Part 11)

On August 11, 2021, the CEC adopted the 2022 Title 24 Standards, which were approved by the California Building Standards Commission for inclusion into the California Building Standards Code in December 2021. The 2022 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 standards.[12]

Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding these standards.

Assembly Bill 1493 (AB 1493)/Pavley Regulations

In response to the transportation sector accounting for more than half of California's CO_2 emissions, Assembly Bill (AB) 1493 (commonly referred to as California Air Resources Board (CARB)'s Pavley regulations), enacted on July 22, 2002, requires CARB to set GHG emission standards for new passenger vehicles, light-duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established standards for model

9 CPUC, RPS Program Overview, http://www.cpuc.ca.gov/RPS_Overview/. Accessed October 2023.
10 California Energy Commission, 2022 Building Energy Efficiency Standards, 2022.
11 California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, 2018.
12 California Energy Commission, 2022 Building Energy Efficiency Standards.

years 2017–2025.[13,14] In September 2019, USEPA published the SAFE Vehicles Rule in the federal register (Federal Register, Vol. 84, No. 188, Friday, September 27, 2019, Rules and Regulations, 51310–51363) that maintains the vehicle mpg standards applicable in model year 2020 for model years 2021 through 2026. In November 2019, California and 23 other states and environmental groups filed a petition in the U.S. District Court in Washington, DC, for USEPA to reconsider the published rule. The Court has not yet ruled on these petitions. However, consistent with President Biden's executive order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, in February 2022, USEPA issued the Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.[15] This final rule revises current GHG standards beginning for vehicles in model year 2023 and through model year 2026 and establish the most stringent GHG standards ever set for the light-duty vehicle sector that are expected to result in average fuel economy label values of 40 mpg, while the standards they replace (the SAFE rule standards) would achieve only 32 mpg in model year 2026 vehicles.[16]

As discussed under the *Federal* section, above, in March 2020, USDOT and USEPA issued the SAFE Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026. Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding this regulation.

California Health and Safety Code (HSC), Division 25.5, California Global Warming Solutions Act of 2006

In 2006, the California State Legislature adopted AB 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. Under HSC Division 25.5, CARB has the primary responsibility for reducing the State's GHG emissions; however, AB 32 also tasked the CEC and the CPUC with providing information, analysis, and recommendations to CARB regarding strategies to reduce GHG emissions in the energy sector.

In 2016, the California State Legislature adopted SB 32 and its companion bill, AB 197, which amended HSC Division 25.5 and established a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and included provisions to ensure that the benefits of state climate policies reach into disadvantaged communities. Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for details regarding these regulations.

Senate Bill 350

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. Building off of AB 32, SB 350 established California's 2030 GHG reduction target of 40 percent below 1990 levels. To

13 CARB, Clean Car Standards—Pavley, AB 1493.

14 United States Environmental Protection Agency, USEPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017–2025 Cars and Light Trucks, 2012.

15 U.S. Environmental Protection Agency, *Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards*, https://www.govinfo.gov/content/pkg/FR-2021-12-30/pdf/2021-27854.pdf.

16 U.S. Environmental Protection Agency, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1013NR8.pdf.

achieve this goal, SB 350 set ambitious 2030 targets for energy efficiency and renewable electricity, among other actions aimed at reducing GHG emissions. SB 350 increased California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030 prior to the current goals set by SB 100. In addition, SB 350 requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030.

Low-Carbon Fuel Standard

The Low-Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10 percent total reduction in 2020. Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas, and hydrogen.

California Air Resources Board

CARB's Advanced Clean Car Program

The Advanced Clean Cars emissions-control program was approved by CARB in 2012 and is closely associated with the Pavley regulations.[17] The program requires a greater number of zero-emission vehicle models for years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles; and the ZEV regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. In particular, implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered. Effective November 26, 2019, the federal SAFE Vehicles Rule Part One: One National Program withdraws the California waiver for the GHG and ZEV programs under section 209 of the Clean Air Act, which revokes California's authority to implement the Advanced Clean Cars and ZEV mandates. On March 9, 2022, USEPA issued a notice of decision to reinstate California's Clean Air Act waiver for its Advanced Clean Car regulations.[18]

In addition, Governor Gavin Newsom signed an executive order (Executive Order No. N-79-20) on September 23, 2020, that would phase out sales of new gas-powered passenger cars by 2035 in California with an additional 10-year transition period for heavy vehicles. The State would not restrict used car sales, nor forbid residents from owning gas-powered vehicles. In accordance with the Executive Order, CARB is developing a 2020 Mobile Source Strategy, a comprehensive analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The strategies will provide important information for numerous regulations and incentive programs going forward by conveying what is necessary to address the aggressive emission reduction requirements.

[17] CARB, Clean Car Standards – Pavley, AB 1493, https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley, last reviewed January 11, 2017. Accessed January 31, 2022.

[18] California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Notice of Decision, 87 Fed. Reg. 14,332 (Mar. 14, 2022).

The primary mechanism for achieving the ZEV target for passenger cars and light trucks is CARB's Advanced Clean Cars II (ACC II) Program. The ACC II regulations will focus on post-2025 model year light-duty vehicles, as requirements are already in place for new vehicles through the 2025 model year. A rulemaking package was presented to the Board in June 2022 and was adopted on November 30, 2022.

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

In 2004, the CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (CCR Title 13, Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen, and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles

Because off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. In 2007, CARB approved the "In-Use Off-Road Diesel Fueled Fleets Regulation" to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation sets an anti-idling limit of five minutes for all off-road vehicles 25 horsepower and up. It also establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. Revised in October 2016, the regulation enforced off-road restrictions on fleets adding vehicles with older tier engines and started enforcing beginning July 1, 2014. By each annual compliance deadline, a fleet must demonstrate that it has either met the fleet average target for that year or has completed the Best Available Control Technology requirements (BACT). Large fleets have compliance deadlines each year from 2014 through 2023, medium fleets each year from 2017 through 2023, and small fleets each year from 2019 through 2028. While the goal of this regulation is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from the use of more fuel-efficient engines.

Sustainable Communities Strategy

Adopted by the State on September 30, 2008, the Sustainable Communities and Climate Protection Act of 2008, or SB 375, establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Pursuant to SB 375, on April 7, 2016, the Southern California Association of Governments (SCAG) adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which achieves and exceeds the GHG emission-reduction targets set by CARB by demonstrating an 8 percent reduction in vehicular emissions by 2020, an 18 percent reduction by 2035, and a 21 percent reduction by 2040 as compared to the 2005 level on a per capita basis.

In addition, in September 2020, SCAG adopted the 2020–2045 RTP/SCS, referred to as Connect SoCal, which is an update to the previous 2016–2040 RTP/SCS. Using growth forecasts and economic trends, Connect SoCal provides a vision for transportation throughout the region for the next 25 years. Connect SoCal successfully achieves and exceeds the GHG emission-reduction targets set by CARB. Compliance with and implementation of Connect SoCal policies and strategies would have the co-benefits of reducing per capita vehicle miles travelled (VMT) and corresponding decreases in per capita transportation-related fuel consumption.

Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for details regarding these applicable policies and strategies.

California Environmental Quality Act

In accordance with CEQA and Appendix F, *Energy Conservation*, of the CEQA Guidelines, in order to assure that energy implications are considered in project decisions, EIRs are required to include a discussion of the potential significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the CEQA Guidelines provides a list of energy-related topics that should be analyzed in the EIR. In addition, while not described or required as significance thresholds for determining the significance of impacts related to energy, Appendix F provides the following topics that the lead agency may consider in the discussion of energy use in an EIR, where topics are applicable or relevant to project:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources;
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.
- The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.
- Whether the Project conflicts with adopted energy conservation plans.

Regional

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

SB 375 requires each Metropolitan Planning Organization (MPO) to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled from automobiles

and light duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, Connect SoCal (the 2020–2045 RTP/SCS), adopted on September 3, 2020, is the current RTP/SCS and is an update to the 2016–2040 RTP/SCS.

Connect SoCal focuses on the continued efforts of the previous RTP/SCS plans for an integrated approach in transportation and land use strategies in development of the SCAG region through horizon year 2045. Connect SoCal projects that the SCAG region will meet the GHG per capita reduction targets established for the SCAG region of eight percent by 2020 and 19 percent by 2035. Additionally, its implementation is projected to reduce VMT per capita for the year 2045 by 4.1 percent compared to baseline conditions for the year. Rooted in the 2008 and 2012 RTP/SCS plans, Connect SoCal includes "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by location housing, jobs, and transit closer together, and increasing investments in transit and complete streets. In addition, refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding these requirements.

Local

Culver City Municipal Code

The City participates in an environmental recognition program, California Green Communities. The program helps cities develop strategies to reduce carbon emissions and increase energy efficiency in their community. In addition, the City has adopted green building ordinances to reduce GHG emissions for new development. Pursuant to the Culver City Municipal Code (CCMC) Chapter 15.02.1005, the City requires 1 kilowatt (kw) of PV power installed per 10,000 square feet (sf) of new development. Under Chapter 17.320.035 of the CCMC, the City goes beyond CALGreen Code standards and requires at least 20 percent EV capable parking spaces, 10 percent EV ready parking spaces, and 10 percent EV charging stations for both new residential and retail developments.[19] Additionally, Sections 4.408.1 and 5.408.1 Construction Waste Management require the recycle and/or salvage for reuse a minimum of 75 percent of nonhazardous construction and demolition waste.

In 2009, the City adopted the Green Building Program as CCMC Chapter 15.02.100, which contains a number of GHG reducing features such as enhanced building insulation, low-flow water fixtures, and efficient lighting and heating, ventilation, and air conditioning (HVAC) systems. An example of the City's Green Building Program requirements would be all lighting required to be fluorescent, light-emitting diode (LED) or other type of high-efficiency lighting and that parking garages require all new lighting to be motion sensor controlled and the minimum base level lighting would use high-efficiency lighting.

Culver City Bicycle & Pedestrian Action Plan

As discussed in Section 4.7, *Land Use and Planning* and Section 4.11, *Transportation*, the City updated the Bicycle & Pedestrian Master Plan with the Culver City Bicycle & Pedestrian Action

[19] City of Culver City Zoning Code, Title 17, Sections 17.320, Off-Street Parking and Loading, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-52279#JD_17.320.020. Accessed January 18, 2021.

Plan (Action Plan) which received public input from 2017 through 2019. The Action Plan was adopted by the City Council in June 2020.[20] The Action Plan establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Action Plan aims to provide a safe, convenient, and accessible active transportation network. The Action Plan includes goals to support increased access to neighborhood destinations and transit stations, empowering residents to live a more active lifestyle, and increasing affordability and collaboration for transportation within the community. Hannum Avenue and Buckingham Parkway, adjacent to the Project Site, contain a Class II Bike lane. The approved Action Plan shows that Buckingham Parkway between Hannum Avenue and Green Valley Circle, immediately adjacent to the Project Site, are planned as Class IV Separated Bikeways.[21]

Clean Power Alliance

In February 2019 for residential customers and May 2019 for non-residential customers, Clean Power Alliance (CPA) became the new electricity supplier for Culver City. With this change, CPA purchases the renewable energy resources for electricity and Southern California Edison (SCE) delivers it to Culver City customers. The CPA is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Culver City are automatically defaulted to have 100 percent renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent or opt out of the CPA to remain with SCE as their provider. The Project's energy analyses conservatively assume the Project will remain with SCE as their electricity provider and does not take additional credit for renewable energy beyond the expected SCE renewable energy percentage for year 2022 based on the required renewables by year 2024 under SB 100.[22]

Culver City Reach Code

The Culver City Reach Code, codified under CCMC Section 15.02.1100, establishes building energy efficiency standards that are additional to the standards established by the State's CALGreen Building Code and Title 24 Energy Code requirements. The Culver City Reach Code includes provisions for all new buildings with separate standards for buildings of 49,999 sf or less (Category 1) and buildings 50,000 sf or more (Category 2). The following requirements do not apply to one- and two-family residences.

For Category 1 buildings, the Reach Code provides a list of 25 items that new buildings can implement in order to meet the standards. A project must comply with at least 80 percent of all items listed. Examples include gas heating units being 93 percent energy efficient, installing radiant

[20] City of Culver City, Bicycle & Pedestrian Action Plan, June 2020, https://www.culvercity.org/files/assets/public/v/1/documents/public-works/mobility/2021-10-cc-bikepedplan-app2020-v10-final.pdf. Accessed September 7, 2023.

[21] As defined by Caltrans, a Class IV separated bikeway is an on-street facility that is physically separated from other motor vehicle traffic by a vertical element or barrier, such as a curb, bollards, or vehicle parking aisle.

[22] For the purposes of estimating energy demand, the analysis conservatively assumes the Project would not switch electricity providers from SCE to the CPA (i.e., does not take any credit for 36 percent, 50 percent, or 100 percent renewable electricity, depending on the selected CPA plan). Should the Project switch electricity providers from SCE to the CPA, the Project's electricity-related emissions would be lower than those disclosed in this section.

barriers on all new roof sheathing, installing high-efficiency lighting in all exterior and interior spaces, and installing 1 kW of solar photovoltaic.

For Category 2 buildings, the Reach Code establishes three mandatory requirements related to Leadership in Energy and Environmental Design (LEED) certification. The requirements include the following:

(1) Prior to the issuance of a building permit, the applicant shall submit:
   a. Evidence that a LEED Accredited Professional (AP) is one of the members of the project team
   b. Evidence that the project has been registered with the United States Green Building Council's (USGBC) LEED Program
   c. Complete a LEED Checklist including points allocated to the "Innovation and Design" category, which demonstrates that the project meets the selected LEED® Rating System at the "Certified" level or higher.
   d. A signed declaration from the LEED®-AP member of the project team, stating that the plans and plan details have been reviewed and the project meets the intent of the criteria for certification of the selected LEED® Rating System at the "Certified" level or higher.

(2) The project shall comply with USGBC's "3 point margin of error" for LEED Certification.

(3) Applicant shall submit to the Building Official copies of all correspondence between the applicant and USGBC regarding the project.

Existing Conditions

Existing Electricity Sales

Electricity, as a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components for distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid.

Energy capacity, or electrical power, is generally measured in watts (W), while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, the capacity of a generator is typically rated in megawatts (MW), which is 1 million W, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is 1 billion Wh.

SCE provides electrical services to approximately 15 million people, 15 counties, 180 incorporated cities including the Culver City and the Project Site, 5,000 large businesses, and 280,000 small businesses throughout its 50,000-square-mile service area, across central, coastal and southern California, an area bounded by Mono County to the North, Ventura County to the West, San

Bernardino County to the East, and Orange County to the South.[23] SCE produces and purchases energy from a mix of conventional and renewable generating sources.

SCE generates power from a variety of energy sources, including large hydropower (greater than 30 MW), coal, gas, nuclear sources, and renewable resources, such as wind, solar, small hydropower (less than 30 MW), and geothermal sources. The annual electricity sale to customers in 2022 was approximately 84,218,000 MWh.[24] See **Table 4.4-1**, *Existing Annual Regional Energy Use*, for a summary of energy use for the region, including the SCE service area.

TABLE 4.4-1
EXISTING ANNUAL REGIONAL ENERGY USE

Source	Amount
Electricity (SCE service area) [a]	84,218,000 MWh
Natural Gas (SoCalGas service area) [b]	1,253,775 cf
Gasoline (Los Angeles County) [c]	3,070,000,000 gallons
Diesel (Los Angeles County) [c]	463,800,000 gallons

SOURCES:

[a] Edison International and Southern California Edison (SCE), 2022 Annual Report, 2022, page 2, https://download.edison.com/406/files/20232/2022-eix-sce-annual-report.pdf?Signature=N0sq4yv8uPjj%2F32CHqD9P67Ydr0%3D&Expires=1696599567&AWSAccessKeyId=AKIAJX7XEOOELCYGIVDQ&versionId=bpeN_aiySep67UMc7RtP511pq9M5I127&response-content-disposition=attachment. Accessed October 2023.

[b] California Gas and Electric Utilities, 2022 California Gas Report, page 186, https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf. Accessed October 2023.

[c] CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Year 2022 Results.

SCE is required to commit to the use of renewable energy sources for compliance with the Renewable Portfolio Standards. As shown in **Table 4.4-2**, *Electric Power Mix Delivered to Retail Customers in 2021*, SCE procures 31.4 percent of its energy portfolio from renewable sources. Senate Bill (SB) 350 (Chapter 547, Statues of 2015) and SB 100 (Chapter 312, Statutes of 2018) further increased California's Renewable Portfolio Standards and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. The legislation also instructed CARB to plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.[25] SCE anticipates it will meet its own climate change and renewables objectives that align with SB 100's 2045 renewables requirement.[26]

[23] Southern California Edison (SCE), Who We Are, https://www.sce.com/about-us/who-we-are. Accessed October 2023.

[24] Edison International and SCE, 2022 Annual Report, 2022, page 2, https://download.edison.com/406/files/20232/2022-eix-sce-annual-report.pdf?Signature=N0sq4yv8uPjj%2F32CHqD9P67Ydr0%3D&Expires=1696599567&AWSAccessKeyId=AKIAJX7XEOOELCYGIVDQ&versionId=bpeN_aiySep67UMc7RtP511pq9M5I127&response-content-disposition=attachment. Accessed October 2023.

[25] California Legislative Information, Senate Bill 100, California Renewable Portfolio Standards Program: Emissions of Greenhouse Gases, Approved by Governor on September 10, 2018, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100. Accessed October 2023.

[26] Edison International and SCE, 2022 Annual Report, 2022, page 159.

TABLE 4.4-2
ELECTRIC POWER MIX DELIVERED TO RETAIL CUSTOMERS IN 2021

Energy Resource	2021 SCE	2021 CA Power Mix (for comparison)
Eligible Renewable	**31.4%** [a]	**33.6%** [a]
Biomass & bio-waste	0.1%	2.3%
Geothermal	5.7%	4.8%
Eligible hydroelectric	0.5%	1.0%
Solar	14.9%	14.2%
Wind	10.2%	11.4%
Coal	**0.0%**	**3.0%**
Large Hydroelectric	**2.3%**	**9.2%**
Natural Gas	**22.3%**	**37.9%**
Nuclear	**9.2%**	**9.3%**
Other	**0.2%**	**0.2%**
Unspecified sources of power [b]	**34.6%**	**6.8%**
Total	**100%**	**100%**

[a] Percentages are estimated annually by the CEC based on the electricity sold to California consumers during the previous year.
[b] "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.

SOURCES: CEC, 2021 Power Content Label, Southern California Edison, https://www.energy.ca.gov/filebrowser/download/4676, Accessed October 2023.

Existing Natural Gas Supply

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs and delivered through high-pressure transmission pipelines. Natural gas provides almost one-third of the State's total energy requirements. Natural gas is measured in terms of both cubic feet (cf) or British thermal units (Btu).

Natural gas is used for cooking, space heating, water heating, electricity generation, and as an alternative transportation fuel. The Project Site is served by the Southern California Gas Company (SoCalGas), which is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.8 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout central and southern California, from the City of Visalia to the US/Mexican border.[27]

SoCalGas, along with five other California utility providers, released the 2022 California Gas Report, presenting a forecast of natural gas supplies and requirements for California through the year 2035. The 2022 California Gas Report predicts gas demand for all sectors (residential, commercial, industrial, energy generation and wholesale exports) and presents best estimates, as well as scenarios for hot and cold years. Overall, SoCalGas predicts a decrease in natural gas

[27] SoCalGas, Company Profile, https://www.socalgas.com/about-us/company-profile. Accessed October 2023.

demand in future years due to a decrease in per capita usage, energy efficiency policies, and the State's transition to renewable energy displacing fossil fuels including natural gas.[28]

SoCalGas receives gas supplies from several sedimentary basins in the western United States (US) and Canada, including supply basins located in New Mexico (San Juan Basin), west Texas (Permian Basin), the Rocky Mountains, and western Canada as well as local California supplies.[29] Sources of natural gas in the southwestern US will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.[30] Gas supply available to SoCalGas averaged 3,435 million cf per day in 2022. This equates to an annual average of 1,253,775 million cf per year.[31] See Table 4.4-1 for a summary of energy use for the region, including the SoCalGas service area.

Existing Transportation Energy

The annual transportation fuel consumption of diesel and gasoline in 2022 for California (the most recent year for which Statewide data is available) is 1,846 million gallons and 11,495 million gallons respectively. Transportation fuel consumption of diesel and gasoline for Los Angeles County in 2022 is 464 million gallons and 3,070 million gallons, respectively. The estimated Los Angeles County and Statewide transportation fuel consumption is based on retail sale data from the CEC.[32] See Table 4.4-1 for a summary of Los Angeles County fossil fuel consumption in 2022.

The State is now working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT. Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels.[33]

Existing Project Site

The 2.23-acre Project Site is currently developed with a two-story office building in the northern portion of the Project Site and associated surface parking. All existing improvements would be removed. Energy demand (i.e., electricity, natural gas, and fuel consumption from vehicle trips) from the existing uses is estimated and incorporated into this analysis to determine the Project's net (Project minus existing) energy consumption. As detailed under Section 4.4.3 under *Methodology*, annual electricity and natural gas usage is estimated using CalEEMod and is based on the size of the buildings. Existing gasoline and diesel usage are estimated based on existing

28 California Gas and Electric Utilities, 2022 California Gas Report.

29 California Gas and Electric Utilities, 2022 California Gas Report.

30 California Gas and Electric Utilities, 2022 California Gas Report.

31 California Gas and Electric Utilities, 2022 California Gas Report.

32 CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2022, https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed October 2023.

33 CEC, 2019 Integrated Energy Policy Report, February 2020, page 228, https://efiling.energy.ca.gov/getdocument.aspx?tn=232922. Accessed October 2023.

VMT and the estimated fuel economy and fuel consumption factors from CARB EMission FACtors model (EMFAC) model (specifically EMFAC 2021).

Current annual energy demand estimated for the existing land uses located on the Project Site is presented in **Table 4.4-3**, *Existing Site Annual Energy Use*.

TABLE 4.4-3
EXISTING SITE ANNUAL ENERGY USE

Source	Amount
Electricity	489 MWh
Natural Gas	595,417 cf
Gasoline	27,420 gallons
Diesel	3,722 gallons

SOURCE: ESA, 2023.

4.4.3 Environmental Impacts

Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in significant adverse impacts related to Energy if it would:

- **ENE-1** Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- **ENE-2** Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in Appendix G and Appendix F of the CEQA Guidelines, as appropriate, to assist in answering the Appendix G questions. The factors to evaluate energy impacts under Threshold ENE-1 include:

1) The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
2) The effects of the Project on local and regional energy supplies and on requirements for additional capacity;
3) The effects of the Project on peak and base period demands for electricity and other forms of energy;
4) The effects of the Project on energy resources; and
5) The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In accordance with Appendix G and Appendix F of the CEQA Guidelines, the degree to which the Project complies with existing energy standards is considered, as appropriate, to evaluate impacts under Threshold ENE-2.

Methodology

Construction

Project construction is estimated to start in 2025. Anticipated construction activities would vary substantially from day to day, depending on the specific type of construction activity and the number of workers and vendors traveling to the Project Site. This analysis considers these factors and provides the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources. This analysis is based on estimated maximum construction activities, meaning that for each phase of construction it was assumed that all of the vehicles and equipment that could be used for that phase are in simultaneous use for all day and every day of the phase.

Electricity

Construction electricity was estimated for a temporary construction office, for construction equipment that would use electricity as an alternative to diesel fuel, and for water usage from dust control. The construction office was assumed to be a 2,000-square-foot trailer and was modeled using CalEEMod (version 2022.1.1).[34] In addition, electricity from water conveyance for dust control was also calculated based on the estimated water consumption rate per day and assuming that water used for construction is non-potable and delivered on-site by trucks to cover the area during construction activity. Region-specific water electricity intensity factors for recycled non-potable water generation and conveyance were used to convert the volume of water needed to electricity demand from water conveyance.[35]

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas is not expected to be consumed during Project construction. Therefore, natural gas associated with construction activities was not calculated.[36]

Transportation Fuels

Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files included in Appendix C of this Draft EIR. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour from CARB's off-road vehicle (OFFROAD) model. Fuel consumption from construction on-road worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the emissions modeling worksheets and CalEEMod construction output

34 California Air Pollution Control Officers Association, California Emissions Estimator Model, 2022, http://caleemod.com/. Accessed October 2023.

35 Next 10 and Pacific Institute, The Future of California's Water-Energy-Climate Nexus, Table 4.

36 In general, natural gas would not be expected to be used and this energy analysis assumes heavy-duty construction equipment is diesel-fueled, as is typically the case. However, natural gas-fueled heavy-duty construction equipment could be used to replace some diesel-fueled heavy-duty construction equipment. If this does occur, diesel fuel demand would be slightly reduced and replaced by a small amount of temporary natural gas demand. This would not substantially affect the energy analysis or conclusions provided herein.

files. Total VMT for these on-road vehicles were then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's EMFAC2021 model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. CalEEMod assumed trip lengths were used for worker commutes while vendor, management visits, concrete, and haul truck trips were taken from emissions modeling worksheets that used EMFAC2021 emission factors.

Consistent with CalEEMod, construction worker trips were assumed to include a mix of light duty gasoline automobiles and light duty gasoline trucks. Construction vendor trucks were assumed to be a mix of medium-heavy-duty and heavy-duty diesel trucks, and concrete and haul trucks were assumed to be heavy-duty diesel trucks. Refer to Appendix E of this Draft EIR for detailed energy calculations.

The energy usage required for Project construction has been estimated based on the number and type of construction equipment that would be used during Project construction by assuming a conservative estimate of construction activities (i.e., maximum daily equipment usage levels). Energy for construction worker commuting trips has been estimated based on the expected number of workers for the various phases of construction and the estimated VMT based on the conservative values in the CalEEMod and EMFAC2021 models. The assessment also includes a discussion of the Project's compliance with relevant energy-related regulatory requirements that would minimize the amount of energy usage during construction. These measures are also discussed in Chapter 2, *Project Description*, Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.

The construction equipment and haul trucks would likely be diesel-fueled, while the construction worker commute vehicles would primarily be gasoline-fueled. For the purposes of this assessment, it is conservatively assumed that all heavy-duty construction equipment and haul trucks would be diesel-fueled. The estimated fuel economy for heavy-duty construction equipment is based on fuel consumption factors from the CARB OFFROAD emissions model, which is a State-approved model for estimating emissions from off-road heavy-duty equipment. The estimated fuel economy for haul trucks and worker commute vehicles is based on fuel consumption factors from the CARB EMFAC 2021 emissions model. Both OFFROAD and EMFAC are incorporated into CalEEMod. However, fuel consumption for worker, vendor, and concrete/haul trucks were calculated outside of CalEEMod using emission factors from EMFAC2021 to provide a more detailed and accurate account of truck fuel consumption.

Operation

Operation of the Project would require energy in the form of electricity and natural gas for building space and water heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs, and transportation fuels, primarily gasoline, for on-site landscaping equipment and vehicles traveling to and from the Project Site. Operational energy impacts were assessed based on the increase in energy demand compared to existing conditions. The net change in operational energy demand is based on the difference between the existing Project Site energy demand and the energy demand of the Project at full buildout.

Electricity

The Project's estimated electricity demand was analyzed relative to SCE's existing and planned energy supplies in 2027 (i.e., the Project buildout year) to determine if the utility would be able to meet the Project's energy demands. Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) from Project operation was calculated using demand factors provided in CalEEMod, which are based on the 2019 Title 24 standards, which went into effect on January 1, 2020. The 2022 Title 24 standards are in effect as of January 1, 2023; therefore, the analysis is likely conservative and overestimates Project operational building energy demand. Energy usage from water demand (e.g., electricity used to supply, convey, treat, and distribute) was estimated based on new buildings and facilities. The assessment also includes a discussion of the Project's compliance with relevant energy-related regulations and its land use transportation characteristics that would minimize the amount of energy usage during operations. These features and characteristics are also discussed in Chapter 2, *Project Description*, Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR. Electricity generated by the existing site was calculated using demand factors provided in CalEEMod and subtracted from the Project's electricity demand to obtain the net annual electricity demand.

Natural Gas

The Project's estimated natural gas demand was analyzed relative to SoCalGas' existing and planned energy supplies in 2027 (i.e., the Project buildout year)[37] to determine if the utility would be able to meet the Project's energy demands. Natural gas demand for the Project would be generated mainly by building heating and appliances. Natural gas demand generated by the existing site was calculated using demand factors provided in CalEEMod and subtracted from the Project's natural gas demand to obtain the net annual natural gas demand.

Transportation Fuels

Energy for transportation from Project and existing land use visitors and employees traveling to and from the Project Site is estimated based on the predicted number of trips to and from the Project Site and existing site, based on VMT output from the Culver City VMT Calculator used to estimate trips for the Project.[38] The Project and existing annual VMT is based on the sum of the estimated daily VMT (365 days out of a year). Refer to VMT data in Appendix I of this Draft EIR and energy calculations in Appendix E of this Draft EIR.

Project Design Features

The following project design features (PDFs) would be implemented as part of the Project:

GHG-PDF-1: Green Building Features. The Project will include the following green building features:

- The Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) rating system at a "certified" performance level or higher and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and Culver City's Green Building Program Requirements.

[37] California Gas and Electric Utilities, 2020 California Gas Report, 2020, p. 145.
[38] City of Culver City, VMT Calculator. Provided in Appendix I of this Draft EIR.

- The Project will incorporate renewable energy features in the form of 1 kW solar photovoltaic panels per 10,000 sf in order to achieve compliance with the City of Culver City's solar photovoltaic requirement, per the City's Green Building Ordinance and CALGreen standards.
- The Project will provide EV parking and charging for residential and commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. Forty-four (44) total spaces (41 residential + 3 commercial) would have EV charging stations.
- The Project will include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances.
- The Project will incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems.
- The Project will utilize only electricity and no natural gas in all land uses except for the retail space.

In addition to Project Design Feature GHG-PDF-1, the Project would implement Project Design Feature TRAF-PDF-2 (Transportation Demand Management (TDM) Program), which would reduce single occupancy trips, and VMT. These PDFs would also reduce GHG emissions.

Analysis of Project Impacts

Impact ENE-1: The Project could have a potentially significant impact on energy if it would result in wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.

Impact Analysis

Factor 1: The Project's Energy Requirements and its Energy Use Efficiencies by Amount and Fuel Type for Each Stage of the Project Including Construction, Operation, Maintenance, and/or Removal. If Appropriate, the Energy Intensiveness of Materials may be Discussed

Construction

During construction of the Project, energy would be consumed in the form of electricity for powering the construction office (lights, electronic equipment, and heating and cooling), water conveyance for dust control, and other construction activities. Natural gas would not be used for construction purposes. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction workers traveling to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). The estimated total energy consumed during construction is shown in **Table 4.4-4**, *Summary of Energy Use During Project Construction*. Calculation details are provided in Appendix E of this Draft EIR.

TABLE 4.4-4
SUMMARY OF ENERGY USE DURING PROJECT CONSTRUCTION

Energy Type	Total Quantity	Annual Average Quantity During Construction
Electricity		
Construction Office	102,060 kWh	40,936 kWh
Electricity from Water (Dust Control)	7,059 kWh	2,831 kWh
Total Electricity	**109,119 kWh**	**43,767 kWh**
Gasoline		
On-Road Construction Equipment	74,674 gallons	29,952 gallons
Off-Road Construction Equipment	0 gallons	0 gallons
Total Gasoline	**74,674 gallons**	**29,952 gallons**
Diesel		
On-Road Construction Equipment	80,548 gallons	32,308 gallons
Off-Road Construction Equipment	84,718 gallons	33,980 gallons
Total Diesel	**165,266 gallons**	**66,288 gallons**

NOTES: kWh = kilowatt-hours

[a] Detailed calculations are provided in Appendix E of this Draft EIR.

SOURCE: ESA, 2023.

Electricity

During construction of the Project, electricity would be used for the construction office (lights, electronic equipment, and heating and cooling), water conveyance for dust control, and other construction activities. Electricity would be supplied to the Project Site by SCE and would be obtained from the existing electrical lines that connect to the Project Site.

As shown in Table 4.4-4, annual average construction electricity usage would be approximately 43.8 MWh. The electricity demand would be within the supply and infrastructure capabilities of SCE (which reported 84,218 GWh of total energy sales in the 2021–2022 fiscal year).[39] The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the Project's net annual operational electricity. Therefore, the Project would not result in a wasteful, inefficient, and unnecessary consumption of energy associated with electricity used for construction, and impacts would be less than significant.

Natural Gas

As previously stated above, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would

[39] SCE, 2022 Annual Report, https://download.edison.com/406/files/20232/2022-eix-sce-annual-report.pdf. Accessed October 2023.

not be supplied to support Project construction activities; thus, there would be no expected demand generated by construction of the Project. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy associated with natural gas used for construction and impacts would be less than significant.

Transportation Energy

Table 4.4-4 reports the estimated amount of petroleum-based transportation energy that could potentially be consumed during Project construction based on the set of assumptions provided in Appendix E of this Draft EIR. During Project construction, on- and off-road vehicles would consume an estimated annual average of approximately 29,952 gallons of gasoline fuel and approximately 66,288 gallons of diesel over the approximately 30 months of construction. For comparison purposes only, and not for the purpose of determining significance, the fuel usage during Project construction would represent approximately 0.001 percent of the 2022 annual on-road gasoline-related energy consumption and 0.14 percent of the 2022 annual diesel-related energy consumption in Los Angeles County, as shown in Appendix E of this Draft EIR.[40]

Construction of the Project would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with Section 2485 in 13 CCR, and fuel requirements in accordance with 17 CCR Section 93115. The Project would benefit from fuel and automotive manufacturers' compliance with CAFE standards, which would result in more efficient use of transportation fuels (lower consumption). As such, the Project would indirectly comply with regulatory measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. While these regulations are intended to reduce construction emissions, compliance with the anti-idling and emissions regulations discussed above would also result in fuel savings from the use of more fuel-efficient engines.

Based on the analysis above, construction would utilize energy only for necessary on-site activities and to transport construction materials, excavated fill, and demolition debris to and from the Project Site. As discussed above, idling restrictions and the use of cleaner, energy-efficient equipment would result in less fuel combustion and energy consumption and, thus, reduce the Project's construction-related energy use. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and impacts associated with transportation fuels for construction would be less than significant.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, on-road mobile sources (i.e., transportation fuel), area sources (i.e., landscape maintenance equipment and natural gas heating), energy (i.e., electricity, natural gas), water conveyance and wastewater treatment, and solid waste. Usage of these energy sources was calculated for the Project buildout year (2027). **Table 4.4-5**, *Summary of Annual Net New Energy*

[40] CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2022, https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed October 2023.

Use During Project Operation, summarizes the Project's annual net new operational energy demand for electricity, natural gas, and gasoline and diesel transportation fuels.

TABLE 4.4-5
SUMMARY OF ANNUAL NET NEW ENERGY USE DURING PROJECT OPERATION

Energy Type[a]	Annual Quantity
Electricity	
Existing Site	526 MWh
Proposed Project – Total	2,320 MWh
Building Energy	*2,158 MWh*
EV Charging	*71 MWh*
Water Conveyance	*91 MWh*
Total Net Electricity	**1,794 MWh**
Natural Gas	
Existing Site	666,201 cf
Proposed Project - Total	394,001 cf
Retail	*26,643 cf*
Mobile Sources	*367,358 cf*
Total Net Natural Gas	**(272,201 cf)**
Transportation Fuel	
Existing Site	
Gasoline	27,420 gallons
Diesel	3,722 gallons
Proposed Project	
Gasoline	131,013 gallons
Diesel	20,604 gallons
Total Net Gasoline	**103,593 gallons**
Total Net Diesel	**16,882 gallons**

NOTES: kWh = kilowatt-hours; cf = cubic feet

[a] Detailed calculations are provided in Appendix E of this Draft EIR.

SOURCE: ESA, 2023.

Electricity

Based on the Title 24 standards and applicable CALGreen requirements and associated building energy factors in CalEEMod, at buildout, the Project would result in a projected net increase in the on-site annual demand for electricity totaling 21,239,533 kWh for the Project, as shown in Table 4.4-5.

The Project would include energy-saving measures. These measures include Project Design Feature GHG-PDF-1 (Green Building Features), which include the Project buildings achieving the USGBC LEED Certified performance level or higher to improve building energy efficiency above regulatory requirements. LEED Certification requires documenting achievement of the rating

system requirements and the required credits after the completion of construction. Projects may achieve credits in a variety of categories, including categories that are relevant to energy such as Location and Transportation, Water Efficiency, and Energy and Atmosphere. It is not yet known which specific credits in each of the LEED categories the Project will achieve; therefore, it is not possible at this time to accurately quantify specific amounts of energy reduction the Project would achieve from LEED Certification above regulatory requirements. Therefore, LEED Certified performance level or higher is not quantitatively accounted for in this analysis.

These measures include energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. Also as included in Project Design Feature GHG-PDF-1, the Project would directly support building electrification as the Project will utilize only electricity and no natural gas in all land uses except for limited natural gas in the retail space. Accordingly, natural gas would not be supplied to support Project operational activities related to building energy for all Project land uses except for limited use in the retail space. While building electrification would result in higher electricity usage, it would greatly reduce the use of a fossil fuel and the associated GHG emissions (i.e., natural gas combustion) from building energy demand since only the retail space still uses natural gas. The Project would also comply with applicable solar installation regulatory requirements.

Further, SCE is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020. With the passage of SB 100 in September 2018, SCE will be required to update its long-term plans to demonstrate compliance including providing 60 percent of its energy portfolio from renewable sources by December 31, 2030, and ultimately planning for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. SCE's current sources include wind, solar, eligible hydroelectric, biomass/biowaste, and geothermal sources.

Based on the CEC's 2021–2035 Energy Demand Forecast, SCE total system sales for 2027 are estimated to be 101,171,000 MWh of electricity.[41] As such, the Project-related net increase in annual electricity consumption of 1,794 MWh per year would represent approximately 0.002 percent of SCE's total energy sales. In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage. Therefore, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity.

Natural Gas

With compliance with the Title 24 standards and applicable CALGreen Code requirements, buildout of the Project is projected to generate a net decrease in the on-site demand for natural gas of approximately 272,201 cf per year. As discussed above, in addition to complying with applicable regulatory requirements regarding energy conservation (e.g., California Building Energy Efficiency Standards and CALGreen Code), the Project will implement GHG-PDF-1 and other sustainability features to further reduce energy use and will include all-electric development except

[41] CEC, The California Energy Demand 2021–2035, Mid-Demand Case. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2021-integrated-energy-policy-report/2021-1. Accessed October 2023.

for the retail space. Consistent with regulatory requirements and the City's Green Building Program, the Project would also include building features that would include such items as energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.

The Project would not result in an increase in consumption in SoCalGas' planning area. Therefore, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of natural gas.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. A majority of the vehicle fleet that would be used by Project residents, employees, and visitors would consist of light-duty automobiles and light-duty trucks, which are subject to fuel efficiency standards. Annual trips for the Project were estimated using trip rates provided in the Project's Transportation Study included in Appendix I of this Draft EIR.[42]

As shown in Table 4.4-5, the Project's estimated annual net increase in petroleum-based fuel usage would be 103,593 gallons of gasoline and 16,882 gallons of diesel. The Project would account for approximately 0.003 percent of the County's 2022 gasoline consumption and approximately 0.004 percent of the County's 2022 diesel consumption.

The Project would benefit from fuel and automotive manufacturers' compliance with CAFE standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also indirectly benefit from Pavley Standards, which are designed to reduce vehicle GHG emissions by mandating increasingly stringent emissions standards on new vehicles but would also result in fuel savings from more efficient engines in addition to compliance with CAFE standards.

The Project would support Statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles for the reasons provided below. As discussed in detail in Section 4.6, *Greenhouse Gas Emissions*, the Project would not conflict with the Connect SoCal goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. The Project represents an infill development at a location served by several local and regional bus lines including Culver CityBus Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site. In addition, the Project Site is located 0.6 mile east of the Culver City Transit Center which serves Los Angeles County Metropolitan Transportation Authority (Metro) Bus Lines 108 and 110, as well as Culver CityBus Line 6. Also, the Project would include 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015, as well as bicycle amenities as part of the Project's TDM Program (TRAF-PDF-2). The Project would provide residents, visitors, and employees with the ability to access nearby public

[42] Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR.

transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular fuel consumption.

Based on the above, the Project would minimize operational transportation fuel demand consistent with State, regional, and City goals. Therefore, operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy.

Factor 2: The Effects of the Project on Local and Regional Energy Supplies and on Requirements for Additional Capacity

Construction

Electricity

As discussed above, electricity would be consumed during Project construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity would be supplied to the Project Site by SCE and would be obtained from the existing electrical lines that connect to the Project Site. While temporary power poles would be installed to provide electricity during Project construction, the existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project Site during construction or demolition. Electricity demand during Project construction would be 1.9 percent of the Project's net annual operational electricity consumption and would be 8.3 percent of the existing site's electricity demand, which would be within the supply and infrastructure capabilities of SCE and, thus, would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new facilities or expansion of existing facilities.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site.

Transportation Fuel

As stated above, transportation fuel usage during Project construction activities would represent 0.001 percent of gasoline usage and 0.01 percent of diesel usage within Los Angeles County, respectively. Construction transportation energy would be provided by existing retail service stations and from existing mobile fuel services that are typically needed to deliver fuel to a construction site to refuel the off-road construction equipment at the Project Site, and, as such, no new facilities would be required. Energy consumption during construction be temporary and short-term, and energy supplies of the existing providers would be sufficient to serve the project in addition to existing commitments. As such, the Project would not affect the local and/or regional energy supplies and would not require additional capacity.

Operation

Electricity

Based on CEC's 2021-2035 California Energy Demand Forecast, SCE is forecasted to have energy sales of 101,171 GWh in the 2027-2028 fiscal year (the Project's first full buildout year).[43] The Project-related increase in annual electricity consumption of 1,794 MWh/year at would represent 0.002 percent of SCE's projected system sales for 2027. Energy consumption would be consistent with SCE anticipated regional demand from population or economic growth. During peak conditions, the Project would represent 0.002 percent of the SCE estimated peak load. Based on these factors, it is anticipated that SCE's existing and planned electricity capacity and electricity supplies would be sufficient to serve the Project's electricity demand, and, thus, the Project would not require additional infrastructure (i.e., a substation) beyond the aforementioned proposed utilities installed on-site during construction.

Natural Gas

As stated above, the Project would result in an annual net decrease in demand for natural gas. Therefore, since SoCalGas' infrastructure is sufficient to serve existing uses and the Project would use less natural gas, the Project would not require an increase in supplies or infrastructure. As such, SoCalGas' existing and planned natural gas capacity, supplies and infrastructure would be sufficient to serve the Project's demand.

Transportation Energy

As stated above, at buildout, the Project would consume a net increase of 103,593 gallons of gasoline and 16,882 gallons of diesel per year. For comparison purposes, the transportation-related fuel usage for the Project would represent 0.003 percent of the 2022 annual on-road gasoline- and 0.004 percent of the 2022 annual on-road diesel-related energy consumption in Los Angeles County (based on the available County fuel sales data). Detailed calculations are shown in Appendix E of this Draft EIR. Operational transportation energy would be provided by existing retail service stations, and, as such, no new retail service stations would be required. Transportation fuels (gasoline and diesel) are produced from crude oil, which can be produced from domestic supplies or imported from various regions around the world, and based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[44] As such, existing and planned transportation fuel supplies would be sufficient to serve the Project's demand. In addition, the Project would provide EV charging stations, which would serve to incentivize the use of hybrid or full electric vehicles, thereby reducing the reliance on transportation fuels. As energy consumption during operation would be relatively negligible and within existing and planned supplies, the Project would not affect the local and/or regional energy supplies and would not require additional capacity.

[43] CEC, The California Energy Demand 2021–2035, Mid-Demand Case. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2021-integrated-energy-policy-report/2021-1. Accessed October 2023.

[44] BP Global, Oil reserves, 2018, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html. Accessed July 11, 2022.

Factor 3: The Effects of the Project on Peak and Base Period Demands for Electricity and Other Forms of Energy

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of SCE's power grid and base load conditions and would be consistent with expected levels of electricity demand. SCE's base case peak demand would be 24,531 MW in 2027.[45] Under peak conditions, the Project would consume a net increase of 1,794 MWh on an annual basis which, assuming 12 hours of active electricity demand per day, would be equivalent to 0.41 MW (peak demand assuming 4,380 hours per year of active electricity demand). In comparison to the SCE base peak load of 24,531 MW, the Project would represent 0.002 percent of the SCE base peak load and, therefore, would not create any new peak demand impacts that are inconsistent with SCE demand projections. Therefore, the Project's electrical consumption during operational activities would have a negligible effect on peak load conditions of the power grid and is within existing and planned demand.

Factor 4: The Effects of the Project on Energy Resources

Electricity

As discussed above, SCE's electricity generation is derived from a mix of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal wind and hydropower. The CEC's California Energy Demand 2018-2030 Revised Forecast identify adequate energy resources to support future generation capacity, and, as discussed above, SCE's existing and planned electricity capacity and supplies would be sufficient to serve the Project's electricity demand.[46] As discussed above in the Regulatory Framework, one of the objectives of SB 350 was to increase the procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. Accordingly, SCE is required to procure at least 33 percent to 50 percent of its energy portfolio from renewable sources by 2030. SCE is on track to hit their power goals and interim targets. SCE has committed to providing an increasing percentage of its energy portfolio from renewable sources so as to exceed the RPS requirements. With the passage of SB 100, SCE will be required to update its long-term plans to demonstrate compliance with the updated requirements including providing 60 percent of its energy portfolio from renewable sources by December 31, 2030 and ultimately planning for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regard to on-site renewable energy sources, the Project would meet the applicable requirements of the CALGreen Building Code. The Applicant would also comply with CCMC Chapter 15.02.1005 by either installing a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code or paying an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code.

45 CEC, The California Energy Demand 2021–2035, Mid-Demand Case. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2021-integrated-energy-policy-report/2021-1. Accessed October 2023.

46 CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018.

Natural Gas

As discussed above, natural gas supplied to the Southern California area is mainly sourced from out-of-state with a small portion originating in California. According to the U.S. Energy Information Administration (EIA), the U.S. currently has approximately 90 years of natural gas reserves based on 2016 consumption.[47] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years.[48] Therefore, as the Project would comply with energy efficiency standards for natural gas, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation Fuel

As stated earlier in the discussion, transportation fuels (gasoline and diesel) are produced from crude oil, which can be provided domestically or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.[49] Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

Based on the above, the Project would minimize construction and operational energy and transportation fuel demand to the extent feasible and would not substantially impact energy resources. Therefore, construction and operation of the Project would not have a significant impact on energy resources.

Factor 5: The Project's Projected Transportation Energy Use Requirements and its Overall Use of Efficient Transportation Alternatives

As discussed in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR, Connect SoCal (SCAG 2020–2045 RTP/SCS) presents the transportation vision for the region through the year 2045 and provides a long-term investment framework for addressing the region's transportation and related challenges. As shown in Exhibit 3.8 of Connect SoCal, the Project Site is located within an HQTA, which SCAG defines as "corridor-focused Priority Growth Areas within one half mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours."[50] Connect SoCal encourages increasing the density of development within HQTAs and other infill locations, to reduce VMT and trips.[51]

The Project would not conflict with Connect SoCal goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. The Project represents an infill development at a location served by several local and regional bus lines including Culver CityBus

47 U.S. Energy Information Administration, How much natural gas does the United States have, and how long will it last? Last updated April 9, 2018, https://www.eia.gov/tools/faqs/faq.php?id=58&t=8. Accessed July 11, 2022.

48 California Energy Commission, Tracking Progress – Energy Efficiency. Last updated September 2018.

49 BP Global, Oil reserves, 2018, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html. Accessed July 11, 2022.

50 Southern California Association of Governments, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, December 2020, pp. 51 and 91.

51 Southern California Association of Governments, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, December 2020, pp. 50-51.

Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site. In addition, the Project Site is located 0.6 mile east of the Culver City Transit Center which serves Metro Bus Lines 108 and 110, as well as Culver City Bus Line 6. Also, the Project would include 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015, as well as bicycle amenities as part of the Project's TDM Program (TRAF-PDF-2). The Project would provide residents, visitors, and employees with the ability to access nearby public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular fuel consumption.

Mitigation Measures

Impacts regarding wasteful, inefficient, or unnecessary consumption of energy resources were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance after Mitigation

Impacts regarding wasteful, inefficient, or unnecessary consumption of energy resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Consistency with Energy Plans

Impact ENE-2: The Project could have a significant impact on energy if it would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Impact Analysis

Construction

As discussed below, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. With respect to truck fleet operators, USEPA and NHTSA have adopted fuel efficiency standards for medium- and heavy-duty trucks. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles and are phased in for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[52] USEPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which would be phased in from model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[53] The energy modeling for trucks does not take into account specific fuel reductions from these regulations, since they would apply to fleets as they incorporate newer trucks meeting the regulatory standards; however, these regulations would have an overall beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

52 USEPA, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, August 2011.

53 USEPA, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, October 25, 2016.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

The Project would comply with all relevant Federal and State regulations and energy conservation plans including USEPA and NHTSA fleet fuel efficiency standards and CARB's anti-idling regulations. Therefore, Project construction activities would not conflict with energy conservation plans and impacts would be less than significant.

Operation

A detailed discussion of the Project's comparison with the applicable actions and strategies in Culver City's Green Building Program, is provided in Section 4.6, *Greenhouse Gas Emissions*. As discussed, the Project is designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and CALGreen Building Code, which have been incorporated into the Culver City's Green Building Program. In addition, the Project would achieve LEED Certified performance level or higher (refer to Project Design Feature GHG-PDF-1). The Project would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high-efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation.

Electricity and natural gas usage during Project operations, as presented in Table 4.4-5, would be minimized through incorporation of applicable Title 24 standards, applicable CALGreen Building Code requirements, and Culver City's Green Building Code. Furthermore, as noted above, the Project incorporates energy-conservation measures that would achieve LEED rating system at a "certified" performance level or higher and would include all-electric development for all land uses except retail (refer to Project Design Feature GHG-PDF-1).

The Project would also be consistent with and not conflict with regional planning strategies that address energy conservation. As discussed above and in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR, SCAG's Connect SoCal focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, Connect SoCal focus on reducing fossil fuel use by decreasing VMT, encouraging the reduction of building energy use, and increasing use of renewable sources. The Project's design and its location on an infill site within proximity to transit; its proximity to existing off-site retail, restaurant, entertainment, commercial, and job destinations; and its walkable environment would achieve a reduction in VMT. These land use characteristics are included in the transportation fuel demand

for the Project's mobile sources. Additional detailed information regarding these land use characteristics are provided in Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR. With respect to operational transportation-related fuel usage, the Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The Project would also benefit from fuel and automotive manufacturers' compliance with CAFE fuel economy standards and the Pavley Standards, which are designed to result in more efficient use of transportation fuels. As a result, the Project would implement project design features and incorporate water conservation, energy conservation, landscaping, and other features consistent with applicable actions and strategies in the Culver City Green Building Code. The Project's design would comply with existing energy standards and incorporate project design features to reduce energy consumption. Therefore, the Project would not conflict with energy conservation plans and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. The Project would result in less than significant impacts regarding conflicts with or obstructing a state or local plan for renewable energy or energy efficiency.

Cumulative Impacts

Wasteful, Inefficient, and Unnecessary Use of Energy

Cumulative impacts occur when the incremental effects of a proposed project are significant when combined with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. As presented in Chapter 3, *Environmental Setting*, of this Draft EIR, Table 3-1, the City of Culver City, as lead agency for the Project, has identified 12 related projects located within the vicinity of the Project Site. Of the 12 related projects, 8 are located within the City of Culver City and 4 are located within the City of Los Angeles. The geographic context for the analysis of cumulative impacts on electricity is SCE's and Los Angeles Department of Water & Power's (LADWP) service areas, and the geographic context for the analysis of cumulative impacts on natural gas is SoCalGas' service area, because the Project and related projects are located within the service boundaries of SCE, LADWP, and SoCalGas. While the geographic context for transportation-related energy use is more difficult to define, the Project is considered in the context of County-wide consumption given the tendency for vehicles to travel within and through the County and the availability of County-level data. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

Electricity

Buildout of the Project, related projects, and additional forecasted growth in SCE's and LADWP's service areas would cumulatively increase the demand for electricity supplies and on infrastructure capacity. However, SCE and LADWP, in coordination with the CEC, account for future increases in service area demand based on various economic, population, and efficiency factors. SCE and

LADWP rely on multiple forms of data from various agencies, including historical sales from the General Accountings Consumption and Earnings report, historical Los Angeles County employment data provided from the State's Economic Development Division, plug-in electric vehicle (PEV) projections from the CEC account, building permits when determining electricity Load Forecasts, solar rooftop installations from the Solar Energy Development Group, electricity price projections from the Financial Services organization, and LADWP program efficiency forecasts.[54,55] As described in LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards.[56] The 2017 Power Strategic Long-Term Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements.[57] Accordingly, LADWP considers projected Los Angeles County building permit amounts calculated by the University of California, Los Angeles Anderson School of Management when determining its load forecast and would, therefore, account for the Project's and the related projects' electricity demand within its forecasts.[58] SCE has determined that the use of energy resources would be minor compared to existing supply and infrastructure within the SCE service area and would be consistent with growth expectations.[59] Thus, SCE and LADWP consider growth from related projects within its service area for the increase in demand for electricity, as well as the need for energy infrastructure, such as new or expanded energy facilities.

Thus, although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could affect future availability, the Project's use of such resources would be on a relatively small scale and would be reduced by measures rendering the Project more energy efficient. The Project would also incorporate additional energy efficiency measures, including LEED certification equivalent (refer to Project Design Feature GHG-PDF-1). Refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR for more information. Related projects, as with the Project, would be required to evaluate energy impacts during construction and operation related to the wasteful, inefficient or unnecessary use of electricity, incorporate energy conservation features, comply with applicable regulations including the Los Angeles Green Building Code, Los Angeles' Green New Deal, Culver City's Green Building Program, the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. Related projects, as with the Project, would also be required to evaluate potential impacts related to local and regional supplies or capacity based on regional growth plans, such as SCAG's Connect SoCal, and SCE and LADWP energy supply projections for long-term planning. Each of the related projects would be reviewed by the local utility provider to identify necessary electricity service connections to meet the needs of their respective projects.

54 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. 70.
55 CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018.
56 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. ES-2.
57 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. ES-2.
58 Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. 67.
59 CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018.

In addition, the local utility provider would provide service letters (which take into account all current uses and projected future development projects) for each related project confirming availability of adequate electricity supplies and infrastructure as part of the total load growth of the regional power system.

Additionally, as discussed above, SCE and LADWP are required to procure 60 percent renewables by 2030 and 100 percent renewables by 2045 and are on track to hit their RPS targets. This represents the available off-site renewable sources of energy that could meet the Project's and related projects energy demand. Therefore, the Project and related projects would comply with the energy conservation plans and efficiency standards required to ensure efficient energy use.

As such, the Project's impact, when considered together with related projects, would not be cumulatively considerable and would not result in cumulatively significant impacts related to wasteful, inefficient, or unnecessary use of electricity.

Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and on infrastructure capacity. As stated above, based on the 2022 California Gas Report, the CEC estimates natural gas consumption within SoCalGas' planning area will be approximately 810,665 million cf in 2027 (the Project's first full buildout year).[60] The Project would result in a net decrease in natural gas consumption. SoCalGas forecasts consider projected population growth and development based on local and regional plans, and the Project's growth and development would not conflict with those projections. Additionally, as with the Project, each of the related projects would be reviewed by SoCalGas to identify necessary natural gas service connections to meet the needs of their respective projects, and SoCalGas would provide service letters for each related project confirming availability of adequate natural gas supplies as part of the total load growth of the regional natural gas system. Natural gas infrastructure is expanded and improved in response to increasing demand and it is expected that SoCalGas would continue to expand delivery capacity if necessary to meet growth requirements in the service area. Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, would be consistent with regional and local growth expectations for SoCalGas' service area, and would not result in the need to construct new or expand existing natural gas facilities or distribution lines.

Related projects, as with the Project, would be required to evaluate natural gas impacts during construction and operation related to the wasteful, inefficient or unnecessary use of natural gas, incorporate energy conservation features, comply with applicable regulations including the Los Angeles Green Building Code, Los Angeles' Green New Deal, Culver City's Green Building Program, the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. As with the Project, related projects would also be required to obtain evidence of service from SoCalGas, or the appropriate utility provider, to ensure that

60 California Gas and Electric Utilities, 2022 California Gas Report, 2022, p. 186.

natural gas service would be available and provided to meet related project demands. Furthermore, the related projects are generally infill projects in a highly urbanized area already served by existing facilities and are generally residential, mixed-use, and commercial projects and not high-energy demand facilities, such as heavy industrial uses.

As such, the Project's contribution to cumulative impacts due to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As described above, at buildout, the Project would consume a total net increase of 103,593 gallons of gasoline and 16,882 gallons of diesel per year. For comparison purposes, the transportation-related fuel usage for the Project would represent between 0.003 percent of the 2022 annual on-road gasoline- and 0.004 percent of the annual on-road diesel-related energy consumption in Los Angeles County (based on the available County fuel sales data), as shown in Appendix E of this Draft EIR.

Additionally, as described above, petroleum currently accounts for 72 percent of California's transportation energy sources;[61] however, over the last decade the State has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT, which would reduce reliance on petroleum fuels.

Construction of the Project and related projects would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with Section 2485 in 13 CCR, and fuel requirements in accordance with 17 CCR Section 93115. The Project and related projects would benefit from fuel and automotive manufacturers' compliance with CAFE standards, which would result in more efficient use of transportation fuels (lower consumption). As such, the Project and related projects would indirectly comply with regulatory measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels.

As discussed previously, the Project would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation and a reduction in overall VMT. The Project Site is an infill location close to jobs, off-site housing, shopping, and entertainment uses and in close proximity to existing public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. Therefore, operation of the Project would provide visitors and employees with transportation options that would limit VMT and transportation fuel consumption, and would not result wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels.

61 U.S. Energy Information Administration, California Energy Profile Overview, 2021, https://www.eia.gov/state/?sid=CA#tabs-1. Accessed July 11, 2022.

Connect SoCal is a regional planning tool that addresses cumulative growth and resulting environmental effects and is applicable to the Project and related projects with respect to transportation energy efficiency. Related projects would be required under CEQA to evaluate if their respective developments would conflict with the energy efficiency policies emphasized by Connect SoCal, such as the per capita VMT targets, promotion of alternative forms of transportation, proximity to public transportation options, and provisions for encouraging multi-modal and energy efficient transit, such as by accommodating bicycle parking and EV chargers at or above regulatory requirements. Furthermore, as with the Project, the related projects would similarly be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions that would not be in conflict with applicable provisions of SCAG's Connect SoCal for the land use type. For more information on the Project's consistency with SCAG's Connect SoCal, refer to Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.

Since the Project would not conflict with Connect SoCal, the Project's contribution to cumulative impacts due to wasteful, inefficient or unnecessary use of transportation fuel would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

Conclusion

Based on the analysis provided above, the Project's contribution to cumulative impacts related to energy consumption (i.e., electricity, natural gas, and transportation energy) would not result in a cumulatively considerable effect related to potentially significant environmental impacts due to the wasteful, inefficient and unnecessary consumption of energy during construction or operation. As such, cumulative energy impacts under Threshold ENE-1 would be less than significant.

Consistency with State or Local Plan

Electricity

The Project would also incorporate energy and water efficiency measures outlined in Section 4.6, *Greenhouse Gas Emissions*, which include LEED Certified or equivalent (refer to Project Design Feature GHG-PDF-1). Related projects, as with the Project, would be required to evaluate electricity conservation features, comply with applicable electricity efficiency plans and standards, including Los Angeles' Green Building Code, Culver City's Green Building Program, the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. Related projects, as with the Project, would also be required to evaluate potential impacts related to consistency with the Los Angeles Green New Deal standards, and local and regional supplies or capacity based on regional growth plans, such as the SCE and LADWP energy supply projections for long-term planning.

As such, the Project's contribution to cumulative impacts due to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity.

However, as discussed above, SoCalGas forecasts take into account projected population growth and development based on local and regional plans, and the Project's growth and development would not conflict with those projections.

Related projects, as with the Project, would be required to evaluate natural gas conservation features and compliance with applicable regulations, including the Los Angeles Green Building Code, Culver City's Green Building Program, the Title 24 standards and CALGreen Building Code, and incorporate mitigation measures, as necessary under CEQA. Related projects, as with the Project, would also be required to evaluate potential impacts related to consistency with the Los Angeles Green New Deal standards, and local and regional supplies or capacity based on regional growth plans, such as the SoCalGas energy supply projections for long-term planning.

As such, the Project's contribution to cumulative impacts due to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency would not be cumulatively considerable, and, thus, cumulative impacts would be less than significant.

Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. However, as discussed above, the Project would not conflict with the energy efficiency policies emphasized by Connect SoCal. As discussed previously, the Project would be consistent with and not conflict with SCAG's land use type for the area and would encourage alternative transportation and achieve a reduction in VMT compared to a standard non-infill project and based on its location near a diverse mix of land uses and public transit options.

Connect SoCal is a regional planning tool that addresses cumulative growth and resulting environmental effects and is applicable to the Project, and related projects with respect to transportation energy efficiency. Related projects would be required under CEQA to evaluate if their respective developments would conflict with the energy efficiency policies emphasized by Connect SoCal, such as the per capita VMT targets, promotion of alternative forms of transportation, proximity to public transportation options, and provisions for encouraging multi-modal and energy efficient transit, such as by accommodating bicycle parking and EV chargers at or above regulatory requirements. Furthermore, related projects would be required to implement mitigation measures, as needed, if found to be in conflict with applicable provisions of Connect SoCal for the land use type.

Since the Project would not conflict with Connect SoCal, the Project's contribution to cumulative impacts related to potentially significant environmental impacts due to conflicting with or obstruction of a state or local plan for transportation energy efficiency would not be cumulatively considerable and, thus, would be less than significant.

Conclusion

Based on the analysis provided above, the Project's contribution to cumulative impacts related to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency

would not be cumulatively considerable; therefore, cumulative energy impacts under Threshold ENE-2 would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. Cumulative impacts during construction and operation of the Project would be less than significant.

This page intentionally left blank

4.5 Geology and Soils – Paleontological Resources

4.5.1 Introduction

This section evaluates potential impacts on paleontological resources. As noted in Chapter 6, *Other CEQA Considerations,* of this Draft EIR, the City of Culver City (City) determined in the Initial Study, provided in Appendix A-2 of this Draft EIR, that the Project would result in less than significant impacts related to geology and soils, with the exception of paleontological resources. The analysis provided in this section is based in part on the *5700 Hannum Mixed-Use Residential and Commercial Project, Culver City, California, Paleontological Resources Assessment Report,*[1] included as Appendix F of this Draft EIR.

Paleontology is a branch of geology that studies the life forms of the past, especially prehistoric life forms, through plant and animal fossils. Paleontological resources represent a limited, non-renewable, and impact-sensitive scientific and educational resource. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities.

4.5.2 Environmental Setting

Regulatory Framework

State

California Environmental Quality Act

The California Environmental Quality Act (CEQA) Guidelines (Title 14, Chapter 3 of the California Code of Regulations [CCR], Section 15000 *et seq*.), define the procedures, types of activities, individuals, and public agencies required to comply with CEQA. As part of CEQA's Initial Study process (CEQA Guidelines Section 15023, Appendix G, Section VII, Part f), one of the questions that the lead agency must answer relates to paleontological resources: "Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?" If the answer is yes, the project reaches the CEQA threshold of significance for a significant impact to paleontological resources.

The loss of any identifiable fossil that could yield information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact. Direct impacts to paleontological resources primarily concern the potential destruction of nonrenewable paleontological resources and the loss of information associated with these resources. This includes the unauthorized collection of fossil remains. If potentially fossiliferous bedrock or surficial sediments are disturbed, the disturbance could result in the destruction of paleontological resources and subsequent loss of information, which would be a significant impact.

[1] Environmental Science Associates, *5700 Hannum Mixed-Use Residential and Commercial Project, Culver City, California, Paleontological Resources Assessment Report*, Culver City, California, October 2023. Provided in Appendix F of this Draft EIR.

The CEQA threshold of significance for a significant impact to paleontological resources is reached when it is determined that a project would "directly or indirectly destroy a significant paleontological resource or unique geologic feature." In general, for project sites that are underlain by paleontologically sensitive geologic units[2], the greater the amount of ground disturbance, the higher the potential for significant impacts to paleontological resources. For project sites that are directly underlain by geologic units with no paleontological sensitivity, there is no potential for impacts on paleontological resources unless sensitive geologic units which underlie the non-sensitive unit are also affected.

Public Resources Code Section 5097.5

Other State requirements for paleontological resource management are included in Public Resources Code (PRC) Section 5097.5. This statute prohibits the removal of any paleontological site or feature from public lands without permission of the jurisdictional agency, defines the removal of paleontological sites or features as a misdemeanor, and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (State, county, city, district) lands.

California Penal Code Section 622.5

California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."

Local

City of Culver City General Plan

The City's General Plan does not include policies, goals, and objectives for paleontological resources.

Society for Vertebrate Paleontology Standard Guidelines

As discussed above, PRC Section 5097.5 and the California Environmental Quality Act Statute require protection of paleontological resources. The Society for Vertebrate Paleontology (SVP) has established standard guidelines that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation.[3]

[2] A geologic unit is a term that is used to describe a basic unit of rock measurement in geology. It is comprised of similar rock types created by associated depositional events and environments.

[3] Society of Vertebrate Paleontology (SVP), Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010.

The SVP guidelines are the industry standard. As defined by the SVP, significant nonrenewable paleontological resources are:[4]

> *Fossils and fossiliferous deposits here are restricted to vertebrate fossils and their taphonomic and associated environmental indicators. This definition excludes invertebrate or paleobotanical fossils except when present within a given vertebrate assemblage. Certain invertebrate and plant fossils may be defined as significant by a project paleontologist, local paleontologist, specialists, or special interest groups, or by lead agencies or local governments.*

As defined by the SVP, significant fossiliferous deposits are:[5]

> *A rock unit or formation which contains significant nonrenewable paleontologic resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information). Palaeontologic resources are considered to be older than recorded history and/or older than 5,000 years BP [before present].*

Based on the significance definitions of the SVP, all identifiable vertebrate fossils are considered to have significant scientific value.[6] This standard is used because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate fossils have previously been found are considered to have high sensitivity. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

Existing Conditions

Regional Geology

The Project Site is situated in the northern portion of the Los Angeles Basin (Basin), a structural depression approximately 50 miles long and 20 miles wide.[7],[8] The Basin is located within the Transverse Ranges, a physiographic-structural province that includes a series of east-west trending mountains and valleys that interrupt the northwest-southeast orientation of other major California ranges, including the Peninsular Ranges, Coast Ranges, and the Sierra Nevada. The Basin is

4 SVP, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines, Society of Vertebrate Paleontology News Bulletin 163:22–27, 1995.

5 SVP, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines, Society of Vertebrate Paleontology News Bulletin 163:22–27, 1995.

6 SVP, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines, Society of Vertebrate Paleontology News Bulletin 163:22–27, 1995.

7 Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder, Geology of the Los Angeles Basin – an introduction. Geological Survey Professional Paper 420-A, 1965.

8 Ingersoll, R. V. and P. E. Rumelhart, Three-stage basin evolution of the Los Angeles basin, southern California. Geology 27: 593-596, 1999.

bounded on the north by the Santa Monica Mountains, the Elysian Hills, Repetto Hills, and Puente Hills and on the east, and by the Santa Ana Mountains and San Joaquin Hills to the southeast. The Basin formed between 3 and 18 million years ago as a result of tectonic subsidence.[9] Continuous sedimentation into the Basin began during the middle Miocene Epoch around 13 million years ago as thousands of feet of sediments were deposited in a marine environment.[10] Deposition of terrestrial alluvial sediments commenced during the Pleistocene Epoch approximately 2.6 million years ago and ended 11,700 years ago.

More specifically, the Project Site lies on the southwest slope of the Baldwin Hills, which are situated near the south edge of the Los Angeles Basin. The area where the Baldwin Hills recently formed was a marine habitat as late as 36,200 and 28,450 radiocarbon years ago.[11] The subsequent uplift of the Baldwin Hills is the result of tension along the Newport –Inglewood fault. Several smaller uplifts (e.g., Signal Hill, Rosecrans Hills, and Dominguez Hills) also resulted from tension along this fault. Both the San Pedro and Lakewood formations are exposed in the Baldwin Hills.

Site Geology and Literature Review

There is disagreement between geologists over the geologic conditions at the Project Site. For example, according to a 1959 review from Poland et al.[12] the Project Site geology is the San Pedro Sand Formation, a nearshore marine deposit. However, Dibblee and Minch[13] mapped the Project Site in 2007—the most recent geologic mapping including the Project Site—as Qop (Fox Hills paleosol), Qoa (Late Pleistocene alluvium) and Qa (Holocene-age alluvium). Qa is surficial alluvium of Holocene age that implies clasts of Santa Monica Slate from the Santa Monica Mountains are present. These clasts would have been transported down the coast before the uplift of the Baldwin Hills more than 28,000 calendar years ago and then reworked into Holocene alluvium. The Qa has a low sensitivity for paleontological resources due to the young age of the deposits. Qoa and the Qop are likely from the late Pleistocene.[14]. If the Fox Hills paleosol[15] is of late Pleistocene age, it would have been developed between the latest date for marine sediments 28,000 calendar years ago and the end of the Pleistocene Epoch 11,500 calendar years ago. The Qoa has a high sensitivity for paleontological resources given its age. The authors who named the Fox Hills paleosol[16] never stated whether they believed it was of Pleistocene or Holocene age.

---

9 Critelli, S. P. Rumelhart, and R. Ingersoll, Petrofacies and provenance of the Puente Formation (middle to upper Miocene), Los Angeles Basin, southern California: implications for rapid uplift and accumulation rates. Journal of Sedimentary Research A65: 656-667, 1995.

10 Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder, Geology of the Los Angeles Basin – an introduction. Geological Survey Professional Paper 420-A, 1965.

11 Bandy, O. L., and L. Marincovich, Jr. 1973. Rates of late Cenozoic Uplift, Baldwin Hills, Los Angeles, California. Science 181:653-655.

12 Poland, J.F., A. A. Garrett, and A. Sinnot. 1959. Geology, hydrology, and chemical character of ground waters in the Torrance-Santa Monica area, California: U.S. Geological Survey Water Supply Paper 1461, 425 p.

13 Dibblee and Minch. 2007. Geologic map of the Venice and Inglewood Quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. Scale 1:24000

14 Dibblee and Minch. 2007. Geologic map of the Venice and Inglewood Quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. Scale 1:24000

15 Paleosol is an ancient soil that formed in the past

16 Hsu, E.Y., R. B. Saul, S. S. Tan, J. Treiman, and F. H. Weber, Jr. 1982. Slope Stability and Geology of the Baldwin Hills, Los Angeles County, California. California Department of Conservation Division of Mines and Geology Special Report 152:1-93. Scale 1:48,000.

Pleistocene sediments in particular have a rich fossil history in Southern California and especially the Los Angeles Basin. The most common terrestrial fossils include the bones of mammoth, bison, horse, wolf, camel, antelope, and giant ground sloth, as well as small animals such as rodents, birds, and lizards.[17],[18],[19],[20] The most common marine fossils are various types of mollusks, with occasional bony fish and shark elements (isolated teeth). Terrestrial organisms are sometimes found in Los Angeles Basin Pleistocene marine sediments, documenting animals that washed out to sea.

In connection with the Project, Geotechnologies, Inc.[21] reproduced the mapping of Poland et al.[22], and describe the soils in the northern portion of the Project Site as marine terrace deposits, which could be compatible with the San Pedro Sand Formation. Geotechnologies, Inc. encountered fill materials down to depths of one and three feet below ground surface (bgs), followed by marine terrace deposits then bedrock (siltstone).[23] Based on a literature review and the Geotechnologies, Inc. study, the northwestern corner of the Project Site might host sediments of the Baldwin Hills paleosol (also known as the Fox Hills paleosol)[24], which is thought to be of latest Pleistocene age. The Baldwin Hills paleosol within the Project Site is here assigned a high sensitivity for paleontological resources as it is a paleosol. Beneath the Baldwin Hills paleosol is the older Quaternary alluvium.

Pleistocene deposits in Culver City west of the Baldwin Hills have produced many Pleistocene vertebrate and invertebrate fossils. For instance, in 2016, paleontological resources monitoring was conducted for a construction project in the immediate vicinity of the Project Site. There, 78 fossil specimens were collected at this project from sediments at 28 to 29 feet below street level, both *in situ* and from spoil piles excavated at that level.[25] The taxa represented by the collected fossils range from mammal (*Camelops hesternus*) and plant (*Pinus* sp.) remains, to a large number of mollusks (Bivalvia and Gastropoda). Similarly, from 2017 to 2018, paleontological resources

17 Graham, R.W., and E.L. Lundelius. 1994. FAUNMAP: A database documenting the late Quaternary distributions of mammal species in the United States. Illinois State Museum Scientific Papers XXV(1).

18 Jefferson, G.T. 1991a. A catalogue of Late Quaternary Vertebrates from California: Part One, nonmarine lower vertebrate and avian taxa. Natural History Museum of Los Angeles County Technical Reports No. 5.

19 Jefferson, G.T. 1991b. A catalogue of Late Quaternary Vertebrates from California: Part Two, Mammals. Natural History Museum of Los Angeles County Technical Reports No. 7.

20 Miller, W. E. 1971. Pleistocene Vertebrates of the Los Angeles Basin and Vicinity: exclusive of Rancho La Brea. Los Angeles County Museum of Natural History, No. 10.

21 Geotechnologies, Inc. 2022. Preliminary Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 5700 Hannum Avenue, Culver City, California. Prepared for: LPC West, Inc., 915 Wilshire Boulevard, Suite 2050, Los Angeles, CA 90017. Prepared by: Geotechnologies, Inc., 439 Western Avenue, Glendale, CA 91201. 47 pp.

22 Poland, J.F., A. A. Garrett, and A. Sinnot. 1959. Geology, hydrology, and chemical character of ground waters in the Torrance-Santa Monica area, California: U.S. Geological Survey Water Supply Paper 1461, 425 p.

23 Geotechnologies, Inc. 2022. Preliminary Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 5700 Hannum Avenue, Culver City, California. Prepared for: LPC West, Inc., 915 Wilshire Boulevard, Suite 2050, Los Angeles, CA 90017. Prepared by: Geotechnologies, Inc., 439 Western Avenue, Glendale, CA 91201. 47 pp.

24 Hsu, E.Y., R. B. Saul, S. S. Tan, J. Treiman, and F. H. Weber, Jr. 1982. Slope Stability and Geology of the Baldwin Hills, Los Angeles County, California. California Department of Conservation Division of Mines and Geology Special Report 152:1-93. Scale 1:48,000.

25 SWCA Environmental Consultants. 2016. Final Paleontological Resources Monitoring and Mitigation Report for the Washington National Project, Culver City, Los Angeles County, California. Prepared for: Greystar, 2615 Pacific Coast Highway, Suite 208, Hermosa Beach, CA 90254. Prepared by: SWCA Environmental consultants, 150 South Arroyo Parkway, Second Floor, Pasadena, CA 91105.

monitoring was conducted for a project located at Ivy Station in Culver City. The monitoring yielded several paleontological specimens (gastropod and bivalve shells) at depths of 25 to 41 feet bgs that extended past the artificial fill throughout the entire property.[26] In 2018, paleontological resources monitoring was conducted for another project near the intersection of National Boulevard and Washington Boulevard. The paleontological resource mitigation efforts there produced approximately 100 specimens consisting of marine mammal (otariid, and cetacean), terrestrial vertebrates (*Bison,* rodents, rabbits, amphibians and snakes), invertebrate, and plant fossils.[27] Finally, in 2019, ESA monitored construction activity for Culver Studios in Culver City. Fossils of *Bison, Camelops, Smilodon* (saber-toothed cat)*,* and *Paramylodon* (ground sloth) were found there.[28]

National History Museum of Los Angeles County (NHMLAC) Records Search

Paleontological records from the NHMLAC also indicate that older Pleistocene-age geologic units in the vicinity of the Project Site, from immediately north of the Project Site to approximately 2.8 miles away at depths up to 40 feet bgs, have produced a variety of paleontological resources from the Pleistocene.

Specifically, NHMLAC records indicate that one group of fossil localities (LACM IP 42395 – 42408) are located in close proximity to the Project Site, which yielded fossil specimens of sponge trace fossils (E*ntobia*), oysters (*Ostrea*), scallops (*Leptopecten, Chlamys*), and other unsorted invertebrates from approximately 2 feet bgs to 10 feet bgs. Additional fossil localities (LACM IP 23224, LACM VP 4942, LACM VP 3789, LACM VP 7332, LACM VP 1170) exist nearby from the same sedimentary deposits that occur in the Project Site, either at the surface or at depth. LACM IP 23224 is located approximately 0.85 miles away from the Project Site and yielded specimens of cerith, dove snail, nutclam, wentletrap, bivalve, slipper shell, top snail, scallop, jewel boxes, horn snail, cardita, hatchet shell, venus clam, and tower shell at unknown depths. LACM 4942 located approximately 1.85 miles away the Project Site produced specimens of mammoth, bison, and hare at 16 feet bgs. LACM 3789 situated approximately 2 miles away from the Project Site yielded a specimen of mammoth at 14 feet bgs. LACM VP 7332 located approximately 2.80 miles away from the Project Site yielded a fossil specimen of mammoth at 40 feet bgs. Finally, LACM VP 1170 located approximately 2.15 miles away from the Project Site produced fossil specimens of sloth, camel, weasel, bison, deer, sabertooth cat, pronghorn antelope, mastodon, peccary, horse, coot, and unidentified birds at unknown depths.[29]

[26] ESA. 2018. Ivy Station Project, City of Culver City and City of Los Angeles, County of Los Angeles California: Archaeological and Paleontological Monitoring Report. Prepared for: Culver City Triangle Investor, Inc., c/o Lowe Enterprises Real Estate Group, 8740 Washington Boulevard, Suite A, Culver City, CA 90232. Prepared by: ESA.

[27] ESA. 2021. 8777 Washington Project; Culver City, County of Los Angeles, California: Archaeological and Paleontological Monitoring Report. Prepared for: CLPF-8777 Washington, L.P., 3129-B S La Cienega Blvd., Los Angeles, CA 90016. Prepared by: ESA.

[28] ESA. In prep. Culver Studios Project: Culver City, County of Los Angeles, California: Paleontological Monitoring Report. Prepared by: ESA.

[29] Bell, Alyssa. 2023. Paleontological resources for the 5700 Hannum Project. Prepared for Environmental Science Associates by the Natural History Museum of Los Angeles County. 2 p.

4.5.3 Environmental Impacts

Thresholds of Significance

The following threshold of significance is based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in a significant adverse impact to paleontological resources if it would:

- **GEO-1:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Potentially significant impacts related to paleontological resources are discussed and analyzed further below.

The City determined in the Initial Study that the following environmental issue areas would result in no impacts or less-than-significant impacts and, therefore, are scoped out of this Draft EIR. Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding the following issue area:

Would the Project:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - 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.
  - Strong seismic ground shaking?
  - Seismic-related ground failure, including liquefaction?
  - Landslides?
- Result in substantial soil erosion or the loss of topsoil?
- 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?
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
- 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?

As detailed in the Initial Study, the Project Site is generally stable from a geologic perspective. The Project would be required to comply with applicable seismic-related regulatory requirements. In addition, a final design-level geotechnical report must ultimately be prepared and approved by the City prior to issuance of building permits, and would be based on the final construction and building plans prepared by the Applicant. Implementation of the site-specific structural and seismic design parameters and recommendations of the final design-level geotechnical report would ensure that geologic hazards impacts would be less than significant.

Methodology

The paleontological resources analysis is based in part on a review of fossil, soil and rock inventories compiled, synthesized, and evaluated by the staff of the Vertebrate Paleontology Section of the NHMLAC. The objective of the NHMLAC records search was to determine the geological formations underlying the Project Site, whether any paleontological localities have previously been identified within the Project Site or in the same or similar formations near the Project Site, and the potential for excavations associated with the Project Site to encounter paleontological resources. These methods are consistent with the SVP guidelines for assessing the importance of paleontological resources in areas of potential environmental effect.

The potential to encounter paleontological resources during construction at the Project Site was also determined by reviewing the results of the NHMLAC records search, the geotechnical report for the Project, review of geologic maps that encompass the Project Site, pertinent literature of the surrounding vicinity, and the proposed excavation parameters for the Project. Because the Project Site is entirely developed and lacks any visible native ground surface or potential for surface exposure of resources, a paleontological field survey was not undertaken.

Professional Standards and Guidelines

The SVP has established standard guidelines[30,31] that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. Most practicing professional vertebrate paleontologists adhere closely to the SVP's assessment, mitigation, and monitoring requirements as specifically provided in its standard guidelines. Most state regulatory agencies, including California, with paleontological resource-specific laws, ordinances, regulations, and standards accept and use the professional standards set forth by the SVP.

A geologic unit known to contain significant fossils is considered "sensitive" to adverse impacts if there is a high probability that earth-moving or ground-disturbing activities will either directly or indirectly disturb or destroy fossil remains. Paleontological sites indicate that the containing sedimentary rock unit or formation is fossiliferous. The limits of the entire rock formation, both areal and stratigraphic, therefore define the scope of the paleontological potential in each case.[32]

Fossils are contained within surficial sediments or bedrock, and are therefore not observable or detectable unless exposed by erosion or human activity. In summary, paleontologists cannot know either the quality or quantity of fossils prior to natural erosion or human-caused exposure. As a result, even in the absence of surface fossils, it is necessary to assess the sensitivity of rock units based on their known potential to produce significant fossils elsewhere within the same geologic unit (both within and outside of the study area), a similar geologic unit, or based on whether the

30 SVP, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 163:22-27, 1995.

31 SVP, Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010, http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx Accessed October 23, 2020.

32 SVP, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 163:22-27, 1995.

unit in question was deposited in a type of environment that is known to be favorable for fossil preservation. Monitoring by experienced paleontologists greatly increases the probability that fossils will be discovered during ground-disturbing activities and that, if these remains are significant, successful mitigation and salvage efforts may be undertaken in order to prevent adverse impacts to these resources.

Paleontological Sensitivity

Paleontological sensitivity is defined as the potential for a geologic unit to produce scientifically significant fossils. This is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological sensitivity is derived from the known fossil data collected from the entire geologic unit, not just from a specific survey. In its "Standard Guidelines for the Assessment and Mitigation of Adverse Impacts to Non-renewable Paleontologic Resources," the SVP[33] defines four categories of paleontological sensitivity, or potential, for rock units: high, low, undetermined, and no potential:

- **High Potential.** Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rocks units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations and some volcaniclastic formations (e. g., ashes or tephras), and some low-grade metamorphic rocks which contain significant paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils (e. g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.).
- **Low Potential.** Reports in the paleontological literature or field surveys by a qualified professional paleontologist may allow determination that some rock units have low potential for yielding significant fossils. Such rock units will be poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in rare circumstances and the presence of fossils is the exception not the rule, e. g. basalt flows or Recent colluvium. Rock units with low potential typically will not require impact mitigation measures to protect fossils.
- **Undetermined Potential.** Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. A field survey by a qualified professional paleontologist to specifically determine the paleontological resource potential of these rock units is required before a paleontological resource impact mitigation program can be developed. In cases where no subsurface data are available, paleontological potential can sometimes be determined by strategically located excavations into subsurface stratigraphy.
- **No Potential.** Some rock units have no potential to contain significant paleontological resources, for instance high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites). Rock units with no potential require no protection nor impact mitigation measures relative to paleontological resources.

[33] SVP, Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010, http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx Accessed October 23, 2020.

In accordance with the SVP guidelines, full-time monitoring of geologic units with high potential is generally recommended during any project-related ground disturbance. For geologic units with low potential, protection or salvage efforts will not generally be required. For geologic units with undetermined potential, field surveys by a qualified vertebrate paleontologist should be conducted to specifically determine the paleontologic potential of the rock units present within the study area.

Paleontological Resources Significance Criteria

Fossils are considered to be significant if one or more of the following criteria apply:[34]

1. The fossils provide information on the evolutionary relationships and developmental trends among organisms, living or extinct;
2. The fossils provide data useful in determining the age(s) of the rock unit or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events therein;
3. The fossils provide data regarding the development of biological communities or interaction between paleobotanical and paleozoological biotas;
4. The fossils demonstrate unusual or spectacular circumstances in the history of life; or
5. The fossils are in short supply and/or in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation, and are not found in other geographic locations.

Significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important. Significant fossils can include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and animals previously not represented in certain portions of the stratigraphy. Assemblages of fossils that might aid stratigraphic correlation, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, and paleoclimatology are also critically important.[35]

Project Design Features

There are no Project Design Features associated with paleontological resources.

Analysis of Project Impacts

Threshold GEO-1: The Project could have a significant impact if it would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact Analysis

Given the Project is in an urban developed location, there are no unique geologic features, and unique geologic features are not discussed further.[36] Analysis regarding the potential for unique paleontological resources are discussed further below.

[34] Scott, E. and K. Springer, CEQA and Fossil Preservation in California. The Environmental Monitor, 2003.

[35] Scott, E. and K. Springer, CEQA and Fossil Preservation in California. The Environmental Monitor, 2003.

[36] Unique geologic features are typically topographic features such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands.

As indicated previously, the Project Site is completely developed with surface parking and a two-story office building with no visible soil/sediment or rock outcrops to examine for paleontological resources or fossiliferous geological formations. Although the Project Site has been previously developed, geologic mapping indicates that the surface of the Project Site is underlain by Pleistocene-age older alluvium (Qoa), Holocene-age alluvium (Qa), and possibly by the Pleistocene-age Baldwin Hills Paleosol (Qop), also known as the Fox Hills Paleosol. The Pleistocene alluvium, Qoa, has a high potential and produced a significant number of marine invertebrate fossils, and it is probable that these same deposits will produce significant paleontological resources fossils on the Project Site. The Holocene alluvium, Qa, is assigned a low potential to contain paleontological resources given its young age. The Baldwin Hills Paleosol, Qop, has a high potential because the SVP Guidelines (2010) specifically call out paleosols as sensitive, although no reports were located that address paleontological resources in the paleosol. Since excavations at the Project Site are estimated to reach depths of up to 27 feet bgs, which is likely deeper than previous excavations on the Project Site, they have the potential to impact older alluvium and possibly the Baldwin Paleosol, which have a high sensitivity for retaining paleontological resources as discussed above. Therefore, impacts on paleontological resources due to grading and excavation during construction are considered potentially significant.

Operation of the new facilities on the Project Site would not result in any further ground disturbing activities such as grading or excavation; therefore, there is no potential to encounter, alter, or disturb paleontological resources after construction is complete. No operational impacts would thus occur.

Mitigation Measures

GEO-1: Prior to the issuance of grading permits, the Applicant shall retain a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting, and shall be responsible for monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities.

GEO-2: Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments and undisturbed Baldwin Hills Paleosol. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting and wet screening sediment samples of promising horizons for smaller fossil remains. If significant vertebrate fossils are found by screening, it will be necessary to collect a 6,000-pound sample for screening from each producing geologic unit, per SVP Guidelines (2010). The sample(s) can be collected by construction machinery and stockpiled and processed in a safe location on site, or transported to another site for processing. The frequency of monitoring inspections shall be determined by the Qualified 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 Qualified Paleontologist. If a potential fossil is found, the Qualified Paleontologist and the monitor shall have authority to temporarily stop excavation activity or 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 by the Qualified Paleontologist 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 Qualified 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 Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location.

GEO-3: If the older Quaternary alluvium produces any mollusk fossils, a specimen shall be submitted for radiocarbon dating. If the Fox Hills Paleosol produces any pedogenic calcium carbonate, a sample shall be submitted for radiocarbon dating.

GEO-4: Any significant fossils recovered during Project-related excavations shall be prepared to the point of identification. The residue form sediment samples shall be dried and sorted with a binocular dissecting microscope. Both macrofossils and vertebrate microfossils shall be prepared to the point of identification, identified, and curated into an accredited repository. The Qualified Paleontologist shall prepare a final 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 accompany the specimens to the accredited repository. The report shall also be submitted by the Applicant to the City of Culver City to signify the satisfactory completion of the Project and required mitigation measures.

Level of Significance After Mitigation

With implementation of Mitigation Measures GEO-1 to GEO-4, potentially significant impacts to paleontological resources during construction activities would be reduced to a less-than-significant level.

Cumulative Impacts

The Project is required to comply with Mitigation Measures GEO-1 through GEO-4, thus ensuring proper identification, treatment and preservation of any resources that are encountered during excavation, which would reduce the potential for significant impacts on paleontological resources to less than significant levels. These measures require construction monitoring of excavation activities and treatment and curation of discoveries, if encountered.

Some of the related projects identified in Chapter 3, *Environmental Setting*, could require excavation at depths that could potentially expose or damage paleontological resources. However, related projects that involve substantial excavation with the potential to encounter buried or subsurface paleontological resources during construction, are expected to be subject to mitigation measures to mitigate impacts on paleontological resources through construction monitoring programs and treatment and curation requirements for discovered fossils, similar to the Project. With implementation of such mitigation measures, cumulative impacts from related projects are considered less than significant. Therefore, as impacts on paleontological resources from related projects would be less than significant with implementation of mitigation measures, and as the Project would mitigate its potential impacts to paleontological resources to a less than significant level, cumulative impacts would be less than significant.

Mitigation Measures

Refer to Mitigation Measures GEO-1 to GEO-4. No additional mitigation measures are required.

Level of Significance After Mitigation

With implementation of Mitigation Measures GEO-1 to GEO-4, cumulative impacts to paleontological resources would be less than significant.

This page intentionally left blank

4.6 Greenhouse Gas Emissions

4.6.1 Introduction

This section compares the Project's characteristics with applicable regulations, plans, and policies set forth by the State of California, South Coast Air Quality Management District (SCAQMD), the Southern California Association of Governments (SCAG), and the City of Culver City to reduce greenhouse gas (GHG) emissions to determine whether the Project is consistent with and/or would conflict with the provisions of these plans. To assist in analyzing the Project's potential to conflict with applicable regulations, plans and policies, this section also estimates the Project's GHG emissions generated by Project construction and operations, taking into account mandatory and voluntary energy and resource conservation measures that have been incorporated into the Project to reduce GHG emissions. Details regarding the GHG analysis are provided in Appendix C of this Draft EIR.

4.6.2 Environmental Setting

Regulatory Framework

Federal

Federal Clean Air Act

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The United States Supreme Court (Supreme Court) ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that carbon dioxide (CO_2) and other GHGs are pollutants under the Federal Clean Air Act (CAA), which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. In December 2009, USEPA issued an endangerment finding for GHGs under the CAA, setting the stage for future regulation.

The Federal Government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, CH_4 and other non-CO_2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

Corporate Average Fuel Economy Standards

In response to the *Massachusetts v. Environmental Protection Agency* ruling, President George W. Bush issued Executive Order 13432 in 2007, directing the USEPA, the U.S. Department of Transportation (USDOT), and the U.S. Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. The National Highway Traffic Safety Administration (NHTSA) subsequently issued multiple final rules regulating fuel efficiency for, and GHG emissions from, cars and light-duty trucks for model year 2011 and later for model years 2012–2016 and 2017–2021. In March 2020, the USDOT and the USEPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends

existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.[1] These standards set a combined fleet wide average of 36.9 to 37 for the model years affected.[2]

In February 2022, the USEPA issued the Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.[3] This final rule revises current GHG standards beginning for vehicles in model year 2023 and through model year 2026 and establishes the most stringent GHG standards ever set for the light-duty vehicle sector that are expected to result in average fuel economy label values of 40 mpg, while the standards they replace (the SAFE rule standards) would achieve only 32 mpg in model year 2026 vehicles.[4]

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, the USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.[5]

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel

1 USEPA, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.

2 National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.

3 USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

4 USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, December 2021.

5 USEPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[6]

State

California Air Resources Board

The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, CARB conducts research, sets the California Ambient Air Quality Standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan (SIP), for which it works closely with the federal government and the local air districts. The SIP is required for the State to take over implementation of the Federal CAA. CARB also has primary responsibility for adopting regulations to meet the State's goal of reducing GHG emissions. The State has met its goals to reduce GHG emissions to 1990 levels by 2020. Subsequent State goals include reducing GHG emissions to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050.

California Greenhouse Gas Reduction Targets

Executive Order S-3-05

Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels;
- By 2020, California shall reduce GHG emissions to 1990 levels; and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

In accordance with Executive Order S-3-05, the Secretary of CalEPA is required to coordinate efforts of various agencies, which comprise the California Climate Action Team (CAT), in order to collectively and efficiently reduce GHGs. The CAT provides periodic reports to the Governor and Legislature on the state of GHG reductions in the State as well as strategies for mitigating and adapting to climate change.

The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns

[6] A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15. Therein, the Governor directed the following:

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all State agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons (MMT) of CO_2e.

Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress towards this goal as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

In October 2020, CARB released a study, which evaluated three scenarios that achieve carbon neutrality in California by 2045. The scenarios analyzed to achieve carbon neutrality include a High Carbon Dioxide Removal (CDR) scenario, Zero Carbon Energy scenario, and a Balanced scenario. The High CDR scenario achieves GHG reductions by relying on CO_2 removal strategies. The Zero Carbon Energy scenario is based on the assumption of zero-fossil fuel emissions by 2045. The Balanced scenario represents a middle point between the High CDR scenario and Zero Carbon Energy scenario. The scenarios would achieve at least an 80 percent reduction in GHGs by 2045, relative to 1990 levels. Remaining CO_2 would be reduced to zero by applying CO_2 removal strategies, including sinks from natural and working lands and negative emissions technologies, such as direct air capture.[7,8]

Under each of these scenarios, CARB proposed reduction strategies for various sectors that contribute GHG emissions throughout the State. Although specific details are not yet available for the GHG reduction measures discussed above, implementation of these measures would require regulations to be enforced by the State.

California Global Warming Solutions Act of 2006 (Assembly Bill 32)

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code (HSC), Division 25.5 – California Global Warming Solutions Act of 2006),

[7] Sinks are defined as natural or artificial reservoirs that accumulate and store a carbon-containing chemical compound for an indefinite period.

[8] Energy+Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020, p. 22.

which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 represents the first enforceable statewide program to limit emissions of these GHGs from all major industries, with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing State actions that would achieve GHG emissions reductions.

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown. SB 32 and AB 197 amend HSC Division 25.5, establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of State climate policies reach disadvantaged communities. The new goals outlined in SB 32 update the Climate Change Scoping Plan requirement of AB 32 and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

AB 197, signed September 8, 2016, is a bill linked to SB 32 and prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its website the emissions of GHGs, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two Members of the Legislature to the CARB board as ex officio, non-voting members and creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the State's programs, policies, and investments related to climate change.

Climate Change Scoping Plan

AB 32 required CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (HSC Section 38561(h)). The 2008 Climate Change Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[9] The 2008 Climate Change Scoping Plan had a range of GHG reduction actions which included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a Cap-and-Trade Program, and an AB 32 implementation fee to fund the program.

2008 Climate Change Scoping Plan

The 2008 Climate Change Scoping Plan called for a "coordinated set of solutions" to address all major categories of GHG emissions. Transportation emissions were addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard (LCFS), and greater consideration to reducing trip length and generation through land use planning and TOD. Buildings, land use, and industrial operations were encouraged and, sometimes,

9 CARB, Climate Change Scoping Plan, December 2008.

required to use energy more efficiently. Utility energy providers were required to include more renewable energy sources through implementation of the RPS.[10]

As required by HSC Division 25.5, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions reduction target for 2020. The 2020 emissions reduction target was originally set at 427 MMT of CO_2e using the GWP values from the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (SAR). Forecasting the amount of emissions that would occur in 2020 if no actions are taken was necessary to assess the scope of the reductions California must make to return to the 1990 emissions level by 2020 as required by AB 32. CARB originally defined the "business-as-usual" (BAU), scenario as emissions in the absence of any GHG emission reduction measures discussed in the 2008 Climate Change Scoping Plan, as approximately 596 $MMTCO_2e$ (using GWP values from the IPCC SAR). For example, in further explaining CARB's BAU methodology, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards. Therefore, under these original projections, the State would have had to reduce its 2020 BAU emissions by 28.4 percent to meet the 1990 target of 427 $MMTCO_2e$.

2014 Climate Change Scoping Plan Update

The First Update to the Climate Change Scoping Plan (2014 Scoping Plan) was approved by CARB in May 2014 and built upon the initial Climate Change Scoping Plan with new strategies and recommendations.[11] In 2014, CARB revised the target using the GWP values from the IPCC Fourth Assessment Report (AR4) and determined the 1990 GHG emissions inventory and 2020 GHG emissions limit to be increased to 431 $MMTCO_2e$. CARB also updated the State's 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that had recently been adopted for motor vehicles and renewable energy. CARB's projected statewide 2020 emissions estimate using the GWP values from the IPCC AR4 was 509.4 $MMTCO_2e$. Therefore, under the First Update to the Climate Change Scoping Plan, the emission reductions necessary to achieve the 2020 emissions target of 431 $MMTCO_2e$ would have been 78.4 $MMTCO_2e$, or a reduction of GHG emissions by approximately 15.4 percent, (down from 28.4 percent).

In conjunction with the First Update, CARB identified "six key focus areas comprising major components of the State's economy to evaluate and describe the larger transformative actions that will be needed to meet the State's more expansive emission reduction needs by 2050."[12] Those six areas are: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. The First Update identifies key recommended actions for each sector that will facilitate achievement of the 2050 reduction target.

[10] For a discussion of Renewables Portfolio Standard, refer to subsection *California Renewables Portfolio Standard*.
[11] CARB, First Update to the AB 32 Scoping Plan, May 2014.
[12] CARB, 2014 Scoping Plan, May 2014, p. 6.

Based on CARB's research efforts, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050."[13] Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies.

The First Update discussed new residential and commercial building energy efficiency improvements, specifically identifying progress towards zero-net-energy buildings as an element of meeting mid-term and long-term GHG reduction goals. The First Update expressed CARB's commitment to working with the California Public Utilities Commission (CPUC) and California Energy Commission (CEC) to facilitate further achievements in building energy efficiency.

2017 Climate Change Scoping Plan Update

In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan Update (2017 Scoping Plan) in December 2017. The 2017 Scoping Plan builds upon the framework established by the 2008 Climate Change Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Scoping Plan includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constrains and reduces emissions at covered sources.[14]

CARB's projected statewide 2030 emissions take into account 2020 GHG reduction policies and programs.[15] The 2017 Scoping Plan also addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The majority of the reductions would result from the continuation of the Cap-and-Trade regulation. Additional reductions would be achieved from electricity sector standards (i.e., utility providers to supply 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived GHG strategy (e.g., HFCs), and implementing the mobile source strategy and sustainable freight action plan.

The alternatives in the Scoping Plan are designed to consider various combinations of these programs, as well as consideration of a carbon tax in the event the Cap-and-Trade regulation is not continued. However, in July 2017, the California Legislature voted to extend the Cap-and-Trade regulation to 2030. The 2017 Scoping Plan discusses the role of local governments in meeting the State's GHG reductions goals because local governments have jurisdiction and land use authority related to: community-scale planning and permitting processes, local codes and actions, outreach

[13] CARB, 2014 Scoping Plan, May 2014, p. 32.
[14] CARB, 2017 Scoping Plan, November 2017, p. 6
[15] CARB, 2017 Scoping Plan, November 2017.

and education programs, and municipal operations.[16] Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures.[17]

For individual projects under the California Environmental Quality Act (CEQA), the 2017 Scoping Plan states that local governments can support climate action when considering discretionary approvals and entitlements. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the 2017 Scoping Plan, the State's long-term goals, and climate change science.[18]

Under the Scoping Plan Scenario, continuation of the Cap-and-Trade regulation (or carbon tax) is expected to cover approximately 34 to 79 $MMTCO_2$ of the 2030 reduction obligation.[19] The State's short-lived climate pollutants strategy, which is for GHGs that remain in the atmosphere for shorter periods of time compared to longer-lived GHGs like CO_2, is expected to cover approximately 17 to 35 $MMTCO_2e$. The RPS with 50 percent renewable electricity by 2030 is expected to cover approximately 3 $MMTCO_2$. The mobile source strategy and sustainable freight action plan includes maintaining the existing vehicle GHG emissions standards, increasing the number of ZEVs and improving the freight system efficiency, and is expected to cover approximately 11 to 13 $MMTCO_2$. CARB expects that the reduction in GHGs from doubling of the energy efficiency savings in natural gas and electricity end uses in the CEC 2015 Integrated Energy Policy Report by 2030 would cover approximately 7 to 9 $MMTCO_2$ of the 2030 reduction obligation. The other strategies would be expected to cover the remaining 2030 reduction obligations.

2022 Climate Change Scoping Plan for Achieving Carbon Neutrality

CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the initial 2008 Climate Change Scoping. The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires. A summary of the GHG emissions reductions and targets set forth under the 2022 Scoping Plan Update is provided in **Table 4.6-1**, *Estimated Statewide Greenhouse Gas Emissions Reductions in the 2022 Scoping Plan*.

16 CARB, 2017 Scoping Plan, November 2017, p.97.
17 CARB, 2017 Scoping Plan, November 2017, p.97.
18 CARB, 2017 Scoping Plan, November 2017, p.100.
19 CARB, 2017 Scoping Plan, Appendix G, November 2017.

TABLE 4.6-1
ESTIMATED STATEWIDE GREENHOUSE GAS EMISSIONS REDUCTIONS IN THE 2022 SCOPING PLAN

Emissions Scenario	GHG Emissions ($MMTCO_2e$)
2019	
2019 State GHG Emissions	404
2030	
2030 BAU Forecast	312
2030 GHG Emissions without Carbon Removal and Capture	233
2030 GHG Emissions with Carbon Removal and Capture	226
2030 Emissions Target Set by AB 32 (i.e., 1990 level by 2030)	260
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2030	52 (16.7%)[a]
2045	
2045 BAU Forecast	266
2045 GHG Emissions without Carbon Removal and Capture	72
2045 GHG Emissions with Carbon Removal and Capture	(3)

$MMTCO_2e$ = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative values.

[a] 312 – 260 = 52 /312 = 16.7%

SOURCE: CARB, Final 2022 Scoping Plan for Achieving Carbon Neutrality, November 2022.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan. **Table 4.6-2**, *Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan*, provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

The 2022 Scoping Plan Update identifies the need to accelerate AB32's 2030 target, from 40 percent to 48 percent below 1990 levels. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan Update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan Scenario is summarized in Table 2-1 starting on page 72 of the Scoping Plan. It includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors such as: smart growth and reductions in Vehicle Miles Traveled (VMT); light-duty vehicles (LDV) and zero-emission vehicles (ZEV); truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; and petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and commercial

buildings; electrification and emission reductions across industries such as the for food products, construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of combined heat and power facilities; low carbon fuels for transportation, business, and industry; improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

TABLE 4.6-2
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) *The California Climate Crisis Act*	AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage (CCUS) technologies. This bill is reflected directly in 2022 Scoping Plan Update.
Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) *Carbon Capture, Removal, Utilization, and Storage Program*	SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology. The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project. The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.
Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022) *Diablo Canyon Powerplant: Extension of Operations*	SB 846 extends the Diablo Canyon Power Plant's sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the CPUC not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant. The 2022 Scoping Plan Update explains the emissions impact of this legislation.
Senate Bill (SB 1020) (Laird, Chapter 361, Statutes of 2022) *Clean Energy, Jobs, and Affordability Act of 2022*	SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, CEC, and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability. The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment. The 2022 Scoping Plan Update describes the implications of this legislation on emissions.
Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022) *Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors*	SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.

TABLE 4.6-2
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022) *Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases*	SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses. This bill would inform the production of hydrogen at the scale called for in the 2022 Scoping Plan Update.
Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022) *California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands*	AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience. This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO_2, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible. This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.
Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022) *Hydrofluorocarbon gases: sale or distribution*	SB 1206 mandates a stepped sales prohibition on newly produced high- global warming potential (GWP) hydrofluorocarbons (HFCs) to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.
Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021) *Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects*	SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO_2 removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding. CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry. This bill is reflected directly in 2022 Scoping Plan Update as CO_2 removal targets for 2030 and 2045 in support of carbon neutrality.
Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021) *Greenhouse Gases: Cement Sector: Net-Zero Emissions Strategy*	SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must: Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives.

TABLE 4.6-2
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
	• Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. The 2022 Scoping Plan Update modeling is designed to achieve these outcomes.
Executive Order N-82-20	Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California's land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state's carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy. CO_2 Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to: • Establish a baseline assessment of California's biodiversity that builds upon existing data and can be updated over time. • Analyze and project the impact of climate change and other stressors in California's biodiversity. • Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state's process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator insects, which restore biodiversity and improve agricultural production. The Natural and Working Lands Climate Smart Strategy informs 2022 Scoping Plan Update.
Executive Order N-79-20	Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are: • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero- electric passenger vehicles, medium- and heavy-duty vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above. The 2022 Scoping Plan Update modeling reflects achieving these targets.
Executive Order N-19-19	Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that: • Includes a proactive strategy for the state's pension funds that reflects the increased risks to the economy and physical environment due to climate change.

TABLE 4.6-2
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
	• Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change. • Aligns with the fiduciary responsibilities of the California Public Employees' Retirement System, California State Teachers' Retirement System, and the University of California Retirement Program. Executive Order N-19-19 directs the State Transportation Agency to leverage more than $5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of the state's 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government's carbon footprint. Finally, it tasks CARB with accelerating progress toward California's goal of five million ZEV sales by 2030 by: • Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. • Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. • Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector. The 2022 Scoping Plan Update modeling reflects efforts to accelerate ZEV deployment.
Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019) *Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program*	Sea level rise, combined with storm-driven waves, poses a direct risk to the state's coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy's jurisdiction.
Assembly Bill 65 (AB 65) (Petrie- Norris, Chapter 347, Statutes of 2019) *Coastal Protection: Climate Adaption: Project Prioritization: Natural Infrastructure: Local General Plans*	This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaption information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.
Executive Order B-55-18	Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall: • Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. • Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state's water supply, water quality, and native plants and animals. This Executive Order also calls for CARB to: • Develop a framework for implementation and accounting that tracks progress toward this goal. • Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

TABLE 4.6-2
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
	The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.
Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) *California Renewables Portfolio Standard Program: emissions of greenhouse gases*	Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021. The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.
Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018) *Electric Vehicle Charging Infrastructure: Assessment*	This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40 percent below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure. This bill supports the deployment of ZEVs as modeled in 2022 Scoping Plan Update.
Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018) *Insurance: Climate Change*	This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.
Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) *Near-Zero-Emission and Zero-Emission Vehicles*	Existing state and federal law sets specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero- emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds. This bill supports the deployment of cleaner trucks as modeled in this 2022 Scoping Plan Update.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and

approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." Appendix D is intended to provide clarification on challenges local jurisdictions face when implementing GHG reduction strategies or approving much-needed housing projects.[20]

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by addressing it in the Culver City General Plan and developing programs and regulations such as the Culver City Green Building Ordinance, Culver City Bicycle & Pedestrian Action Plan, Culver City's Electric Vehicle (EV) Infrastructure Plan, and Culver City Clean Power Alliance. Each of these is discussed further below.

Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as one of the strategies California would employ to reduce GHG emissions. CARB asserts that this program will help put California on the path to meet its goal of ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under the Cap-and-Trade Program, an overall limit on GHG emissions from capped sectors is established and facilities subject to the cap will be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program[21] pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from public and private major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve the State's emission-reduction mandates. The statewide cap for GHG emissions from the capped sectors[22] (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the Program's duration.

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 $MTCO_2e$ per year must comply with the Cap-and-Trade

20 CARB, Final 2022 Climate Change Scoping Plan – Appendix D: Local Actions, November 2022.
21 California Code of Regulations (CCR) 17, Section 95800 to 96023.
22 CCR 17, Section 95811, 95812.

Program.[23] Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule).[24]

Each covered entity with a compliance obligation is required to surrender "compliance instruments"[25] for each $MTCO_2e$ of GHG they emit. Covered entities are allocated free allowances in whole or part (if eligible), and can buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the statewide emission limits will not be exceeded. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.[26] Accordingly, for projects that are subject to the CEQA, GHG emissions from electricity consumption are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.[27]

The Program applies to emissions that cover approximately 80 percent of the State's GHG emissions. Demonstrating the efficacy of AB 32 policies, California achieved its 2020 GHG Reduction Target four years earlier than mandated. The largest reductions were the result of increased renewable electricity in the electricity sector, which is a covered sector in the Cap-and-Trade Program.

AB 398 was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

Energy-Related (Stationary) Sources

Emission Performance Standards

SB 1368, signed September 29, 2006, is a companion bill to AB 32, which requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into

23 CCR 17, Section 95812.
24 CCR 17, Section 95100-95158.
25 Compliance instruments are permits to emit, the majority of which will be "allowances," but entities also are allowed to use CARB-approved offset credits to meet up to 8% of their compliance obligations.
26 CCR 17, Section 95811(b).
27 CCR 17, Section 95811, 95812(d).

the State. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB 32.

Renewables Portfolio Standard

SB 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017 as an RPS. Subsequent amendments provided additional targets throughout the years. Most recently, on October 7, 2015, SB 350 (Chapter 547, Statues of 2015), also known as the Clean Energy and Pollution Reduction Act, further increased the RPS to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. SB 350 also requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. On September 10, 2018, SB 100, provided additional RPS targets of 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030, and that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by 2045.[28]

Assembly Bill 1279 (The California Climate Crisis Act)

The Legislature enacted AB 1279[29], The California Climate Crisis Act, on September 16, 2022. AB 1279 establishes the policy of the State to achieve net zero GHG emissions, carbon neutrality[30], as soon as possible, but no later than 2045 and achieve and maintain net negative GHG emissions thereafter. Additionally, AB 1279 ensures that by 2045 Statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. SB 1279 also requires CARB to ensure that the 2022 Scoping Plan Update identifies and recommends measures to achieve carbon neutrality, and to identify and implement policies and strategies for carbon dioxide removal solutions and carbon capture, utilization, and storage technologies. It also requires CARB to submit an annual report on progress in achieving the 2022 Scoping Plan's goals.

Mobile Sources

Pavley Standards

AB 1493 (Chapter 200, Statutes of 2002), enacted on July 22, 2002, required CARB to set GHG emission standards for passenger vehicles, light duty trucks, and other vehicles whose primary use is non-commercial personal transportation manufactured in and after 2009. In 2018, the USEPA proposed the SAFE Vehicles Rule, which would roll back fuel economy standards and revoke California's waiver. The rule amended certain average fuel economy and GHG standards for passenger cars covering model years 2021 through 2026. On March 30, 2020, the SAFE Rule was finalized and published in the Federal Register, commencing a review period. Subsequent legal challenges from a coalition of states, including California, and private industry groups were issued.

---

28 California Legislative Information, SB-100 California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases.

29 California Legislative Information, 2022. AB-1279 The California Climate Crisis Act. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1279. Accessed January 2023.

30 *Carbon neutrality* means "net zero" emissions of GHGs. In other words, it means that GHG emissions generated by sources such as transportation, power plants, and industrial processes must be less than or equal to the amount of carbon dioxide that is stored, both in natural sinks and through mechanical sequestration. AB 1279 uses the terminology net zero and the 2022 Scoping Plan Update uses the terminology carbon neutrality or carbon neutral. These terms mean the same thing and are used interchangeably.

In August 2021, USEPA proposed to revise and strengthen the emissions standards for passenger cars and light trucks for model years 2023 through 2026.

On September 27, 2019, the USEPA withdrew the waiver it had previously provided to California for the State's GHG and ZEV programs under Section 209 of the CAA.[31] The withdrawal of the waiver was effective November 26, 2019. In response, several states including California filed a lawsuit challenging the withdrawal of the USEPA waiver.[32] In April 2021, the USEPA announced it will move to reconsider its previous withdrawal and grant California permission to set more stringent climate requirements for cars and SUVs.[33] On March 14, 2022, the USEPA published its Notice of Decision to continue California's waiver for its Advanced Clean Cars program, which allows the state to set and enforce more stringent standards than the federal government, including California's GHG standards and zero emission vehicle mandate, thereby ending the SAFE rule (87 Fed. Reg. 14,332).

California Low-Carbon Fuel Standard

Executive Order S-01-07 was enacted on January 18, 2007. The order mandates the following: (1) that a Statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 and (2) that a LCFS for transportation fuels be established in California. The final regulation was approved by the Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the LCFS became effective on the same day. In September 2015, CARB approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted.[34]

The development of the 2022 Scoping Plan has identified LCFS as a regulatory measure to reduce GHG emission to meet the 2030 emissions target. In September 2018, the standards were amended by CARB to require a 20 percent reduction in carbon intensity by 2030, aligning with California's 2030 targets set by SB 32.[35]

Advanced Clean Car Regulations

In 2012, CARB approved the ACC program, an emissions-control program for model years 2015–2025.[36] The components of the ACC program include the low-emissions vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the ZEV regulation, which requires manufacturers to produce an increasing number of pure ZEVs

31 84 FR 51310.

32 United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.

33 United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.

34 CARB, Low-Carbon Fuel Standard – About, https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/about. Accessed September 25, 20232.

35 CARB, CARB amends Low-Carbon Fuel Standard for wider impact, 2018, https://ww2.arb.ca.gov/index.php/news/carb-amends-low-carbon-fuel-standard-wider-impact. Accessed September 25, 2023.

36 CARB, Advanced Clean Cars Program – About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about. Accessed September 25, 2023.

(meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in-hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.[37] During the March 2017 Midterm Review, CARB voted unanimously to continue with the vehicle GHG emission standards and the ZEV program for cars and light trucks sold in California through 2025.[38] Effective November 26, 2019, the federal SAFE Vehicles Rule Part One: One National Program withdrew the California waiver for the GHG and ZEV programs under section 209 of the Clean Air Act, which revokes California's authority to implement the Advanced Clean Cars and ZEV mandates. In response, several states including California filed a lawsuit challenging the withdrawal of the EPA waiver.[39] On March 14, 2022, the USEPA issued a notice of decision to continue California's Clean Air Act waiver for its Advanced Clean Car regulations.[40]

In addition, Governor Gavin Newsom signed an executive order (Executive Order No. N-79-20) on September 23, 2020, which would phase out sales of new gas-powered passenger cars by 2035 in California with an additional 10-year transition period for heavy vehicles. The State would not restrict used car sales, nor forbid residents from owning gas-powered vehicles. In accordance with the Executive Order, CARB is developing a 2020 Mobile Source Strategy, a comprehensive analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The strategies will provide important information for numerous regulations and incentive programs going forward by conveying what is necessary to address the aggressive emission reduction requirements.

The primary mechanism for achieving the ZEV target for passenger cars and light trucks is CARB's ACC II Program. The ACC II regulations will focus on post-2025 model year light-duty vehicles, as requirements are already in place for new vehicles through the 2025 model year. A rulemaking package was presented to the Board in June 2022 and was adopted on November 30, 2022.

Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act of 2008, or SB 375 (Chapter 728, Statutes of 2008), establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. SB 375 finds that the "transportation sector is the single largest contributor of GHGs of any sector."[41] Under SB 375, CARB is required, in consultation with the metropolitan planning organizations (MPOs), to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. SCAG is the MPO in which the City of Culver City is located. CARB set targets for 2020 and 2035 for each of the 18 MPO regions in 2010, and updated them in 2018.[42] In March 2018, the CARB updated the SB 375 targets for the SCAG region to require an eight percent

37 CARB, Advanced Clean Cars Program – About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about. Accessed September 25, 2023.

38 CARB, News Release: CARB finds vehicle standards are achievable and cost-effective, ww2.arb.ca.gov/news/carb-finds-vehicle-standards-are-achievable-and-cost-effective, accessed September 1, 2022.

39 United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.

40 California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Notice of Decision, 87 Fed. Reg. 14,332 (Mar. 14, 2022).

41 State of California, SB No. 375, September 30, 2008.

42 CARB, Sustainable Communities & Climate Protection Program – About, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about. Accessed September 25, 2023.

reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions.[43] As discussed further below, SCAG has adopted an updated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) subsequent to the update of the emission targets. The 2020–2045 RTP/SCS, referred to as Connect SoCal, is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[44]

Under SB 375, the target must be incorporated within that region's RTP, which is used for long-term transportation planning, in an SCS. Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plans) are not required to be consistent with either the RTP or SCS.

As required under SB 375, CARB is required to update regional GHG emissions targets every 8 years with the last update formally adopted in March 2018. As part of the 2018 updates, CARB has adopted a passenger vehicle related GHG reduction of 19 percent for 2035 for the SCAG region which is reflected in Connect SoCal.[45]

Senate Bill 743

Former Governor Brown signed SB 743 in 2013, which creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires the Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) methodology for evaluating transportation impacts. Particularly within areas served by transit, the required alternative criteria must "promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses." Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

Building Standards and Other Regulations

California Appliance Efficiency Regulations

The Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608), adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24, Building Standards Code and California Green Building Standards Code

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR] Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and

[43] CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets.
[44] SCAG, Connect SoCal, Chapter 0: Making Connections, May 7, 2020, p. 5.
[45] CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets (2018).

nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) are commonly referred to as the CALGreen Building Code and was developed to help the State achieve its GHG reduction goals under HSC Division 25.5 (e.g., AB 32) by codifying standards for reducing building-related energy, water, and resource demand, which in turn reduces GHG emissions from energy, water, and resource demand. The purpose of the CALGreen Building Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality."[46] The CALGreen Building Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CALGreen Building Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality.[47]

On August 11, 2021, the CEC adopted the 2022 Title 24 Standards, which were approved by the California Building Standards Commission for inclusion into the California Building Standards Code in December 2021. The 2022 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 standards.[48]

California Environmental Quality Act Guidelines

In August 2007, the California State Legislature adopted SB 97 (Chapter 185, Statutes of 2007), requiring the Governor's OPR to prepare and transmit new CEQA Guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted the CEQA Guidelines that became effective on March 18, 2010.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the CEQA Guidelines.[49] The CEQA Guidelines require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Discretion is given to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use, or (2) rely on a qualitative analysis or

46 California Building Standards Commission, 2010 California Green Building Standards Code, 2010.
47 California Building Standards Commission, 2010 California Green Building Standards Code, 2010.
48 California Energy Commission, 2022 Building Energy Efficiency Standards.
49 See 14 California Code of Regulations Sections 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHGs).

performance-based standards. Furthermore, three factors are identified that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.[50]

On December 28, 2018, OPR adopted amendments to the CEQA Guidelines to clarify several points such as cumulative nature of GHG emissions, modeling methodology, and significance evaluation. The administrative record for the CEQA Guidelines amendments also clarifies "that the effects of GHG emissions are cumulative and should be analyzed in the context of California Environmental Quality Act's requirements for cumulative impact analysis."[51]

Regional

South Coast Air Quality Management District

The Project Site is located in the South Coast Air Quality Management District (SCAQMD) South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside Counties, in addition to the San Gorgonio Pass area in Riverside County. SCAQMD is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.[52] A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.[53] The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 $MTCO_2e$ per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects).

50 14 California Code of Regulations Section 15064.4(b).

51 Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research (OPR) to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

52 South Coast Air Quality Management District (SCAQMD), Board Meeting, December 5, 2008, Agenda No. 31, http://www3.aqmd.gov/hb/2008/December/0812ag.html. Accessed September 25, 2023.

53 SCAQMD, Greenhouse Gases CEQA Significance Thresholds, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed September 25, 2023.

The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance threshold for other jurisdictions.

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the SCAG's Regional Council formally adopted the 2020–2045 RTP/SCS also known as the Connect SoCal, which is an update to the previous 2016–2040 RTP/SCS.[54] Using growth forecasts and economic trends, Connect SoCal provides a vision for transportation throughout the region for the next several decades by considering the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. Connect SoCal describes how the region can attain the GHG emission-reduction targets set by CARB by achieving an 8 percent reduction in per capita transportation GHG emissions by 2020 and a 19 percent reduction in per capita transportation emissions by 2035 compared to the 2005 level on a per capita basis.[55] Compliance with and implementation of Connect SoCal policies and strategies would have co-benefits of reducing per capita criteria air pollutant emissions (e.g., nitrogen dioxide, carbon monoxide) associated with reduced per capita vehicle miles traveled (VMT).

Connect SoCal states that the SCAG region was home to approximately 18.8 million people in 2016 and included approximately 6.0 million homes and 8.4 million jobs.[56] By 2045, the integrated growth forecast estimates that these figures will increase by 3.7 million people, with approximately 1.6 million more homes and 1.7 million more jobs. High-quality transit areas (HQTAs), which are defined by Connect SoCal as generally walkable transit villages or corridors that are within 0.5 miles of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours, will account for 2.4 percent of regional total land, but are projected to accommodate 51 percent and 60 percent of future household growth respectively between 2016 and 2045.[57] Connect SoCal overall land use pattern reinforces the trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. Transit Priority Areas[58] (TPAs) will account for less than one percent of regional total land but are projected to accommodate 30 percent of future household growth between 2016 and 2045. Connect SoCal overall land use pattern reinforces the trend of focusing new housing and employment in the region's TPAs. TPAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

54 SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), May 2020.

55 SCAG, Connect SoCal, May 2020.

56 SCAG, Connect SoCal, Demographics and Growth Forecast Technical Report, May 2020.

57 SCAG, Connect SoCal, May 2020, p. 51.

58 Defined by Connect SoCal as generally walkable transit villages or corridors that are within 0.5 mile of a major transit stop (rail or bus rapid transit station) with 15-minute or less service frequency during peak commute hours

SCAG's Connect SoCal provides specific strategies for implementation. These strategies include supporting projects that encourage diverse job opportunities for a variety of skills and education, recreation and cultures and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.[59]

In addition, Connect SoCal include strategies to promote active transportation, support local planning and projects that serve short trips, promote transportation investments, investments in active transportation, more walkable and bikeable communities, that will result in improved air quality and public health, and reduced GHG emissions, and supports building physical infrastructure, regional greenways and first-last mile connections to transit, including to light rail and bus stations. Connect SoCal aligns active transportation investments with land use and transportation strategies, increase competitiveness of local agencies for federal and state funding, and to expand the potential for all people to use active transportation. CARB has accepted the SCAG GHG quantification determinations in Connect SoCal and demonstrates achievement of the GHG emission reduction targets established by CARB.[60,61] To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted Connect SoCal in October 2020. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality, and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing and using an electric vehicle will be easier thanks to an expanded regional charging network.

Although there are GHG emission reduction targets for passenger vehicles set by CARB for 2045, Connect SoCal GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2045. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an additional 4.1 percent reduction in GHG from transportation-related sources in the ten years between 2035 and 2045, Connect SoCal is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[62]

59 SCAG, Connect SoCal, May 2020, pp. 48-86.
60 SCAG, Connect SoCal, May 2020, pp. 48-86.
61 CARB, Southern California Association of Governments' (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 2016.
62 SCAG, 2020-2045 RTP/SCS Public Health Technical Report, May 2020, p. 53.

Local

City of Culver City

The City of Culver City has not adopted a GHG significance threshold; however, the City of Culver City participates in an environmental recognition program, California Green Communities. The program helps cities develop strategies to reduce carbon emissions and increase energy efficiency in their community.

Culver City General Plan

The Circulation Element provides an overview of regulatory policies, transportation agencies, and local conditions; presents a vision for mobility in the Culver City area; presents a Street System Classification; discusses the Culver CityBus system; presents Bikeway Classifications; and provides goals, objectives, and policies to improve the local and regional transportation system. The City of Culver City has also adopted the concept of Complete Streets, which emphasizes a balanced transportation system that considers all users of the road (cyclists, pedestrians, transit riders, and vehicles) while planning development and transportation projects.[63] The goal of this concept is to transform the City of Culver City into a place with an extensive bicycle and pedestrian network that allows travelers of all levels and abilities to feel comfortable walking and biking to their destinations.[64]

Culver City Green Building Ordinance and Program

The City of Culver City has adopted green building ordinances to reduce GHG emissions for new development. The City of Culver City has adopted a Photovoltaic Requirement that requires 1 kilowatt (kw) of photovoltaic power installed per 10,000 square feet (sf) of new development or payment of an in-lieu fee.[65] The developer would comply with CCMC Chapter 15.02.1005 by installing a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 sf.

In 2009, the City of Culver City adopted the Green Building Program that requires new developments totaling more than 50,000 sf to achieve Leadership in Energy and Environmental Design (LEED) equivalent certification.[66] An example of the City of Culver City's Green Building Program requirements is that all lighting has to be either fluorescent, LED or other type of high-efficiency lighting. As stated below in subsection *Project Design Features*, the Project buildings will be designed to meet the United States Green Building Council (USGBC) LEED Certified performance level or higher and will be designed and operated to meet or exceed the applicable requirements of Culver City's Green Building Program Requirements.

Culver City's Electric Vehicle (EV) Infrastructure Plan

The Culver City EV Infrastructure Plan was developed as a result of Culver City's participation as one of 18 cities in the SCAG 2020 charging station study where SCAG assisted in developing a citywide EV infrastructure plan.[67] As noted in the City's Electric Vehicle (EV) Infrastructure Plan,

63 City of Culver City, Culver City Bicycle & Pedestrian Master Plan (BPMP), adopted by City Council, November 8, 2010, p. 8.
64 City of Culver City, BPMP, p. 136.
65 City of Culver City, Municipal Code Chapter 15.02.1005, Solar Photovoltaic Systems.
66 City of Culver City, Municipal Code Chapter 15.02.1100, Green Building Program and Requirements.
67 SCAG, SCAG EV Charging Station Study- Electric Vehicle (EV) Infrastructure Plan – Culver City, February 2023.

depending on the mix of EV charging station types, Culver City may need between 380 and 1,154 charging stations by 2030 to support statewide goals. The EV Infrastructure Plan aims to assist Culver City to expand its EV charging network as it determines the most suitable sites in Culver City to install EV charging stations and identifies hurdles to installing EV charging stations and develop solutions. Culver's City's EV Infrastructure Plan also highlights that while the City will increase EV charging stations at publicly owned locations, the majority of EV charging stations will be owned and operated by the private sector. The City with assistance from the City's EV Infrastructure Plan looks to foster private EV development by increasing education and awareness about EVs and EV charging stations; create policies and initiatives that encourage and streamline EV charging stations development, installation, and use; and connect EV and EV charging stations stakeholders to funding resources to reduce upfront costs.[68]

Culver City Bicycle & Pedestrian Action Plan

The City of Culver City updated the Bicycle & Pedestrian Master Plan with the Bicycle & Pedestrian Action Plan (Action Plan), which received public input throughout 2017 through 2019. The Action Plan was adopted by Culver City Council in June 2020.[69] The Action Plan establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Action Plan aims to provide a safe, convenient, and accessible active transportation network.

Culver City Clean Power Alliance

Clean Power Alliance (CPA) became the new electricity supplier for Culver City in February 2019 for residential customers and in May 2019 for non-residential customers. With this change, CPA purchases the renewable energy resources for electricity, and Southern California Edison (SCE) delivers it to Culver City customers. The CPA is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Culver City are automatically defaulted to have 100 percent renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent or opt out of the CPA and remain with SCE as their provider.

Greenhouse Gas Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and severe weather events. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHGs in the atmosphere. GHGs are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat

[68] SCAG, SCAG EV Charging Station Study- Electric Vehicle (EV) Infrastructure Plan – Culver City, February 2023.
[69] City of Culver City, Bicycle & Pedestrian Action Plan, June 2020.

from escaping, thus warming Earth's atmosphere. Some levels of GHGs keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, as GHG from human activities increase, they build up in the atmosphere and warm the climate, leading to many other changes around the world - in the atmosphere, on land, and in the oceans, with associated adverse climatic and ecological consequences.[70]

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.), deforestation, agricultural activity, and the decomposition of solid waste. Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.[71]

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the USEPA, global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 43 percent between 1990 and 2015. In addition, in the Global Carbon Budget 2022 report, published in November 2022, atmospheric CO_2 concentrations in 2022 were found to be more than 50 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years.[72] Global increases in CO_2 concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. Regarding emissions of non-CO_2 GHGs, these have also increased significantly since 1990.[73] In particular, studies have concluded that it is very likely that the observed increase in methane (CH_4) concentration is predominantly due to agriculture and fossil fuel use.[74]

In August 2007, international climate talks held under the auspices of the United Nations Framework Convention on Climate Change led to the official recognition by the participating nations that global emissions of GHG must be reduced. According to the "Ad Hoc Working Group on Further Commitments of Annex I Parties under the Kyoto Protocol," avoiding the most catastrophic events forecast by the United Nations IPCC would entail emissions reductions by industrialized countries in the range of 25 to 40 percent below 1990 levels. Because of the Kyoto Protocol's Clean Development Mechanism, which gives industrialized countries credit for financing emission-reducing projects in developing countries, such an emissions goal in industrialized countries could ultimately spur efforts to cut emissions in developing countries as well.[75]

70 United States Environmental Protection Agency (USEPA), Climate Change Indicators: Greenhouse Gases, https://www.epa.gov/climate-indicators/greenhouse-gases. Accessed September 25, 2023.

71 Pew Center on Global Climate Change, Climate Change 101: Understanding and Responding to Global Climate Change.

72 P. Friedlingstein et al.: Global Carbon Budget *2020*, 2020.

73 USEPA, Global Greenhouse Gas Emissions Data, www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data. Accessed September 25, 2023.

74 USEPA, Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gas, updated April 2021.

75 United Nations Framework Convention on Climate Change, Press Release—Vienna UN Conference Shows Consensus on Key Building Blocks for Effective International Response to Climate Change, August 31, 2007.

In December 2015, the US entered into the Paris Agreement which has a goal of keeping a global temperature rise this century below 2 degrees Celsius above pre-industrial levels and limit the temperature increase further to 1.5 degrees Celsius. This agreement requires that all parties report regularly on emissions and implementation efforts to achieve these goals.

Regarding the adverse effects of global warming, as reported by SCAG:

> *Global warming poses a serious threat to the economic well-being, public health and natural environment in southern California and beyond. The potential adverse impacts of global warming include, among others, a reduction in the quantity and quality of water supply, a rise in sea level, damage to marine and other ecosystems, and an increase in the incidences of infectious diseases. Over the past few decades, energy intensity of the national and state economy has been declining due to the shift to a more service-oriented economy. California ranked fifth lowest among the states in CO_2 emissions from fossil fuel consumption per unit of Gross State Product. However, in terms of total CO_2 emissions, California is second only to Texas in the nation and is the 12th largest source of climate change emissions in the world, exceeding most nations. The SCAG region, with close to half of the state's population and economic activities, is also a major contributor to the global warming problem.*[76]

Greenhouse Gas Fundamentals

GHGs are those compounds in the Earth's atmosphere that play a critical role in determining temperature near the Earth's surface. GHGs include CO_2, CH_4, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[77] More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy, which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. Compounds that are regulated as GHGs are discussed in **Table 4.6-3**, *Description of Identified GHGs*.[78,79]

Not all GHGs possess the same ability to induce climate change. CO_2 is the most abundant GHG in Earth's atmosphere. Other GHGs are less abundant but have higher global warming potential (GWP) than CO_2. Thus, emissions of other GHGs are commonly quantified in the units of equivalent mass of CO_2 (CO_2e). GWP is based on several factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years otherwise referred to as atmospheric lifetime) relative to that of CO_2.

76 Southern California Associated of Governments (SCAG), The State of the Region—Measuring Regional Progress, December 2006, p. 121.

77 As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

78 Intergovernmental Panel on Climate Change (IPCC), Second Assessment Report, Working Group I: The Science of Climate Change, 1995.

79 IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

TABLE 4.6-3
DESCRIPTION OF IDENTIFIED GHGS

GHG	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human-caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and the main component of natural gas. When one molecule of CH_4 is burned in the presence of oxygen, one molecule of CO_2 and two molecules of water are released. A natural source of CH_4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH_4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF_3)	An inorganic, non-toxic, odorless, non-flammable gas. NF_3 is used in the manufacture of semi-conductors, as an oxidizer of high energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

NOTE: GHGs identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.

SOURCES: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007; U.S. Environmental Protection Agency, Acute Exposure Guideline Levels (AEGLs) for Nitrogen Trifluoride; January 2009.

The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that time.[80] These GWP ratios are available from IPCC. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values in its AR4. The GWPs in the IPCC AR4 are used by CARB for reporting statewide GHG emissions inventories, consistent with international reporting standards. By applying the GWP ratios, Project-

[80] GWPs and associated CO_2e values were developed by IPCC and published in its Second Assessment Report (SAR) in 1996. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). CARB has begun reporting GHG emission inventories for California using the GWP values from the IPCC AR4.

related CO_2e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline.

The IPCC has issued an updated Fifth Assessment Report (AR5), which has reduced down the majority of the GWP for key regulated pollutants. As CARB still uses AR4 values and the modeling software California Emissions Estimator Model (CalEEMod) is built on these assumptions, AR4 GWP values are used for the Project. Generally, the changes from AR4 to AR5 are reductions in warming potential for the GHG most associated with construction and operation of typical development projects. The GWP from AR4 and AR5 and atmospheric lifetimes for key regulated GHGs are provided in **Table 4.6-4**, *Atmospheric Lifetimes and GWPs*.

TABLE 4.6-4
ATMOSPHERIC LIFETIMES AND GWPS

Gas	Atmospheric Lifetime (Years)	GWP (100-Year Time Horizon) (AR4 Assessment)	GWP (100-Year Time Horizon) (AR5 Assessment)
Carbon Dioxide (CO_2)	50-200	1	1
Methane (CH_4)	12 (+/-3)	25	28
Nitrous Oxide (N_2O)	114	298	265
HFC-23: Fluoroform (CHF_3)	270	14,800	12,400
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH_2FCF_3)	14	1,430	1,300
HFC-152a: 1,1-Difluoroethane ($C_2H_4F_2$)	1.4	124	138
PFC-14: Tetrafluoromethane (CF_4)	50,000	7,390	6,630
PFC-116: Hexafluoroethane (C_2F_6)	10,000	12,200	11,100
Sulfur Hexafluoride (SF_6)	3,200	22,800	23,500
Nitrogen Trifluoride (NF_3)	740	17,200	16,100

SOURCE: IPCC, Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials.

Projected Impacts of Global Warming in California

In 2009, California adopted a statewide Climate Adaptation Strategy (CAS) that summarizes climate change impacts and recommends adaptation strategies across seven sectors: Public Health, Biodiversity and Habitat, Oceans and Coastal Resources, Water, Agriculture, Forestry, and Transportation and Energy. The CNRA updated the CAS in 2018 in a strategy called *Safeguarding California* and again in 2021. The 2021 CAS's goal is to drive collective action moving forward through six main priorities: Strengthen Protections for Climate Vulnerable Communities, Bolster Public Health and Safety to Protect Against Increasing Climate Risks, Building a Climate Resilient Economy, Accelerate Nature-Based Climate Solutions and Strengthen Climate Resilience of Natural Systems, Make Decisions Based on the Best Available Climate Science, Partner and Collaborate to Leverage Resources.[81]

[81] California Natural Resources Agency, California Climate Adaptation Strategy, https://resources.ca.gov/Initiatives/Building-Climate-Resilience/2021-State-Adaptation-Strategy-Update. Accessed September 25, 2023.

The Natural Resources Agency has also produced climate change assessments which detail impacts of global warming in California.[82] These include:

- Sea level rise, coastal flooding and erosion of California's coastlines would increase, as well as sea water intrusion.
- The Sierra snowpack would decline between 70 and 90 percent, threatening California's water supply.
- Higher risk of forest fires resulting from increasing temperatures and making forests and brush drier. Climate change will affect tree survival and growth.
- Attainment of air quality standards would be impeded by increasing emissions, accelerating chemical processes, and raising inversion temperatures during stagnation episodes resulting in public health impacts.
- Habitat destruction and loss of ecosystems due to climate change affecting plant and wildlife habitats.
- Global warming can cause drought, warmer temperatures and saltwater contamination resulting in impacts to California's agricultural industry.

With regard to public health, as reported by the Center for Health and the Global Environment at the Harvard Medical School, the following are examples of how climate change can affect cardio-respiratory disease: (1) pollen is increased by higher levels of atmospheric CO_2; (2) heat waves can result in temperature inversions, leading to trapped masses or unhealthy air contaminants by smog, particulates, and other pollutants; and (3) the incidence of forest fires is increased by drought secondary to climate change and to the lack of spring runoff from reduced winter snows. These fires can create smoke and haze, which can settle over urban populations causing acute and exacerbating chronic respiratory illness.[83]

Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's *Fifth Assessment Report, Summary for Policy Makers* states that, "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic forces [sic] together."[84] A report from the National Academy of Sciences

[82] State of California, Department of Justice, Office of the Attorney General, Climate Change Impacts in California, https://oag.ca.gov/environment/impact. Accessed September 25, 2023.

[83] Paul R. Epstein, et al., Urban Indicators of Climate Change, Report from the Center for Health and the Global Environment, (Harvard Medical School and the Boston Public Health Commission, August 2003), unpaginated.

[84] IPCC, Climate Change 2014: Synthesis Report, Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, Summary for Policy Makers, 2014, p. 5, http://ipcc.ch/report/ar5/syr/. Accessed September 25, 2023.

concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.[85]

According to the CalEPA, the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation.[86] Data regarding potential future climate change impacts are available from CNRA, which in 2009 published the *California Climate Adaptation Strategy*[87] as a response to Executive Order S-13-2008. The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the *California Climate Adaptation Strategy*, the California Energy Commission (CEC) was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers.[88] The website, known as Cal-Adapt, became operational in 2011.[89] The information provided by the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. Below is a summary of some of the potential climate change effects and relevant Cal-Adapt data, reported by an array of studies that could be experienced in California as a result of global warming and climate change.

Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State.[90]

According to the Cal-Adapt website's "Local Climate Change Snapshot" database, the Project location could see an average annual increase in maximum temperature to 73.9 to 74.7°F in the mid-century (2035–2064) and 74.9 to 77.8°F at the end of the century (2070–2099) compared to

85 Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America, 2010, 107:12107-12109.

86 California Environmental Protection Agency (CalEPA), Climate Action Team (CAT), Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2006.

87 California Natural Resources Agency (CNRA), CAT, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

88 CNRA, CAT, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008.

89 The Cal-Adapt website: http://cal-adapt.org. Accessed September 25, 2023.

90 California Energy Commission (CEC), Scenarios of Climate Change in California: An Overview, February 2006.

71.0°F for the baseline period (1961–1990). The average annual number of extreme heat days also could increase to 4 to 5 days in the mid-century (2035–2064) and 6 to 14 days at the end of the century (2070–2099) compared to 2 days for the baseline period (1961–1990).[91]

Water Supply

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change."[92] For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation.[93] Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full.[94] Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.[95]

According to the Cal-Adapt website's "Local Climate Change Snapshot" database, the Project location could see an average annual length of dry spells of 170 to 172 days in the mid-century (2035–2064) and 171 to 178 days at the end of the century (2070–2099), compared to 163 days for the baseline period (1961–1990). The average annual precipitation could decrease to 13.7 to 13.8 inches in the mid-century (2035–2064) and potentially increase or decrease to 14.1 to 13.9 inches at the end of the century (2070–2099), compared to 14.0 inches for the baseline period (1961–1990).

The California Department of Water Resources report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain." It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows.[96] In its AR5, the IPCC states "Changes in the global water cycle in

91 The Cal-Adapt website: http://cal-adapt.org. Accessed September 25, 2023.

92 Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

93 Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

94 Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

95 Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

96 California Department of Water Resources, Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, July 2006.

response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions."[97]

Hydrology and Sea Level Rise

As discussed above, climate changes could potentially affect: the amount of snowfall, rainfall and snowpack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for saltwater intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm and melting of ice over land. Absent planning and preparation, a rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply, and increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has a $30 billion agricultural industry that produces one half of the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; without planning and preparations. Crop yield could be threatened by a less reliable water supply. Also, greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.[98]

Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2 to 11.5°F (1.1 to 6.4°C) by 2100, with significant regional variation.[99] Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as 2 feet along most of the U.S. coast. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage.[100,101]

97 IPCC, Fifth Assessment Report, Summary for Policy Makers, p. 20.
98 California Climate Change Center, Our Changing Climate: Assessing the Risks to California, 2006.
99 National Research Council, Advancing the Science of Climate Change, 2010.
100 Parmesan, C., Ecological and Evolutionary Response to Recent Climate Change, first published on August 24, 2006.
101 Parmesan, C. and Galbraith, H., Observed Ecological Impacts of Climate Change in North America. Arlington, VA: Pew. Cent. Glob. Clim. Change, 2004.

Existing Conditions

GHG Emissions Inventory

CARB is responsible for the coordination and administration of both federal and State air pollution control programs within California. CARB compiles GHG inventories for the State of California. The most updated inventory reports the State's GHG emissions inventory from calendar year 2020. Based on the 2020 GHG inventory data (i.e., the latest year for which data are available from CARB), California emitted 369.2 $MMTCO_2e$ including emissions resulting from imported electrical power.[102] Between April 2010 and July 2020, the population of California grew by an annualized rate of 0.64 percent to a total of 39.78 million.[103] In addition, the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross domestic product (GDP)) is declining. The California economy, measured as gross state product, grew from $773 billion in 1990 to $3.4 trillion in 2021 representing an increase of over three times the 1990 gross state product.[104] California's economy, as with most of the country, experienced a decline in gross state product in 2020 ($3.0 trillion) due to the COVID-19 pandemic. Despite the population and economic growth experienced in 2021, California's net GHG emissions were reduced to below 1990 levels in 2020.[105] According to CARB, as of 2016, statewide GHG emissions dropped below the 2020 GHG Limit (431 $MMTCO_2e$) and have remained below this limit since that time.

Table 4.6-5, *State of California GHG Emissions*, identifies and quantifies statewide anthropogenic GHG emissions and sinks (e.g., carbon sequestration due to forest growth) in 1990 and 2020. As shown in the table, the transportation sector is the largest contributor to statewide GHG emissions at approximately 37 percent in 2020.

Existing Site GHG Emissions

The Project Site is currently developed with a 30,672 square foot two-story office building with associated landscaping and surface parking, which would be demolished and removed to support development of the Project. GHG emissions are currently associated with vehicle trips to and from the existing Project Site, landscaping equipment, on-site combustion of natural gas for heating, off-site combustion of fossil fuels for electricity, and off-site emissions from solid waste decomposition, water conveyance, and wastewater treatment. GHG emissions are estimated using CalEEMod (Version 2022.1.1), 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 from a variety of land use projects.

[102] CARB, California Greenhouse Gas Emissions for 2000–2020 – by Category as Defined in the 2008 Scoping Plan, October 26, 2022. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/ghg_inventory_scopingplan_sum_2000-20.pdf. Accessed October 2022.

[103] California Department of Finance, "E-6. Population estimates and components of change by county 2010–2020," 2020, December. http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-6/. Accessed October 2022.

[104] California Department of Finance, Gross State Product, 2021, https://dof.ca.gov/Forecasting/Economics/economic-indicators/gross-state-product/. Accessed December2022. Amounts are based on current dollars as of May 2022.

[105] California Department of Finance, Gross State Product, 2021, https://dof.ca.gov/Forecasting/Economics/economic-indicators/gross-state-product/. Accessed January 2023. Amounts are based on current dollars as of May 2022.

TABLE 4.6-5
STATE OF CALIFORNIA GHG EMISSIONS

Category	Total 1990 Emissions ($MMTCO_2e$)	Percent of Total 1990 Emissions	Total 2020 Emissions ($MMTCO_2e$)	Percent of Total 2020 Emissions
Transportation	150.7	35%	135.8	36.8%
Electric Power	110.6	26%	59.5	16.1%
Commercial	14.4	3%	11.6	3.6%
Residential	29.7	7%	25.3	6.8%
Industrial	103.0	24%	73.3	19.9%
Recycling and Waste[a]	–	–	8.9	2.4%
High GWP/Non-Specified[b]	1.3	<1%	21.3	5.8%
Agriculture/Forestry	23.6	6%	31.6	8.6%
Forestry Sinks[c]	-6.7	–	–	–
Net Total (IPCC SAR)[d]	**426.6**	**100%**	**369.2**	**100%**
Net Total (IPCC AR4)[e]	**431**	**100%**	**135.8**	**36.8%**

NOTES:

[a] Included in other categories for the 1990 emissions inventory.

[b] High Global Warm Potential (GWP) gases are not specifically called out in the 1990 emissions inventory.

[c] Forestry sinks were not calculated for 2020 pending a revised methodology under development. Forestry sinks are ecosystem carbon stored in plants and soils.

[d] IPCC = Intergovernmental Panel on Climate Change

[e] CARB revised the State's 1990 level GHG emissions using GWPs from the IPCC AR4.

SOURCE: CARB, California Air Resources Board, California Greenhouse Gas Emissions for 2000 to 2020. Trends of Emissions and Other Indicators. October 26, 2022. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf. Accessed January 2023.

CalEEMod was developed in collaboration with the air districts of California. Regional 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 to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[106] CalEEMod was used to estimate existing site GHG emissions from energy, refrigerants solid waste, water and wastewater, and landscaping equipment. Mobile source emissions estimates were calculated outside of CalEEMod and were based on CARB's latest on-road vehicle EMissions FACtor (EMFAC) model, EMFAC2021, and daily VMT for existing conditions was provided by the Project's Traffic Consultant where VMT analysis used the City's VMT analysis procedures and Culver City VMT Tool.[107] Existing operational emissions for the Project Site are presented in **Table 4.6-6**, *Estimated Existing Project Site GHG Emissions*. Details regarding the calculation of the existing Project Site emissions are provided in Appendix C of this Draft EIR. The emissions from existing conditions will be subtracted from Project emissions and net emissions will be presented.

[106] See: http://www.caleemod.com.

[107] Gibson Transportation Consulting, Inc provided existing use and Project VMT outputs using the City's VMT Calculator Tool. The existing use outputs are included in Appendix C of this Draft EIR, while the Project VMT outputs are within the Project's Transportation Study. Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR.

TABLE 4.6-6
ESTIMATED EXISTING PROJECT SITE GHG EMISSIONS

Emissions Sources	Project CO_2e (Metric Tons per Year)[a,b]
Existing Operational	
On Road Mobile Sources	286
Area (landscaping)	1
Energy (electricity and natural gas)	110
Water Conveyance and Wastewater Treatment	5
Solid Waste	7
Existing Total Emissions	**409**

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

[b] CO_2e emissions are calculated using the global warming potential values from the IPCC AR4. Although the IPCC has released AR5 with updated GWPs, CARB reports the Statewide GHG inventory using the AR4 GWPs, which is consistent with international reporting standards.

SOURCE: ESA, 2023.

4.6.3 Project Impacts

Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would have a significant impact related to GHG emissions if it would:

- **GHG-1:** Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- **GHG-2:** Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Amendments to Section 15064.4 of the CEQA Guidelines were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, CEQA Guidelines Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. If a qualitative analysis is used, in addition to quantification, this section recommends certain qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CNRA has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and that they should

be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15064(h)(3)).[108]

Although GHG emissions can be quantified, CARB, SCAQMD, and the City of Culver City have not adopted project-level significance thresholds for GHG emissions that would be applicable to the Project. The OPR 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."[109] 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."[110]

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project[111]. To qualify, such a plan or program 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.[112] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of GHG emissions."[113] Thus, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions.

In the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if the Project is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures discussed within CARB's Climate Change Scoping Plan, Connect SoCal, and City of Culver City's plans, programs, and policies including Culver City's Green Building Program established for the purpose of increasing energy efficiency and reducing GHG emissions for new developments.

SCAQMD Thresholds

As discussed above, SCAQMD has an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where SCAQMD is the lead agency. This SCAQMD

[108] See generally CNRA, Final Statement of Reasons for Regulatory Action (December 2009), pp. 11-13, 14, 16; see also Letter from Cynthia Bryant, Director of the OPR to Mike Chrisman, Secretary for Natural Resources, April 13, 2009.
[109] Governor's OPR, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008.
[110] Governor's OPR, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008.
[111] CCR, Title 14, Section 15064(h)(3).
[112] CCR, Title 14, Section 15064(h)(3).
[113] CCR, Title 14, Section 15064(h)(3).

interim GHG significance threshold is not applicable to the Project because it is a mixed-use residential and commercial project, and the City is the Lead Agency.

Methodology

Project GHG Emissions Estimates

For informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which requires a good-faith effort by the lead agency to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. The significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project and is evaluated solely on the basis of consistency with GHG reduction plans, policies, and regulations.

The Climate Action Registry General Reporting Protocol provides procedures and guidelines for calculating and reporting GHG emissions from general and industry-specific activities. Although no numerical thresholds of significance have been adopted, and no specific protocols are available for land use projects, the General Reporting Protocol provides a framework for calculating and reporting GHG emissions from the Project. The GHG emissions provided in this report are consistent with the General Reporting Protocol framework. For the purposes of this Draft EIR, total GHG emissions (i.e., construction and operation) from the Project were quantified to provide information to decision makers and the public regarding the level of the Project's annual GHG emissions. GHG emissions are typically separated into three categories that reflect different aspects of ownership or control over emissions:

- Scope 1: Direct, on-site and off-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, diesel, and transportation fuels).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy.[114]

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility: "As facilities consider changes that would affect their emissions – addition of a cogeneration unit to boost overall efficiency even as it increases direct emissions, for example – the relative impact on total (direct plus indirect) emissions by the facility should be monitored. Annually reported indirect energy usage also aids the conservation awareness of the facility and provides information" to CARB to be considered for future strategies by the industrial sector.[115] For these reasons, CARB has proposed requiring the calculation of direct and indirect

[114] Embodied energy includes energy required for water pumping and treatment for end-uses.

[115] California Air Resources Board, Staff Report: Initial Statement of Reasons for Rulemaking, Revisions to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), 2010, page 27.

GHG emissions as part of the AB 32 reporting requirements. Additionally, OPR directs lead agencies to "make a good-faith effort, based on available information, to calculate, model, or estimate…GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[116] Therefore, direct and indirect emissions have been calculated for the Project.

A fundamental challenge in the analysis of GHG emissions is the global nature of the existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular project because the project may cause a shift in the locale for some type of GHG emissions, rather than simply causing "new" GHG emissions. As a result, there is a lack of clarity as to whether a project's GHG emissions represent a net global increase, reduction, or no change in GHGs that would exist if the project were not implemented. Therefore, the analysis of the Project's GHG emissions is conservative in that it assumes all of the GHG emissions are new additions to the atmosphere.

For purposes of this analysis, it was considered reasonable, and consistent with criteria pollutant calculations, to consider GHG emissions resulting from direct Project-related activities, including use of vehicles, and natural gas, to be new emissions. These emissions include Project construction activities such as demolition, hauling, and construction worker trips, as well as operational emissions. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long-term rather than temporary, GHG emissions were calculated on an annual basis. As previously discussed, the Project would remove existing office uses and associated GHG emissions. The GHG emissions analysis subtracted existing emissions as a credit when calculating net Project emissions.

GHG emissions for the Project are estimated using CalEEMod (Version 2022.1.1), which is a statewide land use emission 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 from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California and is recommended by SCAQMD. Regional 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 to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California. Mobile source emissions have been estimated based on CARB's on-road vehicle emissions factor (EMFAC2021) model.

As discussed previously, the City of Culver City has adopted and implemented a range of GHG reduction activities and strategies including Culver City's Green Building Program that would reduce GHG emissions. In addition, SCAG has adopted Connect SoCal applicable to the region, which outlines SCAG's plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The SCS focuses the majority of new housing and job growth in HQTAs and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for TOD and

[116] Governor's Office of Planning and Research, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008, page 5.

demonstrates a reduction in per capita GHG emissions relative to 2005 of nine percent in 2020 and 16 percent in 2035. The project-level analysis describes the consistency of the Project's GHG emission sources with local and regional GHG emissions reduction strategies.

Construction Emissions

The emissions of GHGs associated with construction of the Project were calculated for each year of construction activity using CalEEMod and EMFAC2021. Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date). Project construction is estimated to start in 2025 but may commence at a later date. If the onset of construction is delayed to a later date than assumed in the modeling analysis, construction impacts would be similar to or less than those analyzed, because a more energy-efficient and cleaner burning construction equipment and vehicle fleet mix would be expected in the future. This is because State regulations require construction equipment fleet operators to phase-in less polluting heavy-duty equipment and trucks over time. As a result, should the Project commence construction on a later date than modeled in this GHG impact analysis, GHG impacts would be less than the impacts disclosed herein.

Project construction activities would include demolition, grading and excavation, foundations, building construction, paving and architectural coating. Demolition activities would generate demolition debris (asphalt and general construction debris), which would require transport by haul truck. Soil excavation and grading activities would generate soil for export, which would require transport by haul truck. Heavy-duty construction equipment, vendor supply trucks and concrete trucks would be used during construction of foundations and buildings, as well as during paving and architectural coating.

The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the criteria pollutant analysis in Section 4.2, *Air Quality*, to generate GHG emissions values for each construction year.

SCAQMD's *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* recognizes that construction-related GHG emissions from projects "occur over a relatively short-term period of time" and that "they contribute a relatively small portion of the overall lifetime project GHG emissions."[117] The guidance recommends that construction project GHG emissions should be "amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies."[118] In accordance with that SCAQMD guidance, GHG emissions from construction

[117] SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2. Accessed July 12, 2020.

[118] SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2. Accessed September 25, 2023.

have been amortized over the 30-year lifetime of the Project. More detailed descriptions of the Project's construction subphasing and equipment list are available in Appendix C of this Draft EIR.

Operational Emissions

Operation of the Project would generate GHG emissions from on-site operations such as natural gas combustion for heating/cooking, landscaping equipment and the use of consumer products. CalEEMod was used to estimate operational GHG emissions from electricity, natural gas, solid waste, water and wastewater, refrigerants and landscaping equipment. GHG emissions would also be generated by Project-generated vehicle trips. Operational impacts were assessed for the first full Project buildout year in 2027.

This EIR quantifies the Project's annual GHG emissions and compares them to a Project without Reduction Features scenario, as defined by CARB's most updated projections for AB/SB 32. This approach mirrors the concepts used in CARB's 2022 Climate Change Scoping Plan, which demonstrates GHG reductions compared to a Project without implementation of GHG reduction characteristics, features, and measures where operational GHG emissions were calculated based on a scenario without Project Design Features and consistent with CARB's Climate Change Scoping Plan Statewide BAU forecast. The Project without Reduction Features scenario does not account for energy efficiency measures that would exceed the Title 24 Building Standards Code. The Project without Reduction Features does not account for GHG-PDF-1 and assumes the Project without Reduction Features scenario will utilize natural gas in all land uses and does not include a solar photovoltaic system. A 50 percent diversion rate of solid waste was assumed for the Project as well as the Project without Reduction Features scenario. This comparison is being done for informational purposes only, including to disclose the relative carbon efficiency of the Project. The City of Culver City, as lead agency, is focusing its determination of the significance of the Project's GHG emissions in relation to the Project's location and design and its consistency with local City of Culver City regulatory schemes, as explained below.

Project energy demand and the consumption of fossil fuels to generate electricity and to provide space heating and cooling and hot water generates GHG emissions. Emissions of GHGs associated with energy usage under the Project's proposed land uses are calculated using the CalEEMod tool. Future fuel consumption rates are estimated based on specific square footage of the Project's residential, retail, and vehicular parking land uses, as well as predicted water supply needs of the Project. The Project electricity demands are supplied by SCE. The Project and Project without Reduction Features use a CO_2e intensity factor based on CalEEMod forecasted future year carbon intensities that reflect utility-specific planning considerations, including future integration of renewables for 2027 including SB 100 requirements, which requires local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by 2027, 60 percent by 2030, and 100 percent by 2045. While the Project would be required to comply with the 2022 Title 24 Building Energy Efficiency Standards (which are effective for building permit applications that are applied for on or after January 1, 2023), CalEEMod includes building energy efficiency factors for the 2019 Title 24 Building Energy Efficiency Standards but does not include correction factors for the 2022 standards. Thus, the analysis of building energy-related GHG emissions does not reflect additional building energy reductions and associated GHG emissions reductions from 2022 Title 24 compliance. The Project's GHG analysis conservatively assumes the

Project will remain with SCE as their electricity provider and will not take additional credit for renewable energy beyond the expected SCE renewable energy percentage for year 2027 based on the future trend under SB 100 and CalEEMod forecasted future year carbon intensities.[119]

Mobile emissions in both the Project and the Project without Reduction Features were estimated based on emission factors from EMFAC along with Project VMT calculations as shown in the VMT Calculator outputs provided for the Project in the Project's Transportation Study, provided in Appendix I, consistent with calculations in Section 4.2, *Air Quality*, of this Draft EIR.[120] All vehicle types could visit the Project Site. Therefore, this assessment uses Los Angeles County's motor vehicle fleet mix and the fleet average calendar year emissions factors from EMFAC to estimate mobile source GHG emissions. While the Project would also implement transportation demand management (TDM) measures in the Project's Transportation Demand Management (TDM) Program (see Project Design Feature TRAF-PDF-2) that would reduce Project-related VMT (refer to Section 4.11, *Transportation*, of this Draft EIR, for additional details regarding the TDM Program), these TDM measures in TRAF-PDF-2 were conservatively not credited to the GHG analysis as the exact amount of VMT reduction associated the measures are not precisely quantifiable and are qualitatively discussed in the analysis in Section 4.11, *Transportation*. Thus, the GHG analysis conservatively estimates mobile emissions, because the estimates do not account for the reduced emissions that would occur through implementation of the Project's TDM Program.

As previously described above, within Culver City, in 2019 all residential and commercial users were automatically enrolled in the CPA program. Electricity customers in the City of Culver City are automatically defaulted to receive electricity from 100 percent renewable resources unless they opt out of the CPA. However, the analysis for the Project conservatively assumes that the renewable usage is equal to that of Southern California Edison's renewable production as predicted through SB 100 and CalEEMod forecasted future year carbon intensities.[121]

Emissions of GHGs associated with solid waste disposal under the Project's proposed land uses are calculated using the CalEEMod tool. The emissions are based on the size of the Project's residential and retail uses, the waste disposal rate for the land uses are estimated based on land use type through CalEEMod, and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for CH_4, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery) are statewide averages and are used in this assessment. In addition, a 50 percent diversion rate of solid waste is assumed for the Project and the Project without Reduction Features.

[119] For the purposes of estimating GHG emissions in this Draft EIR, the emissions analysis conservatively assumes Project would not switch electricity providers from SCE to the Clean Power Alliance (CPA) (i.e., does not take any credit for 36 percent, 50 percent, or 100 percent renewable electricity, depending on the selected CPA plan). Should the Project switch electricity providers from SCE to the CPA, the Project's electricity-related emissions would be lower than those disclosed in this section if they chose 50 or 100 percent renewable electricity.

[120] Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR.

[121] The CPA allows for 100 percent, 50 percent, and 36 percent renewable energy content as well as the option to opt out of the program all together. Assuming that all of the City of Culver City's residents opt out of the program is a highly conservative assumptions and therefore the analysis will likely overestimate net Project emissions.

The emissions of GHGs associated with water demand and wastewater generation from the Project are calculated using CalEEMod. The emissions are based on the size of the Project land uses, the water demand factors, the electrical intensity factors for water supply, treatment, and distribution for wastewater treatment, the GHG emission factors for the electricity utility provider, and the GWP values for the GHGs emitted. Emissions were calculated using CalEEMod and were based on the water usage rate consistent with Section 4.13.1, *Utilities and Service Systems – Water Supply*, of this Draft EIR.

The emissions of GHGs associated with operational area sources under the Project are calculated using the CalEEMod tool. The emissions for landscaping equipment are based on the size of the open space based on the Project's residential and retail land uses, the GHG emission factors for fuel combustion, and the GWP values for the GHGs emitted. Refrigerant emissions are based on Project land use type since different types of refrigeration equipment are used by different types of land uses. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing of the refrigeration equipment lifetime, and then derives average annual emissions from the lifetime estimate.

As previously stated, operational GHG impacts are calculated by subtracting existing emissions from Project emissions. The GHG emissions calculations incorporate GHG reductions sustainability measures, some of which are required by regulation, such as the City of Culver City's Green Building Program requirements, and compliance with SCAQMD rules and regulations and reductions in energy, water, and waste demand.

Consistency with GHG Reduction Plan, Policies, and Actions

The Project's potential for GHG impacts is also evaluated by assessing the Project's consistency with applicable GHG reduction strategies and local actions adopted by CARB, SCAG, and the City. As there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on whether the Project is not in conflict with, and therefore is consistent with, Statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment consistent with CEQA Guidelines Section 15064.4 and CEQA Guidelines Appendix G. Based on CEQA case law, when no guidance exists, the lead agency may look to and assess general compliance with comparable regulatory schemes.[122]

A consistency analysis is provided and describes the Project's compliance with performance-based standards included in the regulations outlined in the applicable portions of CARB's 2022 Climate Change Scoping Plan, Connect SoCal and the City's Green Building Program.

[122] 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).

For this Project, the City of Culver City serves as the lead agency. OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. The City of Culver City does not have a programmatic mitigation plan to tier from, such as a GHG Emissions Reduction Plan as recommended in the CEQA Guidelines. However, the City of Culver City has adopted the Green Building Program that encourages and requires applicable projects to implement energy efficiency measures. In addition, the California CAT Report provided recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in HSC Division 25.5. Thus, if the Project is designed and operated in accordance with these policies and regulations, it would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reductions.

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." [123]

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50% of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, funding. Additionally, CAPs need to be monitored and updated as State targets change and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas when developing local climate plans, measures, policies, and actions. "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction." [124]

The State also recognizes in Appendix D, Local Actions, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the need for housing while demonstrating that a Project is in alignment with the State's Climate Goals.[125] The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing or solar arrays, is not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

[123] CARB, Final 2022 Climate Change Scoping Plan – Appendix D: Local Actions, November 2022.
[124] CARB, Final 2022 Climate Change Scoping Plan – Appendix D: Local Actions, November 2022.
[125] The State recognizes the need for 2.5 million housing units over the next eight years, with one million being affordable units. See page 20, Appendix D, 2022 Scoping Plan Update, November 2022.

Project Design Features

The following project design features would be implemented as part of the Project:

GHG-PDF-1: Green Building Features. The Project will include the following green building features:

- The Project buildings will be designed to meet the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Certified performance level or higher and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and Culver City's Green Building Program Requirements.
- The Project will include installation of a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 sf consistent with CCMC Chapter 15.02.1005 in order to achieve compliance with the City of Culver City's solar photovoltaic requirement, per the City's Green Building Ordinance and CALGreen standards.
- The Project will provide EV parking and charging for residential and commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. Forty-four (44) total spaces (41 residential + 3 commercial) would have EV charging stations.
- The Project will include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances.
- The Project will incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems.
- The Project will utilize only electricity and no natural gas in all land uses except for the retail space.

In addition to Project Design Feature GHG-PDF-1, the Project would implement Project Design Feature TRAF-PDF-2 (Transportation Demand Management (TDM) Program), which would reduce single occupancy trips, and VMT. These PDFs would also reduce GHG emissions.

Analysis of Project Impacts

Impact GHG-1: The Project could have a significant impact if it would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Impact GHG-2: The Project could have a significant impact if it would conflict with any applicable plan, policy, regulation, or recommendation of an agency adopted for the purpose of reducing the emissions of GHGs.

Impact Analysis

Consistency with State Plans, Policies, or Regulations

In the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted for the purpose of reducing the emissions of GHGs.

The analyses below demonstrate that the Project is consistent with the applicable GHG emission reduction plans and policies included within the 2008 Climate Change Scoping Plan and subsequent updates, SCAG's Connect SoCal, and the City of Culver City's Green Building Program. As shown herein, the Project would be consistent with the applicable GHG reduction plans, policies, and regulations.

CARB's Climate Change Scoping Plan

As discussed above, jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas).[126] Specifically, Table 3 of Appendix D discusses attributes for residential and mixed-use project that would accommodate growth in a manner consistent with State GHG reduction and equity prioritization goals.[127] A detailed assessment of the Project's consistency with applicable goals, plans, and policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below.[128] In addition, further details are provided regarding the correlation between these reduction strategies and applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero emissions by 2035 (see Table 2-1 of the Scoping Plan).

- **Convert local government fleets to zero-emission vehicles (ZEV)**

The CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

Culver's City's EV Infrastructure Plan aims to foster increased EV charging stations at public facilities and in private development. The City with assistance from the City's EV Infrastructure Plan looks to foster private EV charging station development by increasing education and awareness about EVs and EV charging stations; create policies and initiatives that encourage and streamline EV charging stations development, installation, and use; and connect EV and EV charging stations stakeholders to funding resources to reduce upfront costs. As noted in the City's

[126] Table 1 of Appendix D, 2022 Scoping Plan Update, November 2022.
[127] Table 3 of Appendix D, 2022 Scoping Plan Update, November 2022.
[128] Table 1 and 3 of Appendix D, 2022 Scoping Plan Update, November 2022.

EV Infrastructure Plan, depending on the mix of EV charging station types, Culver City may need between 380 and 1,154 charging stations by 2030 to support statewide goals.

The Project would support these goals by providing EV charging stations for Project residential uses and commercial uses. The Project would provide a total of 428 parking spaces. While the CCMC no longer has any minimum amount of required parking for any use citywide, the Project's voluntarily provided parking would meet CCMC Section 17.320.035.O.3 requirements with installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 20 percent of the parking spaces (approximately 86 spaces: 81 residential + 5 commercial), with 10 percent of the spaces further improved to be EV ready (approximately 44 spaces: 41 residential + 3 commercial), and with 10 percent of the spaces further improved with electric vehicle charging stations (approximately 41 residential spaces + 3 commercial spaces). Installation of additional EV chargers would encourage adoption of EVs.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)**

The State has adopted AB 1236 and AB 970, which require cities to adopt streamline permitting procedures for EV charging stations. As a result, CCMC Section 17.320.035.O.3, includes EV parking design requirements with installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 20 percent of the parking spaces, with 10 percent of the spaces further improved to be EV ready, and with 10 percent of the spaces further improved with electric vehicle charging stations. In addition, the City also aims to foster increased EV charging stations at public facilities and in private development through Culver's City's EV Infrastructure Plan.

The City's goals of increasing EV chargers in both public and private development throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. The Project would support this GHG reduction strategy by providing EV charging stations for both residential and commercial parking spaces. The Project would provide a total of 428 parking spaces. While the CCMC no longer has any minimum amount of required parking for any use citywide, the Project's voluntarily provided parking would meet CCMC Section 17.320.035.O.3 parking design requirements regarding EV Capable, EV Ready and spaces with full EV charging stations (see discussion above for specific number of spaces provided for each by the Project), which would encourage adoption of EVs.

VMT Reduction

The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- **Reduce or eliminate minimum parking standards in new developments**
- **Implement parking pricing or transportation demand management pricing strategies**

The City's Municipal Code Section 7.05.015 (Transportation Demand and Trip Reduction Measures), requires development greater than 25,000 gross square feet to implement transportation demand and trip measures, including measures associated with parking, related to VMT reduction prior to issuance of a certificate of occupancy.

As described in the 4.11, *Transportation*, of this Draft EIR, the Project proposes a CCMC Section 7.05.015 required TDM Program as described in Project Design Feature TRAF-PDF-2. The Project's TDM Program (TRAF-PDF-2) includes TDM measures to reduce peak hour vehicular traffic and air emissions to and from the Project Site. The Project's TDM Program (TRAF-PDF-2) includes a comprehensive program of measures, design features, transportation services, education programs, and incentives intended to reduce the effect of Project traffic from residents, employees, and visitors to the Project Site during the most congested time periods of the day. The TDM measures include the following: Transportation Information Center (TIC); Bicycle Parking and Amenities, which includes 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015; Pedestrian-Friendly Environment; Employee Parking; Bus Stop Improvements. Additional TDM strategies that may be offered by the Project to further reduce VMT and reliance on single-passenger vehicles, and help future residents and employees manage each TDM element and maximize program participation include: Project Transportation Coordinator; Transportation Information Packet for New Residents and Employees; and Bike Repair Station (see Section 4.11, *Transportation*, of this Draft EIR for a detailed explanation of all TDM measures contained in TRAF-PDF-2). Thus, the Project would implement strategies and action plans as part of a comprehensive TDM Program (TRAF-PDF-2) in compliance with the requirements set forth in CCMC Section 07.05.015 to reduce single occupancy vehicle trips while promoting the use of alternative transportation modes, thereby reducing Project VMT. While the Project voluntarily proposes to provide 428 parking stalls, the Project would be consistent with the overall intent of this GHG reduction policy through the Project's TDM Program (TRAF-PDF-2).

- **Implement Complete Streets policies and investments, consistent with general plan circulation element requirements**

The City adopted the Complete Streets Policy in January 2020. The Complete Streets Policy lays out a plan for designing safer, more vibrant streets that are accessible to people, no matter how they travel. The policy sets a variety of goals and standards in the application of complete streets principles including improving mobility for all road users, enhancing safety, and creating a standard set of criteria applicable to all city departments and private developers who construct within the public right of way. The Project would incorporate the complete streets principles into the Project design to encourage multi-modal transportation options within the community. The Complete Streets Policy emphasizes a balanced transportation system that considers all users of the road (cyclists, pedestrians, transit riders, and vehicles) while planning development and transportation projects.

The Project would implement Complete Street policy through encouraging pedestrian-oriented design where the Project design allows residents to be able to walk through and around the Project Site with multiple access points and community connections to the development. In addition, the first floor retail use at the corner of Hannum Avenue and Buckingham Parkway would serve as a

pedestrian point of interest on the Project Site where the Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza fronting Hannum Avenue, which would provide open space for both residents and visitors. The Project would occupy a location that is highly accessible by existing transit options along Hannum Avenue and Buckingham Parkway provided by the Culver City Department of Transportation and further detailed below.

In addition, the Project would include 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015, as well as bicycle amenities as part of the Project's TDM Program (TRAF-PDF-2). The Project's bicycle parking spaces and facilities would be provided at various locations throughout the Project Site, which include short-term facilities (e.g., bicycle racks) and secure long-term bicycle parking (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner). In addition, an existing Class II bike lane is provided on both sides of Hannum Avenue adjacent to the Project Site. Development of the Project would maintain the existing bike lane along Hannum Avenue; however, the Hannum Driveway would intersect with the eastbound bike lane on the south side of Hannum Avenue. To ensure maximum visibility, the Hannum Driveway would meet all applicable CCMC requirements to ensure adequate sight distance is provided for drivers of vehicles entering and leaving the Project Site as well as bicyclists and pedestrians wishing to cross the driveway. Also, while no existing bicycle lanes are provided on Buckingham Parkway, *Culver City Bicycle & Pedestrian Action Plan* calls for a Class IV bike lane to be installed. The Buckingham Driveway and loading area would intersect the southbound bicycle lane on the west side of Buckingham Parkway. Similar to the Hannum Driveway, the Buckingham Driveway would ensure maximum visibility by meeting all of the City's driveway requirements and would provide adequate sight distance for drivers of vehicles entering and leaving the Project Site as well as bicyclists crossing the driveway. Therefore, the Project complies with complete street policies and would not conflict with implementation of Complete Streets policies.

- **Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.**
- **Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking**
- **Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)**
- **Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).**

The above strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote TOD, and encourages high-density residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted Connect SoCal. Connect SoCal's "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in

transit and complete streets. Please refer below for additional discussion of consistency with Connect SoCal and as shown in Table 4.6-7, *Consistency with Applicable SCAG Connect SoCal Actions and Strategies*, below, the Project would not conflict with Connect SoCal's goals.

On a local level, the City has adopted the Complete Streets Policy in January 2020 where the goal of this concept is to transform the City of Culver City into a place with an extensive bicycle and pedestrian network that allows travelers of all levels and abilities to feel comfortable walking and biking to their destinations as well as the Culver City Bicycle & Pedestrian Action Plan, which aims to provide a safe, convenient, and accessible active transportation network. In addition, Culver's City's EV Infrastructure Plan aims to foster increased EV charging stations at public facilities and in private development. The EV Charging Station Study/Infrastructure Plan aims to assist Culver City to expand its EV charging network as it determines the most suitable sites in Culver City to install EV charging stations and identifies hurdles to installing EV charging stations and develop solutions. Culver's City's EV Infrastructure Plan also highlights that while the City will increase EV charging stations at publicly owned locations, the majority of EV charging stations will be owned and operated by the private sector. As mentioned above, the City with assistance from the City's EV Infrastructure Plan looks to foster private EV development by increasing education and awareness about EVs and EV charging stations; create policies and initiatives that encourage and streamline EV charging stations development, installation, and use; and connect EV and EV charging stations stakeholders to funding resources to reduce upfront costs.

The Project would occupy a location that is highly accessible by existing transit options along Hannum Avenue and Buckingham Parkway provided by the Culver City Department of Transportation. The Project is a mixed-use development and represents an infill development at a location served by several public transit options, including Culver CityBus Bus Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site. In addition, the Project Site is located 0.6 mile east of the Culver City Transit Center which serves Los Angeles County Metropolitan Transportation Authority (Metro) Bus Lines 108 and 110, as well as Culver CityBus Line 6. Also, the Project would include 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015, as well as bicycle amenities as part of the Project's TDM Program (TRAF-PDF-2). The Project's bicycle parking spaces and facilities would be provided at various locations throughout the Project Site, which include short-term facilities (e.g., bicycle racks) and secure long-term bicycle parking (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner). Therefore, the Project complies with Complete Street policies and would not conflict with implementation of Complete Streets policies. In addition, an existing Class II bike lane is provided on both sides of Hannum Avenue adjacent to the Project Site. Development of the Project would maintain the existing bike lane along Hannum Avenue. Also, while no existing bicycle lanes are provided on Buckingham Parkway, *Culver City Bicycle & Pedestrian Action Plan* calls for a Class IV bike lane to be installed. However, the Buckingham Driveway and loading area would intersect the southbound bicycle lane on the west side of Buckingham Parkway, so additional bike amenities are expected to increase around the Project Site in the future. Therefore, the Project complies with the above strategies by increasing development density near public transit and access to bicycle parking and facilities to encourage increased bike share.

The General Plan Land Use designation for the Project Site is Regional Center, which allows large-scale commercial uses and is intended to support existing and anticipated regional-serving commercial developments. The Regional Center land use designation does not support residential and/or residential mixed-use projects. Per the Culver City Zoning Code (Zoning Code), the Project Site is zoned Regional Business Park (CRB). The Project is proposing to change the Project Site's zoning designation to Planned Development (PD) with adoption of a Comprehensive Plan that would serve as the overarching entitlement mechanism for the Project Site. Per the Zoning Code, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site planning and design and to support more effective responses to the settings of such properties and other environmental considerations.[129] To permit this, a Comprehensive Plan regulates permitted uses, development standards, and conditions of approval on a Project Site. To achieve the Project's proposed density and mix of uses, a General Plan Amendment Map would be needed to designate the Project Site as General Corridor. The Project's unit count is consistent with the recently-adopted October 2021-2029 Housing Element's Preferred Mixed-Use High Designation and state density bonus law. Refer to Draft EIR, Section 4.7, *Land Use and Planning*, for additional details regarding requested zoning actions for the Project.

The Project would not convert any natural and working lands to urban uses. The Project is an infill project that provides increased opportunities to use alternative transportation modes by co-locating complementary residential and retail land uses on an infill Project Site that is in close proximity to existing off-site commercial and residential uses, being located within a quarter-mile of off-site commercial and residential uses, and would occupy a location that is highly accessible by existing public transit options along Hannum Avenue and Buckingham Parkway in a highly walkable area well served by public transportation for visitors, residents, employees and patrons. As described above, the Project would implement pedestrian-oriented design where the Project design allows residents to be able to walk through and around the Project Site with multiple access points and community connections to the development. In addition, the first floor retail use at the corner of Hannum Avenue and Buckingham Parkway would serve as a pedestrian point of interest on the Project Site where the Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza fronting Hannum Avenue, which would provide open space for both residents and visitors.

California continues to experience a severe housing shortage. The State must plan for more than 2.5 million residential units over the next eight years, and no less than one million of those residential units must be affordable to lower-income households.[130] This represents more than double the housing planned for during the last eight years.[131] The housing crisis and the climate crisis must be confronted simultaneously, and it is possible to address the housing crisis in a manner

[129] City of Culver City Zoning Code, Title 17, Section 17.560, Comprehensive Plans, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-56855#JD_CHAPTER17.560. Accessed April 2023.

[130] California Department of Housing and Community Development. 2022. Statewide Housing Plan. Available at www.hcd.ca.gov/docs/statewide-housing-plan.pdf.

[131] California Department of Housing and Community Development. 2022. Statewide Housing Plan. Available at www.hcd.ca.gov/docs/statewide-housing-plan.pdf.

that supports the State's climate and regional air quality goals.[132] CAPCOA's Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (CAPCOA's Handbook) provides a VMT reduction measurement for incorporation of low-income housing. Measure T-4 (Integrate Affordable and Below Market Rate Housing) shows a 28.6 percent reduction in VMT for low-income units in comparison to market rate units.

As discussed in Section 4.7, *Land Use and Planning*, the Culver City General Plan Land Use Element's Objective 3 aims to increase housing for all members of the public, including the provision of affordable housing. The Project would comply with Objective 3 by providing 27 affordable housing units of the Project's 309 residential units. Also, as discussed above, the Project would not convert any natural and working lands to urban uses. Additionally, the Project is an infill project that provides increased opportunities to use alternative transportation modes by co-locating complementary residential and retail land uses on an infill Project Site that is in close proximity to existing off-site commercial and residential uses, being located within a quarter-mile of off-site commercial and residential uses, and highly accessible by existing public transit options along Hannum Avenue and Buckingham Parkway for visitors, residents, employees and patrons. This colocation of uses on an accessible Project Site provides the opportunity to further reduce GHG emissions. In addition, the Project would provide a total of 428 parking spaces and would meet CCMC Section 17.320.035.O.3 parking design requirements regarding EV Capable, EV Ready and spaces with full EV charging stations (see discussion above for specific number of spaces provided for each by the Project), which may also help to further reduce GHG emissions by encouraging increased EV use.

Therefore, the Project would be consistent with these reduction strategies. While these reduction strategies mainly apply to traffic circulation infrastructure within the City, the Project would support these reduction strategies.

Building Decarbonization

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan).

- **Adopt all-electric new construction reach codes for residential and commercial uses**

California's transition away from fossil fuel–based energy sources will bring the project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be

[132] Elkind, E. N., Galante, C., Decker, N., Chapple, K., Martin, A., & Hanson, M. 2017. Right Type, Right Place: Assessing the Environmental and Economic Impacts of Infill Residential Development through 2030. Available at https://ternercenter.berkeley.edu/research-and-policy/right-type-right-place/.

increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City of Culver City has adopted green building ordinances to reduce GHG emissions for new development. The City of Culver City has adopted a Photovoltaic Requirement that requires 1 kilowatt (kw) of photovoltaic power installed per 10,000 square feet (sf) of new development or the developer will pay an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code. In addition, the Culver City Green Building Program requires new developments totaling more than 50,000 sf to achieve LEED rating system at a "certified" performance level or higher. As described above, in 2019, the CPA became the new electricity supplier for Culver City for both residential customers (February) and for non-residential customers (May). With this change, CPA purchases the renewable energy resources for electricity, and SCE delivers it to Culver City customers. The CPA is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Culver City are automatically defaulted to have 100 percent renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent or opt out of the CPA and remain with SCE as their provider. In future years, the SCE will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the energy efficiency regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

Although this GHG reduction measure is aimed primarily at jurisdictions and not individual projects, as discussed in subsection, Project Design Features, of this GHG section above, the Project would be designed with Project Design Feature GHG-PDF-1 and be required to comply with the Culver City Green Building Program and ordinances where the Project would achieve the USGBC LEED Certified performance level or higher to improve building energy efficiency, and design features would include energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. In addition, as part of Project Design Feature GHG-PDF-1, the Project would directly support building electrification as the Project will utilize only electricity and no natural gas in all land uses except for the retail space. While building electrification would result in higher electricity usage, it would greatly reduce the use of a fossil fuel and the associated GHG emissions (i.e., natural gas combustion) from building energy demand since only the retail space still uses natural gas. The Project would also comply with applicable solar installation regulatory requirements.

- **Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)**

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings (see Table 2-1 of the Scoping Plan). As stated above, the City of Culver City has adopted green building ordinances to reduce GHG emissions for new development, including a Photovoltaic Requirement that requires 1 kilowatt (kw) of photovoltaic

power installed per 10,000 square feet (sf) of new development or the developer will pay an in-lieu fee and the Green Building Program requirement that new developments totaling more than 50,000 sf achieve LEED certified performance level or higher.

The Project would support this measure by meeting or exceeding electricity requirements in the 2022 Building Efficiency Standards which encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards. As described above, the Project would be designed with Project Design Feature GHG-PDF-1 and be required to comply with the Culver City Green Building Program and ordinances where the Project would achieve the USGBC LEED certified performance level or higher to improve building energy efficiency, and design features would include energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. Also, as described above, as part of Project Design Feature GHG-PDF-1, the Project would directly support building electrification as the Project will utilize only electricity and no natural gas in all land uses except for the retail space. While building electrification would result in higher electricity usage, it would greatly reduce the use of a fossil fuel and the associated GHG emissions (i.e., natural gas combustion) from building energy demand since only the retail space still uses natural gas. The Project would also comply with applicable solar installation regulatory requirements. Therefore, based on the above, the Project would not conflict with energy strategies in the 2022 Scoping Plan.

As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

Post-2030 Analysis

The 2022 Scoping Plan Update also outlines strategies to reduce GHG emissions to achieve the 2030 target from sectors that are not directly controlled or influenced by the Project, but nonetheless contribute to Project-related GHG emissions. For instance, the Project itself is not subject to the Cap-and-Trade regulation; however, Project-related emissions would decline pursuant to the regulation as utility providers and transportation fuel producers are subject to renewable energy standards, Cap-and-Trade, and the LCFS. While CARB is in the process of expanding the regulatory framework to meet the 2030 reduction target based on the existing laws and strategies in the 2022 Scoping Plan, the Project would support or not impede implementation of these potential GHG reduction strategies identified by CARB for all the reasons summarized above.

In June 2018, an updated report was published on the California PATHWAYS model, which was used in the preparation of the 2022 Scoping Plan Update. This report determined that "meeting the state's 2030 climate goals requires scaling up and using technologies already in the market such as energy efficiency and renewables, while pursing aggressive market transformation of new technologies that have not yet been utilized at scale in California (for example, zero-emission vehicles and electric heat pumps)."[133] Priority GHG reduction strategies include energy efficiency in buildings, renewable energy, and smart growth through increased use of public transit, walking,

[133] California Energy Commission, Energy Research and Development Division, Final Project Report, Deep Decarbonization in a High Renewables Future Updated Results from the California PATHWAYS Model, June 2018.

biking, telepresence, and denser, mixed-use community design. The Project would not conflict with these strategies given it would locate residential and retail uses on an infill Project Site located within a walkable area of the Fox Hills Sub-Area of the City with access to public transit and employment opportunities, restaurants, and entertainment. The Project would occupy a location that is highly accessible by existing public transit options along Hannum Avenue and Buckingham Parkway provided by the Culver City Department of Transportation and further detailed below. The Project is a mixed-use development and represents an infill development at a location served by several public transit options, including Culver CityBus Bus Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site. In addition, the Project Site is located 0.6 mile east of the Culver City Transit Center which serves Metro Bus Lines 108 and 110, as well as Culver CityBus Line 6. Furthermore, the Project would support the priority market transformation strategy of zero-emission light-duty vehicles by providing for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations where the Project would provide a total of 428 parking spaces and the Project's voluntarily provided parking would meet CCMC Section 17.320.035.O.3 parking design requirements regarding EV Capable, EV Ready and spaces with full EV charging stations (see discussion above for specific number of spaces provided for each by the Project). As such, the Project would not conflict with the findings relevant to the Project from the updated California PATHWAYS model report.

With Statewide efforts underway to facilitate the State's achievement of those Statewide goals, it is reasonable to expect the Project's GHG emissions to decline from their opening year levels as reported in Table 4.6-9, below, as the regulatory initiatives identified by CARB in the 2022 Scoping Plan Update are implemented, and other technological innovations occur. Stated differently, the Project's emissions at buildout likely represents the maximum emissions for the Project as anticipated regulatory developments and technology advances are expected to reduce emissions associated with the Project, such as emissions related to electricity use and vehicle use.

Even though the 2022 Scoping Plan Update and supporting documentation do not provide an exact regulatory and technological roadmap to achieve carbon neutrality by 2045 as established by AB 1279, they demonstrate that various combinations of policies could allow the Statewide emissions level to remain very low through 2045, suggesting that the combination of new technologies and other regulations not currently feasible at the time the 2022 Scoping Plan Update was adopted could enable the State to meet the 2045 targets.[134] For example, the 2022 Scoping Plan Update states some policies are not feasible at this time, such as ZEV technology for off-road equipment and for propulsion, such as commercial aircraft or ocean-going vessels, but that this type of policy would be necessary to meet the 2045 target.

Based on the above, the Project would not conflict with CARB's Climate Change Scoping Plan, and there would be an anticipated decline in Project emissions once fully constructed and operational; the Project would not conflict with the State's GHG reduction targets for 2030,2045 and 2050. Therefore, impacts would be less than significant. As stated above, a detailed consistency table that contains a list of the State's Climate Change Scoping Plan GHG-reducing strategies

[134] California Air Resources Board. 2022. 2022 Scoping Plan For Achieving Carbon Neutrality, November 16. 2022 Scoping Plan Update (ca.gov). Accessed December 19, 2022.

relevant to the Project and describes that the Project would not conflict with the Climate Change Scoping Plan is available in the *Air Quality and Greenhouse Gas Technical Documentation* appendix for the Project, which is provided in Appendix C of this Draft EIR.

SCAG Connect SoCal

Transportation-related GHG emissions would be the largest source of emissions from the Project. This finding is consistent with the findings in regional plans, including Connect SoCal, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. At the regional level, Connect SoCal is an applicable plan adopted for the purpose of reducing GHGs.

The purpose of Connect SoCal is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. To accomplish this goal, Connect SoCal identifies various strategies to reduce per capita VMT. Connect SoCal is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, Connect SoCal outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of Connect SoCal would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in Connect SoCal can be grouped into the following three categories: (1) reduction of vehicle trips and VMT, (2) increased use of alternative fuel vehicles, and (3) improved energy efficiency. These strategies and policies are addressed below.

In order to assess the Project's potential to conflict with Connect SoCal, this section analyzes the Project's land use characteristics for consistency with the strategies and policies set forth in Connect SoCal to meet GHG emission-reduction targets set by CARB.[135] Generally, projects are considered to not conflict with applicable land use plans and regulations, such as SCAG's Connect SoCal, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project would support reducing VMT given that it is a mixed-use development with residential and retail land uses and represents an infill development at a location served by several public transit options, including Culver CityBus Bus Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site. In addition, the Project Site is located 0.6 mile east of the Culver City Transit Center which serves Metro Bus Lines 108 and 110, as well as Culver CityBus Line 6. The Project would not conflict with Connect SoCal goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. Thus, successful implementation

[135] As discussed in Connect SoCal, the actions and strategies included in Connect SoCal remain unchanged from those adopted in the 2012-2035 and 2016-2040 RTP/SCS.

of Connect SoCal would result in more complete communities with jobs near a variety of transportation and housing choices, which would reduce automobile use.

Integrated Growth Forecast

Connect SoCal provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. The Project would introduce new residential uses, new businesses, and new employees. As discussed in Section 4.9, *Population and Housing*, of this Draft EIR, based on Connect SoCal growth projections, the Project's proposed 309 units would comprise approximately 194 percent of SCAG's year 2045 estimated increase of 1,000 households within the City, relative to 2020.[136] Based on Connect SoCal growth projections, the Project's estimated 733 resident population would comprise approximately 89 percent of SCAG's year 2045 estimated increase of 821 population within the City, relative to 2020.[137] Based on Connect SoCal growth projections, the Project would result in an decrease in the number of employees on the Project Site of approximately 127 net new employees, which would comprise a decrease of approximately 1 percent of SCAG's year 2045 estimated increase of 17,073 employees within the City, relative to 2020.[138] Therefore, the Project's contribution to population and employment would be consistent with SCAG population and employment projections for the City and would be consistent with SCAG's Connect SoCal goals and with the growth projections contained in Connect SoCal. Accordingly, the Project's generation of population and employees would not conflict with employment generation projections contained in Connect SoCal. However, while the Project's contributions to households would exceed those estimated household projections for the City contained in Connect SoCal, as discussed in Section 4.9, *Population and Housing*, of this Draft EIR, the Culver City October 2021-2029 Housing Element, which is based on the SCAG's 6th Cycle Regional Housing Needs Assessment (RHNA)[139] allocations, indicates the total housing growth need for the City during this planning period through 2029 is 3,341 units. Accordingly, the Project's proposed housing would constitute 9.2 percent of the 6th Cycle RHNA allocations between 2021 and 2029 (refer to Section 4.9, *Population and Housing*, of this Draft EIR for additional details). Therefore, the Project would promote fulfillment of the City's future updated Housing Element goals and is consistent with SCAG and the City's 6th Cycle RHNA allocations. Refer to Section 4.7, *Land Use and Planning*, of this Draft EIR, for additional information regarding consistency with Connect SoCal.

VMT Reduction Strategies and Policies

As similarly described in Section 4.11, *Transportation*, the Project is served by several public transit options, including Culver CityBus Bus Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site. In

136 Refer to Section 4.9, *Population and Housing*, of this Draft EIR for additional information.

137 Refer to Section 4.9, *Population and Housing*, of this Draft EIR for additional information.

138 Refer to Section 4.9, *Population and Housing*, of this Draft EIR for additional information.

139 SCAG's 6th Cycle Regional Housing Needs Assessment focused on existing need (current housing shortages and overcrowding) plus projected growth, which takes into account factors beyond what was used to determine Connect SoCal's projected growth. Therefore, the 6th Cycle RHNA allocation for the City results in a higher allocation of housing than what is represented in Connect SoCal, which is focused solely on projected or future growth (see Section 4.9, *Population and Housing*, of this Draft EIR, for additional details).

addition, the Project Site is located 0.6 mile east of the Culver City Transit Center which serves Metro Bus Lines 108 and 110, as well as Culver CityBus Line 6. In addition, an existing Class II bike lane is provided on both sides of Hannum Avenue adjacent to the Project Site. Development of the Project would maintain the existing bike lane along Hannum Avenue. Also, while no existing bicycle lanes are provided on Buckingham Parkway, *Culver City Bicycle & Pedestrian Action Plan* calls for a Class IV bike lane to be installed. The Project would also provide the Project would include 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015, as well as bicycle amenities as part of the Project's TDM Program (TRAF-PDF-2). The Project's bicycle parking spaces and facilities will be provided at various locations throughout the Project Site, which include short-term facilities (e.g., bicycle racks) and secure long-term bicycle parking (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner). In addition, the first floor retail use at the corner of Hannum Avenue and Buckingham Parkway would serve as a pedestrian point of interest on the Project Site where the Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza fronting Hannum Avenue, which would provide open space for both residents and visitors. The streets immediately bordering the Project Site and all other public streets in the vicinity include sidewalks on both sides of the street, facilitating pedestrian movement. In addition, as discussed in Section 4.11, *Transportation*, the Project would have a less than significant impact on household VMT per capita as estimated by the City's VMT Calculator where the daily household VMT per capita for the Project is estimated at 6.8, which is below the citywide household VMT threshold of 7.1 per capita (see Section 4.11, *Transportation*, for additional details). Therefore, the Project would facilitate a reduction in VMT and related vehicular GHG emissions and would not conflict with the VMT Reduction Strategies and Policies of Connect SoCal.

The Project would also not be in conflict with the following key GHG reduction strategies in SCAG's Connect SoCal as substantiated below, which are based on changing the region's land use and travel patterns in the following key areas:[140]

- Compact growth in areas accessible to transit
- Locate jobs in proximity to transit
- Locate job growth focused in Priority Growth Areas
- Biking and walking infrastructure to improve active transportation options and transit access

As described above, the Project would concentrate residential and retail land uses in an area served by several transit providers within the immediate vicinity of the Project Site. Connect SoCal focuses on orienting job growth in Priority Growth Areas served by high quality transit and into other infill areas where urban infrastructure including housing and other services already exists. The Project supports this by locating residential and retail land uses in an area well served by public transit and bicycle/pedestrian facilities. Furthermore, the Project would also provide 92 bicycle spaces. Therefore, the Project would facilitate a reduction in VMT and related vehicular GHG emissions, which would not conflict with the goals of Connect SoCal.

[140] SCAG, Connect SoCal, May 2020, pp. 3, 21, 26, 50, 52, 69, and 144.

Increased Use of Alternative Fueled Vehicles Policy Initiative

A goal of Connect SoCal, with regard to individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. Connect SoCal policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. The Project would provide a total of 428 parking spaces. While the CCMC no longer has any minimum amount of required parking for any use citywide, the Project's voluntarily provided parking would meet CCMC Section 17.320.035.O.3 parking design requirements regarding EV Capable, EV Ready and spaces with full EV charging stations (see discussion above for specific number of spaces provided for each by the Project). The Project would comply with the City of Culver City Municipal Code (CCMC) as applicable for electric vehicle parking. As such, the Project would not conflict with this goal of Connect SoCal.

Energy Efficiency Strategies and Policies

Connect SoCal includes strategies for individual developments, such as the Project, to improve energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. As discussed in Chapter 2, *Project Description*, of the Draft EIR, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the applicable Culver City Green Building Program and CALGreen Building Code. These standards would reduce energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The Project design would include sustainability features, including energy saving and sustainable design features that would be incorporated into the Project as the proposed buildings would comply with the applicable Title 24 California Code of Regulations. As discussed under subsection, Project Design Features, above, the Project would be designed with Project Design Feature GHG-PDF-1 and be required to comply with the Culver City Green Building Program and ordinances where the Project would achieve the USGBC LEED Certified performance level or higher to improve building energy efficiency, and design features would include energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. EV parking and charging would be available for residential and commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. Forty-four (44) total spaces (41 residential + 3 commercial) would have EV charging stations. The Project would include 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces. As it relates to energy conservation, the Project would include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances. As it relates to water conservation, the Project would incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems. In addition, the Project would include installation of a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 sf in order to achieve compliance with the City of Culver City's solar photovoltaic requirement, per the City's Green Building Ordinance and CALGreen standards. In addition, as part of Project Design Feature GHG-PDF-1, the Project would directly support building electrification as the Project will utilize only electricity and no natural gas in all land uses except for the retail space. Therefore, based on the above, the Project would not conflict with energy strategies in Connect SoCal.

Land Use Characteristics

In order to assess the Project's consistency with Connect SoCal, this Draft EIR also analyzes the Project's land use characteristics, such as density and proximity to job centers, for consistency with those utilized by SCAG in its SCS. The Project's consistency with the applicable land use goals and principles set forth in Connect SoCal is discussed in Section 4.7, *Land Use and Planning*, and **Table 4.6-7**, *Consistency with Applicable SCAG* Connect SoCal *Actions and Strategies*. As concluded therein, the Project would not conflict with applicable land use strategies of Connect SoCal.

As discussed above and in Table 4.6-7, the Project would not conflict with and would support the applicable goals and benefits of Connect SoCal to reduce GHG. Accordingly, the Project is the type of land use development that is encouraged by Connect SoCal to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State regulatory requirements.

Culver City's Green Building Program

As discussed in Chapter 2, *Project Description*, of the Draft EIR, and as described in subsection, Project Design Features, above, the Project would be designed with Project Design Feature GHG-PDF-1 and be required to comply with the Culver City Green Building Program and ordinances where the Project would achieve the USGBC LEED Certified performance level or higher to improve building energy efficiency, and design features would include energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. EV parking and charging would be available for residential and commercial use. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. Forty-four (44) total spaces (41 residential + 3 commercial) would have EV charging stations. The Project would include 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces. As it relates to energy conservation, the Project would include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances. As it relates to water conservation, the Project would incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems. In addition, the Project would include installation of a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 sf consistent with CCMC Chapter 15.02.1005 in order to achieve compliance with the City of Culver City's solar photovoltaic requirement, per the City's Green Building Ordinance and CALGreen standards. In addition, as part of Project Design Feature GHG-PDF-1, the Project would directly support building electrification as the Project will utilize only electricity and no natural gas in all land uses except for the retail space. Therefore, based on the above, the Project would not conflict with Culver City's Green Building Program.

TABLE 4.6-7
CONSISTENCY WITH APPLICABLE SCAG CONNECT SOCAL ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Land Use Actions and Strategies		
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood-oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots.	Local Jurisdictions, COGs, SCAG, CTCs	**No Conflict.** This action applies to local jurisdictions, Council of Governments (COGs), SCAG and County Transportation Commissions (CTCs). While the use of alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would encourage the use of alternative-fueled vehicles by providing 428 parking spaces and would meet CCMC Section 17.320.035.O.3 requirements with installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 20 percent of the parking spaces (approximately 86 spaces: 81 residential + 5 commercial), with 10 percent of the spaces further improved to be EV ready (approximately 44 spaces: 41 residential + 3 commercial), and with 10 percent of the spaces further improved with electric vehicle charging stations (approximately 41 residential spaces + 3 commercial spaces). The Project would comply with CCMC as applicable for electric vehicle parking.
Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.	Local Jurisdictions, SCAG	**No Conflict.** While this action applies to local jurisdictions and SCAG, the Project would facilitate pedestrian and bicycle movements by providing convenient access to and from on-site uses. The Project is served by an existing Class II bike lane provided on both sides of Hannum Avenue adjacent to the Project Site. Also, while no existing bicycle lanes are provided on Buckingham Parkway, *Culver City Bicycle & Pedestrian Action Plan* calls for a Class IV bike lane to be installed. However, the Buckingham Driveway and loading area would intersect the southbound bicycle lane on the west side of Buckingham Parkway. The Project would provide the Project would include 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015, as well as bicycle amenities as part of the Project's TDM Program (TRAF-PDF-2). The Project's bicycle parking spaces and facilities will be provided at various locations throughout the Project Site, which include short-term facilities (e.g., bicycle racks) and secure long-term bicycle parking (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner). In addition, the first floor retail use at the corner of Hannum Avenue and Buckingham Parkway would serve as a pedestrian point of interest on the Project Site where the Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza fronting Hannum Avenue, which would provide open space for both residents and visitors. The streets immediately bordering the Project Site and all other public streets in the vicinity include sidewalks on both sides of the street, facilitating pedestrian movement. Furthermore, the Project would implement a TDM Program, as described in Project Design Feature TRAF-PDF-2, that would encourage alternative transportation choices by employees accessing the Project Site.
Update local zoning codes, General Plans, and other regulatory policies to promote a more balanced mix of residential, commercial, industrial, recreational and institutional uses located to provide options and to contribute to the resiliency and vitality of neighborhoods and districts.	Local Jurisdictions	**No Conflict.** While this action applies to local jurisdictions, the Project would support this action/strategy by adding residential and retail land uses in an area developed primarily with a mix of commercial and residential uses. The Project Site is located within a walkable area of the Fox Hills Sub-Area of the City. The Project would support the Project Objective to reduce VMT by increasing employee density in proximity to transit and housing.

TABLE 4.6-7
CONSISTENCY WITH APPLICABLE SCAG CONNECT SOCAL ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State, SCAG	**No Conflict.** While this action applies to the State and SCAG, the Project would be consistent with and would not conflict with the goals of SB 375, including the goal to reduce VMT and the corresponding emission of GHGs. The Project is a mixed-use development with residential and retail uses that would increase residential, retail and employee density in proximity to transit and housing and would provide bicycling and pedestrian facilities. Furthermore, the Project would implement a TDM Program, as described in Project Design Feature TRAF-PDF-2, to reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.
Transportation Network Actions and Strategies		
Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers.	SCAG, CTCs, Local Jurisdictions	**No Conflict.** While this action applies to local jurisdictions, SCAG and CTCs, the Project is currently served by several public transit options, including Culver CityBus Bus Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site. In addition, the Project Site is located 0.6 mile east of the Culver City Transit Center which serves Metro Bus Lines 108 and 110, as well as Culver CityBus Line 6.
Encourage transit fare discounts and local vendor product and service discounts for residents and employees of TOD/HQTAs or for a jurisdiction's local residents in general who have fare media.	Local Jurisdictions	**No Conflict.** While this action applies to local jurisdictions and CTCs, the Project's land use characteristics, including its location near transit, housing, and bicycle/pedestrian facilities, would encourage non-automotive forms of transportation. Additionally, the Project's TDM Program, as described in Project Design Feature TRAF-PDF-2 in Section 4.11, *Transportation*, of this Draft EIR, would provide a TIC, which is a commuter information center where residents, employees, and visitors can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile.
Transportation Demand Management (TDM) Actions and Strategies		
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	**No Conflict.** While this action applies to local jurisdictions and SCAG, the Project is proposed in an area well served by public transit. The Project would also provide a TDM Program, as described in Section 4.11, *Transportation*, of this Draft EIR, which would provide a TIC, which is a commuter information center where residents, employees, and visitors can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile. In addition, the Project's TDM Program (TRAF-PDF-2) would feature the measure Employee Parking where at least 10 percent of employee parking will be reserved, as signed on the spaces, for use by potential carpool or vanpool vehicles and located as close as practical to employee entrances. This preferential parking will be identified on the site plan accompanying the application for a building permit. Also, the Project's TDM Program (TRAF-PDF-2) would feature Bicycle Parking and Amenities that support bicycling to work through the provision of bike storage facilities throughout the Project Site. Bicycle parking will be provided in accordance with the City Municipal Code requirements for the Project and will include short-term facilities (e.g., bicycle racks) and secure long-term bicycle parking (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner).

TABLE 4.6-7
CONSISTENCY WITH APPLICABLE SCAG CONNECT SOCAL ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions, CTCs	**No Conflict.** While this action applies to local jurisdictions and CTCs, the telecommuting programs for the Project's uses will depend on the office tenants that occupy those uses. While the Project would not implement any telecommuting programs, the Project would provide a TDM Program (TRAF-PDF-2), as described in Section 4.11, *Transportation*, of this Draft EIR, which would provide a TIC, which is a commuter information center where residents, employees, and visitors can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile.
Clean Vehicle Technology Actions and Strategies		
Support subregional strategies to develop infrastructure and supportive land uses to accelerate fleet conversion to electric or other near zero-emission technologies. The activities committed in the two subregions (Western Riverside COG and South Bay Cities COG) are put forward as best practices that others can adopt in the future.	SCAG, Local Jurisdictions	**No Conflict.** While this action applies to local jurisdictions and SCAG, the Project would not interfere with the City of Culver City's or SCAG's ability to encourage the use of alternative-fueled vehicles through various policies and programs. The Project would provide a total of 428 parking spaces. While the CCMC no longer has any minimum amount of required parking for any use citywide, the Project's voluntarily provided parking would meet CCMC Section 17.320.035.O.3 parking design requirements regarding EV Capable, EV Ready and spaces with full EV charging stations (see discussion above for specific number of spaces provided for each by the Project). The Project would comply with the CCMC as applicable for electric vehicle parking.

SOURCE: SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), referred to as Connect SoCal, May 2020, p. 21 and 46. The actions and strategies included in Connect SoCal are similar to, and consistent with the 2012-2035 and 2016-2040 RTP/SCS.
ESA, 2024.

Construction Emissions

As explained in the subsection, *Methodology*, the emissions of GHGs associated with construction of the Project were calculated for each year of construction activity. Detailed emissions calculations including a complete list of construction equipment, construction phasing, and other assumptions are provided in Appendix C. Construction is anticipated to commence in the second quarter of 2025 and is expected to take approximately 30 months to complete. Project operations are expected to commence in 2027. Results of the Project's construction related GHG emissions calculations are presented in **Table 4.6-8**, *Project Construction GHG Emissions*. Although construction related GHGs are one-time emissions, any assessment of Project emissions should include construction emissions. The SCAQMD recommends that a project's construction-related GHG emissions be amortized over the project's 30-year lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. The Project's estimated construction GHG emissions have been amortized over a 30-year period in accordance with SCAQMD guidance.

It is estimated that the Project would export approximately 57,000 cubic yards of soil, all of which would be exported from the Project Site. It should be noted that the GHG emissions shown in Table 4.6-8 are based on construction equipment operating continuously throughout the workday. In reality, construction equipment tends to operate periodically or cyclically throughout the workday. Therefore, the GHG emissions shown reflect a conservative estimate.

TABLE 4.6-8
PROJECT CONSTRUCTION GHG EMISSIONS

Year	CO_2e (Metric Tons)[a]
2025	1,140
2026	858
2027	358
Total Construction Emissions	**2,356**
Amortized Construction Emissions (30-years)	79

[a] Totals may not add up exactly due to rounding in the modeling calculations Detailed emissions calculations are provided in Appendix C.

SOURCE: ESA, 2024.

Although GHGs are generated during construction and are accordingly considered one-time emissions, it is important to include them when assessing all of the long-term GHG emissions associated with a project. As recommended by the SCAQMD, construction-related GHG emissions were amortized over a 30-year project lifetime in order to include these emissions as part of a project's annualized lifetime total emissions. In accordance with this methodology, the estimated Project's construction GHG emissions have been amortized over a 30-year period and are added to the annualized operational GHG emissions.

Operational Emissions

The Project's annual GHG emissions included emissions from operations and construction calculated by CalEEMod and EMFAC for mobile source emissions. As previously described, construction GHG emissions for the entire construction period were amortized over 30 years. The Project must comply with the portions of the City of Culver City's Green Building Code and mandatory Green Building Program. These plans and policies are intended to reduce GHG emissions in accordance with the goals of AB 32. As explained above, the Project's mobile source emission calculations associated with the Project are calculated using the VMT from the VMT Calculator, which is attached in Appendix C, prepared for the Project.

The Project would implement Project Design Feature GHG-PDF-1 (Green Building Features), which include the Project buildings achieving the USGBC LEED Certified performance level or higher to improve building energy efficiency. LEED Certification requires documenting achievement of the rating system requirements and the required credits after the completion of construction. Projects may achieve credits in a variety of categories, including categories that are relevant to energy such as Location and Transportation, Water Efficiency, and Energy and Atmosphere. It not yet known which specific credits in each of the LEED categories the Project will achieve; therefore, it is not possible at this time to accurately quantify specific amounts of energy and VMT reduction and associated GHG emissions reductions the Project would achieve from LEED Certification above regulatory requirements. Therefore, LEED Certification is not quantitatively accounted for in this analysis.

Maximum unmitigated, annual net GHG emissions resulting from on road mobile sources, area sources (landscape maintenance equipment, refrigerants), energy (i.e., electricity, natural gas), water conveyance and wastewater treatment, and solid waste were calculated for the Project buildout year (2026). The Project's total and net GHG emissions from operation of the Project are shown in **Table 4.6-9**, *Estimated Annualized Unmitigated Project GHG Emissions*.

Physical and operational Project characteristics for which sufficient data are available to quantify the reductions from building energy and water consumption (see Section 4.13.1, *Utilities and Service Systems – Water Supply*, for water usage) have been included in the quantitative analysis and include water reduction and efficiency features such as: low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems The Project would include installation of a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 sf consistent with CCMC Chapter 15.02.1005 in order to achieve compliance with the City of Culver City's solar photovoltaic requirement. There is no quantification of the TDM Program (TRAF-PDF-2) in Section 4.11, *Transportation*.

TABLE 4.6-9
ESTIMATED ANNUALIZED UNMITIGATED PROJECT GHG EMISSIONS

Emissions Sources	Operational Emissions CO_2e (metric tons per year)[a]	
	Proposed Project	Project without GHG Reduction Characteristics, Features, and Measures
Opening Operational Year (2026)		
Mobile	1,399	1,399
Area	10	10
Energy (Electricity and Natural Gas)	344	488
Waste	40	40
Water	39	39
Amortized Construction Emissions	79	79
Total Project Emissions	**1,911**	**2,055**
Existing Emissions	**409**	**409**
Net Emissions	**1,646**	**1,502**
Emissions Reduction	**144**	**—**
Percent Reduction	**10.0%**	**—**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C.

SOURCE: ESA, 2023.

While other methodologies for calculating Project GHG reduction efficiencies exist, this analysis compares the Project's GHG emissions to the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures and is presented here for informational purposes only, in order to evaluate the efficacy of the GHG reduction characteristics, features, and measures that would be implemented as part of the Project as required by GHG reduction plans and policies. This comparison is provided to evaluate the Project's efficiency with respect to GHG emissions but is not the threshold of significance used for impact analysis. The analysis assumes the Project without implementation of GHG reduction characteristics, features, and measures would incorporate the same land uses and building square footage as the Project. Furthermore, this analysis is consistent with the current regulatory policies and GHG quantification methods. As shown in Table 4.6-9, the Project would achieve a 50 percent diversion rate for solid waste, similar to the Project without Reduction Features scenario, as this diversion rate is based on compliance with AB 939. Reductions to emissions from energy are due to GHG-PDF-1 where the Project would only utilize electricity and no natural gas in all land uses except for the retail space, whereas the Project without Reduction Features scenario would use utilize both electricity and natural gas in all land uses. While building electrification would result in higher electricity usage, it would greatly reduce the use of a fossil fuel and the associated GHG emissions (i.e., natural gas combustion) from building energy demand since only the retail space still uses natural gas.

The quantification of GHG emissions for the Project without implementation of GHG reduction characteristics, features, and measures scenario is evaluated based on the specific and defined circumstances that CARB relied on when it projected the State's GHG emissions in the absence of GHG reduction measures in the Climate Change Scoping Plan. (For complete list of assumptions refer to Appendix C of this Draft EIR).

Emissions reductions from the Project's two highest GHG-emitting sources, mobile and electricity, would decrease over the next decade due to state mandates discussed above, and beyond, ensuring that the Project's total GHG emissions would be further reduced. Emissions from electricity would decline as utility providers, including SCE, meet their RPS obligations consistent with SB 350 and SB 100, which would achieve additional reductions in emissions from electricity demand. Although the actual reduction will depend on the mix of fossil fuels that the utility providers will replace with renewables and the relative CO_2 intensities of those fossil fuels. Project emissions from mobile sources would also decline in future years as older vehicles are replaced with newer vehicles resulting in a greater percentage of the vehicle fleet meeting more stringent combustion emissions standards, such as the model year 2017–2025 Pavley Phase II standards. It should be noted that Project-related GHG emissions presented above are provided for informational purposes as there is no numeric threshold applicable to the Project. The Project's evaluation of consistency with the relevant plans to reduce GHG emissions is the basis for determining the significance of the Project's GHG-related impacts on the environment.

Post Buildout Emissions

Executive Orders S-3-05 and B-30-25 establish a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050. This goal has not been codified by the Legislature and CARB has not adopted a strategy or regulations to meet the 2050 goal. However, studies have shown that, in order to meet the 2050 goal, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, would be required.

The 2022 Scoping Plan Update is designed to chart a path to achieving an even stricter GHG goal of carbon neutrality by year 2045 and recognizes additional work will be required to fully design and implement any policies and actions identified in this plan to achieve the more stringent 2045 goal.[141] For example, the 2022 Scoping Plan Update acknowledges that ZEV technology for off-road equipment and for propulsion, such as commercial aircraft or ocean-going vessels, but that this type of research, technological development and policy would be necessary to meet the 2045 target.[142]

- **Energy Sector:** Technological improvements such as increased decarbonization of the electricity sector and additions to California's renewable resource portfolio would favorably influence the Project's emissions level.[143]

[141] California Air Resources Board, 2022 Scoping Plan For Achieving Carbon Neutrality, November 16, 2022.
[142] California Air Resources Board, 2022 Scoping Plan For Achieving Carbon Neutrality, November 16, 2022, pages 195-206.
[143] California Air Resources Board, 2022 Scoping Plan For Achieving Carbon Neutrality, November 16, 2022, pages 184-194.

- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all would serve to reduce the Project's emissions level.[144]

The methodology used for GHG analysis in this section was prepared after thorough investigation of feasible methodologies to determine the potential GHG impacts associated with the Project. Due to the technological shifts required and the unknown parameters of the regulatory framework in 2045, quantitatively analyzing the Project's impacts relative to the 2045 goal is speculative for purposes of CEQA. Despite the thorough investigation performed, due to the uncertainty regarding specific State and local actions that would be implemented to achieve the state's carbon neutrality goal in 2045, calculating Project emissions levels for 2045 would be highly speculative. Nonetheless, Statewide efforts are underway to facilitate the State's achievement of those goals, and it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the 2022 Scoping Plan Update are implemented, and other technological innovations occur.

In addition, the Project is the type of land use development that is encouraged by Connect SoCal to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies. The Project Site is located at a location served by several public transit options, including Culver CityBus Bus Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site. In addition, the Project Site is located 0.6 mile east of the Culver City Transit Center which serves Metro Bus Lines 108 and 110, as well as Culver CityBus Line 6. In addition, the Project would include 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015, as well as bicycle amenities as part of the Project's TDM Program (TRAF-PDF-2). The Project's bicycle parking spaces and facilities will be provided at various locations throughout the Project Site, which include short-term facilities (e.g., bicycle racks) and secure long-term bicycle parking (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner). Therefore, the Project complies with complete street policies and would not conflict with implementation of Complete Streets policies. In addition, an existing Class II bike lane is provided on both sides of Hannum Avenue adjacent to the Project Site. Also, while no existing bicycle lanes are currently provided on Buckingham Parkway, the *Culver City Bicycle & Pedestrian Action Plan* calls for a Class IV bike lane to be installed, so additional bike amenities are expected to increase around the Project Site in the future. Therefore, the Project would facilitate pedestrian and bicycle movements by providing convenient access to and from on-site uses.

These Project characteristics are related to key GHG reduction strategies in Connect SoCal, which include locating uses in areas accessible to transit and providing biking infrastructure to improve active transportation options and transit access. Additional details regarding the Project's furtherance of key GHG reduction strategies in Connect SoCal are discussed in Threshold (b). By

[144] California Air Resources Board, First Update to the AB 32 Scoping Plan, May 2014, pages 55–56.

furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions and would not conflict with State climate targets for 2030 and beyond.

Stated differently, the Project's emissions total at buildout represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would not conflict with the 2030 and 2050 Statewide targets and Executive Orders S-3-05 and B-30-15.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. Project-specific impacts regarding GHG emissions were determined to be less than significant.

Cumulative Impacts

Impact Analysis

Analysis of GHG emissions is cumulative in nature because impacts are caused by cumulative global emissions. Additionally, climate change impacts related to GHG emissions do not necessarily occur in the same area as the Project is located. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. The GHG emissions of the Project alone would not likely cause a direct physical change in the environment. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."[145] It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone. Given that the Project would generate GHG emissions that would not conflict with applicable reduction plans and policies and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than significant.

Although the Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide

[145] California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, August 2010, p. 39.

emissions to 40 percent below 1990 levels by 2030, even though statewide population and commerce are predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. Currently, there are no applicable CARB, SCAQMD, or City of Culver City significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064(h)(3),[146] the City of Culver City, as lead agency, has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project would not conflict with the applicable regulatory plans and policies to reduce GHG emissions: Climate Change Scoping Plan, SCAG's Connect SoCal, and Culver City's Green Building Program.

As described above, the CARB's Climate Change Scoping Plan illustrates that implementation of the Project's regulatory requirements and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from the Project without implementation of GHG reduction characteristics, features, and measures scenario and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in CARB's 2022 Climate Change Scoping Plan for the implementation of AB 32.

The Project would be consistent with the approach outlined in CARB's Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Climate Change Scoping Plan, the Project would use "green building" features as a framework for achieving GHG emissions reductions as new buildings would be designed to comply with the CCMC and the CALGreen Building Code.

As part of SCAG's Connect SoCal, a reduction in VMT within the region is a key component to achieving the 2035 GHG emission reduction targets established by CARB. As discussed previously, the Project Site's characteristics demonstrate that the Project's VMT would be reduced based on its location near public transit, provision of bicycling/pedestrian access and facilities, and a TDM Program, as described in Project Design Feature TRAF-PDF-2.

The Project would comply with the City of Culver City Green Building Program, which emphasizes improving energy conservation and energy efficiency, and increasing renewable energy generation.

[146] As indicated above, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction program renders a cumulative impact insignificant. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program 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. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of GHG emissions."

The Project's regulatory requirements and project design features (refer to Project Design Feature GHG-PDF-1) provided above and throughout this Draft EIR would advance these objectives. Furthermore, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives.

As discussed above, the Project would not conflict with the applicable GHG reduction plans and policies. The comparison of the Project's emissions to a scenario without GHG reduction features demonstrates the efficacy of the measures contained in these policies. Moreover, while the Project is not directly subject to the Cap-and-Trade Program, that Program would indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program would backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program would be responsible for relatively more emissions reductions if California's direct regulatory measures reduce GHG emissions less than expected. The Cap-and-Trade Program would ensure that the GHG reduction targets of AB 32 and SB 32 are met.

The 2017 Scoping Plan demonstrates that the State's existing and proposed regulatory framework would allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030. Even though the 2017 Scoping Plan and supporting documentation do not provide an exact regulatory and technological roadmap to achieve the 2050 goal, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target.

Given that the Project would generate GHG emissions consistent with applicable reduction plans and policies and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would not be cumulatively considerable, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. Cumulative impacts regarding GHG emissions were determined to be less than significant.

4.7 Land Use and Planning

4.7.1 Introduction

Development on the Project Site is guided by land use policies and regulations set forth in local and regional plans and local zoning regulations. This section provides an analysis of the potential impacts of the Project with regard to land use and planning. The analysis in this section evaluates whether the Project would conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR. Section 4.2, *Air Quality*, addresses relevant air quality plans and policies; Section 4.6, *Greenhouse Gas Emissions*, discusses relevant plans and policies to reduce greenhouse gas emissions; and Section 4.11, *Transportation*, discusses consistency with transportation plans.

4.7.2 Environmental Setting

Regulatory Framework

Following is a summary of the applicable local and regional regulatory land use plans, policies, and ordinances that apply to development at the Project Site. Specific provisions of these documents that pertain to land use are evaluated under the Environmental Impacts subsection for consistency with the Project.

State

California Government Code Section 65915

The State Density Bonus Law (DBL), Government Code section 65915, provides the opportunity to develop additional market-rate housing and receive other benefits in exchange for including affordable units in a project. The DBL promotes the construction of housing for low-income families, seniors, students, and other disadvantaged segments of the population. Assembly Bill (AB) 2345, which became effective January 1, 2021, amended the State DBL, found in Government Code 65915. Under AB 2345, the maximum available density bonus for projects not composed exclusively of affordable housing increased from 35 to 50 percent, where additional affordable units are built. To receive the maximum 50 percent density bonus, a project must comply with unit replacement requirements and set aside at least (1) 24 percent of units for low-income households, (2) 15 percent of units for very low-income households, or (3) 44 percent of for-sale units for moderate-income households. Bonuses between 35 and 50 percent are granted on a sliding scale, while current affordability requirements to obtain a lesser bonus will remain unchanged from the DBL. California Government Code Section 65302

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address

the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of greenhouse gas (GHG) emission reduction targets for the transportation sector set forth in AB 32. It establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPO) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential or mixed-use residential projects, which help achieve AB 32 goals to reduce GHG emissions.

Regional

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

The Southern California Association of Governments (SCAG) is the designated regional planning agency for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. SCAG is a joint powers agency with responsibilities pertaining to regional issues. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, land use, sustainability, and economic development.

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. Connect SoCal presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. Connect SoCal contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall

quality of life. These benefits include but are not limited to a five percent reduction in vehicle miles traveled (VMT) per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of Connect SoCal, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTA's)[1] by six percent and the share of new job growth in HQTAs by 15 percent. According to SCAG, the Project Site is located within an HQTA.[2]

Local

City of Culver City General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. The City's General Plan includes nine elements that have been updated at various points between 1968 and 2014. The City's General Plan includes the Land Use Element (adopted in 1996 and amended through 2004), the Circulation Element (amended through 1995), the Housing Element (approved in 2022), the Open Space Element (approved in 1996), the Noise Element (approved in 1996), Conservation Element (adopted in 1973), Seismic Safety Element (adopted in 1974), Public Safety Element (adopted in 1975), and Recreation Element (adopted in 1968). The City's General Plan elements and policies relevant to the topic of land use and open space are discussed below. Other General Plan elements and policies related to topics addressed in this Draft EIR are discussed in applicable sections in Chapter 4, *Environmental Impact Analysis*. The Circulation Element is addressed in Section 4.11, *Transportation,* elements and policies relevant to the topic of Housing are addressed in Section 4.9, *Population and Housing,* and Noise and Public Safety Elements are addressed in Sections 4.8, *Noise*, 4.10.1, *Fire Protection*, and 4.10.2, *Police Protection,* of this Draft EIR.

The City is currently in the process of comprehensively updating its General Plan to respond to changing needs and conditions in the City and region, and to reflect new state laws. The current General Plan update is the first time all of the elements are to be updated at one time. Since the General Plan Update is not yet adopted, the analysis in this section compares the Project to the current General Plan.

However, for informational purposes, the draft Land Use Element under consideration as part of Culver City's General Plan 2045 Update, includes the draft Land Use Map and Land Use designations with appropriate draft densities. The Project Site's draft land use designation is Mixed-Use High which permits 100 dwelling units per acre, consistent with the 2022 Housing Element preferred designation and density.

Land Use Element

The Land Use designation of the Project Site is Commercial - Regional Center. This designation allows large-scale commercial uses and is intended to support existing and anticipated regional-

[1] HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minute or less service frequency during peak commuting hours.

[2] SCAG GIS data (High Quality Transit Areas (HQTA) 2045 – SCAG Region) available online. https://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1/explore. Accessed November 13, 2023.

serving commercial developments. The Commercial - Regional Center designation is intended to support existing and anticipated regional-serving commercial developments. The designation is characterized by areas with a two-to three-story height limit, recognizing the proximity to residential neighborhoods, and other areas with up to a 56-foot height limit.

The surrounding areas to the north of the Project Site across Hannum Avenue and west and south of the Project Site (east side of Buckingham Parkway) have a General Plan land use designation of Commercial - Regional Center. The multi-family uses across Buckingham Parkway to the east of the Project Site are designated by the General Plan for Planned Residential Development use, while the Fox Hills Parkette has an Open Space land use designation. The Commercial - Regional Center along Hannum Avenue reflects the long-standing existence of regional-serving commercial uses within this area of the City.[3]

As indicated in the Land Use Element, Figure LU-12, the Project Site is located within the Fox Hills Sub-Area of the City. Issues specific to the Fox Hills Sub-Area, pertain to a lack of connection to other areas in the City, safety, and moderate-income housing opportunities. No specific objectives or policies were identified for or are directly applicable to the Project Site.

For informational purposes, as stated above, the draft Land Use Element under consideration as part of Culver City's General Plan 2045 Update, the Project Site's draft land use designation is Mixed-Use High and permitted density is 100 dwelling units per acre, consistent with the 2022 Housing Element preferred designation and density.

Housing Element

The Housing Element was created to provide an assessment of current and future housing needs, and the constraints in and resources for meeting those needs. It also identifies and prioritizes the housing needs of the City and outlines the goals, policies, and programs to address those needs while balancing community character, objectives, and resources. State law requires Housing Elements to be updated at least every eight years to reflect a community's changing housing needs. The most recent update was approved in October 2022 and covers an eight-year period, extending from October 2021 through October 2029. The primary issues addressed in the Housing Element include: 1) preservation and improvement of the existing housing stock, 2) housing availability for special needs populations, 3) planning for a sufficient supply of new housing to meet the city's fair share of regional need, and 4) fair housing. The 2021-2029 Housing Element indicated that the total housing growth need for the City during the 2021-2029 planning period is 3,341 units. Under the approved Housing Element, the Project Site is designated as Mixed-Use High. Per the City's 2021-2029 Housing Element, Mixed-Use High land uses are permitted to develop up to 100 units per acre.

Open Space Element

The intent of the Open Space Element is to protect, expand, and enhance, visible and usable open space resources. The Open Space Element identifies existing City resources; provides open space

[3] City of Culver City, General Plan Land Use Element, adopted 1996, amended through 2004, page LU-20, https://www.culvercity.org/files/assets/public/v/1/documents/planning-amp-development/advance-planning/general-plan/landuseelement.pdf. Accessed September 7, 2023.

definitions and standards; and presents goals, objectives and open space policies.[4] Objective 1 addresses open space protection and acquisition, Objectives 2 and 3 address active and passive recreation, respectively, and Objective 4 addresses natural areas. Policy 2.C of the Open Space Element encourages private sponsorship of bikeway or public park land improvements in exchange for development incentives. In addition, Policy 3.E is to provide seating, bike rack, and drinking fountains in passive recreation areas. The Open Space Element also addresses the streetscape, which is implemented through the City's Bicycle and Pedestrian Action Plan, the Urban Forest Master Plan, and the Municipal Code.

Culver City Bicycle & Pedestrian Action Plan

The City updated the Bicycle & Pedestrian Master Plan with the Culver City Bicycle & Pedestrian Action Plan (Action Plan) which received public input from 2017 through 2019. The Action Plan was adopted by the City Council in June 2020.[5] The Action Plan establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Action Plan aims to provide a safe, convenient, and accessible active transportation network. The Action Plan includes goals to support increased access to neighborhood destinations and transit stations, empowering residents to live a more active lifestyle, and increasing affordability and collaboration for transportation within the community. Both sides of Hannum Avenue, adjacent to the Project Site, contain a Class II Bike lane. The approved Action Plan shows that Buckingham Parkway between Hannum Avenue and Green Valley Circle, immediately adjacent to the Project Site, are planned as Class IV Separated Bikeways.[6] Section 4.11, *Transportation*, of this Draft EIR includes a list of applicable actions set forth in the Action Plan that are applicable to the Project, as well as a Project consistency analysis with these actions.

Culver City Urban Forest Master Plan

The Culver City Urban Forest Master Plan (UFMP) is a comprehensive long-term management plan that includes designations of tree species to be planted on each street segment when an existing tree must be removed, and best management practices for tree planning, preservation, and maintenance. In addition, the UFMP includes recommendations for green connections throughout the City to encourage recreation, walking, biking and public transit use. Recommendations are also provided for plant palettes and planting structure, places of priority, designations of trees and plants to assist with wayfinding and placemaking, and action areas and strategies to be implemented by the City in public areas.[7] As indicated in the UFMP, in the vicinity of and adjacent to the Project

4 City of Culver City, General Plan Open Space Element, adopted 1996, amended through 2004, https://www.culvercity.org/files/assets/public/v/1/documents/planning-amp-development/advance-planning/general-plan/openspaceelement.pdf. Accessed September 7, 2023.

5 City of Culver City, Bicycle & Pedestrian Action Plan, June 2020, https://www.culvercity.org/files/assets/public/v/1/documents/public-works/mobility/2021-10-cc-bikepedplan-app2020-v10-final.pdf. Accessed September 7, 2023.

6 As defined by Caltrans, a Class IV separated bikeway is an on-street facility that is physically separated from other motor vehicle traffic by a vertical element or barrier, such as a curb, bollards, or vehicle parking aisle.

7 City of Culver City, Culver City Urban Forest Master Plan, 2015, https://www.culvercity.org/files/sharedassets/public/v/1/city-hall/culver_city_urban_forest_master_plan.pdf. Accessed September 7, 2023.

Site, Hannum Avenue and Buckingham Parkway are designated as proposed bicycle routes, where additional trees and landscaping are recommended to provide shade and aid in wayfinding.[8]

City of Culver City Municipal Code

The Culver City Zoning Code (Title 17 of the Culver City Municipal Code [CCMC]) implements the policies of the General Plan by classifying and regulating the uses of land and structures within the City. The zoning designation of the Project Site is Regional Business Park (CRB), which is consistent with the Regional Center land use designation in the General Plan. The CRB Zoning District identifies areas appropriate for large-scale office and business park developments with shared parking, including specific light industrial uses and does not permit residential uses.

Adjacent zoning designations include CRB directly across Hannum Avenue to the north and to the west of the Project Site. Zoning designations east and south of the Project Site include RHD (Residential High Density Multiple) across Buckingham Parkway and Open Space (OS) to the northeast (Fox Hill Parkette). Across Hannum Avenue to the northeast is zoned CN (Commercial Neighborhood).

CCMC Sections 17.240.010 and 17.240.015 describe the purpose and requirements of the Culver City Planned Development (PD) District as allowing large scale residential and commercial complexes within a physically integrated and contiguous area and which may only be applied to sites of 1 acre or greater. Development requires the approval of a Comprehensive Plan through a rezoning of the site. No building may exceed 56 feet in height, and all utilities within the limits of a PD zone must be located underground. The allowed uses and development standards for PD districts are developed as part of the project approval process.

CCMC Section 17.560, Comprehensive Plans, provides requirements and procedures for reviewing Comprehensive Plans, which allow for flexibility in the application of Zoning Code standards to proposed development. Per the Zoning Code (Title 17 of the CCMC), a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site planning and design and to support more effective responses to the settings of such properties and other environmental considerations.

Existing Conditions

The Project Site is currently occupied by an approximately 30,672 square foot two-story office building built in the late 1970s. The remainder of the Project Site includes surface parking (111 total parking spaces) and associated landscaping. The sidewalks adjoining the Project Site to the north, west, and south are landscaped with street trees and trees are scattered throughout the existing surface parking lot. The office building and surface parking uses are on relatively flat graded land, however, Buckingham Parkway slopes downward from north to south, with the northernmost elevation (at its intersection with Hannum Avenue) at approximately 128 feet above mean sea level (amsl) and the southernmost elevation (near Windsor Way) at approximately 103 feet amsl. Thus, the topographical street elevation decreases by approximately 25 feet from north to south. A landscaped slope at varying widths up to approximately 50-feet wide and heights up approximately

[8] City of Culver City, Culver City Urban Forest Master Plan, 2015, page 164.

17 feet high traverses along the Project Site's eastern edge along Buckingham Parkway. Existing vehicle access to the Project Site is provided via two ingress and egress points, which are located along Hannum Avenue and Uplander Way, via an access easement through the adjacent property to the west.

As discussed above, the General Plan land use designation of the Project Site is Commercial - Regional Center. **Figure 4.7-1**, *Project Site and Surrounding Land Use Designations,* illustrates General Plan land use designations for the Project Site and surrounding areas. The zoning designation of the Project Site is Regional Business Park (CRB), which is consistent with the Regional Center land use designation in the General Plan. **Figure 4.7-2**, *Zoning on the Project Site and in the Surrounding Area,* illustrates the zoning designations for the Project Site and surrounding uses.

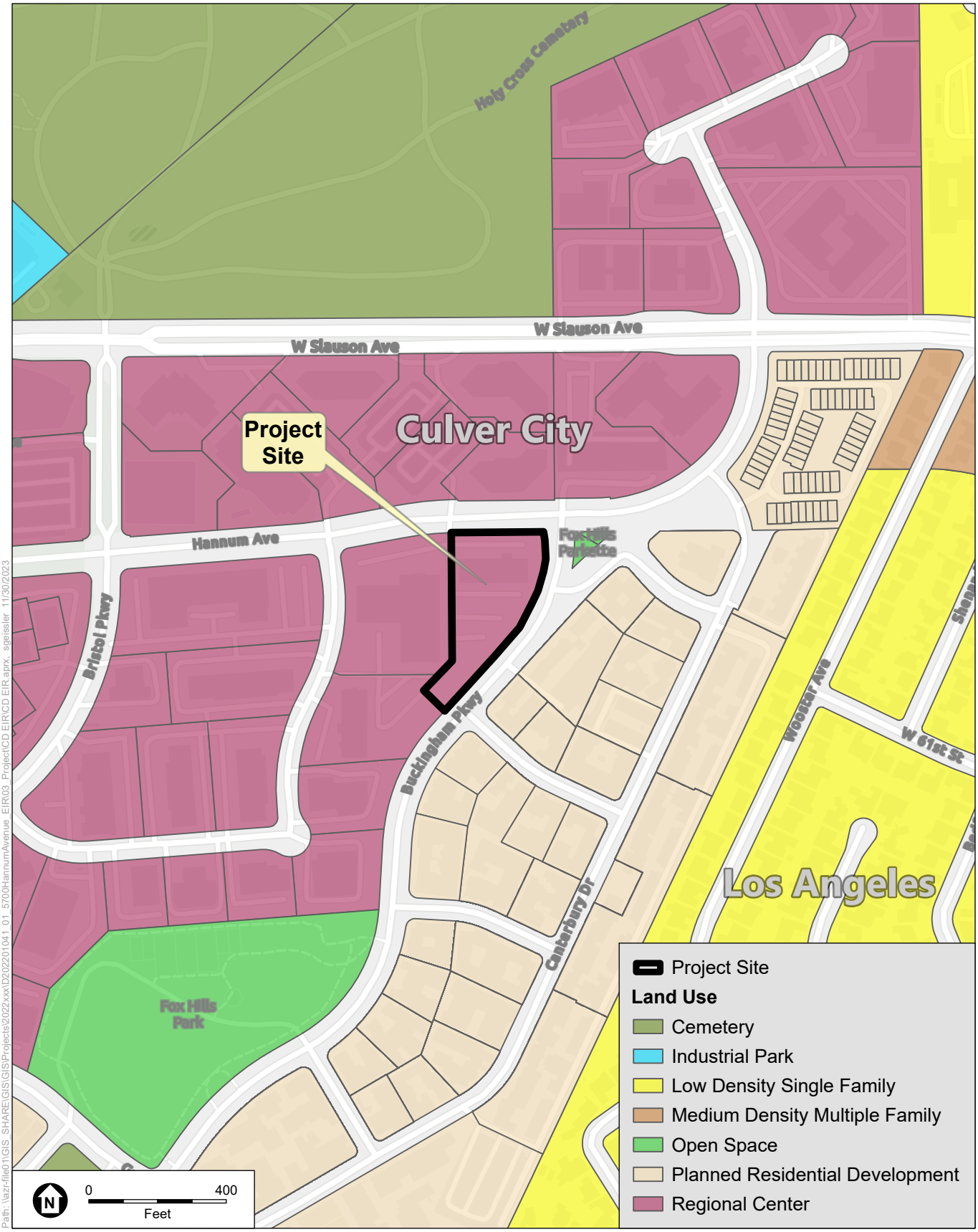
A Tree Inventory Report was prepared for the Project and is included in Appendix A of the Initial Study (see Appendix A of this Draft EIR for a copy of the Initial Study). No native or heritage trees were observed during the tree survey. A total of 119 trees are located within the Project Site including carrotwood, Canary Island Pine, Brazilian pepper, olive, weeping bottlebrush, paperbark, and podocarpus were recorded as part of the survey. Fourteen (14) carrotwood street trees were observed along Buckingham Parkway and all others were observed throughout the Project Site. There are no street trees on Hannum Avenue.

As discussed in detail in Section 4.11, *Transportation*, of this Draft EIR, the Project Site and local area is served by five bus lines, which include City Bus Lines 2, 3 and 5C2, as well as Los Angeles Bus Local Lines 108 and 110. These bus lines are shown in Figure 4.11-1, *Existing Transit Service*, of this Draft EIR. The Culver City Transit Center is also located approximately 0.6 miles west of the Project Site, but is not in one of the City's four key Transit Priority Areas (TPA) identified in the City's July 13, 2020 Transportation Study Criteria and Guidelines. Also, adjacent to the Project Site, both sides of Hannum Avenue contain a Class II Bike lane. Additionally, a Class II bike lane follows both sides of Centinela Avenue from Green Valley Circle to Bristol Parkway, as shown in Figure 4.11-2, *Existing Bicycle Facilities*, in Section 4.11, *Transportation*, of this Draft EIR. Pedestrian access is provided via sidewalks located along Hannum Avenue, Buckingham Parkway, and Uplander Way.

Surrounding Uses

The Project Site is located in an urban area and represents infill redevelopment at the southwest corner of the intersection at Hannum Avenue and Buckingham Parkway. The area surrounding the Project Site is developed primarily with office, business park and residential uses. Land uses located adjacent to the Project Site include the following:

- North – Land uses to the north across Hannum Avenue have a General Plan land use designation of Commercial - Regional Center. Office uses directly north of the site are part of the larger office complex known as Corporate Pointe, which is bounded by Hannum Avenue to the west and south, Bristol Parkway to the south and east, and Slauson Avenue to the north. Within Corporate Pointe, between Bristol Parkway and Buckingham Parkway, there are six office buildings (up to 12-stories) and three parking structures (up to 8-stoies).



SOURCE: City of Culver City/Los Angeles; ESA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.7-1
Project Site and Surrounding Land Use Designations

ESA



SOURCE: City of Culver City/Los Angeles; ESA, 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.7-2
Zoning on the Project Site and in the Surrounding Area

ESA

- East – Land uses to the east across Buckingham Parkway include multi-family residential (up to 4-stories) uses and the Fox Hills Parkette. The multi-family uses are designated by the General Plan for Planned Residential Development use, while the Fox Hills Parkette has an Open Space land use designation.
- West – A business park building and surface parking lot are located immediately adjacent to the west of the Project Site. This area has a General Plan land use designation of Commercial – Regional Center.
- South – Because of the curved nature of Buckingham Parkway, the uses south of the Project Site are considered to include multi-family residential uses (up to 4-stories) across Buckingham Parkway, which are designated by the General Plan for Planned Residential Development use.

See Figures 4.7-1 and 4.7-2 for illustrations of the General Plan land use and zoning designations, respectively, of the surrounding land uses.

4.7.3 Environmental Impacts

Thresholds of Significance

The following threshold of significance is based on the Environmental Checklist contained in Appendix G of the CEQA Guidelines. A project would result in significant adverse impacts related to Land Use and Planning if it would:

- **LU-1** Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Potentially significant impacts related to the Project's potential to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect are discussed and analyzed further below.

The City determined in the Initial Study that the following environmental issue area would result in no impacts or less-than-significant impacts and, therefore, is scoped out of this Draft EIR. Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding the following issue area:

Would the Project:

- Physically divide an established community.

As detailed in the Initial Study, provided in Appendix A-2 of the Draft EIR, the Project Site is currently developed with a two-story office building, surface parking and ornamental landscaping. The Project vicinity is urbanized and generally built out and is characterized by a mix of office, business park and residential uses and includes a fully developed roadway system. As such, the Project would represent redevelopment and infill development of an already developed site. Furthermore, the Project would not close any public streets or otherwise alter established infrastructure in the area. The Project would encourage multiple modes of travel by providing bicycle access and bicycle parking spaces. Therefore, the Project would not physically divide an established community. No further analysis of this issue is therefore included in this Draft EIR.

Methodology

The analysis of potential land use impacts considers consistency of the Project with adopted plans, regulations, and development guidelines, and in some instances advisory guidance, which are applicable to the Project Site and the Project and that have been adopted for the specific purpose of avoiding or mitigating an environmental effect.

CEQA Guidelines Section 15125(d) requires an EIR include a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Separately, Appendix G recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Importantly, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. As provided in CEQA Guidelines Section 15126.2 "an EIR shall identify and focus on the significant effects of the proposed project on the environment." An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

> *"An inconsistency between a proposed project an applicable plan is a legal determination not a physical impact on the environment. …if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor."*

Under the Planning and Zoning law (Government Code Section 65000 et seq.) strict conformity with all aspects of a plan is not required. Plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Generally, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

This Land Use section evaluates Project consistency with applicable plans, policies and regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect. These include SCAG's Connect SoCal, the Culver City General Plan and the 2021-2029 Housing Element, the Culver City Bicycle & Pedestrian Action Plan, the Culver City UFMP, and the Culver City Municipal Code. With the exception of the Culver City UFMP and Culver City Municipal Code, the applicable plans, policies and regulations are evaluated in detail in Tables 4.7-1 through 4.7-3. The results and determination of whether the Project would cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect considers the Project's potential to conflict with applicable plans/policies/regulations as shown on the tables and summarized in the impact analysis below. Policies relevant to land use and planning within these planning documents is provided within this Land Use and Planning section. To the extent that the Projects' potential to conflict with a plan, program or policy is analyzed in another section of the EIR, that plan is not

further discussed in the Land Use Section. For example, consistency with air quality plans is analyzed in Section 4.2, *Air Quality,* of this Draft EIR. However, the UFMP and the Culver City Bicycle & Pedestrian Action Plan are also evaluated in Section 4.1, *Aesthetics*, and 4.11, *Transportation*, respectively, with analyses pertinent to those issues areas provided therein.

Project Design Features

There are no Project Design Features relative to land use and planning.

Analysis of Project Impacts

Threshold LU-1: The Project would have a significant impact if it would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Impact Analysis

SCAG's Connect Socal

SCAG's Connect SoCal incorporate goals that are applicable to the Project. These SCAG goals are discussed below. **Table 4.7-1,** *Consistency of the Project with Applicable Goals of Connect Socal*, provides a detailed analysis of the Project's consistency with applicable Connect SoCal goals.

TABLE 4.7-1
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS OF CONNECT SOCAL

Strategy	Would the Project Conflict?
Goals	
Encourage regional economic prosperity and global competitiveness.	**No Conflict.** This goal pertains to SCAG funding and policies. The Project would not adversely affect the capacity to encourage regional economic prosperity and global competitiveness. As the Project does provide regional economic benefits and does so in a manner consistent with other Connect SoCal goals as discussed below, the Project would support SCAG policies related to this goal.
Improve mobility, accessibility, reliability, and travel safety for people and goods.	**No Conflict.** The location of the Project Site, in proximity to the Culver City Transit Center and multiple regional and local bus lines, the I-405, and bicycle facilities, would serve to improve mobility, accessibility, reliability, and travel safety for people and goods in support of this goal. Also, the Project would provide approximately 5,600 sf of retail use which would provide goods to the residents on-site and adjacent neighboring land uses.
Enhance the preservation, security, and resilience of the regional transportation system.	**No Conflict.** The proximity of the Project Site to alternative transit modes, including regional and local bus lines, would support the region's transportation investment and the sustainability of the regional transportation system.
Increase person and goods movement and travel choices within the transportation system.	**No Conflict.** The location of the Project Site, in proximity to the Culver City Transit Center, multiple regional and local bus lines, the I-405, and bicycle facilities, would support an increase in person and goods movement and increase the available travel choices within the transportation system.

TABLE 4.7-1
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS OF CONNECT SOCAL

Strategy	Would the Project Conflict?
Reduce greenhouse gas emissions and improve air quality.	**No Conflict.** The Project would provide a pedestrian-friendly design, promote access from the nearby transit options, as well as provide bicycle parking and storage facilities for Project residents, employees, and visitors. The Project would also be designed to include electric vehicle parking and charging stations and a solar photovoltaic per the City's Green Building Ordinance and CALGreen standard. Furthermore, as discussed in Section 4.11, *Transportation*, the Project would implement a Transportation Demand Management Program as a project design feature to VMT. All of these features would reduce GHG emissions and improve air quality.
Support healthy and equitable communities.	**No Conflict.** As noted above, the Project would implement design features to reduce air quality and GHG impacts, including compliance with the City's Green Building Ordinance and CALGreen standard (refer to Sections 4.2, *Air Quality*, and 4.4, *Greenhouse Gas Emissions*, of this Draft EIR). The Project includes the provision bicycle parking spaces and associated amenities and pedestrian amenities in proximity to the Culver City Transit Center and multiple regional and local bus lines as well as commercial points of interest including the Westfield Culver City Mall and commercial businesses along Hannum Avenue, thereby promoting a healthier and more active lifestyle. The Project would also provide a gym for Project residents.
Adapt to changing climate and support an integrated regional development pattern and transportation network.	**No Conflict.** The Project would develop mixed-use residential and retail uses within proximity to the Culver City Transit Center and multiple regional and local bus lines, the I-405, and bicycle facilities. The Project's accessibility to numerous alternative transportation facilities and provision of bicycle facilities would support an integrated regional development pattern and transportation network that would reduce GHG emissions.
Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**No Conflict.** This goal pertains to SCAG leveraging new transportation technologies and data-driven solutions that result in more efficient travel. The Project would not adversely affect SCAG's ability to develop more efficient travel consistent with this goal.
Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**No Conflict.** Development of the proposed mixed-use development with residential and retail uses would include diverse housing types in support of this goal, including 282 market-rate units and 27 units affordable to very low income households, within proximity to multiple transportation options. The Project would, thus, not conflict with SCAG's goal to encourage the development of diverse housing types in an area with multiple transit options.
Promote conservation of natural and agricultural lands and restoration of habitats.	**No Conflict.** As detailed in the Initial Study, provided in Appendix A-2 of this Draft EIR, the Project Site does not contain agricultural uses or related operations, nor is the Project Site located within a designated riparian habitat or support suitable habitat for candidate, sensitive, or special status species; as such, the development of the Project would not conflict with this goal to promote conservation of natural agricultural lands and restoration of habitats.
Focus Growth Near Destinations and Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	**No Conflict.** The Project represents an intensification of development in proximity to public transit options including the Culver City Transit Station, numerous bus lines and bicycle lanes, and as such, would not conflict with this strategy that emphasize land use patterns facilitating multi-modal access to work and other destinations.
Plan for growth near transit investments and support implementation of first/last mile strategies.	**No Conflict.** The Project would not conflict with strategies that plan for growth near transit investments and support implementation of first/last mile strategies. The Project Site is located in close proximity to the Culver City Transit Center, multiple regional and local bus lines, and bicycle facilities. Connect SoCal recommends an increase in the number of trips accomplished by walking, bicycling, and the use of

TABLE 4.7-1
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS OF CONNECT SOCAL

Strategy	Would the Project Conflict?
	micro-mobility devices to reduce automobile vehicle miles traveled (VMT) (Connect SoCal, page 69). These strategies include building physical infrastructure such as local and regional bikeways, sidewalk improvements, and first-last mile connections to transit. According to Connect SoCal, these strategies would also improve air quality and public health by reducing emissions and increasing levels of physical activity. Because of its proximity to transit, the Project would encourage walking between the transit options and the Project Site. In addition, with public sidewalk improvements and safe vehicle egress at all driveways, and proximity to employment opportunities and services in the local area, the Project would encourage walking (a first mile/last mile strategy) between the Project Site and public transit, as well as nearby employment opportunities. The Project would not conflict with Connect SoCal strategy to reduce automobile vehicle miles, reduce air emissions, and improve public health through first/last mile strategies. Therefore, the Project would not conflict with policies that encourage growth near transit investments and support implementation of first/last mile strategies.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	**No Conflict.** The Project would not conflict with policies that prioritize infill redevelopment to accommodate new growth, increase amenities and connectivity in existing neighborhoods. The Project would represent an infill development that would increase amenities, including public amenities, and connectivity in the existing area. As an infill use, it would not result in urban sprawl or other effects that would conflict with the objectives of Connect SoCal to reduce vehicle miles and improve air quality. Therefore, the Project would not conflict with policies that prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	**No Conflict.** The Project would not conflict with strategies that encourage design and transportation options that reduce the reliance on, and number of, solo car trips. The Project would implement a transportation demand management (TDM) Program to reduce the Project's single occupant vehicle trips and increase the trips arriving via alternative modes of transportation (e.g., walking, bicycle, carpool, vanpool, and transit). The Project's TDM Program (TRAF-PDF-2) includes a comprehensive program of measures, design features, transportation services, education programs, and incentives intended to reduce the effect of Project traffic from residents, employees, and visitors to the Project Site during the most congested time periods of the day. The TDM measures include, but not limited to, the following: Transportation Information Center (TIC); Bicycle Parking and Amenities, which includes 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015; Pedestrian-Friendly Environment; Employee Parking; Bus Stop Improvements. Additional TDM strategies that will be offered by the Project to further reduce VMT and reliance on single-passenger vehicles, and help future residents and employees manage each TDM element and maximize program participation include, but may not be limited to: Project Transportation Coordinator and Transportation Information Packet for New Residents and Employees (see Section 4.11, *Transportation*, of this Draft EIR for a detailed explanation of all TDM measures contained in TRAF-PDF-2). Therefore, the Project would not conflict with policies that encourage design and transportation options that reduce the reliance on and number of solo car trips.

TABLE 4.7-1
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS OF CONNECT SOCAL

Strategy	Would the Project Conflict?
Support Implementation of Sustainability Policies	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	**No Conflict.** The Project would be designed with Project Design Feature GHG-PDF-1 and be required to comply with the Culver City Green Building Program and ordinances where the Project would achieve the USGBC LEED Certified performance level or higher to improve building energy efficiency, and design features would include energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. The Project's environmentally sustainable building features and construction protocols would meet the requirements of Culver City's mandatory Green Building Program requirements and CALGreen Building Code. Sustainability features would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable, and EV ready spaces; and bicycle facilities that would meet City requirements; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; active indoor/outdoor air circulation, and adequate daylight. These features would reduce energy and water usage and hydrological hazards. Therefore, the Project would support local climate adaptation and hazard mitigation plans, as well as implement policies that improve community resiliency to climate change and natural hazards.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	**No Conflict.** The Project would remove the existing asphalt paved surface parking lot, which contributes to heat island effects. The Project would incorporate an extensive landscaping program in accordance with CCMC requirements. Existing canopy street trees would remain along Buckingham Parkway and Hannum Avenue as well as 56 new trees interior to the Project Site. Planted areas within the Project perimeters and within the interior courtyard, would serve to minimize heat island effects and promote carbon sequestration. The Project's building design would include a solar system and EV parking and charging facilities. All of The Project's landscaping would emphasize the use water-saving native plantings. contribute to passive cooling strategies and enhanced biodiversity. Therefore, the Project's landscaping and building design would not conflict with policies for renewable energy and reduction of heat islands and carbon sequestration.
Promote more resource efficient development focused on conservation, recycling and reclamation.	The Project would be designed with Project Design Feature GHG-PDF-1 and be required to comply with the Culver City Green Building Program and ordinances where the Project would achieve the USGBC LEED Certified performance level or higher to improve building energy efficiency, and design features would include energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. Sustainability features would include water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use. With the implementation of these features, the Project would not conflict with policies that support resource efficient development focused on conservation, recycling, and reclamation.
Preserve, enhance and restore regional wildlife connectivity	**No Conflict.** The Project is located within a developed, urban area. Wildlife in the surrounding area is limited to migrating species, such as birds, which do not access the area through ground-level corridors. Although the Project would not block or divert any existing wildlife ground corridors, the Project's tree program could accommodate migrating bird species that frequent the region. Therefore, the Project would not conflict with strategies to enhance and restore regional wildlife connectivity.

TABLE 4.7-1
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS OF CONNECT SOCAL

Strategy	Would the Project Conflict?
Reduce consumption of resource areas, including agricultural land	**No Conflict.** The Project is located within an existing developed site, surrounded by existing urban development. Therefore, the Project would not consume natural areas or agricultural land and would not conflict with the policy to reduce consumption of resource areas, including agricultural land.
Identify ways to improve access to public park space	**No Conflict.** The Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza fronting Hannum Avenue. The Project operator would maintain the public open space area's hardscape and landscape, as well as manage any commercial vendors using the amenity area. With the incorporation of an outdoor open space area for public use, the Project would not conflict with programs to Identify ways to improve access to public park space.

SOURCE: ESA, 2023.

Based on the analysis presented in Table 4.7-1, the Project would not conflict with policies/strategies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to Connect SoCal would be less than significant.

City of Culver City General Plan

As shown in Figure 4.7-1, the Culver City General Plan land use designation for the Project Site is Regional Center, which allows large-scale commercial uses and is intended to support existing and anticipated regional-serving commercial developments. The Regional Center land use designation does not support residential and/or residential mixed-use projects.

The Project is requesting a discretionary approval from the City to permit the Project's proposed mix of multi-family and retail uses, in the form of a General Plan Amendment Map to re-designate the Project Site from Regional Center to General Corridor. The General Corridor designation would permit the Project's proposed uses and is consistent with the proposed zoning designation amendment from CRB to Planned Development (PD). For informational purposes, a draft General Plan Land Use map was released by the City on September 29, 2023 which largely conforms to the approved Housing Element map. Under both the approved Housing Element map and the draft General Plan Land Use map, the Project Site would be designated as Mixed-Use High, which would allow 100 dwelling units per acre. The draft General Plan also limits nonresidential floor area ratio (FAR) to 4.0:1. The Project would have a FAR of 3.73:1.

The Project would provide a mixed-use development consisting of 309 units of multi-family housing, of which 27 would be affordable units, as well as 5,600 sf of retail use. The housing units would range in size and would include studio, one-bedroom and two-bedroom units, thereby providing housing opportunities for all members of the community. The commercial uses would include retail, which would contribute to the economic diversity within the City. The Project would redevelop the Project Site with a site plan that would revitalize the area through a cohesive design that would integrate uses and provide various community benefits, including 7,507 sf of publicly accessible open space and affordable housing, as well as streetscape improvements. The Project would activate the pedestrian environment in the area by providing ground level commercial space that fronts on the streets, and

publicly accessible open space areas. The provision of publicly accessible open space at the intersection of Hannum Avenue and Buckingham Parkway would contribute to a sense of place and would provide a gathering area that would liven the pedestrian environment (see Figure 2-4). In addition, the Project would enhance the Project frontage sidewalks with street trees, lighting, and aesthetic treatments on building facades. Refer to Section 4.1, *Aesthetics*, for further discussion of the Project's design characteristics and renderings of the proposed building.

Table 4.7-2, *Comparison of the Project to Applicable Policies of the Culver City General Plan*, evaluates the consistency of the Project with objectives and policies of the adopted General Plan Land Use Element, Housing Element, Open Space Element, and Noise Element.

TABLE 4.7-2
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY GENERAL PLAN

Objective/Policy	Would the Project Conflict?
Land Use Element	
Goal: Residential neighborhoods that offer residents the qualities of a peaceful, small-town environment.	
Objective 1. Neighborhood Character. Protect the low-to medium density character of residential neighborhoods throughout the City • **Policy 1.B.** Protect the City's residential neighborhoods from encroachment of incompatible land uses and environmental hazards which may have negative impacts on the quality of life (such as traffic, noise, air pollution, building scale and bulk, and visual intrusions).	**No Conflict.** Development of the Project, which would include both commercial and multi-family residential uses, would serve as a transition between the surrounding residential uses to the east and the commercial uses to the north, west and south. The Project's multi-family residential uses would be similar to the adjacent multi-family uses to the east of the Project Site across Buckingham Parkway, while offering retail uses that could also be used by the adjacent residents. As discussed throughout this Draft EIR, operation of the Project would not result in any long-term significant impacts to the environment or adjacent residential areas. Thus, no long-term environmental hazards which may have negative impacts on the quality of life would occur from Project implementation.
Objective 2. Housing Supply. Encourage the retention and creation of housing throughout the City. • **Policy 2.B.** Continue to allow and encourage multiple family housing opportunities in areas designated for such development.	**No Conflict.** The Project would provide 309 multi-family residences on a property that is designated Regional Center. The Project would require a General Plan Amendment Map to designate the Project Site as General Corridor, which would allow the proposed multi-family residential uses. The multi-family uses allowed under proposed designation is consistent the City's draft General Plan Land Use map released by the City on September 29, 2023 which largely conforms to the approved Housing Element map. Under both the approved Housing Element map and the draft General Plan Land Use map, the Project Site would be designated as Mixed-Use High, which would allow 100 dwelling units per acre. The Project would provide 309 multi-family units and approximately 5,600 sf of commercial floor area. Thus, the Project would encourage and provide multi-family housing opportunities on a site that is contemplated for residential use in its various foreseeable planning documents.
• **Policy 2.E.** Develop standards and guidelines for residential unit development in appropriate commercial areas.	**No Conflict. T**he Project's Comprehensive Plan would incorporate standards to ensure that the proposed mixed-use development would be compatible with the surrounding area. The Comprehensive Plan would include requirements for the Project's proposed uses, setbacks, height, parking, as well as open space and landscape requirements. Per the Zoning Code, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site planning and design and to support more effective responses to the settings of such properties and other environmental considerations. The Comprehensive Plan would be reviewed and approved by the City. The design standards in the Comprehensive Plan have been developed to all the Project to serve as a between the surrounding residential uses to the east and the commercial uses to the north, west and south.

TABLE 4.7-2
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY GENERAL PLAN

Objective/Policy	Would the Project Conflict?
Objective 3. **Affordable Housing.** Encourage the provision of housing opportunities for all members of the community.	**No Conflict.** The Project would provide 309 residential units, of which 27 would be affordable. In addition, the Project would provide a mix of units, with 39 studio units, 180 one-bedroom units, and 90 two-bedroom units. Through the provision of affordable units and a range in unit size, the Project would provide housing opportunities for all members of the community. Therefore, the Project would not conflict with policies related to affordable housing.
Goal: Economic Vitality that serves the community and protects the quality of life.	
Objective 5. **Economic Diversity.** Encourage new business opportunities that expand Culver City's economic base and serve the needs of the City's residential and business community.	**No Conflict.** The Project would redevelop the Project Site with a mix of multi-family residential and retail uses. The Project inclusion of 5,600 sf of new retail floor area would provide new business opportunities in the area that support the Project's residential uses, as well as the neighboring residential and business park/office uses. The Project's proposed 309 residential units would provide much needed housing within the City per the City's updated Housing Element goals and SCAG's 6th Cycle Regional Housing Needs Assessment (RHNA) allocation (see Section 4.9, *Population and Housing*, of this Draft EIR, for further discussion of this issue).
• **Policy 5.D.** Provide development incentives for projects that provide specific community or neighborhood needs.	**No Conflict.** As stated above, the Project would provide much needed housing within the City, including affordable housing. By doing so, consistent with the CCMC, State Density Bonus Law (Gov't Code §65915) and Assembly Bill (AB) 2345, the Project is entitled to receive development incentives including a height increase. The Project is requesting a height increase of 22 feet beyond the maximum allowable height as a development incentive for providing affordable units. With this incentive, the Project would have a height of up to 78 feet due to the existing site topography. In addition to a height incentive due to the Project's inclusion of affordable units, the Project would be available to receive up to a 50 percent density bonus per AB 2345. Per the City's 2021-2029 Housing Element, Mixed-Use High land uses are allowed to develop 100 units per acre. Thus, with the Project Site being 2.23 acres, up to 223 units could be developed. The Project includes 27 units (12 percent of base density) as Very Low Income affordable units. Providing this amount permits a 38.75 percent density increase under AB 2345. At 309 units, the Project would be within the allowed number of units with the density bonus incentives included.
Objective 7. Commercial Centers. Maintain commercial centers that serve the community as well as regional markets. • **Policy 7.B.** Allow existing regional and community centers to upgrade and expand in response to changing market conditions, to maintain their economic viability, with adequate mitigation of impacts to nearby residential neighborhoods	**No Conflict.** The Project would provide 309 multi-family residences on a property that is designated Regional Center. The Project would require a General Plan Amendment Map to designate the Project Site as General Corridor, which would allow the proposed multi-family residential uses. Based on the current market conditions, operation of the existing on-site office uses in no longer a viable financial option. Furthermore, the proposed multi-family and retail uses allowed under the Project's proposed General Corridor designation is consistent the City's draft General Plan Land Use map released by the City on September 29, 2023 which largely conforms to the approved Housing Element map. Under both the approved Housing Element map and the draft General Plan Land Use map, the Project Site would be designated as Mixed-Use High, which would allow 100 dwelling units per acre. The Project would provide 309 multi-family units and approximately 5,600 sf of commercial floor area. Thus, the Project would provide land uses that are consistent with the current market demands and housing needs of the City. Also, as discussed throughout this Draft EIR, operation of the Project would not result in any long-term significant impacts to the environment or adjacent residential areas.

TABLE 4.7-2
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY GENERAL PLAN

Objective/Policy	Would the Project Conflict?
Objective 8. Fiscal Health. Foster the growth of businesses that increase City revenues by promoting attractive, quality retail establishments that serve neighborhood, community and regional markets. • **Policy 8.A.** Support desirable retail establishments in proximity to residential neighborhoods that provide needed goods and services.	**No Conflict.** The Project would result in a mixed-use development with 309 multi-family residential units and approximately 5,600 sf of retail use. The retail use would provide goods and services to Project residents, while also serving residents in the surrounding neighborhoods. Further, the Project would change the character and quality of the existing dated office building and parking lot site to a new, modern high-quality architecturally designed building. See Section 4.1, *Aesthetics*, of this Draft EIR, for further discussion and renderings of the Project's building.
Objective 12. Urban Design. Ensure that new construction and renovation of existing residential and non-residential buildings and streetscapes are accomplished with the highest quality of architectural and site design.	**No Conflict.** The Project would redevelop the Project Site with an integrated, high-quality, mixed-use development that would provide 309 residential units and approximately 5,600 sf of commercial uses. The Project would create an active streetscape through the provision of ground level retail use as well as approximately 7,507 sf of publicly accessible open space. The provision of publicly accessible open space at the intersection of Hannum Avenue and Buckingham Parkway would contribute to a sense of place and would provide a gathering area that would liven the pedestrian environment. The Project's open space areas would include amenities, such as planting areas, walkways, trees, and seating areas. With the provision of open space, the building setbacks would vary on the Site with the retail use close to the street, which would serve to activate the street. Private balconies for the residential units would provide articulation and would break up the building mass. High-quality building materials would be varied and would include concrete, brick veneer, and glass. The overall color palette would be warm and soft, including white, brown, and grey, which would contribute to the architectural look and feel of the structure. Therefore, the Project would not conflict with policies to provide high quality urban design.
Open Space Element	
Objective 3. Passive Recreation. Provide passive recreational open space within walking distance of all City neighborhoods.	**No Conflict.** As indicated above in Policy 5.D, the Project would provide a total of approximately 54,156 sf of open space, including 7,507 sf of publicly accessible open space, which would exceed the minimum requirement of 23,175 sf of common and/or private open space. The 7,507 sf Hannum Plaza at the corner of Hannum Avenue and Buckingham Parkway, would include amenities such as seating and landscape designed to serve residents, visitors, retail space users, and community members. The open space and gathering areas on the Project Site would be within walking distance from nearby neighborhoods. In addition, the Project would provide common open space for Project residents in the form of an amenity deck, community rooms, a gym, and open air courtyard. Therefore, the Project would not conflict with policies to provide passive recreational open space within walking distance of residential neighborhoods.
Housing Element	
Goal 1: A city that proactively provides equitable access to safe, healthy, and affordable housing for all income levels to create a balanced jobs-to-housing ratio and commits to addressing the housing needs of persons experiencing homelessness and special needs populations. **Goal 2:** A city with a variety of rental and ownership housing opportunities that complement and enhance the city's goals for continued economic vitality and prosperity. **Goal 3:** A city that plans to grow sustainably and intelligently by revisiting policies and programs frequently to update and adjust if they are not meeting goals.	**No Conflict.** The Project would redevelop the Project Site with an integrated, high-quality, mixed-use development that would provide 309 residential units of which 27 would be affordable, and approximately 5,600 sf of commercial uses. The Project would not conflict with goals identified in the Housing Element.

TABLE 4.7-2
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY GENERAL PLAN

Objective/Policy	Would the Project Conflict?
Goal 4: A city that affirmatively furthers fair housing to reverse the legacy of segregation and provide housing and opportunity for historically disenfranchised groups.	
Objective 1. Housing Maintenance. Encourage a high level of housing maintenance to promote the availability of decent housing and to protect the quality of neighborhood environments. • **Policy 1.B:** Maintain quality neighborhood living environments throughout the entire city.	**No Conflict.** The Project would redevelop the Project Site with an integrated, high-quality, mixed-use development that would provide 309 residential units and approximately 5,600 sf of commercial uses. The Project would create an active streetscape through the provision of ground level retail use as well as approximately 7,507 sf of publicly accessible open space. The provision of publicly accessible open space at the intersection of Hannum Avenue and Buckingham Parkway would contribute to a sense of place and would provide a gathering area that would liven the pedestrian environment and maintain a quality neighborhood living environment.
• **Policy 1.F:** Promote sustainable development through energy conservation, water consumption, and waste reduction measures to reduce future operating costs, and ensure local regulations support environmental justice that protects public health and open space, and expands the tree canopy.	**No Conflict. T**he Project design incorporates environmentally sustainable building features and construction protocols required by the applicable Culver City Green Building Program and CALGreen Building Code. These standards would reduce energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The Project design would include sustainability features, including energy saving and sustainable design features that would be incorporated into the Project as the proposed buildings would comply with the applicable Title 24 California Code of Regulations. The Project would be designed with Project Design Feature GHG-PDF-1 and be required to comply with the Culver City Green Building Program and ordinances where the Project would achieve the USGBC LEED Certified performance level or higher to improve building energy efficiency, and design features would include energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. As it relates to energy conservation, the Project would include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances. As it relates to water conservation, the Project would incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems. In addition, the Project would include installation of a solar photovoltaic system with 1 kW solar photovoltaic panels per 10,000 sf in order to achieve compliance with the City of Culver City's solar photovoltaic requirement, per the City's Green Building Ordinance and CALGreen standards. In addition, as part of Project Design Feature GHG-PDF-1, the Project would directly support building electrification as the Project will utilize only electricity and no natural gas in all land uses except for the retail space.
Objective 2. Housing Supply. Expand opportunities for developing a variety of housing types. • **Policy 2.A:** Provide for a residential lifestyle that is environmentally sound and aesthetically pleasing and that places a high priority on quality development.	**No Conflict.** The Project would result in a mixed-use development with 309 multi-family residential units and approximately 5,600 sf of retail use. The retail use would provide goods and services to Project residents, while also serving residents in the surrounding neighborhoods. Further, the Project would change the character and quality of the existing dated office building and parking lot site to a new, modern high-quality architecturally designed building. See Section 4.1, *Aesthetics*, of this Draft EIR, for further discussion and renderings of the Project's building.

TABLE 4.7-2
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY GENERAL PLAN

Objective/Policy	Would the Project Conflict?
• **Policy 2.B:** Coordinate the plans, programs, and policies of all city departments to ensure that residential development is orderly, and that new development is adequately and effectively served by a balanced system of transportation, transit, amenities, community facilities, and public services. Residential development must be sensitive to the environmental, recreational, social, and economic needs of the community. The City should promote access, where feasible, to the LA Metro E Line Culver City Station, for new residential development.	**No Conflict.** The Project supports this policy by introducing a development that is conducive to walking, biking, and taking transit. The Project would introduce new bicycle parking and additionally would enhance pedestrian rights-of-way by introducing increased sidewalk widths, publicly available open space as part of the Hannum Plaza, and enhanced streetscape, landscape and street trees along Hannum Avenue and Buckingham Parkway. Existing transit options within close proximity to the Project Site would allow for pedestrian and bicycle access to public transit.
• **Policy 2.C:** Promote mixed use residential development that is sensitive to adjacent residential uses and reinforce the compatible nonresidential uses of the area.	**No Conflict.** The Project would redevelop the Project Site with a mix of multi-family residential and retail uses. The Project inclusion of 5,600 sf of new retail floor area would provide new business opportunities in the area that support the Project's residential uses, as well as the neighboring residential and business park/office uses.
• **Policy 2.D:** Encourage the incremental infilling of residential neighborhoods to enhance housing affordability and supply through the provision of smaller units.	**No Conflict.** the Project would provide 309 residential units, of which 27 would be affordable. In addition, the Project would provide a mix of units, with 39 studio units, 180 one-bedroom units, and 90 two-bedroom units. Through the provision of affordable units and a range in unit size, the Project would provide housing opportunities for all members of the community. Therefore, the Project would not conflict with policies related to housing affordability or supply.
• **Policy 2.E:** Promote programs that seek to provide housing opportunities to meet the needs of people who work in the city.	**No Conflict. T**he Project would provide 309 residential units, of which 27 would be affordable. In addition, the Project would provide a mix of units, with 39 studio units, 180 one-bedroom units, and 90 two-bedroom units. Through the provision of affordable units and a range in unit size, the project would support programs that seek to provide housing opportunities to meet the needs of people who work in the city.
Objective 3. Housing Affordability: Encourage a diverse range of rental and ownership housing opportunities that are compatible with the needs of all socioeconomic segments of the community. • **Policy 3.A:** Encourage the inclusion of affordable housing units in new housing developments by granting incentives as called for by the Zoning Code and the State Density Bonus law.	**No Conflict. T**he Project would provide much needed housing within the City, including affordable housing. By doing so, consistent with the CCMC, State Density Bonus Law (Gov't Code §65915) and Assembly Bill (AB) 2345, the Project is entitled to receive development incentives including a height increase. The Project is requesting a height increase of 22 feet beyond the maximum allowable height as a development incentive for providing affordable units. With this incentive, the Project would have a height of up to 78 feet due to the existing site topography. In addition to a height incentive due to the Project's inclusion of affordable units, the Project would be available to receive up to a 50 percent density bonus per AB 2345. Per the City's 2021-2029 Housing Element, Mixed-Use High land uses are allowed to develop 100 units per acre. Thus, with the Project Site being 2.23 acres, up to 223 units could be developed. The Project includes 27 units (12 percent of base density) as Very Low Income affordable units. Providing this amount permits a 38.75 percent density increase under AB 2345. At 309 units, the Project would be within the allowed number of units with the density bonus incentives included.
• **Policy 3.B:** Actively support affordable housing development by private and non-profit housing developers.	**No Conflict.** The Project would provide 309 residential units, of which 27 would be affordable. In addition, the Project would provide a mix of units, with 39 studio units, 180 one-bedroom units, and 90 two-bedroom units. Through the provision of affordable units and a range in unit size, the Project would provide housing opportunities for all members of the community. Therefore, the Project would not conflict with the development of affordable housing.

TABLE 4.7-2
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY GENERAL PLAN

Objective/Policy	Would the Project Conflict?
• **Policy 3.F:** Encourage an equitable distribution and the production of affordable housing in areas that have historically not accommodated affordable housing or have excluded diverse housing opportunities, especially in the highest opportunity areas, to help overcome historic patterns of segregation. Explore strategies like public funding, incentives, infrastructure investments, and a "Right to Return" program to support historically displaced families and individuals in Culver City with housing.	**No Conflict.** As described above, the Project would provide 309 residential units, of which 27 would be affordable. Through the provision of affordable units and a range in unit size, the Project would provide housing opportunities for all members of the community. Therefore, the Project would not conflict with the development of affordable housing.
• **Policy 3.J:** Incentivize housing development on surface parking lots on underused sites that would not displace existing residents.	**No Conflict. T**he Project would redevelop the Project Site with a mix of multi-family residential and retail uses. The Project Site is currently developed with an existing two-story office building and associated surface parking. Through the provision of residential uses, the Project would provide housing opportunities on the Project Site that is not currently developed for residential use. Therefore, the Project would not displace existing residents or conflict with this policy.
Objective 4. Housing Access: Improve access to quality housing for all members of the community by eliminating discrimination, reducing governmental and non-governmental constraints, increasing the number of affordable housing units, and supporting access to emergency shelters • **Policy 4.A:** Promote efforts aimed at the development of housing available to all income and age levels.	**No Conflict.** The Project would provide 309 residential units, of which 27 would be affordable. In addition, the Project would provide a mix of units, with 39 studio units, 180 one-bedroom units, and 90 two-bedroom units. Through the provision of affordable units and a range in unit size, the Project would provide housing opportunities for all members of the community. Therefore, the Project would not conflict with this policy.
• **Policy 4.B:** Promote housing opportunities for households of all income levels to help maintain the family-oriented character of the city into the future.	**No Conflict.** As described above, the Project would provide 309 residential units, of which 27 would be affordable. In addition, the Project would provide a mix of units, with 39 studio units, 180 one-bedroom units, and 90 two-bedroom units. Through the provision of affordable units and a range in unit size, the Project would provide housing opportunities for all members of the community. Therefore, the Project would not conflict with this policy.
Noise Element	
Goal: A Community that Minimizes Noise Disturbance.	
Objective 1. Land Use Compatibility. Ensure that compatibility of land uses with regard to noise sources and receptors.	**No Conflict.** The Project would consist of multi-family and retail uses, a central internal courtyard, and amenity deck on the 6th floor and the publicly accessible Hannum Plaza. The proposed uses would not include uses such as entertainment venues, restaurants, manufacturing, or other uses that could potentially generate high noise levels. Adjacent uses include business park, office and multi-family residential uses. The most sensitive receptors would be the residential uses to the east and south of the Project Site across Hannum Avenue. As discussed in Section 4.8, *Noise*, of this Draft EIR, the operation of the Project would not increase noise levels that would exceed the City's noise standards at any sensitive receptor site. Therefore, the Project would not conflict with policies to ensure compatibility of land uses with regard to noise sources and receptors.

TABLE 4.7-2
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY GENERAL PLAN

Objective/Policy	Would the Project Conflict?
Objective 2. Stationary Noise Sources. Protect those areas that are or may be subject to unacceptable noise from stationary noise sources.	**No Conflict.** The highest stationary noise generator in the operation of the Project would be from heating and cooling systems. The publicly accessible, privately maintained Hannum Plaza would not accommodate large gatherings of people so as to cause unacceptable noise to residents across Hannum Avenue. The central courtyard, which could result in larger gatherings would be generally shielded from residential uses to the east and south across Hannum Avenue. As further discussed in Section 4.10, *Noise*, of this Draft EIR, the operation of the Project would not increase ambient noise levels that would exceed the City's noise standards at any of the receptor sites. Therefore, the Project would not conflict with policies to protect sensitive receptors from stationary noise sources.
Objective 3. Transportation-Related Noise Sources. Protect those areas that are or may be subject to noise from transportation noise sources.	**No Conflict.** Vehicle traffic generated by the Project would result in an increase in ambient noise levels, particularly during commuting hours. However, as discussed in Section 4.10, *Noise*, of this Draft EIR, noise levels from these mobile sources would not increase ambient noise levels that would exceed the City's noise standards at any of the receptor sites. Therefore, the Project would not conflict with policies to protect sensitive receptors from transportation noise sources.

SOURCE: ESA, 2023.

As discussed in Table 4.7-2, the Project would be consistent with the objectives and policies of the Land Use Element. The Project would support Land Use Element Policy 1.B by providing a high-quality architecturally design building that would serve a transition between the surrounding residential uses to the east and the commercial uses to the north, west and south, while result in no long-term significant environmental impacts; Policy 2.B by providing multi-family housing opportunities; Policy 2.E by implementing site-specific design standards and guidelines in a Comprehensive Plan; Objective 3 by providing housing for all members of the public, including the provision of affordable housing; Objective 5 by providing new business opportunities that expand the City's economic base while serving the needs of the residential and business communities; Policy 5.D through the inclusion of development incentives for providing affordable housing; Policy 7.B by providing uses that are reflective of current market conditions and provide much needed housing in the City; Policy 8.A by providing retail uses in proximity to residential neighborhoods; and Objective 12 by supporting urban design through high quality architecture and site design.

The Project would also be consistent with the objectives and policies of the Housing Element. The Project supports Housing Element Objectives 1 through 4 by redeveloping the Project Site with an integrated, high-quality, mixed-use development that would provide 309 residential units and approximately 5,600 sf of commercial uses. The Project would create an active streetscape through the provision of ground level retail use as well as approximately 7,507 sf of publicly accessible open space. The provision of publicly accessible open space at the intersection of Hannum Avenue and Buckingham Parkway would contribute to a sense of place and would provide a gathering area that would liven the pedestrian environment and maintain a quality neighborhood living environment. Development of the proposed mixed-use development with residential and retail uses would include diverse housing types, including 282 market-rate units and 27 units affordable to very low income households, within proximity to multiple transportation options. In addition, the

Project would provide a mix of units, with 39 studio units, 180 one-bedroom units, and 90 two-bedroom units. Through the provision of affordable units and a range in unit size, the Project would provide housing opportunities for all members of the community in support of Policy 2.D, Policy 2.E, Policy 3.A, Policy 3.B, Policy 3.F, Policy 4.A, and Policy 4.B. For informational purposes, the draft Land Use Element under consideration as part of Culver City's General Plan 2045 Update, includes the draft Land Use Map and Land Use designations with appropriate draft densities. The Project Site's draft land use designation is Mixed-Use High which permits 100 dwelling units per acre, consistent with the Housing Element preferred designation and density.

In regards to the General Plan Open Space Element, the Project would be consistent with the Objective 3 by providing approximately 7,507 sf of publicly accessible open space. A total of 54,156 sf of open space would be provided, which would exceed the minimum requirement of 23,175 sf of common and/or private open space on the Project Site that would be accessed from Hannum Avenue and Buckingham Parkway, as well as from the interior of the Project Site. Publicly accessible open space would include Hannum Plaza with amenities, such as seating, planting areas, and walkways. In addition, the Project would provide common open space for Project residents in the form of the amenity deck, community rooms, a gym, an open air courtyard, and private balconies.

As discussed in Section 4.10, *Noise*, of the Draft EIR, the Project would not increase ambient noise levels that would exceed the City's noise standards at any sensitive receptor sites from construction stationary or mobile noise sources and, thus, would not conflict with policies in the Noise Element to ensure compatibility of land uses with regard to noise sources and receptors.

Overall, the Project would not conflict with Culver City General Plan policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to the General Plan would be less than significant.

Culver City Bicycle & Pedestrian Action Plan

Although the objectives, policies, and actions of Action Plan are directed towards the City and therefore not directly applicable to the Project, the Project would support the Action Plan through the provision of an enhanced streetscape plan, bicycle parking and other bicycle amenities that would serve to encourage alternative forms of transportation. **Table 4.7-3,** *Comparison of the Project to Applicable Policies of the Culver City Bicycle & Pedestrian Action Plan*, evaluates the consistency of the Project with objectives and policies of the Action Plan. As discussed therein, the Project would provide bicycle and pedestrian facilities to promote alternative transit for residents, visitors and employees at the Project Site. The Project's intensification of development on the Project Site near multiple transit options would support public transit service. Also, the Project's design would minimize the potential for collisions involving bicyclists and pedestrians through safe and comfortable bicycle and pedestrian facilities. Vehicular access to the Project Site would be provided via the Hannum Avenue driveway and Buckingham Parkway driveway. Both driveways would provide access to the parking structure, with the Hannum Driveway accessible to residents, employees, and visitors. The Buckingham Driveway would be restricted to residential vehicles only on levels P1 and P2. Pedestrian access to the Project would be provided via separate lobby and retail entrances along Hannum Avenue. As described in Section 4.11, *Transportation*, development of the Project would maintain the existing Class II bike lane on Hannum; however, the Hannum Driveway would intersect with the eastbound bike lane on the south side of Hannum Avenue. To

ensure maximum visibility, the Hannum Driveway would meet all of the City's requirements and would provide adequate sight distance for drivers of vehicles entering and leaving the Project Site as well as bicyclists and pedestrians wishing to cross the driveway.

TABLE 4.7-3
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY BICYCLE & PEDESTRIAN ACTION PLAN

Policies	Would the Project Conflict?
Goal 1- Access and Connectivity	
Objective AC-1. Increase access and connectivity to jobs, education, retail, parks and libraries, schools, recreation centers, transit, and other neighborhood destinations.	**No Conflict.** The Project Site is located within an urban environment well served by public transit. The Project would support this policy by enhancing pedestrian circulation and promoting an active streetscape with access to alternative transportation options (bus and bicycle facilities) through increased sidewalk widths, enhanced streetscape, landscape and street trees along Hannum Avenue and Buckingham Parkway. The Project would be located adjacent to existing bike lanes on Hannum Avenue that would provide access to the Project's retail and residential uses. The Project would include 92 bicycle parking spaces to accommodate cyclists. The Project would enhance the Project frontage sidewalks with street trees, lighting, and aesthetic treatments on building facades. Because the Project would accommodate cyclists and would improve pedestrian routes in the area, it would not conflict with policies to education, retail, parks and libraries, schools, recreation centers, transit, and other neighborhood destinations.
Objective AC-2. Support public transit service.	**No Conflict.** The Project would intensify development and occupancy with new residents, visitors and employees associated with the retail uses within proximity to the Culver City Transit Station, multiple regional and local bus lines, and bicycle facilities which provide a range of alternative transit opportunities. Also, the Project aims to activate the ground level with pedestrian oriented design to enhance the neighborhood, as the area currently has minimal streetscape improvements. The activated streetscape would promote walking to available transit options. With these features, the Project, the Project would not conflict with policies to support public transit service.
Goal 2 – Health and Safety	
Objective HS-1. Reduce collisions involving bicyclists and pedestrians through safe and comfortable bicycle and pedestrian facilities.	**No Conflict.** An existing Class II bike lane is provided on both sides of the street adjacent to the Project. Development of the Project would maintain the existing bike lane; however, the Hannum Driveway would intersect with the eastbound bike lane on the south side of Hannum Avenue. To ensure maximum visibility, the Hannum Driveway would meet all of the City's requirements and would provide adequate sight distance for drivers of vehicles entering and leaving the Project Site as well as bicyclists and pedestrians wishing to cross the driveway. No exceptional horizontal or vertical curvatures exist along this section of roadway that would create sight distance issues for Project traffic utilizing the proposed driveway. Therefore, the Project would not conflict with policies to reduce collisions involving bicyclists and pedestrians through safe and comfortable bicycle and pedestrian facilities.
Objective HS-3. Use infrastructure and programs to promote an active lifestyle that includes bicycling and walking.	**No Conflict.** The Project would provide bicycle parking that would support active bicycle use by residents, visitors and on-site employees. The Project's proximity to a range of transit options including the Culver City Transit Center, bus routes, and bike lanes, and other commercial uses and services and residential neighborhoods in the area would encourage pedestrian activity. Therefore, the Project would not conflict with policies that use infrastructure and programs to promote an active lifestyle that includes bicycling and walking.
Objective HS-4. Reduce air pollution, asthma rates, and greenhouse gas emissions.	**No Conflict.** The Project would provide a pedestrian-friendly design, promote access from the nearby transit options, as well as provide bicycle parking and storage facilities for Project residents, employees, and visitors. The Project would also be designed to include electric vehicle parking and charging stations and a solar photovoltaic per the City's Green Building Ordinance and CALGreen standard. Furthermore, as discussed in Section 4.11, *Transportation*, the Project would implement a TDM Program as a project design feature to VMT. All of these features would reduce GHG emissions, improve air quality and serve to reduce asthma rates.

TABLE 4.7-3
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY BICYCLE & PEDESTRIAN ACTION PLAN

Policies	Would the Project Conflict?
Goal 3 - Affordability	
Objective A-1. Reduce long-term transportation costs by reducing the need for vehicle ownership or for parking in new developments.	**No Conflict.** The Project would provide on-site bicycle parking for residents, visitors, and employees. In addition, the Project would have access to a range of transportation options within walking distance, including a range of adjacent bus routes and bike lanes on Hannum Avenue. Because residents and employees could commute via the range of transit options in the area, the Project would not conflict with the policy to reduce long-term transportation costs by reducing the need for vehicle ownership or for parking in new developments.

SOURCE: ESA, 2023

While no existing bicycle lanes are provided on Buckingham Parkway, Culver City Bicycle & Pedestrian Action Plan calls for a Class IV bike lane to be installed. The design for this bicycle lane has not been finalized. The Buckingham Driveway would intersect the southbound bicycle lane on the west side of Buckingham Parkway. Similar to the Hannum Driveway, the Buckingham Driveway would ensure maximum visibility by meeting all of the City's driveway requirements and would provide adequate sight distance for drivers of vehicles entering and leaving the Project Site as well as bicyclists and pedestrians wishing to cross the driveway and loading area. Overall, the Project would not conflict with any of the applicable objectives of the Culver City Bicycle & Pedestrian Action Plan, as further discussed in Section 4.11, *Transportation*, of the Draft EIR.

Culver City Urban Forest Master Plan

Chapter 2 of the UFMP provides recommendations for the urban forest, beginning with the large scale and broad vision for the urban environment of the City. It envisions an urban forest to strengthen the important network of "green connections" throughout the City. More than just treelined streets, the UFMP describes a green infrastructure that includes the urban forest, park land, sustainable transportation networks, and pedestrian areas that would provide vital functions for the City including improving air and water quality, mitigating the urban heat island effect, reducing energy demand, and improving public health. In the vicinity of the Project Site, Hannum Avenue and Buckingham Parkway are identified as bicycle routes. For each of these streets, the UFMP recommends trees in these areas to provide shade and to aid in wayfinding in an effort to promote cycling and walking. One of the most important components of the UFMP is the Tree Palette, which provides a plan for creating a more resilient urban forest in Culver City. The Tree Palette is a master list of the species that are recommended for Culver City's urban forest based on proven local performance, ability to thrive in urban conditions, resiliency, environmental benefits, aesthetics, habitat/ecosystem value, and good "new" species for Culver City.

Currently, 14 carrotwood street trees are located along Buckingham Parkway and all other trees are located throughout the Project Site. There are no street trees on Hannum Avenue. For any street tree removed, 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 Department of Public Works based on what is appropriate for the particular Street Right-of-Way or Parkway. The Project anticipates that one street tree along Buckingham Parkway near the proposed driveway would be removed. This tree will either be re-planted or replaced along Buckingham Parkway and an additional tree would be planted along Buckingham Parkway to comply with City street tree replacement requirements.

The Project would provide 7,507 square feet of publicly accessible open space as part of the Hannum Plaza. The Hannum Plaza, located along Hannum Avenue, would feature drought tolerant landscaping and a variety of seating areas, open to the community. In addition, the Project landscape design would incorporate trees along Hannum Avenue, with a tree palette consistent with that envisioned in the UFMP palette. The Project's landscaping and trees would contribute to the improvements of Buckingham Parkway and Hannum Avenue envisioned in the UFMP. The UFMP articulates a clear vision for the future of Culver City's urban forest based on analysis of the City's historical and existing urban forest, as well as on synthesis of current research, best management practices and community input. The UFMP provides recommendations for the City's urban forest as well as a structured framework of five Action Areas and related Strategies to support achievement of this vision. As described in Section 4.1, *Aesthetics*, the UFMP's Tree Palette and Designations provide a plan for creating a more resilient urban forest in The UFMP designates specific tree species for both the 5700-6099 block of Hannum Avenue and the 5800-5899 block of Buckingham Parkway. *Podocarpus gracilior* is designated for Hannum Avenue and *Ginkgo biloba* is designated for Buckingham Parkway. New replacement trees would be planted on the Project Site per Section 9.08.215 of the CCMC. The selected street tree species would meet the UFMP Tree Palette as identified in the UFMP's performance criteria. The Project's landscaping and trees would also enhance the pedestrian character of these streets. Because the Project would increase street trees in accordance with the UFMP palette and include a the landscaped, publicly accessible, privately maintained Hannum Plaza, it would not conflict with policies related to providing shade and wayfinding improvements within the designated bicycle routes shown in the UFMP along Hannum Avenue and Buckingham Parkway. Therefore, the Project would not conflict with UFMP policies adopted to avoid or mitigate an environmental effect and, as such, impacts with respect to this plan would be less than significant.

City of Culver City Municipal Code

As shown on Figure 4.7-2, the Culver City zoning of the Project Site is CRB. The CRB zone identifies areas appropriate for large-scale office and business park developments with shared parking, including specific light industrial uses and does not permit residential uses. The CRB zone permits industrial uses; recreation, education and public assembly; retail and service uses; and transportation and communication uses.[9]

The Project is proposing to change the Project Site's zoning designation to Planned Development (PD) with adoption of a Comprehensive Plan that would serve as the overarching entitlement

9 City of Culver City, CCMC Section 17.220.015.

mechanism for the Project Site. Per the Zoning Code, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site planning and design and to support more effective responses to the settings of such properties and other environmental considerations.[10] To permit this, a Comprehensive Plan regulates permitted uses, development standards, and conditions of approval on a Project Site.

CCMC Section 17.240.015, Planned Development (PD) District Requirements, sets forth requirements of PD designated areas. Per Section 17.240.015 A, development standards, allowable land uses and permit requirements for the PD Zoning District shall be established by a Comprehensive Plan. The minimum site area for PD Zoning is 1 acre or large, which the Project Site exceeds at 2.23 acres. Per Section 17.240.015 E, no building or structure in the PD Zone may exceed 56 feet in height, unless a height exception is granted pursuant to Section 17.300.025 (Height Measurement and Height Limit Exceptions). However, the Project is proposing to include 27 units (12 percent of base density) of its residential units as Very Low Income affordable units. By doing so, consistent with the CCMC, State Density Bonus Law (Gov't Code §65915), the Project is entitled to receive development incentives including a height increase. The Project is requesting a height increase of 22 feet beyond the maximum allowable height as a development incentive for providing affordable units. With this incentive, the Project would have a maximum building height of 78 feet. With this height increase, no significant physical impact to the environment would occur. Refer to Section 4.1, *Aesthetics*, of this Draft EIR for a discussion of aesthetics impacts. Also, Section 17.240.015.F (Underground Utilities), requires all utilities to be underground, which the Project would comply with.

Under CCMC Section 17.220.020, Table 2-7, building setback requirements for Commercial Regional Business Park (CRB) zone are 5 feet at the front yard (which apply to both Hannum Avenue and Buckingham Parkway) with no side yard or rear yard building setback requirements. Under CCMC Section 17.560.015.B, a Comprehensive Plan sets forth development standards including setbacks. The Project would follow Project-specific development standards (including setbacks) as provided in the Comprehensive Plan. The Comprehensive Plan includes 0 foot setback standards at the ground level and five-feet above the ground level along both Hannum Avenue and Buckingham Parkway. However, the Project aims to activate the ground level with pedestrian oriented design to enhance the neighborhood, as the area currently has minimal streetscape improvements. The first floor along Hannum Avenue would be setback between 20- to 35-feet to create a public plaza with landscaping and a variety of seating areas open to the community. Along Buckingham Parkway, as well as the southern and western boundaries, the building would be set back at least 10-feet from the property line. With the provision of the Comprehensive Plan, the Project would be consistent with the current setback criterion.

CCMC Section 17.560, Comprehensive Plans, sets forth procedures for reviewing Comprehensive Plans. As stated in this section, the purpose is to allow consideration of innovation in site planning and other aspects of project design, and more effective design responses to site features, uses on adjoining properties, and other impacts than the zoning code standards would produce without

[10] City of Culver City, CCMC Section 17.560.005

adjustment. Consistent with Section 17.560.105 B, Comprehensive Plan Requirements, the Project's Comprehensive Plan includes a Site Plan; development standards, building plans, landscape plans, lighting and signage plans, civil engineering plans, and proposed Project uses and occupancy. CCMC Section 17.560.010, Finding and Decision, lists various findings the City must make as part of the approval process for a Comprehensive Plan. Consistent with the findings requirements, the Project would be completed within four years, the Project is capable of creating an environment of sustained desirability and stability, and the proposed uses will not be substantially detrimental to present and potential surrounding uses as evidenced by the analysis in this Draft EIR (no long-term significant and unavoidable impacts), but will have a beneficial effect. Also, the streets and thoroughfares serving the Project are suitable and adequate to carry anticipated traffic (refer to the non-CEQA traffic analysis included in the Project's Transportation Assessment, included as Appendix I of this Draft EIR), and the development will not generate traffic that will overload the adjacent street network. The Project has been shown throughout this Draft EIR to be compatible with the surrounding area. The Comprehensive Plan is being proposed with a concurrent General Plan amendment in process. As shown in Section 4.13, Utilities and Service Systems, of this Draft EIR, existing and proposed utility services are adequate for the proposed uses. Finally, the Project's Comprehensive Plan will comply with all applicable City requirements.

The Project is seeking approval of extended construction hours per CCMC Section 9.07.035.C.1. Per CCMC Section 9.07.035.A, Construction, allowed construction hours are 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. The Project is requesting an approval for Extended Hours of Construction, as allowed by CCMC Section 9.07.035.C.1, to allow for a 7:00 AM daily start Monday through Saturday during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction. The extended construction hours are being requested over the course of approximately four (4) months of construction. The other construction phases would occur per the allowable standard CCMC permitted construction hours. The request for extended construction hours will accompany the land use permit application and will be considered in conjunction with the Project as a whole and will be subject to conditions of approval, as necessary. Refer to Section 4.10, *Noise*, of this Draft EIR for a discussion of noise impacts associated with the potential for extended construction hours.

Other ministerial approvals that would be required for the Project include, but may not be limited to, demolition, grading, excavation, and building permits as well as haul route permits. None of these approvals would conflict with an applicable land use 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 Draft EIR document.

Conclusion

Based on the analysis above, with approval of the requested discretionary actions, the Project would not conflict with or impede implementation of applicable land use plans, policies, or regulations 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. Therefore, the impact would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Project-specific impacts related to land use and planning would be less than significant.

Cumulative Impacts

Chapter 3, *Environmental Setting*, of this Draft EIR provides a list of 12 related projects that are planned or are under construction within an approximately 1.0-mile radius of the Project Site. Of these 12 related projects, eight (8) are located within the City of Culver City and four (4) are located within the City of Los Angeles. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3.

The Project would redevelop the Project Site and would represent infill development on an already urbanized site located near the Culver City Transit Center and multiple regional and local bus lines. In addition, the Project includes the provision of bicycle and pedestrian amenities within a SCAG designated HQTA. The Project would be consistent with the proposed General Plan General Corridor land use designation and the proposed zoning designation of PD. As discussed above, for informational purposes, a draft General Plan Land Use map was released by the City on September 29, 2023 which largely conforms to the approved Housing Element map. Under both the approved Housing Element map and the draft General Plan Land Use map, the Project Site would be designated as Mixed-Use High, which would allow 100 dwelling units per acre. Currently, the City's land use regulations do not specify or limit floor area ratio (FAR). It is anticipated that the draft General Plan would limit nonresidential FAR to 4.0:1. The Project would have a total FAR of 3.73:1, which is compliant with existing and potential development standards relating to FAR. The Project would also be consistent with other local and regional land use plans as discussed above.

Related projects are subject to CEQA review and review by City regulatory agencies. Most notably, related projects seeking increases in permitted densities or height are subject to review by the Culver City Planning Division Commission and other City departments and divisions for consistency with plan provisions and other City requirements. The related projects represent infill development and as such are consistent with local and regional policies to concentrate development near public transit and encourage alternative transportation. Based on this and based on the determination that the Project would be consistent with the adopted land use plans and zoning, cumulative impacts regarding consistency with the land use regulatory framework would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. Cumulative impacts related to land use and planning would be less than significant.

4.8 Noise

4.8.1 Introduction

This section analyzes potential noise and vibration impacts that would result from the Project. The analysis describes the existing noise environment in the vicinity of the Project Site, estimates future noise and vibration levels at surrounding land uses resulting from construction and operation of the Project, identifies the potential for significant impacts, and includes mitigation measures to address significant impacts. An evaluation of the Project's contribution to potential cumulative noise impacts is also provided. Noise worksheets and technical data used in this analysis are provided in Appendix G, Noise Documentation, of this Draft EIR.

4.8.2 Noise and Vibration Basics

Noise Principles and Descriptors

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as undesirable (i.e., loud, unexpected, or annoying) sound. Acoustics is defined as the physics of sound and addresses its propagation and control.[1] In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determine the sound level and characteristics of the noise perceived by the receiver.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement and reflects the way people perceive changes in sound amplitude[2]. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of feeling pain. Pressure waves traveling through air exert a force registered by the human ear as sound.[3]

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but, rather, a broad band of frequencies varying in levels of magnitude. When all of the audible frequencies of a sound are measured, a sound spectrum is plotted consisting of a range of frequencies spanning 20 to 20,000 Hz. The sound pressure level, therefore, constitutes the additive force exerted by a sound corresponding to the sound frequency/sound power level spectrum.[4]

The typical human ear is not equally sensitive to the frequency range from 20 to 20,000 Hz. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter

1 California Department of Transportation (Caltrans), Technical Noise Supplement (TeNS) to the Traffic Noise Analysis Protocol, Section 2.2.1, September 2013.

2 All sound levels measured in decibel (dB), as identified in the noise calculation worksheets included in Appendix G of this Draft EIR and in this section of the Draft EIR, are relative to $2x10^{-5}$ N/m^2.

3 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.

4 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.

that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of frequency filtering or weighting is referred to as A-weighting, expressed in units of A-weighted decibels (dBA), which is typically applied to community noise measurements.[5] Some representative common outdoor and indoor noise sources and their corresponding A-weighted noise levels are shown in **Figure 4.8-1**, *Decibel Scale and Common Noise Sources*.

Noise Exposure and Community Noise

Community noise exposure is typically measured over a period of time; a noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the sound sources contributing to the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with many unidentifiable individual contributors. Single-event noise sources, such as aircraft flyovers, sirens, etc., may cause sudden changes in background noise level.[6] However, generally, background noise levels change gradually throughout the day, corresponding with the addition and subtraction of distant noise sources, such as changes in traffic volume.

These successive additions of sound to the community noise environment change the community noise level from moment to moment, requiring the noise exposure to be measured over periods of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. The following noise descriptors are used to characterize environmental noise levels over time.[7]

L_{eq}: The equivalent sound level over a specified period of time, typically, 1 hour (L_{eq}). The L_{eq} may also be referred to as the average sound level.

L_{max}: The maximum, instantaneous noise level experienced during a given period of time.

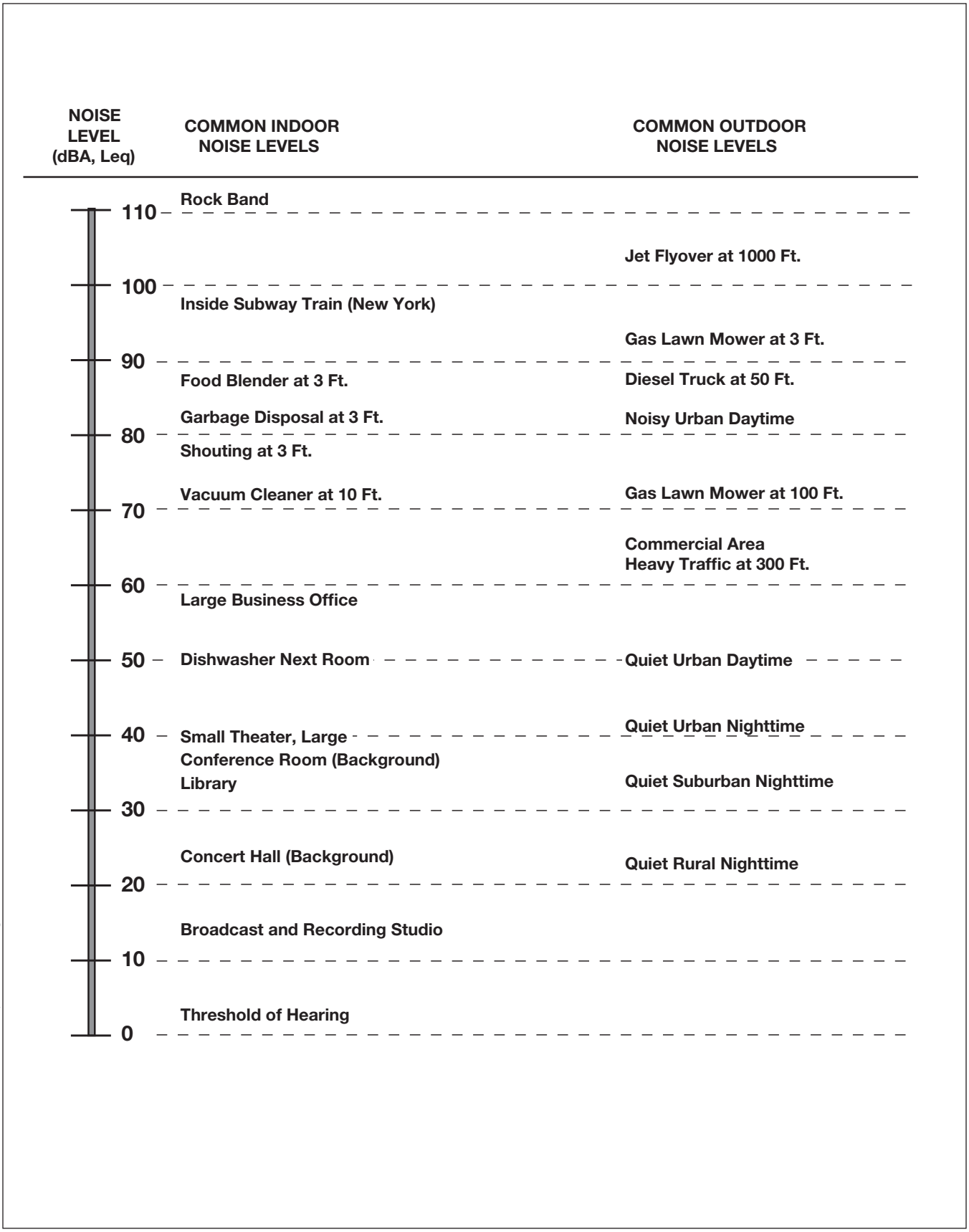
L_{min}: The minimum, instantaneous noise level experienced during a given period of time.

L_x: The noise level exceeded a percentage of a specified time period. For instance, L_{50} and L_{90} represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

L_{dn}: The average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dBA to measured noise levels between the hours of 10:00 p.m. to 7:00 a.m. the next day to account for nighttime noise sensitivity. The L_{dn} is also termed the day-night average noise level (DNL).

CNEL: The Community Noise Equivalent Level (CNEL) is the time average A-weighted noise level during a 24-hour day that includes an addition of 5 dBA to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and an addition of 10 dBA to noise levels between the hours of 10:00 p.m. to 7:00 a.m. the next day to account for noise sensitivity in the evening and nighttime, respectively.

5 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.
6 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, September 2013.
7 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.2, September 2013.



D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR\Illustrator

SOURCE: State of California, Department of Transportation (Caltrans), Technical Noise Supplement (TeNS). October 1998. Available: http://www.dot.ca.gov/hq/env/noise/pub/Technical Noise Supplement.pdf

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.8-1
Decibel Scale and Common Noise Sources

ESA

Effects of Noise on People

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance);
- Interference effects (e.g., communication, sleep, and learning interference);
- Physiological effects (e.g., startled response); and
- Physical effects (e.g., hearing loss).

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects interrupt daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep.[8]

The World Health Organization's Guidelines for Community Noise details the adverse health effects of high noise levels, which include hearing impairment, speech intelligibility, sleep disturbance, physiological functions (e.g., hypertension and cardiovascular effects), mental illness, performance of cognitive tasks, social and behavioral effects (e.g., feelings of helplessness, aggressive behavior), and annoyance.[9]

With regard to the subjective effects, the responses of individuals to similar noise events are diverse and influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity. Overall, there is no completely satisfactory way to measure the subjective effects of noise, or the corresponding reactions of annoyance and dissatisfaction on people. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships generally occur:[10]

- Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived;
- Outside of the laboratory, a change of 3 dBA in ambient noise levels is considered to be a barely perceivable difference;

8 World Health Organization Team, edited by Berglund, Birgitta; Lindvall, Thomas; Schwela, Dietrich H, Guidelines for Community Noise, 1999.

9 World Health Organization Team, edited by Berglund, Birgitta; Lindvall, Thomas; Schwela, Dietrich H, Guidelines for Community Noise, 1999.

10 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, 2013.

- A change of 5 dBA in ambient noise levels is considered to be a readily perceivable difference; and
- A change of 10 dBA in ambient noise levels is subjectively heard as doubling of the perceived loudness.

These relationships between change in noise level and human hearing response occur in part because of the logarithmic nature of sound and the dB scale. Because the dBA scale is based on logarithms, two noise sources do not combine in a simple additive fashion, but, rather, logarithmically. Under the dBA scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two sources are each producing sound of the same loudness, the resulting sound level at a given distance would be approximately 3 dBA higher than one of the sources under the same conditions. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. Under the dB scale, three sources of equal loudness together produce a sound level of approximately 5 dBA louder than one source, and 10 sources of equal loudness together produce a sound level of approximately 10 dBA louder than the single source.[11]

Noise Attenuation

When noise propagates over a distance, the noise level reduces, or attenuates, with distance depending on the type of noise source and the propagation path. Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." The rate of sound attenuation for a point source, such as a piece of mechanical or electrical equipment (e.g., air conditioner) or idling vehicle (e.g., bulldozer), is 6 dBA per doubling of distance from the noise source to the receptor over acoustically "hard" sites and 7.5 dBA per doubling of distance from the noise source to the receptor over acoustically "soft" sites.[12] Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the reduction in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees, which in addition to geometric spreading, provides an excess ground attenuation value of 1.5 dBA (per doubling distance).[13] For example, an outdoor condenser fan that generates a sound level of 60 dBA at a distance of 50 feet from a point source at an acoustically hard site would attenuate to 54 dBA at a distance of 100 feet from the point source and attenuate to 48 dBA at 200 feet from the point source.

Roadways and highways consist of several localized noise sources on a defined path, and, hence, are treated as "line" sources, which approximate the effect of several point sources.[14] Noise from a line source propagates over a cylindrical surface, often referred to as "cylindrical spreading."[15] Line sources (e.g., traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5

11 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1.1, September 2013.
12 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Sections 2.1.4.1 and 2.1.4.2, September 2013.
13 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Sections 2.1.4.1 and 2.1.4.2, September 2013.
14 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, September 2013.
15 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, September 2013.

dBA for soft sites for each doubling of distance from the reference measurement.[16] Therefore, noise due to a line source attenuates less with distance than that of a point source with increased distance.

Structures (e.g., buildings and solid walls) and natural topography (e.g., hills and berms) that obstruct the line-of-sight between a noise source and a receptor further reduce the noise level if the receptor is located within the "shadow" of the obstruction, such as behind a sound wall. This type of sound attenuation is known as "barrier insertion loss." If a receptor is located behind the wall but still has a view of the source (i.e., the line-of-sight is not fully blocked), barrier insertion loss would still occur but to a lesser extent. Additionally, a receptor located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall can reflect noise back to the receptor, thereby compounding the noise. Noise barriers can provide noise level reductions ranging from approximately 5 dBA (where the barrier just breaks the line-of-sight between the source and receiver) to an upper range of 20 dBA with a larger barrier.[17] Additionally, structures with closed windows can further attenuate exterior noise by a minimum of 20 dBA to 30 dBA.[18]

Receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels.[19] Atmospheric temperature inversion (i.e., increasing temperature with elevation) can increase sound levels at long distances. Other factors such as air temperature, humidity, and turbulence can, under the right conditions, also have substantial effects on noise levels.[20]

Vibration Fundamentals

Vibration can be interpreted as energy transmitted in waves through the ground or man-made structures, which generally dissipate with distance from the vibration source. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Since energy is lost during its transfer from one particle to another, vibration becomes less perceptible with increasing distance from the source.

As described in the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment Manual*, groundborne vibration can be a serious concern for nearby neighbors of a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard.[21] In contrast to airborne noise, groundborne vibration is not a common environmental problem, as it is unusual for vibration from sources such as rubber-tired buses and trucks to be perceptible, even in locations close to major roads. Some common sources of groundborne vibration are trains, heavy trucks traveling on rough roads, and certain construction activities, such as blasting, pile-driving, and operation of heavy earth-moving equipment.[22] Groundborne vibration

16 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, 2013.
17 Caltrans, TeNS to the Traffic Noise Analysis Protocol, Sections 2.1.4.24 and 5.1.1, September 2013.
18 Caltrans, TeNS to the Traffic Noise Analysis Protocol, Section 7.4.2, Table 7-1, September 2013.
19 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.3, September 2013.
20 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.3, September 2013.
21 Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, Section 7, 2018.
22 FTA, Transit Noise and Vibration Impact Assessment Manual, Section 7, 2018.

generated by man-made activities (e.g., road traffic, construction operations) typically weakens with greater horizontal distance from the source of the vibration.

Several different methods are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec), and is most frequently used to describe vibration impacts to buildings.[23] The root mean square (RMS) amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body.[24] Decibel notation (VdB) is commonly used to express RMS vibration velocity amplitude. The relationship of PPV to RMS velocity is expressed in terms of the "crest factor," defined as the ratio of the PPV amplitude to the RMS amplitude. PPV is typically a factor of 1.7 to 6 times greater than RMS vibration velocity; FTA uses a crest factor of 4. [25] The decibel notation VdB acts to compress the range of numbers required to describe vibration. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors for vibration include buildings where vibration would interfere with operations within the building or cause damage (especially older masonry structures), locations where people sleep, and locations with vibration sensitive equipment.[26]

Groundborne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.[27] The relationship between groundborne vibration and groundborne noise depends on the frequency of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, groundborne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a groundborne noise level that is approximately 50 decibels lower than the velocity level. For groundborne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the groundborne noise level will be approximately 35 to 37 decibels lower than the velocity level.[28] Therefore, for typical buildings, the groundborne noise decibel level is lower than the groundborne vibration velocity level at low frequencies.

4.8.3 Environmental Setting

Regulatory Framework

Federal

Noise Control Act of 1972

Under the authority of the Noise Control Act of 1972, the United States Environmental Protection Agency (USEPA) established noise emission criteria and testing methods published in Parts 201 through 205 of Title 40 of the Code of Federal Regulations (CFR) that apply to some transportation equipment (e.g., interstate rail carriers, medium trucks, and heavy trucks) and construction equipment. In 1974, USEPA issued guidance levels for the protection of public health and welfare

23 FTA, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.
24 FTA, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.
25 FTA, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.
26 FTA, Transit Noise and Vibration Impact Assessment Manual, Section 6.1, 6.2, and 6.3, 2018.
27 FTA, Transit Noise and Vibration Impact Assessment Manual, Section 5.4, 2018.
28 FTA, Transit Noise and Vibration Impact Assessment Manual, Table 6-3 and Table 6-14, September 2018.

in residential areas of an outdoor L_{dn} of 55 dBA and an indoor L_{dn} of 45 dBA.[29] These guidance levels are not standards or regulations and were developed without consideration of technical or economic feasibility. There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project. Moreover, the federal noise standards are not reflective of urban environments that range by land use, density, proximity to commercial or industrial centers, etc. As such, for purposes of determining acceptable sound levels to determine and evaluate intrusive noise sources and increases, this document utilizes the City of Culver City Noise Regulations, discussed below.

Federal Transit Administration Vibration Standards

There are no federal vibration standards or regulations adopted by any agency that are applicable to evaluating vibration impacts from land use development projects such as the Project. However, the FTA has adopted vibration criteria for use in evaluating vibration impacts from construction activities.[30] The vibration damage criteria adopted by the FTA are shown in **Table 4.8-1,** *Construction Vibration Damage Criteria*.

TABLE 4.8-1
CONSTRUCTION VIBRATION DAMAGE CRITERIA

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

SOURCE: FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.

The FTA has also adopted standards associated with human annoyance for determining the groundborne vibration and noise impacts from groundborne noise on the following three off-site land-use categories: Vibration Category 1 – High Sensitivity, Vibration Category 2 – Residential, and Vibration Category 3 – Institutional.[31] The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment but that still potentially involve activities that could be disturbed by vibration. The vibration thresholds associated with human annoyance for these three land use categories are shown in **Table 4.8-2**, *Groundborne Vibration and Groundborne Noise Impact Criteria for General Assessment.* No thresholds have been adopted or recommended for commercial or office uses.

29 United States Environmental Protection Agency, EPA Identifies Noise Levels Affecting Health and Welfare, 1974.
30 FTA, Transit Noise and Vibration Impact Assessment Manual, Table 7-5, page 186, 2018.
31 FTA, Transit Noise and Vibration Impact Assessment Manual, Table 6-1, page 124, 2018.

TABLE 4.8-2
GROUNDBORNE VIBRATION AND GROUNDBORNE NOISE IMPACT CRITERIA FOR GENERAL ASSESSMENT

Land Use Category	Frequent Events[a]	Occasional Events[b]	Infrequent Events[c]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[d]	65 VdB[d]	65 VdB[d]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB

NOTES:

[a] "Frequent Events" is defined as more than 70 vibration events of the same source per day.

[b] "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.

[c] "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.

[d] This criterion is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes.

SOURCE: FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.

Occupational Safety and Health Act of 1970

Under the Occupational Safety and Health Act of 1970 (29 United States Code [USC] Sections 1919 et seq.), the Occupational Safety and Health Administration (OSHA) has adopted regulations designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed. The regulations further specify a hearing conservation program that involves monitoring noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.[32]

State

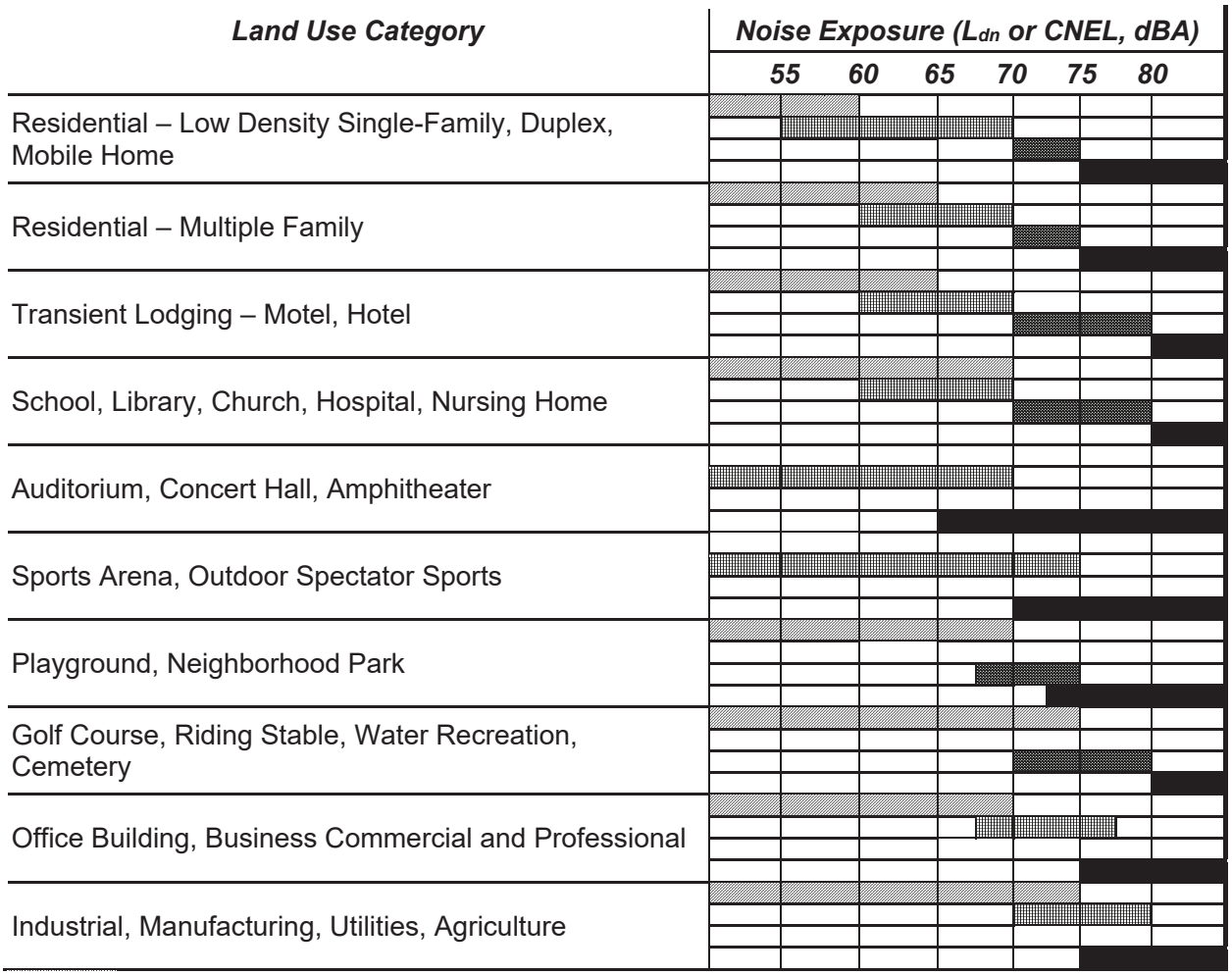
Office of Planning and Research Guidelines for Noise Compatible Land Use

The State of California has not adopted Statewide standards for environmental noise, but the Governor's Office of Planning and Research (OPR) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure, as presented in **Figure 4.8-2,** *Guidelines for Noise Compatible Land Use*.[33]

The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise levels are divided into four general categories, which vary in range according to land use type: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." The City has developed its own compatibility guidelines in the Noise Element of the General Plan based in part on OPR Guidelines. California Government Code Section 65302 requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(f) requiring a noise element to be included in the general plan. The Noise Element must identify and appraise noise problems in the community and analyze and quantify current and projected noise levels.

[32] United States Department of Labor. OSH Act of 1970.

[33] State of California, Governor's Office of Planning and Research, General Plan 2017 Guidelines, page 377, 2017.



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.

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

CLEARLY UNACCEPTABLE: New construction or development should generally not be undertaken. Construction costs to make the indoor environmental acceptable would be prohibitive and the outdoor environment would not be usable.

D202201041.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR\Illustrator

SOURCE: State of California, General Plan Guidelines, Governor's Office of Planning and Research, 2003

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.8-2
Guidelines for Noise Compatible Land Use

ESA

The State has also established noise insulation standards for new multi-family residential units, hotels, and motels. These requirements are collectively known as the California Noise Insulation Standards (Title 24 of the California Code of Regulations [CCR]). The noise insulation standards set forth an interior standard of 45 dBA CNEL in any habitable room. The standards require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL. Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

Assembly Bill 1307

Assembly Bill (AB) 1307 states that the effects of noise generated by project occupants and their guests on human beings shall not be considered a significant effect on the environment under CEQA given that the project is categorized within one of the following definitions as outlined in Section 21085.2 of AB 1307[34]:

1) "Long-range development plan" means a physical development and land use plan to meet the academic and institutional objectives for a particular campus or medical center of public higher education.
2) "Public higher education" means the institutions described in subdivision (a) of Section 66010 of the Education Code.
3) "Residential or mixed-use housing project" means a project consisting of residential uses only or a mix of residential and nonresidential uses, with at least two-thirds of the square footage of the development designated for residential uses.
4) "Substantially surrounded" means at least 75 percent of the perimeter of the project site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
5) Notwithstanding any other law or regulation, institutions of public higher education shall not be required, in an environmental impact report prepared for a residential or mixed-use housing project, to consider alternatives to the location of the residential or mixed-use housing project if both of the following requirements are met:
6) The residential or mixed-use housing project is located on a site that is no more than five acres and is substantially surrounded by qualified urban uses.
7) The residential or mixed-use housing project has already been evaluated in the environmental impact report for the most recent long-range development plan for the applicable campus.

The Project meets criteria No. 3 as a mixed-use housing project. Thus, noise generated by the Project occupants and their guests is not considered a significant effect on the environment under CEQA.

Regional

Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan

In Los Angeles County, the Regional Planning Commission has the responsibility for acting as the Airport Land Use Commission and for coordinating the airport planning of public agencies within

[34] California Legislative Information, Assembly Bill No. 1307. September 7, 2023. Available at: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240AB1307. Accessed October 2023.

the county. The Airport Land Use Commission coordinates planning for the areas surrounding public use airports. The Comprehensive Land Use Plan provides for the orderly expansion of Los Angeles County's public use airports and the area surrounding them. It is intended to provide for the adoption of land use measures that will minimize the public's exposure to excessive noise and safety hazards. In formulating the Comprehensive Land Use Plan, the Los Angeles County Airport Land Use Commission has established provisions for safety, noise insulation, and the regulation of building height within areas adjacent to each of the public airports in the County.

Local

City of Culver City General Plan Noise Element

The City of Culver City Noise Standards are developed from those of several federal and State agencies including the FHWA, the USEPA, the Department of Housing and Urban Development, the American National Standards Institute, and the State of California Department of Health Services. These standards set limits on the noise exposure level for various land uses. **Table 4.8-3**, *City of Culver City Noise Standards*, lists exterior noise level standards and the type of occupancy to which they should be applied. As with the California Noise Standards described above, these General Plan standards are related to the siting of land uses and are not typically used as thresholds of significance for determining noise impacts associated with construction and operation of the Project. However, the standards do provide a means for judging whether an existing noise environment would be compatible with development of a new noise-sensitive land use or whether a new use would create an incompatible noise environment for existing noise-sensitive uses.

TABLE 4.8-3
CITY OF CULVER CITY NOISE STANDARDS

Zone	Interior Standards (dBA CNEL)	Exterior Standard (dBA CNEL)
Residential	45	65
Commercial[a]	45	65

[a] This applies to Hotel, Motel, Transient Lodging, and not to other commercial uses such as retail.

SOURCE: City of Culver City, General Plan, Noise Element, 1996.

The City's General Plan Noise Element includes the following policy related to noise control:

> **Policy 2.A** Create a comprehensive ordinance establishing noise regulation criteria, and standards for noise sources and receptors to include but not be limited to the following:
>
> - Noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses, such as schools, hospitals, convalescent homes, and libraries.
> - Temporary sound barrier installation at construction site if construction noise is impacting nearby noise sensitive land uses.
> - Noise abatement and acoustical design criteria for construction and operation of any new development.

City of Culver City Municipal Code

Chapter 9.07 of the City of Culver City Municipal Code (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. There are no established noise limits for noise associated with construction activity when construction occurs within the permitted hours. 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.

Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions, or providing entertainment on an on-going basis which is audible at the subject property line. This section is applicable only to uses that would include regular and on-going amplification, such as outdoor speakers used for a drive-through restaurant.

4.8.4 Existing Conditions

The predominant existing noise source surrounding the Project Site is traffic noise from Slauson Avenue, Hannum Avenue, Buckingham Parkway, and Uplander Way. Secondary noise sources include general industrial/commercial-related activities, such as loading area/delivery truck activities, trash compaction, and refuse service activities, from the business park/office land uses to the north, west, and southwest of the Project Site. Periodic noise also occurs from residential activities, including lawnmowing and landscaping activities, from residences to the east and south of the Project Site located across Buckingham Avenue.

Noise-Sensitive Receptor Locations

Some land uses are considered more sensitive to noise than others due to the amount of noise exposure and the types of activities typically involved at the receptor location. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks are generally more sensitive to noise than commercial and industrial land uses. Existing noise sensitive uses near the Project Site include the following:

- R1: Multi-family residential uses to the south of the Project Site, east of Buckingham Parkway and south of Windsor Way, approximately 450 feet from the Project boundary.
- R2: Fox Hills Park to the south/southwest of the Project Site, west of Buckingham Parkway, approximately 670 feet from the Project boundary.
- R3: Multi-family residential uses to the southeast of the Project Site, on the east side of Buckingham Parkway between Cambridge Way and Windsor Way, approximately 50 feet from the Project boundary.
- R4: Multi-family residential uses and Fox Hills Parkette to the east of the Project Site, on the east side of Buckingham Parkway north of Cambridge Way, approximately 50 feet to the east of the Project Site.

- R5: Multi-family residential uses to the northeast of the Project Site, on the east side of Buckingham Parkway between Slauson Avenue and Canterbury Drive, approximately 550 feet from the Project boundary.

Commercial Land Uses

Commercial land uses, such as retail and office, are not considered sensitive noise receptors. However, for informational purposes only, the following commercial land uses near the Project Site were evaluated:

- R6: Commercial land uses north of the Project Site, approximately 100 feet from the Project boundary.
- R7: Commercial land uses west of the Project Site, approximately 50 feet from the Project boundary.
- R8: Commercial land uses south/southwest of the Project Site, approximately 250 feet from the Project boundary.

Vibration-Sensitive Receptor Locations

Typically, groundborne vibration generated by man-made activities (i.e., rail and roadway traffic, operation of mechanical equipment and typical construction equipment) diminishes rapidly with distance from the vibration source. Construction activities, such as the use of bulldozers, would have the greatest effect on vibration-sensitive land uses. Energy is lost during the transfer of energy from one particle to another, and, as a result, vibration becomes less perceptible with increasing distance from the source. With respect to potential structural damage, structures within approximately 100 feet to the Project Site are analyzed to determine if there would be impacts resulting in structural damage. As shown in Table 4.8-1, the structural category/construction type (i.e., reinforced-concrete, engineered concrete, non-engineered timber, building susceptible to damage, and historic buildings) determines the vibration damage criteria for a specific building/structure.[35] The structures in the vicinity of the Project Site range from Category I, which are defined as reinforced-concrete, steel, or timber (no plaster) capable of handling up to 0.5 in/sec PPV of vibration, to Category III, which hare defined as non-engineered timber and masonry buildings capable of handling up to 0.12 in/sec PPV of vibration. The following structures were considered in the vibration analysis:

- Category I:
  - Commercial land uses north of the Project Site, approximately 100 feet from the Project boundary.
  - Commercial land uses west of the Project Site, approximately 50 feet from the Project boundary.

[35] Where the structural category/type of a vibration-sensitive receptor is unclear, the analysis herein utilizes a conservative assumption. For example, although structures where industrial processes take place would generally be constructed of concrete, the threshold for non-engineered timber and masonry has been applied due to the uncertainty of building construction.

- Category III:
  - Multi-family residential uses to the south of the Project Site, on the east side of Buckingham Parkway, approximately 50 feet from the Project boundary.
  - Multi-family residential uses and Fox Hills Parkette to the east of the Project Site, on the east side of Buckingham Parkway, approximately 50 feet to the east of the Project Site.

With respect to human annoyance, sensitive land uses include buildings where use of vibration-sensitive equipment is used (e.g., hospitals, research, and manufacturing), residential land uses and buildings where people normally sleep, schools, churches, and doctor's offices.[36] Therefore, the land uses within approximately 100 feet to the Project Site considered for human annoyance impacts are:

- R3: Multi-family residential uses to the south of the Project Site, on the east side of Buckingham Parkway, approximately 50 feet from the Project boundary.
- R4: Multi-family residential uses and Fox Hills Parkette to the east of the Project Site, on the east side of Buckingham Parkway, approximately 50 feet to the east of the Project Site.

Ambient Noise Levels

To quantify the existing noise environment, two sets of short-term (15-minute) measurements were conducted at eight locations, representing the ambient noise levels at land uses identified as R1 through R8 in **Figure 4.8-3**, *Surrounding Land Uses and Noise Measurement Locations*. A 15-minute measurement is a reasonable duration for sampling ambient noise levels where street traffic is the dominant source, as traffic noise generally does not vary significantly within an hour. Ambient sound measurements were conducted on Wednesday, October 11 and Thursday, October 12, 2023, to characterize the existing noise environment in the Project vicinity. The first set of measurements were taken between 6:30 a.m. and 8:00 a.m. to capture ambient morning noise levels.[37] The second set of measurements were taken between 11:00 a.m. and 12:30 p.m. to capture ambient daytime noise levels. The measurement locations are described below:

- M1: Multi-family residential uses to the south/southwest of the Project Site, east of Buckingham Parkway, approximately 450 feet from the Project boundary (representative of R1).
- M2: Multi-family residential uses to the south of the Project Site, on the east side of Buckingham Parkway, approximately 50 feet from the Project boundary. (representative of R3).
- M3: Multi-family residential uses and Fox Hills Parkette to the east of the Project Site, on the east side of Buckingham Parkway, approximately 50 feet to the east of the Project Site. (representative of R4).

[36] FTA, Transit Noise and Vibration Impact Assessment Manual, Table 6-1, September 2018.

[37] Ambient morning measurements were taken because the applicant is requesting a construction start time outside of normally allowable construction hours (9:00 a.m. to 7:00 p.m.)



SOURCE: ESA, 2022; ESRI Imagery, 2022

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.8-3

Surrounding Land Uses and Noise Measurement Locations

ESA

- M4: Multi-family residential uses to the east of the Project Site, on the south side of Hannum Avenue along Buckingham Parkway, approximately 550 feet from the Project boundary. (representative of R5).
- M5: Commercial land uses north of the Project Site, approximately 100 feet from the Project boundary. (representative of R6).
- M6: Commercial land uses west of the Project Site, approximately 50 feet from the Project boundary. (representative of R7).
- M7: Commercial land uses south/southwest of the Project Site, approximately 250 feet from the Project boundary. (representative of R8).
- M8: Fox Hills Park to the south/southwest of the Project Site, west of Buckingham Parkway, approximately 670 feet from the Project boundary. (representative of R2).

Noise measurements were conducted using Larson-Davis LxT1 Sound Level Meters (SLM). The Larson-Davis LxT1 SLM is a Type 1 standard instrument as defined in the American National Standard Institute (ANSI) S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The recording microphones were placed at a height of 5 feet above the local grade elevation. The sound level meters were setup to collect the hourly average noise level (L_{eq}).

The results of the ambient sound measurements are summarized in **Table 4.8-4**, *Summary of Ambient Noise Measurements.*

TABLE 4.8-4
SUMMARY OF AMBIENT NOISE MEASUREMENTS

Location	Measured Ambient Morning Noise Levels, dBA L_{eq}	Measured Ambient Daytime Noise Levels, dBA L_{eq}
R1	71.5	63.0
R2	68.7	63.4
R3	62.8	59.6
R4	64.3	61.2
R5	67.5	63.2
R6	66.2	65.7
R7	56.6	57.1
R8	56.7	53.5

SOURCE: ESA, 2023.

Existing Roadway Noise Levels

To further characterize the Project area's ambient noise environment, CNEL noise levels attributed to existing traffic on local roadways were calculated using a traffic noise prediction model, which was developed based on calculation methodologies provided in the Federal Highway

Administration (FHWA) Traffic Noise Model (TNM) Technical Manual,[38] and traffic data provided in the Project's Transportation Study[39] (see Appendix I of this Draft EIR). The TNM model calculates the average noise level at specific locations based on traffic volumes, average speeds, and site environmental conditions.

Existing roadway noise levels were calculated for 27 roadway segments located in the vicinity of the Project Site. The roadway segments selected for analysis are those expected to be most directly impacted by Project-related traffic, which, for the purpose of this analysis, include the roadways located near and immediately adjacent to the Project Site. These roadways, when compared to roadways located further away from the Project Site, would experience the greatest percentage increase or largest increase in volume from traffic generated by the Project (as distances are increased from the Project Site, traffic is spread out over a greater geographic area and its effects are reduced).

The ambient noise environment in the Project vicinity can be characterized by 24-hour CNEL levels attributable to existing traffic on local roadways. **Table 4.8-5**, *Predicted Existing Vehicular Traffic Noise Levels*, indicates the calculated CNEL from actual existing traffic volumes on the analyzed roadway segments.

Ambient Vibration Levels

Groundborne Vibration Levels

Aside from periodic construction work, field observations noted that other sources of groundborne vibration in the Project Site vicinity are primarily limited to heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, etc.) on local roadways. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of 65 VdB (approximately 0.0068 in/sec PPV).[40]

Groundborne Noise Levels

Groundborne noise levels would generally be 20 to 50 decibels lower than the velocity level depending on the frequency level of the source.[41] With a background groundborne vibration level in residential areas of 50 VdB or lower, groundborne noise levels would be approximately 0 to 30 dBA. A bus traveling at a distance of 50 feet would generate groundborne noise levels of approximately 23 to 38 dBA. The approximate level of human perception of groundborne noise is 25 dBA for low frequency vibration (near 30 Hz) and 40 dBA for mid-frequency vibration (near 60 Hz).[42]

[38] The traffic noise model which was developed based on calculation methodologies provided in the Caltrans TeNS document and traffic data provided in the Project's Transportation Study provided in Appendix I to this Draft EIR. This methodology, considered an industry standard, allows for the definition of roadway configurations, barrier information (if any), and receiver locations.

[39] Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR.

[40] FTA, Transit Noise and Vibration Impact Assessment Manual, Figure 5-4, September 2018.

[41] FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, p. 146.

[42] FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, p. 120.

TABLE 4.8-5
PREDICTED EXISTING VEHICULAR TRAFFIC NOISE LEVELS

Roadway Segment	Adjacent Land Use	Existing CNEL (dBA)[a]
Bristol Pkwy		
between Hannum Ave and Green Valley Cir	Commercial	71.2
between Slauson Ave and Hannum Ave	Commercial	70.1
n/o Slauson Ave	Cemetery	59.8
s/o Green Valley Cir	Residential/Hotel/Cemetery	64.4
Buckingham Pkwy		
between Hannum Ave and Green Valley Cir	Residential/Commercial/ Open Space	66.6
between Slauson Ave and Hannum Ave	Residential/Commercial	61.8
n/o Hannum Ave	Commercial	52.7
n/o Slauson Ave	Commercial	60.6
Centinela Ave		
e/o Green Valley Cir	Residential/Commercial	74.4
w/o Green Valley Cir	Cemetery	72.9
Fox Hills Dr		
s/o Hannum Ave	Commercial	65.6
Green Valley Cir		
between Bristol Pkwy and Buckingham Pkwy	Residential/Educational/ Open Space	69.6
between Buckingham Pkwy and Centinela Ave	Residential	70.7
w/o Bristol Pkwy	Hotel/Commercial	70.5
Hannum Ave		
between Bristol Pkwy and Uplander Wy	Commercial	68.9
between Fox Hills Dr and Bristol Pkwy	Commercial	66.6
between Slauson Ave and Hannum Ave	Commercial	66.8
between Uplander Wy and Buckingham Pkwy	Commercial	68.8
n/o Slauson Ave	Residential/Commercial	70.6
Marina Fwy		
s/o Slauson Ave	Freeway Off Ramp	73.1
Slauson Ave		
between Bristol Pkwy and Buckingham Pkwy	Commercial/Cemetery	74.8
between Hannum Ave and Marina Fwy	Residential/Commercial	70.2
between Marina Fwy and Bristol Pkwy	Commercial	73.8
e/o Buckingham Pkwy	Residential/Commercial	75.9
w/o Hannum Ave	Residential/Commercial	70.7
Uplander Wy		
n/o Hannum Ave	Commercial	53.9
s/o Hannum Ave	Commercial	56.3

[a] Calculated based on existing traffic volumes.
SOURCE: ESA, 2023.

4.8.5 Environmental Impacts

Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in a significant noise or vibration impact would occur if it would result in:

- **NOISE-1:** Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- **NOISE-2:** Generation of excessive groundborne vibration or groundborne noise levels; or
- **NOISE-3:** For a project located within the vicinity of a private airstrip or 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.

Potentially significant impacts related to noise are discussed and analyzed further below.

The City determined in the Initial Study that noise issues due to airport proximity (NOISE-3) would result in no impacts or less-than-significant impacts and, therefore, this issue is scoped out of this Draft EIR. Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding this issue. As discussed in the Initial Study, 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. The Project Site is not located within the vicinity of a private airstrip, or heliport or helistop. Airport and airfields in proximity to the Project Site include Santa Monica Airport approximately 4.2 miles to the northwest, and Los Angeles International Airport approximately 2.5 miles to the south/southwest. Therefore, the Project would not expose people to excessive noise levels from such uses and no impact would occur. No further analysis of this issue is therefore included in this Draft EIR.

Based on the regulatory framework described above, significant impacts would occur if any of the following criteria are met.

Construction:

- Noise Criteria (NC)-1: Without City approval for extended construction hours, Project construction activities would not occur between the hours of 8:00 p.m. and 8:00 a.m. Mondays through Fridays; 7:00 p.m. and 9:00 a.m. Saturdays; 7:00 p.m. and 10:00 a.m. Sundays. Construction occurring within these non-permitted hours would cause a significant noise impact without City approval. That is, should extended construction hours (7:00 a.m. to 8:00 a.m. on weekdays and 7:00 a.m. to 9:00 a.m. on Saturdays) be granted during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction by the City of Culver City via their approval process, a determination of construction noise impacts occurring during those approved extended hours would be subject to the construction-related noise criteria below, as applicable.
- NC-2: Project construction activities would not incorporate noise reduction techniques consistent with the City's General Plan Policy 2.A of the Noise Element.

- NC-3: Project construction activities would result in noise levels 5 dBA L_{eq} greater than measured ambient noise levels (see Table 4.8-4) at noise-sensitive receptors.

Operation:

- NC-4: For Project-related traffic noise, the Project causes the ambient noise levels measured at the property line of affected uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories; or the Project causes the ambient noise levels measured at the property line of affected uses to increase by 5 dBA CNEL or more within the "normally acceptable" or "conditionally acceptable" categories.
- NC-5: For Project-related operational on-site (i.e., non-roadway) noise sources such as outdoor building mechanical/electrical equipment or parking facilities increase the ambient noise level (Leq) at noise sensitive uses by 5 dBA Leq.

Groundborne Vibration and Groundborne Noise:

- NC-6: Potential Building Damage – Project construction activities cause groundborne vibration levels to exceed 0.2 inch-per-second PPV at the nearest residential buildings or 0.5 in/sec PPV at the nearest commercial buildings.
- NC-7: Potential Human Annoyance – Project construction activities cause groundborne vibration levels to exceed 75 VdB at nearby residential uses for occasional events.

Methodology

The methodology for evaluating construction and operational noise and vibration is discussed below and the calculation assumptions and results are also provided in Appendix G of this Draft EIR.

On-Site Construction Noise

On-site construction noise impacts were evaluated by determining the noise levels generated by the different types of construction activity anticipated, calculating the construction-related noise level at nearby sensitive receptor locations, and comparing these construction-related noise levels to existing ambient noise levels (i.e., noise levels without construction noise) at those receptors. The Project would include off-hours construction occurring between 7:00 a.m. and 8:00 a.m. on weekdays and 7:00 a.m. to 9:00 a.m. on Saturdays), therefore the analysis includes a comparison to both morning and daytime ambient noise levels. The types of construction equipment used, construction phasing, and construction schedule were provided by the Project's construction representative. As indicated by the construction equipment list, no high-impact pile driving or vibratory pile equipment would be used for Project construction. Instead, shoring piles will be drilled to minimize noise and vibration.

Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are being operated concurrently. The Project's estimated construction noise levels were calculated for a scenario in which all pieces of construction equipment would operate simultaneously with the loudest type of equipment located at the construction area nearest to the affected receptors to present a conservative impact analysis. The

remaining equipment was assumed to be located at the center of the Project Site. The following steps were undertaken to assess construction-period noise impacts.

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 4.8-4);
2. Typical noise levels for each type of construction equipment were obtained from the Federal Highway Administration Roadway Construction Noise Model (RCNM);
3. Distances between construction site locations (noise sources) and surrounding sensitive receptors were measured using Project architectural drawings and site plans and Google Earth;
4. The construction noise levels were then calculated for each construction phase using the FHWA RCNM, conservatively, in terms of hourly L_{eq}, for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance, assuming that all of the equipment for each construction phase would be in use concurrently and that the loudest equipment would be located at the edge of the Project Site closest to the sensitive receptor locations and;
5. Construction noise levels were then compared to the construction noise significance thresholds identified above.

Off-Site Roadway Noise (Construction and Operation)

Roadway noise impacts have been evaluated using the Caltrans Technical Noise Supplement (TeNS) method based on the roadway traffic volume data provided in the Transportation Study[43] prepared for the Project and included in Appendix I of this Draft EIR. This method allows for the definition of roadway configurations, barrier information (if any), and receiver locations. Roadway noise attributable to Project development was calculated and compared to baseline noise levels that would occur under the "Without Project" condition.

Stationary Point-Source Noise (Operations)

Stationary point-source noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources, such as rooftop mechanical equipment, parking structure, and loading area activity, calculating the hourly L_{eq} noise level from each noise source (incorporating individual usage factor for each equipment) at sensitive receptor property lines, and comparing such noise levels to existing ambient noise levels. More specifically, the following steps were undertaken to calculate outdoor stationary point-source noise impacts:

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 4.8-4);
2. Typical noise levels generated by each type of stationary point-source noise generator including mechanical equipment, loading area, and parking structure operations were obtained from measured noise levels for similar equipment/activities, noise levels published in environmental noise assessment documents for land use development projects or scientific journals, or noise levels from equipment manufacturer specifications;
3. Distances between stationary point-source noise generators and surrounding sensitive receptor locations were measured using Project architectural drawings, Google Earth, and site plans;

[43] Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR.

4. Stationary point-source noise levels were then calculated for each sensitive receptor location based on the standard point source noise-distance attenuation factor of 6 dBA for each doubling of distance;
5. Noise level increases, if any, were compared to the stationary point-source noise significance thresholds identified above in Section *Thresholds of Significance* subsection; and
6. Outdoor mechanical equipment is assessed based on the City Municipal Code requirements and measured data, and their impacts on the nearby offsite receptors are determined based on their distance from these receptors. The noise levels determined at the offsite, noise-sensitive receptors are then compared to the stationary source noise significance thresholds identified in the City Municipal Code.

For purposes of providing a conservative noise analysis for outdoor spaces, the maximum occupant load of Project outdoor spaces was calculated based on an occupancy load factor of 15 square feet per person for an assembly area without fixed seats, according to the California Building Code Table 1004.5 Maximum Floor Area Allowances Per Occupant.[44] Although this occupancy load factor provides an overestimation of the occupancy load and associated noise within passive landscaped areas, it has been applied to the square footage of the Project's outdoor spaces to provide a conservative worst-case noise analysis. It has been assumed that up to 318 people would occupy the first-floor outdoor spaces (Hannum Plaza) at one time, 497 people would occupy the second-floor amenities (exterior courtyard) at one time, and 830 people would occupy the sixth-floor amenities (outdoor amenity deck and pool area) at one time.[45] Simultaneous occupation of the outdoor spaces with this number of people is not anticipated by the Project.

Noise from female adults, male adults, and children talking at a normal level is approximately 55 dBA, 58 dBA, and 58 dBA, respectively, at a distance of 3 feet.[46] As a conservative analysis, it is assumed that each outdoor space would be at full capacity and that half of the visitors would be adults (half male and half female) and half would be children. Of the adults and children, half would be talking simultaneously (assuming approximately half of the occupants talking and the other half listening). Low volume amplified sound is expected in the outdoor areas.

Parking-related noise levels were estimated using the methodology recommended by FTA for the general assessment of stationary transit noise source. 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:

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

44 California Building Standards Commission, 2019 Title 24, Part 2, Volume 1 – California Building Code.
45 Occupancy loads were provided by the applicant.
46 American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012).

The Project's loading areas are located on the north and south sides of the Project. Based on a noise survey that was conducted at a loading area and trash collection facilities by ESA, loading area activity (namely idling semi-trucks and backup alarm beeps) could generate noise levels of approximately 70 dBA L_{eq} at a reference distance of 50 feet.[47]

Groundborne Vibration (Construction and Operations)

Groundborne vibration impacts due to the Project's construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at the potentially affected receptor, and comparing the Project's activities to the applicable vibration significance thresholds. Vibration levels were calculated based on the FTA published standard vibration velocities for various construction equipment operations.[48] The vibration velocities were calculated based on a point source with standard distance propagation conditions, pursuant to FTA procedures. Construction of the Project would not use impact pile driving methods, and as such, impact pile driving vibration is not included in the construction vibration analysis.

Exterior-to-Interior Noise Attenuation

Exterior , interior with windows open, and interior with windows closed noise levels are calculated for on-site construction noise and on-site stationary operational noise. For buildings with windows open would provide approximately 13 dBA exterior/interior noise reduction. With windows closed, the minimum exterior-to-interior noise attenuation for typical structures in California is approximately 25 to 30 dBA or potentially more with improved noise abatement materials or techniques. For purposes of this analysis, the exterior-to-interior noise attenuation for buildings with windows closed is assumed to be 25 dBA.[49]

Project Design Features

As discussed above, the City's General Plan Noise Element includes Policy 2.A, which discusses the use of temporary sound barriers at a construction site if construction noise is impacting nearby noise sensitive land uses. Since noise sensitive land uses are located in proximity to the Project Site, the following Project Design Features (PDF) are recommended and have been incorporated into the Project's construction plans:

> **NOI-PDF-1: Project Construction Schedule**. Prior to issuance of a building permit, notice of the Project construction schedule will be provided to adjacent property owners and occupants. Evidence of such notification will be provided to the City of Culver City Public Works Department. The notice will identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).

47 The loading dock facility noise measurements were conducted at a loading dock facility at a Wal-Mart store using the Larson-Davis 820 Precision Integrated Sound Level Meter ("SLM") in May 2003. The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately 5 feet above the local grade.

48 FTA, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-4.

49 Gordon, C.G., W.J. Galloway, B.A. Kugler, and D.L. Nelson. NCHRP Report 117: Highway Noise: A Design Guide for Highway Engineers. Washington, D.C.: Transportation Research Board, National Research Council, 1971.

NOI-PDF-2: Use of Impact Pile Driver. The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating shoring piles to be drilled will be used.

NOI-PDF-3: Construction Rules Sign. During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers, with 24-hour availability, of the Applicant, Property Owner, construction contractor(s) will be posted on the Property in a location that is visible to the public. In addition, appropriate staff person at the City of Culver City will be notified for such incidences. These names and telephone numbers will also be made available to adjacent property owners and occupants to the satisfaction of the appropriate department (Planning Manager and/or Building Official) of Culver City.

NOI-PDF-4: Neighborhood Streets. No construction haul trucks, including concrete trucks, will be allowed to travel through neighborhood streets that are primarily residential uses.

NOI-PDF-5: Mechanical Equipment Noise. All building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed sound level limits of the noise level requirements of the City of Culver City General Plan Noise Element Regulation of Stationary Noise Sources through the use of quiet fans, duct silencers, parapets, or similar noise attenuation methods.

NOI-PDF-6: Noise Control – Amplified Sound Systems. If the Project installs permanent outdoor amplified sound systems, the systems will be located in discrete areas of the outdoor common opens space areas courtyard such that the sound would be mostly blocked by the proposed on-site building or walls from off-site residential receivers. Section 9.07.055(B) of the CCMC prohibits the operation of a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions or providing entertainment which is audible at a distance of fifty (50) feet or beyond the subject's property line without first filing an application and obtaining a permit as set forth in Chapter 9.07, Noise Regulations, of the CCMC. The systems will at a minimum be designed so as not to result in a perceivable increase at the nearest noise sensitive residential receptor. Specifically, daytime outdoor amplified sound systems will not result in an increase of 5 dBA L_{eq} over existing ambient noise conditions at the nearest noise sensitive residential receptor. Nighttime speaker noise, if it occurs, will comply with the exterior noise standards identified in the Regulation of Stationary Noise Sources (City of Culver City General Plan Noise Element, approved by City Council July 22, 1996). A qualified noise consultant will provide written documentation and submitted to appropriate department of City of Culver City that the design of the system(s) complies with the maximum noise levels at the property line of the nearest off-site sensitive receivers.

In addition, see Project Design Feature TRAF-PDF-1 in Section 1.11, *Transportation*, of this Draft EIR which includes preparation of a Construction Management Plan.

Analysis of Project Impacts

Threshold NOISE-1: The Project would have a potentially significant impact on noise if it would result in the generation of a substantial temporary or permanent increase in ambient noise level in the vicinity of the Project in excess of the applicable standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact Analysis

On-Site Construction Noise

Noise impacts from construction activities are generally a function of the noise generated by construction equipment, equipment locations, the sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Project construction is anticipated to commence in the first quarter of 2025 and require up to 30 months.

Construction sequencing would include demolition; grading/excavation; foundations; building construction; architectural coating; and paving/sitework. Project construction would require the use of mobile heavy equipment with high noise-level characteristics. Individual pieces of construction equipment expected to be used during Project construction could produce maximum noise levels of 73 dBA to 85 dBA at a reference distance of 50 feet from the noise source, as shown in **Table 4.8-6**, *Construction Equipment Noise Levels*. These maximum noise levels would occur when equipment is operating under full power conditions. The estimated usage factor for the equipment is also shown in 4.8-6. The usage factors are based on the FHWA's Roadway Construction Noise Model User's Guide.[50]

TABLE 4.8-6
CONSTRUCTION EQUIPMENT NOISE LEVELS

Equipment	Estimated Usage Factor, %	Maximum Noise Level at 50 feet from Equipment, dBA (Lmax)
Aerial Lift	20	75
Air Compressor	40	78
Bore/Drill Rig	20	79
Concrete Saw	20	90
Crane	16	81
Excavator	40	81
Forklift	10	75
Generator Sets	50	81
Grader	40	85
Off Highway Truck	40	76
Paver	50	77
Paving Equipment	50	85
Pumps	50	81
Rough Terrain Forklift	10	75
Rubber Tired Loader	40	79
Skid Steer Loader	40	78
Surfacing Equipment	20	90
Sweepers/Scrubbers	10	82
Tractor/Loader/Backhoe	40	78

SOURCE: FHWA Roadway Construction Noise Model User's Guide, 2006.

[50] Federal Highway Administration, Roadway Construction Noise Model User's Guide, 2006. https://www.gsweventcenter.com/Draft_SEIR_References/2006_01_Roadway_Construction_Noise_Model_User_Guide_FHWA.pdf

A summary of construction noise impacts at existing nearby sensitive receptors for different times of day and scenarios is provided in Table 4.8-7, with supporting calculations provided in Appendix G of this Draft EIR.

As shown in **Table 4.8-7**, exterior construction noise levels are estimated to reach a maximum of 66.4 dBA L_{eq} at the off-site receptor locations R1, 63.6 dBA L_{eq} at R2, 84.8 dBA L_{eq} at R3, and 84.8 dBA L_{eq} at R4, 65.5 dBA L_{eq} at R5. Projected construction noise levels would exceed morning and daytime noise thresholds at R3 and R4and impacts would be potentially significant before implementation of mitigation measures. As indicated above, 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. In the event construction occurs outside of the permitted hours without approval from the City of Culver City, a significant impact would occur because of the noncompliance with existing regulations. It is anticipated that the Project would seek approval from the City to initiate construction as early as 7:00 a.m. During these extended construction hours (i.e., 7:00 a.m. to 8:00 a.m. on weekdays and 7:00 to 9:00 a.m. on Saturdays) occurring within the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction, noise levels could still nonetheless exceed the thresholds as shown in Table 4.8-7 even if an extended hours permit is granted, and also for this reason, would be considered a potentially significant impact.

As discussed in Chapter 2, *Project Description*, of this Draft EIR, the extended construction hours are being requested over the course of approximately four (4) months during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction. The other construction phases would occur per the allowable standard CCMC permitted construction hours.

As Project construction would result in temporary increases in ambient noise that would meet or exceed the thresholds of significance (see NC-1, NC-2, and NC-3 in Thresholds) at nearby noise sensitive receptors, construction noise impacts would be potentially significant, and mitigation measures would be required.

On-Site Construction Noise – Commercial Land Uses

For informational purposes only, nearby commercial land uses were analyzed at locations R6 through R8. As shown in **Table 4.8-8**, *Estimated Construction Noise Levels at Commercial Land Uses*, noise levels would be 53.8 dBA L_{eq} at R6, 59.8 dBA L_{eq} at R7, and 46.6 dBA L_{eq} at R8. Note that receptors R6 through R8 are commercial land uses with no exterior uses other than driveways, parking, and other similar uses, and as such, exterior noise levels were not analyzed. The maximum increase in interior noise would be 3.2 dBA L_{eq} at receptor R7 relative to the ambient noise level.

TABLE 4.8-7
ESTIMATED CONSTRUCTION NOISE LEVELS AT EXISTING OFF-SITE SENSITIVE RECEPTORS

Noise Sensitive Receptor	Maximum Construction Noise Levels,[a] (Exterior/Interior with windows open/Interior with windows closed) Hourly L_{eq} (dBA)	Morning Noise Threshold (Ambient + 5 dBA)	Exceeds Threshold? (Exterior/Interior with Windows Open/Interior with Windows Closed)	Daytime Noise Threshold (Ambient + 5 dBA)	Exceeds Threshold? (Exterior/Interior with Windows Open/Interior with Windows Closed)
R1	66.4 / 53.4 / 41.4	76.5	No / No / No	68.0	No / No / No
R2	63.6 / 50.6 / 38.6	73.7	No / No / No	68.4	No / No / No
R3	**84.8** / **71.8** / 59.8	67.8	**Yes** / **Yes** / No	64.6	**Yes** / **Yes** / No
R4	**84.8** / **71.8** / 59.8	69.3	**Yes** / **Yes** / No	66.2	**Yes** / **Yes** / No
R5	65.5 / 52.5 / 40.5	72.5	No / No / No	68.2	No / No / No

[a] Estimated construction noise levels represent the worst-case condition when noise generators are located closest to the receptors.
[b] Bold values indicate an exceedance of either the morning or daytime noise threshold.
[c] Noise levels account for an exterior-to-interior noise attenuation rate of 13 dBA for buildings with windows open and 25 dBA for buildings with windows closed.

SOURCE: ESA, 2023.

TABLE 4.8-8
ESTIMATED CONSTRUCTION NOISE LEVELS AT COMMERCIAL LAND USES

Commercial Land Use	Maximum Construction Noise Levels,[a] (Exterior / Interior) Hourly L_{eq} (dBA)	Ambient Noise Level – Morning (dBA L_{eq})	Ambient Noise Level – Daytime (dBA L_{eq})
R6	NA / 53.8[b,c]	66.2	65.7
R7	NA / 59.8[b,c]	56.6	57.1
R8	NA / 46.6[b,c]	56.7	53.5

[a] Estimated construction noise levels represent the worst-case condition when noise generators are located closest to the receptors.
[b] Noise levels account for an exterior-to-interior noise attenuation rate of 25 dBA for buildings with windows closed.
[c] Note that locations R6 through R8 are commercial land uses and as such, exterior noise levels were not analyzed.

SOURCE: ESA, 2023.

Off-Site Construction Noise

Delivery and haul truck trips would occur throughout the construction period, including during extended hours between 7:00 a.m. and 8:00 a.m. on weekdays and 7:00 a.m. to 9:00 a.m. on Saturdays during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction. For the remainder of the construction period, no truck trips would occur between 8:00 p.m. and 8:00 a.m. Monday through Friday, before 9:00 a.m. or after 7:00 p.m. on Saturday, or before 10:00 a.m. and 7:00 p.m. on Sunday.

As shown in **Table 4.8-9**, *Estimate of Off-Site Construction Traffic Noise Levels*, the addition of 190 haul truck trips, 26 vendor truck trips, and 60 worker trips per day (24 truck trips, 4 vendor trips, and 30 worker trips per peak hour) during the grading/excavation phase would result in a less than perceptible 3 dBA noise level increase along affected roadway segments in the project vicinity and would not increase noise levels by a "clearly noticeable" increase of 5 dBA over the ambient condition. The majority of truck trips would occur during the grading/excavation phase of construction. Trucks entering the site would arrive from State Route 90, head east on Slauson Avenue, then head south on Buckingham Parkway.

TABLE 4.8-9
ESTIMATE OF OFF-SITE CONSTRUCTION TRAFFIC NOISE LEVELS

		CNEL (dBA)			
Roadway Segment	**Existing Land Uses Located along Roadway Segment**	**Existing (A)**	**Existing with Project Construction (B)**	**Project Increment (B–A)**	**Exceed Threshold?**
Buckingham Pkwy					
between Hannum Ave and Green Valley Cir	Residential/Commercial/ Open Space	66.6	67.9	1.3	No
between Slauson Ave and Hannum Ave	Residential/Commercial	61.8	64.9	3.1	No
Fox Hills Dr					
s/o Hannum Ave	Commercial	65.6	67.3	1.7	No
Hannum Ave					
between Bristol Pkwy and Uplander Wy	Commercial	68.9	70.1	1.2	No
between Fox Hills Dr and Bristol Pkwy	Commercial	66.6	67.6	1.0	No
between Slauson Ave and Fox Hills Dr	Commercial	68.9	69.7	0.8	No
between Uplander Wy and Buckingham Pkwy	Commercial	68.8	70.0	1.2	No
Marina Fwy					
s/o Slauson Ave	Freeway Off-Ramp	73.1	73.4	0.3	No
Slauson Ave					
between Hannum Ave and Marina Fwy	Residential/Commercial	70.2	70.8	0.5	No
e/o Buckingham Pkwy	Residential/Commercial	75.9	76.2	0.3	No
w/o Hannum Ave	Commercial	70.7	71.5	0.8	No

SOURCE: ESA 2023. Appendix G of this Draft EIR.

Alternatively, trucks would arrive from northbound Interstate 405, exit at Sepulveda Boulevard, head east on Green Valley Circle, head north on Fox Hills Drive, then head east on Hannum Avenue to reach the Project Site. Trucks would exit the site and head north on Buckingham Parkway, then either head west on Slauson Avenue to Interstate 405 or, head west on Hannum Avenue, head west on Slauson Avenue, head south on Jefferson Avenue, and merge onto the Interstate 405 north or south. As indicated in Table 4.8-8, the Project's vehicle trips would increase existing traffic noise levels from 61.8 dBA CNEL to 64.9 dBA CNEL (an increase of 3.1 dBA CNEL) along Buckingham Parkway between Slauson Avenue and Hannum Avenue, where noise-sensitive uses (e.g., multi-family residential uses) are located. As shown in Figure 4.8-2, noise levels are considered "normally acceptable" if they are between 50 dBA CNEL or lower and 65 dBA CNEL, "conditionally acceptable" if they are between 60 dBA CNEL and 70 dBA CNEL, "normally unacceptable" if they are between 70 dBA CNEL and 75 dBA CNEL, or "clearly unacceptable" if they are greater than 75 dBA CNEL. Since the existing noise levels along Buckingham Parkway between Slauson Avenue and Hannum Avenue are within the "normally acceptable" and "conditionally acceptable" categories, the noise threshold of a 5 dBA CNEL increase over existing noise levels applies to the street segment. This increase does not represent an exceedance of the significance threshold of an increase of 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories or an increase by 5 dBA CNEL or more within the "normally acceptable" or "conditionally acceptable" categories. Therefore, based on this additional supporting evidence, noise impacts from off-site construction traffic would be less than significant and no mitigation measures are required.

On-Site Operational Noise

Fixed Mechanical Equipment

The Project would include new mechanical equipment (e.g., air ventilation equipment), which would be located at the roof level. Mechanical equipment such as air conditioning equipment and emergency generators may generate audible noise levels. Equipment such as emergency generators, would be located within enclosed mechanical rooms, which would shield the noise at off-site noise sensitive uses so as to avoid land use noise conflicts with adjacent uses and minimize audible increases in exterior noise levels at off-site noise sensitive uses. **Table 4.8-10**, *Mechanical Equipment Noise Levels at Noise Sensitive Receptors*, presents the estimated on-site mechanical equipment noise levels at the off-site receptor locations. As shown on Table 4.8-9, the estimated noise levels from the mechanical equipment would range from 21.3 dBA (L_{eq}) to R8 to 46.9 dBA (L_{eq}) at receptor locations R2 and R3, which would be below the existing ambient noise levels. As such, the estimated noise levels at all off-site receptor locations would be below the significance threshold of 5 dBA (L_{eq}) above ambient noise levels. As such, the Project would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established by the City, and impacts from mechanical equipment noise would be less than significant.

TABLE 4.8-10
MECHANICAL EQUIPMENT NOISE LEVELS AT NOISE SENSITIVE RECEPTORS

Receptor Location	Existing Ambient Noise Levels,[a] dBA (L_{eq})	Estimated Noise from Project Mechanical Equipment,[b,c] (Exterior/Interior with windows open/Interior with windows closed) dBA (L_{eq})	Ambient + Project Noise Levels (Exterior/Interior with windows open/Interior with windows closed), dBA (L_{eq})	Significance Threshold[d]	Exceedance over Significance Threshold	Significant Impact?
R1	63.0	27.8 / 14.8 / 2.8	63.0 / 63.0 / 63.0	68.0	0.0	No
R2	63.4	21.3 / 8.3 / 0.0	63.4 / 63.4 / 63.4	68.4	0.0	No
R3	59.6	46.9 / 33.9 / 21.9	59.8 / 59.6 / 59.6	64.6	0.0	No
R4	61.2	40.9 / 27.9 / 15.9	61.2 / 61.2 / 61.2	66.2	0.0	No
R5	63.2	26.1 / 13.1 / 1.1	63.2/ 63.2 / 63.2	68.2	0.0	No

NOTES:

[a] The ambient noise level is based on the measured daytime and morning noise levels shown in Table 4.8-4, and the lower value (daytime or morning) is used for the purposes of impact determination.

[b] Exterior reference noise levels for air condenser units, fans, and related equipment, the primary sources of noise from fixed mechanical equipment, would be 81.9 dBA Leq measured at a distance of 5 feet (based on noise data from large shopping center projects in Southern California). Refer to: City of Moreno Valley, Moreno Valley Walmart Noise Impact Analysis, Table 9-1, Page 71, February 10, 2015; and City of Pomona, Pomona Ranch Plaza Walmart Expansion Project, Table 4.4-5, Pg. 4.4-33, August 2014. Assumes mechanical equipment noise generated by the closest Project building to each sensitive receptor.

[c] Noise levels account for an exterior-to-interior noise attenuation rate of 13 dBA for buildings with windows open and 25 dBA for buildings with windows closed.

[d] Significance thresholds are equivalent to the measured daytime or morning ambient noise levels, whichever is lower plus 5 dBA.

SOURCE: ESA 2023

Parking Structure Noise

Ingress/egress driveways to the internal parking garage/structure would be located on the P1 Level from Hannum Avenue and on the P2 level from Buckingham Parkway. Based on the traffic data provided to ESA, the afternoon peak hour traffic volume would be 59 vehicles entering and exiting the parking structure. The vehicles could enter the Project Site from either Hannum Avenue or Buckingham Parkway.[51] To provide a worse-case conservative analysis, assuming all 59 vehicles entered the parking structure from Buckingham Parkway, using FTA's calculation for noise generated by parking lot traffic, the entering vehicles would create noise levels up to 44 dBA.[52]

Sources of noise within the below-grade parking structure would primarily include vehicular movements, engine noise and vehicle door opening and closing. Noise generated within the parking structure would be effectively shielded from off-site sensitive receptor locations, as the structure would be fully enclosed on all sides. However, for purposes of this analysis peak hour trips from the Project are assumed to occur at the closest parking garage driveway to each sensitive receptor. **Table 4.8-11,** *On-Site Parking Noise Levels at Noise Sensitive Receptors*, presents the estimated noise levels from the parking garage at the off-site receptor locations. As indicated in Table 4.8-10, the estimated noise levels from the Project's parking garage would be well below existing ambient noise levels and the significance threshold of 5 dBA (L_{eq}) above ambient noise levels. As such, the Project would not result in the generation of a substantial permanent increase in ambient noise levels

[51] Gibson Transportation Consulting, Inc., Transportation Study for 5700 Hannum Avenue, August 2023. Provided in Appendix I of this Draft EIR.

[52] FTA, Transit Noise and Vibration Impact Assessment. September, 2018, Tables 4-13 and 4-14.

in the vicinity of the Project in excess of standards established by the City, and impacts from parking facilities would be less than significant.

TABLE 4.8-11
ON-SITE PARKING NOISE LEVELS AT NOISE SENSITIVE RECEPTORS

Receptor Location	Existing Ambient Noise Levels,[a] dBA (L_{eq})	Estimated Noise from Project Parking, (Exterior/Interior with windows open/Interior with windows closed)[b] dBA (L_{eq})	Ambient + Project Noise Levels (Exterior/Interior with windows open/Interior with windows closed) dBA (L_{eq})	Significance Threshold[c]	Exceedance over Significance Threshold	Significant Impact?
R1	63.0	25.0 / 12.0 / 0.0	63.0 / 63.0 / 63.0	68.0	0.0	No
R2	63.4	18.5 / 5.5 / 0.0	63.4 / 63.4 / 63.4	68.4	0.0	No
R3	59.6	44.1 / 31.1 / 19.1	59.6 / 59.6 / 59.6	64.6	0.0	No
R4	61.2	44.1 / 31.1 / 19.1	61.2 / 61.2 / 61.2	66.2	0.0	No
R5	63.2	23.3 / 10.3 / 0.0	63.2 / 63.2 / 63.2	68.2	0.0	No

NOTES:

[a] The ambient noise level is based on the measured daytime and morning noise levels shown in Table 4.8-4, and the lower value (daytime or morning) is used for the purposes of impact determination.

[b] Noise levels account for an exterior-to-interior noise attenuation rate of 13 dBA for buildings with windows open and 25 dBA for buildings with windows closed.

[c] Significance thresholds are equivalent to the measured daytime or morning ambient noise levels, whichever is lower plus 5 dBA.

SOURCE: ESA 2023

Loading Areas and Refuse Collection

Temporary loading would be provided along Buckingham Parkway and in the northwestern corner of the Project Site south of Hannum Avenue. Based on a noise survey that was conducted at a loading area and trash collection facilities by ESA, loading area activity (namely idling semi-trucks and backup alarm beeps) and trash compactors could generate noise levels of approximately 70 dBA L_{eq} and 66 dBA L_{eq}, respectively, at a reference distance of 50 feet.[53] Delivery truck idling is restricted to no more than five consecutive minutes in the loading area pursuant to State regulation (Title 13 California Code of Regulations [CCR], Section 2485). Pursuant to Title 13 California Code of Regulations [CCR], Section 2485, signs would be posted in delivery loading areas specifying this idling restriction. Based on the engine idling limitation of five minutes, the hourly average noise level would be 59.2 dBA L_{eq} at 50 feet. As shown in **Table 4.8-12,** *Loading Areas and Refuse Collection Noise Levels*, loading activity and trash compaction would be reduced to 56.3 dBA L_{eq} or lower at the closest receptors located to the east of the Project Site. Therefore, the noise levels from the Project's loading and refuse collection areas would not exceed by 5 dBA over the ambient noise levels captured at sensitive receptors in the Project vicinity and impacts would be less than significant.

[53] The loading dock facility noise measurements were conducted at a loading dock facility at a Wal-Mart store using the Larson-Davis 820 Precision Integrated Sound Level Meter ("SLM") in May 2003. The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately 5 feet above the local grade.

TABLE 4.8-12
LOADING AREAS AND REFUSE COLLECTION NOISE LEVELS

Receptor Location	Existing Ambient Noise Levels,[a] dBA (L_{eq})	Estimated Noise from Project Parking, (Exterior/Interior with windows open/Interior with windows closed)[b] dBA (L_{eq})	Ambient + Project Noise Levels (Exterior/Interior with windows open/Interior with windows closed) dBA (L_{eq})	Significance Threshold[c]	Exceedance over Significance Threshold	Significant Impact?
R1	63.0	35.7 / 22.7 / 10.7	63.0 / 63.0 / 63.0	68.0	0.0	No
R2	63.4	28.2 / 15.2 / 3.2	63.4 / 63.4 / 63.4	68.4	0.0	No
R3	59.6	56.3 / 43.3 / 31.3	61.3 / 59.6 / 59.6	64.6	0.0	No
R4	61.2	54.1 / 41.1 / 29.1	62.0 / 61.2 / 61.2	66.2	0.0	No
R5	63.2	26.3 / 13.3 / 1.3	63.2 / 63.2 / 63.2	68.2	0.0	No

NOTES:

[a] The ambient noise level is based on the measured daytime and morning noise levels shown in Table 4.8-4, and the lower value (daytime or morning) is used for the purposes of impact determination.

[b] Noise levels account for an exterior-to-interior noise attenuation rate of 13 dBA for buildings with windows open and 25 dBA for buildings with windows closed.

[c] Significance thresholds are equivalent to the measured daytime or morning ambient noise levels, whichever is lower plus 5 dBA.

SOURCE: ESA 2023

Off-Site Operational Traffic Noise

Impacts Under Existing Traffic Baseline Conditions

Existing roadway noise levels were calculated along various roadway segments near to the Project Site. Roadway noise attributable to Project development was calculated using the traffic noise model previously described and was compared to baseline noise levels that would occur under the "No Project" condition. Project impacts are shown in **Table 4.8-13**, *Off-Site Traffic Noise Impacts – Existing Plus Project Conditions,* with supporting calculation files provided in Appendix G of this Draft EIR.

TABLE 4.8-13
OFFSITE TRAFFIC NOISE IMPACTS – EXISTING PLUS PROJECT CONDITIONS

		CNEL (dBA) at Referenced Distances from Roadway[a]		
Roadway Segment	Adjacent Land Use	Existing	Existing + Project	Difference
Bristol Pkwy				
between Hannum Ave and Green Valley Cir	Commercial	71.2	71.2	0.1
between Slauson Ave and Hannum Ave	Commercial	70.1	70.3	0.2
n/o Slauson Ave	Cemetery	59.8	59.8	0.0
s/o Green Valley Cir	Residential/Hotel/Cemetery	64.4	64.5	0.1
Buckingham Pkwy				
between Hannum Ave and Green Valley Cir	Residential/Commercial/ Open Space	66.6	66.8	0.2
between Slauson Ave and Hannum Ave	Residential/Commercial	61.8	61.8	0.0
n/o Hannum Ave	Commercial	52.7	52.7	0.0
n/o Slauson Ave	Commercial	60.6	60.6	0.0

TABLE 4.8-13
OFFSITE TRAFFIC NOISE IMPACTS – EXISTING PLUS PROJECT CONDITIONS

		CNEL (dBA) at Referenced Distances from Roadway[a]		
Roadway Segment	**Adjacent Land Use**	**Existing**	**Existing + Project**	**Difference**
Centinela Ave				
e/o Green Valley Cir	Residential/Commercial	74.4	74.4	0.0
w/o Green Valley Cir	Cemetery	72.9	72.9	0.0
Fox Hills Dr				
s/o Hannum Ave	Commercial	65.6	65.6	0.0
Green Valley Cir				
between Bristol Pkwy and Buckingham Pkwy	Residential/Educational/ Open Space	69.6	69.7	0.1
between Buckingham Pkwy and Centinela Ave	Residential	70.7	70.7	0.0
w/o Bristol Pkwy	Hotel/Commercial	70.5	70.5	0.1
Hannum Ave				
between Bristol Pkwy and Uplander Wy	Commercial	68.9	69.1	0.2
between Fox Hills Dr and Bristol Pkwy	Commercial	66.6	66.6	0.0
between Slauson Ave and Fox Hills Dr	Commercial	68.9	68.9	0.0
between Uplander Wy and Buckingham Pkwy	Commercial	68.8	69.1	0.3
n/o Slauson Ave	Residential/Commercial	70.6	70.6	0.0
Marina Fwy				
s/o Slauson Ave	Freeway Off Ramp	73.1	73.2	0.0
Slauson Ave				
between Bristol Pkwy and Buckingham Pkwy	Commercial/Cemetery	74.8	74.8	0.0
between Hannum Ave and Marina Fwy	Residential/Commercial	70.2	70.2	0.0
between Marina Fwy and Bristol Pkwy	Commercial	73.8	73.8	0.0
e/o Buckingham Pkwy	Residential/Commercial	75.9	76.0	0.0
w/o Hannum Ave	Residential/Commercial	70.7	70.7	0.1
Uplander Wy				
n/o Hannum Ave	Commercial	53.9	53.9	0.0
s/o Hannum Ave	Commercial	56.3	56.6	0.3

[a] Calculated based on existing traffic volumes.

NOTE:
s/o: south of
e/o: east of
n/o: north of
w/o: west of

SOURCE: ESA, 2023.

As indicated, the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 0.3 dBA CNEL, which would occur along Hannum Avenue between Uplander Way and Buckingham Parkway and along Uplander Way south of Hannum Avenue. This increase in noise level would be below a "clearly noticeable" increase of 5 dBA CNEL in an area characterized by normally acceptable noise levels that would remain below 55 dBA CNEL or conditionally acceptable noise levels that would remain below 70 dBA CNEL. The increase in sound level would be lower at the remaining roadway segments analyzed. Therefore, Project-related noise increases would be less than the applicable threshold and therefore less than significant, and no mitigation measures would be required.

Impacts Under Future plus Project Conditions Traffic Noise

Future off-site traffic-generated noise impacts were assessed based on a comparison of the future cumulative base traffic volumes with the Project to the future year (2027) base traffic volumes without the Project. The results of that comparison are provided in **Table 4.8-14**, *Off-Site Traffic Noise Impacts – Future Plus Project Conditions*. Table 4.8-13 shows the Project's contribution to the cumulative noise levels. The maximum cumulative noise increase from the Project plus related Project traffic would be 0.3 dBA CNEL, which would occur along Hannum Avenue between Uplander Way and Buckingham Parkway and along Uplander Way south of Hannum Avenue. This increase in sound level would not exceed the significance thresholds of an increase of 5 dBA CNEL in an area characterized by conditionally acceptable noise levels that would remain below 70 dBA CNEL. As a result, cumulative off-site traffic-related noise impacts would not be cumulatively considerable and impacts would be less than significant.

TABLE 4.8-14
OFFSITE TRAFFIC NOISE IMPACTS – FUTURE PLUS PROJECT CONDITIONS

		CNEL (dBA) at Referenced Distances from Roadway[a]		
Roadway Segment	**Adjacent Land Use**	**Future Year (2027)**	**Future + Project**	**Difference**
Bristol Pkwy				
between Hannum Ave and Green Valley Cir	Commercial	71.9	71.9	0.0
between Slauson Ave and Hannum Ave	Commercial	72.5	72.6	0.1
n/o Slauson Ave	Cemetery	60.0	60.0	0.0
s/o Green Valley Cir	Residential/Hotel/Cemetery	65.0	65.1	0.1
Buckingham Pkwy				
between Hannum Ave and Green Valley Cir	Residential/Commercial/ Open Space	67.1	67.2	0.2
between Slauson Ave and Hannum Ave	Residential/Commercial	62.5	62.6	0.1
n/o Hannum Ave	Commercial	52.9	52.9	0.0
n/o Slauson Ave	Commercial	60.7	60.7	0.0
Centinela Ave				
e/o Green Valley Cir	Residential/Commercial	74.8	74.8	0.0
w/o Green Valley Cir	Cemetery	73.1	73.1	0.0

TABLE 4.8-14
OFFSITE TRAFFIC NOISE IMPACTS – FUTURE PLUS PROJECT CONDITIONS

Roadway Segment	Adjacent Land Use	CNEL (dBA) at Referenced Distances from Roadway[a]		
		Future Year (2027)	Future + Project	Difference
Fox Hills Dr				
s/o Hannum Ave	Commercial	65.7	65.7	0.0
Green Valley Cir				
between Bristol Pkwy and Buckingham Pkwy	Residential/Educational/ Open Space	70.2	70.3	0.1
between Buckingham Pkwy and Centinela Ave	Residential	71.5	71.5	0.0
w/o Bristol Pkwy	Hotel/Commercial	71.7	71.7	0.0
Hannum Ave				
between Bristol Pkwy and Uplander Wy	Commercial	70.3	70.4	0.1
between Fox Hills Dr and Bristol Pkwy	Commercial	67.4	67.4	0.0
between Slauson Ave and Fox Hills Dr	Commercial	69.6	69.6	0.0
between Uplander Wy and Buckingham Pkwy	Commercial	69.2	69.5	0.3
n/o Slauson Ave	Residential/Commercial	71.2	71.2	0.0
Marina Fwy				
s/o Slauson Ave	Freeway Off Ramp	73.9	73.9	0.0
Slauson Ave				
between Bristol Pkwy and Buckingham Pkwy	Commercial/Cemetery	75.1	75.1	0.0
between Hannum Ave and Marina Fwy	Residential/Commercial	71.1	71.1	0.0
between Marina Fwy and Bristol Pkwy	Commercial	74.4	74.4	0.0
e/o Buckingham Pkwy	Residential/Commercial	76.3	76.3	0.0
w/o Hannum Ave	Residential/Commercial	72.4	72.4	0.0
Uplander Way				
n/o Hannum Ave	Commercial	54.1	54.1	0.0
s/o Hannum Ave	Commercial	56.4	56.7	0.3

[a] Calculated based on existing traffic volumes.

NOTE:
s/o: south of
e/o: east of
n/o: north of
w/o: west of

SOURCE: ESA, 2023.

Operational Outdoor Open Space Noise

As discussed in Chapter 2, *Project Description*, of the Draft EIR, the Project would provide approximately 54,156 sf of open space, including retail dining and sitting areas within the Hannum Plaza, as well as a centrally located courtyard and amenity/pool deck on sixth floor.

Of the total amount of open space, 19,526 square feet would be provided as private open space within balconies or private yards distributed throughout the Project's eight levels (including the P1 and P2 levels). The Project would provide 7,507 square feet of publicly accessible open space as part of Hannum Plaza. The remaining square footage would be common open space for residents. The Project would provide approximately 27,123 square feet of resident only open space. Outdoor spaces would include an 11,378 square foot centrally located courtyard on the second floor. The central courtyard on the second floor would have a variety of seating areas, BBQs, and drought tolerant landscape. Also, the Project would include a 9,610 square foot amenity deck on the sixth floor. The sixth floor/roof level pool deck would include a pool and spa enclosed by a 3.5 foot perimeter amenity deck glass enclosure.

Outdoor common spaces for residents would include lounge seating, gathering spaces, and small speakers installed in discreet areas to be used for low volume ambient sound and music, to be developed in accordance with Project Design Feature NOI-PDF-6. Occasional events for residents only would be held throughout the year within the courtyard or roof deck as an amenity for the residents. These events might include outdoor yoga, intimate food and beverage events, and/or outdoor movies.

Table 4.8-15, *Estimated Daytime Outdoor Open Space Noise Levels (L_{eq})*, shows the estimated noise levels at the nearest off-site sensitive receptor locations from outdoor open space. As indicated in Table 4.8-15, the estimated noise levels from the Project's individual outdoor open space related activities would range from 36.0 dBA L_{eq} at receptor location R2 to 58.5 dBA L_{eq} at receptor locations R3 and R4. As shown in Table 4.8-14, open space noise would not result in any exceedance of established thresholds and impacts would be less than significant.

TABLE 4.8-15
ESTIMATED DAYTIME OUTDOOR OPEN SPACE NOISE LEVELS (LEQ)

Receptor	Distance to Nearest Receptor (ft)	Open Space Noise Level (Exterior/Interior with windows open/Interior with windows closed)[a] (dBA Leq)	Ambient[b] (dBA Leq)	Ambient + Project (Exterior/Interior with windows open/Interior with windows closed) (dBA Leq)	Threshold[c] (dBA Leq)	Exceeds Threshold?
R1	450	39.4 / 26.4 / 14.4	63.0	63.0 / 63.0 / 63.0	68.0	No
R2	670	36.0 / 23.0 / 11.0	63.4	63.4 / 63.4 / 63.4	68.4	No
R3	50	58.5 / 45.5 / 33.5	59.6	62.1 / 62.1 / 62.1	64.6	No
R4	50	58.5 / 45.5 / 33.5	61.2	63.1 / 63.1 / 63.1	66.2	No
R5	550	37.7 / 24.7 / 12.7	63.2	63.2 / 63.2 / 63.2	68.2	No

NOTES:

[a] Noise levels account for an exterior-to-interior noise attenuation rate of 13 dBA for buildings with windows open and 25 dBA for buildings with windows closed.

[b] The ambient noise level is based on the measured daytime and morning noise levels shown in Table 4.8-4, and the lower value (daytime or morning) is used for the purposes of impact determination.

[c] Significance thresholds are equivalent to the measured daytime or morning ambient noise levels, whichever is lower plus 5 dBA.

SOURCE: ESA 2023.

Composite Noise Level Impacts from Project Operations

An evaluation of composite noise levels, including all Project-related noise sources plus existing ambient noise levels, was conducted to identify the potential maximum Project-related noise level increase that may occur at the noise-sensitive receptor locations. The overall sound environment at the sensitive receptors surrounding the Project Site would include contributions from each on-site and off-site individual noise source associated with maximum daily operation of the Project. Principal on-site noise sources associated with the Project would include mechanical equipment, open space, and parking facilities. **Table 4.8-16**, *Composite Noise Impacts*, presents the estimated noise from Project-related noise sources in terms of CNEL. As indicated in Table 4.8-16, the Project would not result in an increase of 5.0 dBA CNEL at any receptor. Therefore, the Project would not result in the generation of a substantial permanent increase in ambient noise levels at any receptor in excess of standards established by the City, and the Project's operational composite noise would be less than significant.

Operational Noise Levels at Commercial Land Uses.

For informational purposes only, operational noise levels at nearby commercial land uses as a result of the Project's mechanical equipment, parking structure, loading/refuse collections areas, and open space are presented in **Table 4.8-17**, *Operational Noise Levels at Commercial Land Uses*. As shown therein, there would be no perceptible increase in interior noise relative to the ambient noise levels.

Mitigation Measures

As analyzed above, the Project's on-site construction activities would result in significant noise impacts without the implementation of mitigation measures. Therefore, the following noise mitigation measures are recommended to reduce the Project's construction-related noise impacts to sensitive uses in the vicinity of the Project Site:

> **MM-NOI-1:** Temporary noise barriers shall be installed along the southern and eastern Project boundary to shield the sensitive receptors from construction noise. The barrier shall have a minimum height of 6 to 15 feet (from south to north, with the top of the barrier at least 15 feet above the ground surface of the residences to the east along Buckingham Parkway) that is made of sound blanket, plywood or other solid material capable of reducing on-site construction noise levels by 17 to 19 dBA.
>
> **MM-NOI-2:** Since construction equipment operates intermittently, and the types of equipment change with the stage of construction, noise emitted during construction would be mobile and highly variable. The following features shall be implemented during Project construction to reduce noise levels:
>
> - Maintain all construction tools and equipment in good operating order according to manufacturers' specifications.
> - To the extent practicable, schedule construction activity during normal working hours between 8 a.m. and 5 p.m. on weekdays when higher sound levels are typically present and are found acceptable.
> - Equip internal combustion engines with properly operating mufflers that are free from rust, holes, and leaks.
> - For construction equipment that utilize internal combustion engines, ensure the engine's housing doors are kept closed, and install noise-insulating material mounted on the engine housing consistent with manufacturers' guidelines, if possible.

TABLE 4.8-16
ON-SITE COMPOSITE NOISE IMPACTS

Receptor Location	Estimated Composite Noise, (Exterior / Interior with windows open/Interior with windows closed) dBA (L_{eq})				Project Composite Noise Levels, (Exterior /Interior with windows open/ Interior with windows closed) (dBA (L_{eq})	Ambient Noise Levels,[a] dBA (L_{eq})	Ambient Plus Project Composite Noise Levels, dBA (L_{eq})	Maximum Increase in Noise Levels Due to Project, dBA (L_{eq})	Significance Threshold	Significant Impact?
	Mechanical	Parking	Loading Area	Open Space						
R1	27.8 / 14.8 / 2.8	25.0 / 12.0 / 0.0	35.7 / 22.7 / 10.7	37.6 / 24.6 / 12.6	40.2 / 27.2 / 15.2	63.0	63.0 / 63.0 / 63.0	0.0	68.0	No
R2	21.3 / 8.3 / 0	18.5 / 5.5 / 0.0	28.2 / 15.2 / 3.2	36.0 / 23.0 / 11.0	36.9 / 23.9 / 11.9	63.4	63.4 / 63.4 / 63.4	0.0	68.4	No
R3	46.9 / 33.9 / 21.9	44.1 / 31.1 / 19.1	54.1 / 41.1 / 29.1	58.5 / 45.5 / 33.5	58.8 / 45.8 / 33.8	59.6	63.3 / 59.9 / 59.6	3.7	64.6	No
R4	40.9 / 27.9 / 15.9	44.1 / 31.1 / 19.1	54.1 / 41.1 / 29.1	58.5 / 45.5 / 33.5	60.0 / 47.0 / 35.0	61.2	63.7 / 61.4 / 61.2	2.5	66.2	No
R5	26.1 / 13.1 / 1.1	23.3 / 10.3 / 0.0	26.3 / 13.3 / 1.3	37.7 / 24.7 / 12.7	38.4 / 25.4 / 13.4	63.2	63.2 / 63.2 / 63.2	0.0	68.2	No

NOTES:

[a] The ambient noise level is based on the measured daytime and morning noise levels shown in Table 4.8-4, and the lower value (daytime or morning) is used for the purposes of impact determination.

SOURCE: ESA, 2023.

TABLE 4.8-17
OPERATIONAL NOISE LEVELS AT COMMERCIAL LAND USES

Receptor Location	Estimated Composite Noise, (Exterior/Interior) dBA (L_{eq})				Project Composite Noise Levels, (Exterior/Interior) dBA (L_{eq})	Ambient Noise Levels,[a] dBA (L_{eq})	Ambient Plus Project Composite Noise Levels, dBA (L_{eq})
	Mechanical	Parking	Loading Area	Open Space			
R6 [b]	NA / 15.9	NA / 13.1	NA / 13.3	NA / 27.5	NA / 27.8	65.7	NA / 65.7
R7 [b]	NA / 21.9	NA / 19.1	NA / 30.7	NA / 24.9	NA / 26.7	56.6	NA / 56.6
R8 [b]	NA / 7.9	NA / 5.1	NA / 5.7	NA / 19.5	NA / 19.8	53.5	NA / 53.5

NOTES:

[a] The ambient noise level is based on the measured daytime and morning noise levels shown in Table 4.8-4, and the lower value (daytime or morning) is presented.

SOURCE: ESA, 2023.

Operation

Operational noise impacts would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Construction Noise

Implementation of Mitigation Measures MM-NOI-1 and MM-NOI-2, as described above, would reduce the Project's on-site construction noise impacts at the off-site ground-level noise sensitive receptors, to the extent technically feasible.[54] **Table 4.8-18,** *On-Site Construction Noise Impacts – With Mitigation*, presents the estimated, conservative construction noise levels at the off-site receptor locations with implementation of mitigation measures. As indicated in Table 4.8-18, the construction noise levels at all receptor locations would be reduced below the 5-dBA significance threshold. Therefore**,** with implementation of mitigation measures MM-NOI-1 and MM-NOI-2, impacts from on-site construction noise would be less than significant with approval of an extended hours construction permit. However, construction during off-hours (between 7:00 a.m. and 8:00 a.m. on weekdays and 7:00 a.m. to 9:00 a.m. on Saturdays) during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction would remain significant and unavoidable if an extended hours permit was not obtained by the Project because they would occur outside of the City's allowable construction hours.

TABLE 4.8-18
ESTIMATED MITIGATED CONSTRUCTION NOISE LEVELS AT EXISTING OFF-SITE SENSITIVE RECEPTORS

Noise Sensitive Receptor	Maximum Construction Noise Levels, [a,c] (Exterior/Interior with windows open/Interior with windows closed) Hourly L_{eq} (dBA)	Morning Noise Threshold (Ambient + 5 dBA)	Exceeds Threshold? (Exterior/Interior with Windows Open/Interior with Windows Closed)	Daytime Noise Threshold (Ambient + 5 dBA)	Exceeds Threshold? (Exterior/Interior with Windows Open/Interior with Windows Closed)
R1 [b]	44.4 / 31.4 / 19.4	76.5	No / No / No	68.0	No / No / No
R2 [b]	41.6 / 28.6 / 16.6	73.7	No / No / No	68.4	No / No / No
R3 [b]	62.8 / 49.8 / 37.8	67.8	No / No / No	64.6	No / No / No
R4 [b]	62.8 / 49.8 / 35.8	69.3	No / No / No	66.2	No / No / No
R5 [b]	43.5 / 30.5 / 18.5	72.5	No / No / No	68.2	No / No / No

[a] Estimated construction noise levels represent the worst-case condition when noise generators are located closest to the receptors.
[b] Noise levels shown here included the noise attenuation effect by MM-NOI-1 and MM-NOI-2.
[c] Noise levels account for an exterior-to-interior noise attenuation rate of 13 dBA for buildings with windows open and 25 dBA for buildings with windows closed.

SOURCE: ESA, 2023.

[54] Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment. LAMC Chapter XI, Art. 1, Section 112.05.

Threshold NOISE-2: The Project would have a potentially significant impact on noise if it would result in the generation of excessive groundborne vibration or groundborne noise levels.

Impact Analysis

Structural Damage

Construction

Construction activities can generate varying degrees of groundborne vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibration from construction activities rarely reaches levels that damage structures. The Caltrans guidance manual incorporates FTA standard vibration velocities for construction equipment operations (Table 18 of the Caltrans guidance manual). The PPV vibration velocities for the types of construction equipment that can generate perceptible vibration levels and that would be used for the Project are listed in **Table 4.8-19**, *Vibration Source Levels for Construction Equipment*.

Because vibration level in RMS is best for characterizing human response to building vibration and vibration level in PPV is best used to characterize potential for damage, this construction vibration impact analysis assessed the potential for building damages using vibration levels in PPV (inch/sec). Potential human annoyance is assessed in the next subsection using vibration levels in VdB.

TABLE 4.8-19
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

	Approximate PPV (in/sec)					Approximate RMS (VdB)				
Equipment	**25 Feet**	**50 Feet**	**60 Feet**	**75 Feet**	**100 Feet**	**25 Feet**	**50 Feet**	**60 Feet**	**75 Feet**	**100 Feet**
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Wheel Loader	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Fork Lift	0.047	0.016	0.013	0.009	0.006	81	72	70	67	63
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Earth Mover	0.011	0.004	0.003	0.002	0.001	69	60	58	55	51
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

SOURCE: FTA, Transit Noise and Vibration Impact Assessment, September 2018; ESA, 2022.

Because vibration impacts occur normally at or within buildings, the distance to the nearest sensitive uses, for vibration impact analysis purposes, is measured between the nearest off-site

sensitive use buildings and the Project construction equipment area near the Project boundary. The Project would require drill rigs for the installation of drilled piles. As shown in Table 4.8-19, drill rigs generate approximately 0.089 in/sec PPV when measured at 25 feet. As shown in Table 4.8-1, the FTA guidelines indicate that a vibration level of 0.5 inch/sec PPV is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 0.2 inch/sec PPV.

Based on the vibration data provided in Table 4.8-19, vibration velocities from construction equipment would range from approximately 0.003 to 0.089 inches per second PPV at 25 feet from the source of activity. The nearest off-site buildings to the Project Site that could be subjected to Project-related vibration structural damage include the business park buildings to the west (50 feet) and commercial/office buildings to the north (150 feet) as measured from the Project Site boundary. Pile driving would not be used at the Project Site boundary and other vibration-generating equipment would normally operate at least 25 feet or more from the nearest off-site buildings. Thus, based on the vibration data provided in Table 4.8-19, the nearest off-site buildings would not be exposed to vibration levels that would cause structural damage and impacts would be less than significant.

Operation

The Project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Groundborne vibration generated by each of the above-mentioned activities would generate approximately up to 0.005 in/sec PPV adjacent to the Project Site.[55] The potential vibration levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold of 0.2 in/sec PPV significance threshold for potential residential building damage. As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.

Human Annoyance

Construction

The CEQA Thresholds Guide identifies residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks as sensitive uses. Off-site non-residential uses such as retail and commercial uses are not considered vibration sensitive receptors for human annoyance under CEQA. Groundborne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to vibration of floors and walls and is perceptible only inside buildings.[56] For typical buildings, groundborne vibration results in groundborne noise levels approximately 25 to 40 decibels lower than the velocity level.[57] According the FTA *Noise and Vibration Manual*, most of the studies of groundborne vibration in this country have focused on

[55] This vibration estimate is based on data presented in the USDOT Federal Transit Administration, 2018; which is included in Appendix G of this Draft EIR.

[56] Federal Transit Administration, Noise and Vibration Manual, 2018, Page 112,

[57] Federal Transit Administration, Noise and Vibration Manual, 2018, Page 119.

urban rail transit and the problems with groundborne vibration and noise that are common when there is less than 50 feet between a subway structure and building foundations. Project construction would not create on-going and continuous groundborne vibration and noise like that of an urban rail transit system. Groundborne noise impacts would also be less than significant.

Nearby vibration-sensitive uses for potential human annoyance in the Project vicinity include residences approximately 150 feet to east of the Project Site, with other residential structures at greater distances. At a distance of 150 feet or more, the maximum vibration level would be attenuated by 23 VdB to 64 VdB or less.

The Project would generate occasional transient vibrations from period construction and not generate continuous vibrations. Thus, Project construction would not exceed the FTA's 75 VdB threshold for occasional events at the nearest noise-sensitive receiver locations during daytime hours. In addition, construction vibration-generation activities would not occur during the nighttime hours when people normally sleep. Compliance with Chapter 9.07 of the CCMC would eliminate the potential for groundborne vibration and groundborne noise human annoyance impacts at the nearby residential uses during sensitive nighttime hours. Impacts would be less than significant.

Operation

Post-construction on-site activities would be limited to residential uses, commercial retail uses, and associated mechanical equipment such HVAC units that would not be anticipated to generate excessive groundborne noise or vibration. Project operational vibration levels would be substantially less than during construction. As such, groundborne vibration and noise impact to human annoyance associated with the long-term operation of project would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant

Level of Significance After Mitigation

Not applicable. The Project would not result in the generation of excessive groundborne vibration or groundborne noise levels and impacts would be less than significant.

Cumulative Impacts

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and significantly reduces in magnitude as the distance from the source increases. Noise would normally affect the areas immediately adjacent to the source, specifically areas that are less than 500 feet. On-site cumulative noise impacts could occur at receptor locations that are within 500 feet from two different sources. Therefore, based on a 500-foot screening distance, the on-site cumulative noise impacts analysis is limited to related projects within 1,000 feet of the Project Site. The 1,000-foot distance is based on an assumption that a noise-sensitive receptor would be located halfway between the Project Site and the related project. However, the cumulative impacts on roadway noise would be affected by traffic from all cumulative projects throughout a larger vicinity.

As discussed in Chapter 3, *Environmental Setting*, of this Draft EIR, there are 12 related projects identified in the vicinity of the Project Site. The related projects within approximately 1,000 feet of the Project Site are listed in **Table 4.8-20,** *Cumulative Projects within 1,000 feet of the Project Site*.

TABLE 4.8-20
RELATED PROJECTS WITHIN 1,000 FEET OF THE PROJECT SITE

No.[a]	Location	Jurisdiction	Land Use	Size (sf)	Distance to Project Site (ft)
1	5800 Bristol Pkwy / 5801 Hannum Ave	City of Culver City	Office	281,400	750
6	5840 Uplander Way	City of Culver City	Conversion from Office to School	16,128	950

[a] Related projects list based on information from City of Culver City (January 2023), City of Los Angeles (May 2023), and the County of Los Angeles (May 2023).

SOURCE: Gibson Transportation Consulting, 2023

The potential for noise impacts to occur are specific to the location of each related project as well as cumulative traffic on the surrounding roadway network.

Construction Noise

On-Site Construction Noise

Two of the related projects (Related Project Nos. 1 and 6) are located within approximately 1,000 feet of the Project Site and could contribute to cumulative construction noise impacts from on-site construction activities to off-site sensitive receptors if they are under construction at the same time as the Project. However, construction of Related Project No. 1 has already been completed and therefore it is not considered in this cumulative construction noise analysis. Related Project No. 6 would be required to comply with the noise standards and ordinances of the City of Culver City, as applicable. An exact construction schedule for Related Project No. 6 is not known. It is not possible to predict whether construction of this related project would overlap with construction of the Project. Therefore, it is conservatively assumed that construction of these related projects could occur at the same time as the Project. However, Related Project No. 6 is approximately 1,000 feet from the Project Site and involves the conversion of an office building into a school and would likely require little to no demolition and less intensive construction activities than a traditional new project buildout. Intervening buildings between the Project Site and the Related Project No. 6 site would also attenuate on-site construction noise from the related project and the potential for construction noise on that site to combine with the Project's construction noise. For these reasons, cumulative on-site noise from the Project and Related Project No. 6 would not result in cumulatively considerable noise levels and impacts would be less than significant.

Off-Site Construction Noise

With regard to off-site construction noise, construction traffic from all related projects would contribute to noise levels on major thoroughfares throughout the region, although the related projects are located in different areas and, to some extent, would have varied haul routes and traffic patterns associated with their construction. As shown in Table 4.8-9, the Project would not result in any significant off-site construction noise impacts due to construction trips. The street segment with

the highest potential for cumulative impacts due to its proximity to sensitive receptors and location between related projects and the Project Site is Slauson Avenue between Hannum Avenue and Marina Freeway (State Route 90). The Project's construction vehicle trips would increase existing traffic noise levels by a maximum of 0.5 dBA Leq along Slauson Avenue between Hannum Avenue and Marina Freeway.

If related projects contribute to an increase in construction vehicle trips along the same roadway segments and at the same time as the Project, the cumulative increase in construction traffic noise would be greater and could exceed the significance threshold of 3 dBA Leq. While exact construction schedules and construction truck trips for these related projects are not known, it is conservatively assumed that construction of the related projects could occur at the same time as the Project and could include the number of construction truck trips that would generate noise in excess of the significance threshold. For the purposes of this analysis, the number of construction trucks from related projects that would be needed to exceed the significance threshold is estimated to determine the potential for impacts.

The Slauson Avenue roadway segment between Hannum Avenue and Marina Freeway would have a maximum of up to 28 Project truck trips per hour (heavy-duty concrete, vendor, and haul trucks from overlapping Project construction activities), which would generate a combined Existing plus Project Construction Traffic noise level of approximately 70.7 dBA Leq (an increase of 0.5 dBA from the Existing baseline traffic noise level 70.2 dBA Leq). To create a significant roadway noise impact, the related projects would need to contribute an additional 187 heavy-duty truck trips per hour on the same roadway segment at the same time as the Project, which would generate a combined noise level of approximately 73.2 dBA L_{eq}. This cumulative noise level would be equal to the significance threshold of (70.2 + 3 =) 73.2 dBA on Slauson Avenue between Hannum Avenue and Marina Freeway. However, based on the location of their potential haul routes to/from the 405 Freeway and/or the Marina Freeway and size/scope/characteristics of the related projects, there is not a reasonably foreseeable circumstance where the related projects could contribute an additional 187 trips to any roadway segment at the same time as the Project. Furthermore, any overlapping construction truck activity would be limited via the Project's Construction Management Plan, whereby the City and Project contractors of the related projects and the Project would strive to minimize any overlapping truck activity. Based on these considerations, cumulative off-site construction traffic noise impacts would be less than significant.

Operation Noise

On-Site Operational Noise

City of Culver City have provisions that limit stationary-source noise from items such as roof-top mechanical equipment that would ensure noise levels would be less than significant at the property line for each related project. Further, noise from other stationary sources, including parking structures and loading areas would be limited to areas in the immediate vicinity of each related project. With the noise attenuation of 6 dBA per doubling of distance from the noise source, receivers outside of a distance of 200 feet from any noise source would receive a 12 dBA noise reduction compared to the noise level received at 50 feet from that noise source. Although each related project could potentially impact an adjacent sensitive use in its own vicinity, that potential impact would be localized to that specific area and would not contribute to cumulative noise

conditions at or adjacent to the Project Site, which is more than 200 feet from other related projects. As the Project's composite stationary-source impacts would be less than significant, the Project's cumulative on-site stationary-source noise impacts would be less than significant.

Off-Site Operational Noise

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to operation of the Project and related projects, as traffic is the greatest source of operational noise in the Project area. Cumulative traffic-generated noise impacts were assessed based on a comparison of the future cumulative base traffic volumes with the Project to the existing base traffic volumes without the Project. The noise levels associated with existing base traffic volumes without the Project, and future year base traffic volumes with the Project are provided in Table 4.8-13 and Table 4.8-14, above.

Tables 4.8-13 and 4.8-14 show the Project's contribution to the cumulative noise levels during year 2027. The maximum cumulative noise increase from the Project plus cumulative project traffic would be 0.3, which would occur along Hannum Avenue between Uplander Way and Buckingham Parkway and along Uplander Way south of Hannum Avenue. This increase in sound level would be below a 3 dBA increase in areas within "normally unacceptable" zone or a 5 dBA increase in areas within a "normally acceptable" zone, and the increase in sound level would be lower at the remaining roadway segments analyzed. The Project-related noise increases contribution to the cumulative traffic noise impacts would be less than significant, and no mitigation measures would be required.

Construction Groundborne Vibration

On-Site Construction Vibration

Due to rapid attenuation characteristics of groundborne vibration, only related projects located adjacent to the same sensitive receptors would result in cumulatively considerable vibration impacts. None of the related projects are located adjacent to the sensitive receptors identified for the Project. Vibration attenuates at high rates with distance. Therefore, construction vibration would only affect sensitive uses located directly adjacent to the Project and related projects. Therefore, construction of the Project, when considered together with the related projects, would not result in a cumulatively considerable contribution and would have a less-than-significant cumulative impact with regard to on-site groundborne vibration (structural damage and human annoyance).

Off-Site Construction Vibration

Due to rapid attenuation characteristics of groundborne vibration, only related projects located adjacent to the same sensitive receptors would result in cumulatively considerable vibration impacts. It is unusual for groundborne vibration from sources such as rubber-tired trucks to be perceptible, even in locations close to major roads, unless the road surface is rough with uneven spaces. Several related projects are in locations that could potentially lead construction traffic, including truck traffic near sensitive vibration receptors. Should construction of the Project and related projects overlap, there is a potential for cumulative vibration impacts to sensitive vibration receptors. As discussed above, construction of the Project, both on-site and off-site, would not

result in significant vibration impacts related to structural damage or human annoyance. Therefore, cumulative off-site construction vibration impacts would be less than significant.

Operational Groundborne Vibration

Due to the rapid attenuation characteristics of groundborne vibration and distance from each of the related projects to the Project Site, there is no potential for cumulative operational impacts with respect to groundborne vibration. As such, the Project's contribution to impacts related to groundborne vibration during operation would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

Mitigation Measures

Refer to Mitigation Measures MM-NOI-1 and MM-NOI-2 to reduce cumulative on-site construction noise impacts.

Cumulative impacts related to construction vibration impacts and operational noise and vibration would not occur.

Level of Significance After Mitigation

On-Site Construction Noise

As discussed for the Project, after implementation of mitigation, the Project would result in less than significant construction noise impacts during regularly allowable construction hours if an extended hours construction permit is obtained. However, construction during off-hours (between 7:00 a.m. and 8:00 a.m. on weekdays and 7:00 a.m. to 9:00 a.m. on Saturdays) during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction would be significant and unavoidable if an extended hours permit is not obtained because the Project would not be in compliance with applicable construction hour regulations. Any additional construction noise from the related project that could combine with the Project's construction noise, could further increase the extent of the Project's noise levels and impacts. However, as mentioned above, Related Project No. 6 would not require intensive construction activity, is separated by intervening buildings from the Project Site, and is roughly 1,000 feet away from the Project Site. As such, cumulative on-site noise from the Project and the related project would not result in combined noise levels causing significant cumulative construction noise impacts at similar off-site receptors and receivers between the Project Site and the nearest related project site. Therefore, the Project's contribution to cumulative construction noise would not be cumulatively considerable and would be less than significant.

Off-Site Construction Noise

Not Applicable. Cumulative impacts regarding off-site construction noise would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

On-Site Operational Noise

Not Applicable. Cumulative impacts regarding operational noise would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Off-Site Operational Noise

Not Applicable. Cumulative impacts regarding off-site operational noise would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Construction Groundborne Vibration

Not Applicable. Cumulative impacts regarding off-site construction groundborne vibration would be less than significant without mitigation.

Operational Groundborne Vibration

Not Applicable. Cumulative impacts regarding operational groundborne vibration would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4.9 Population and Housing

4.9.1 Introduction

This section addresses potential impacts on population and housing that could occur due to construction and operation of the Project. The analysis focuses on potential effects of the Project's contribution to population and housing growth within the geographical boundaries of the City of Culver City (City) by taking into account population and housing projections established in the Southern California Association of Governments (SCAG) Connect SoCal (2020-2045 Regional Transportation Plan and Sustainable Communities Strategy [2020 RTP/SCS]) and SCAG's 6th Cycle Regional Housing Needs Assessment (RHNA), as well as policies established in the City's Comprehensive General Plan (General Plan). This section analyzes the Project's effects on population, housing, and employment as compared to adopted growth forecasts; and relevant policies and programs regarding planning for future development. Potential growth-inducing impacts of the Project are further addressed in Chapter 6, *Other CEQA Considerations*.

4.9.2 Environmental Setting

Regulatory Framework

State Level

Housing Element Law: California Government Code Section 65583 and 65584(a)(1)

Section 65583 of the California Government Code requires cities and counties to prepare a housing element, as one of the state-mandated elements of the General Plan, with specific direction on its content. Pursuant to Section 65584(a)(1), the California Department of Housing and Community Development (HCD) is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's planning body known as a "council of governments" (COG), the SCAG being the COG serving the Southern California area. HCD prepares an initial housing needs assessment and then coordinates with each COG in order to arrive at the final regional housing needs assessment. The SCAG RHNA and the City's General Plan Housing Element are discussed further below.

Housing Crisis Act of 2019 – (Senate Bill 330, Skinner)

On October 9, 2019, the Governor signed into law the Housing Crisis Act of 2019 (Senate Bill [SB] 330). SB 330 seeks to speed up housing production in the next half decade by eliminating some of the most common entitlement impediments to the creation of new housing, including delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. The bill is in effect as of January 1, 2020, but is temporary in nature. In 2021, the Governor signed into law SB 8 which provided clarifications to SB 330 and extended the bill's provisions until January 1, 2030.

Regional Level

Southern California Association of Governments

The Project Site is located within the jurisdiction of SCAG, a Joint Powers Agency established under California Government Code Section 6502 et seq. Pursuant to federal and state law, SCAG serves as a Council of Governments, a Regional Transportation Planning Agency, and the Metropolitan Planning Organization (MPO) for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan (RCP), RTP/SCS, and RHNA, in coordination with other state and local agencies. These documents include population, employment, and housing projections for the region and its 15 subregions. Subregions play an important role as a conduit between SCAG and cities and counties of the region by participating and providing input on SCAG's planning activities, which helps the Regional Council and its committees make better-informed decisions. The Project Site is located within the Westside Cities Subregion.

SCAG is tasked with providing demographic projections for use by local agencies and public service and utility agencies in determining future service demands. Projections in Connect SoCal serve as the bases for demographic estimates in this analysis of Project consistency with growth projections. The findings regarding growth in the region are consistent with the methodologies prescribed by SCAG and reflect SCAG goals and procedures. Based on 2020 statistics for the City, SCAG has determined that the City has an average housing unit size of 2.37 persons per housing unit.[1]

SCAG data is periodically updated to reflect changes in development activity and provisions of local jurisdictions (e.g. zoning changes). Through these updates, public agencies have advance information regarding changes in growth that must be addressed in planning for their provision of services. Changes in the growth rates are reflected in the new projections for service and utilities planning through the long-term time horizon.

SCAG Connect SoCal (2020 RTP/SCS)

The 2020 RTP/SCS, known as Connect SoCal, was developed through a four-year planning process that involved rigorous technical analysis, extensive stakeholder engagement and robust policy discussions with local elected leaders, who make up SCAG's policy committees and Regional Council. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making key connections: between transportation networks, between planning strategies and between the people whose collaboration can make plans a reality. Connect SoCal was completed in May 2020, approved and adopted by the Regional Council on September 3, 2020, and was approved by the California Air Resources Board on October 30, 2020.

Connect SoCal embodies a collective vision for the region's future, through the horizon year of 2045. It is developed with input from a wide range of constituents and stakeholders within the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura, including

[1] SCAG, 2022 Spatial & Statistical Summary, City of Culver City, May 2022, page 6, https://scag.ca.gov/sites/main/files/file-attachments/culver-city-atlas.pdf?1660027073. Accessed August 18, 2023.

public agencies, community organizations, elected officials, tribal governments, the business community and the general public. Connect SoCal is an important planning document for the region, allowing public agencies who implement transportation projects to do so in a coordinated manner, while qualifying for federal and state funding. The plan includes robust financial analysis that considers operations and maintenance costs to ensure the existing transportation system's reliability, longevity, resilience and cost effectiveness. In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas emission reduction goals and federal Clean Air Act requirements. The plan also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries and more efficient use of resources.[2]

In addition, Connect SoCal establishes policies pertaining to regional growth and efficient development patterns to reduce development impacts on traffic congestion and related increases in air quality emissions. These policies are discussed in detail in Section 4.7, *Land Use and Planning*, of this Draft EIR.

Regional Housing Needs Assessment

The RHNA is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods, or cycles. In prior cycles, factors such as household growth and household income distribution were the primary factors considered in determining a jurisdiction's RHNA allocation. SCAG's 6th Cycle RHNA quantifies the regional need for housing and then allocates the regional need to each jurisdiction for a planning period between October 2021 and October 2029. The 6th Cycle RHNA is focused on existing need (current housing shortages and overcrowding) plus projected growth, which takes into account factors beyond what was used to determine Connect SoCal's projected growth.[3] Therefore, the 6th Cycle RHNA allocation for the City results in a higher allocation of housing than what is represented in Connect SoCal, which is focused solely on projected or future growth. For the 6th RHNA Cycle, SCAG considers other factors in addition to household growth. These factors include transit accessibility, job accessibility, and indicators that influence a community's environmental, educational, and economic resource accessibility.

On October 15, 2019, SCAG received the Final Regional Determination from HCD. On November 7, 2019, SCAG Regional Council approved a Draft RHNA Allocation Methodology for HCD's review. The Regional Council approved the Final RHNA Methodology on March 5, 2020 and released the Draft RHNA Allocation by jurisdictions.[4] The RHNA underwent Appeals Board Hearings throughout January 2021. In February 2021, the RHNA Appeals Board concluded its determination of appeals and issued the proposed final RHNA Allocation Plan and recommended

2 SCAG, Connect SoCal (2020 RTP/SCS), May 2020, page 8. Accessed July 5, 2023.

3 SCAG, Final RHNA Allocation Methodology, adopted March 5, 2020, page 5, https://scag.ca.gov/sites/main/files/file-attachments/scag-final-rhna-methodology-030520.pdf?1602189316. Accessed July 5, 2023.

4 SCAG, Regional Housing Needs Assessment (RHNA) & Housing, https://www.scag.ca.gov/programs/pages/housing.aspx. Accessed August 21, 2023.

the Plan for approval by SCAG's Community, Economic & Human Development (CEHD) Committee and Regional Council.[5] The final 6th Cycle RHNA methodology and allocations were adopted by the Regional Council on March 4, 2021 and approved by HCD on March 22, 2021 and modified on July 1, 2021. As part of the RHNA draft allocations, the City's allocation of housing between October 2021 and October 2029 is 3,341 units.[6]

Consistent with the state housing law, the primary objectives the 6th Cycle RHNA allocation plan are to:

- Increase the housing supply and mix of housing types, tenure and affordability within each region in an equitable manner
- Promote infill development and socioeconomic equity, the projection of environmental and agricultural resources, and the encouragement of efficient development patterns
- Promote an improved interregional relationship between jobs and housing
- Allocating a lower proportion of housing need in income categories in jurisdictions that have a disproportionately high share in comparison to the county distribution
- Affirmatively furthering fair housing

Local jurisdictions are required to plan and zone to accommodate their respective RHNA allocation (housing units) by income categories through the process of updating the Housing Elements of their General Plans. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and housing unit growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and sub region can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, addresses social equity, and fair share housing needs.

Local Level

City of Culver City General Plan

The City's adopted General Plan has a goal to provide for the physical, social and economic needs of the City and its people by protecting and building on the City's strengths.[7] The General Plan includes nine elements that have been updated at various points between 1968 and 2014. The elements focus on: Land Use, Circulation, Housing, Open Space, Noise, Conservation, Seismic Safety, Public Safety, and Recreation. The City is currently in the process of comprehensively updating its General Plan to respond to changing needs and conditions in the City and region, and to reflect new state laws.

5 SCAG, 6th Cycle RHNA, https://scag.ca.gov/rhna. Accessed August 21, 2023.

6 SCAG, SCAG 6th Cycle Final RHNA Allocation Plan.

7 Culver City, Culver City General Plan, May 1994, page O-2, https://www.culvercity.org/Services/Building-Development/General-Plan. Accessed July 3, 2023.

The General Plan established the following goals in order to achieve a balance of quality of life with the economic support necessary to sustain that quality:

- Residential neighborhoods that offer residents the qualities of a peaceful, small-town environment.
- Economic vitality that serves the community and protects the quality of life.
- An urban design, urban forest, open space network that links neighborhoods and businesses, and instills civic pride.
- A community that provides recreational, historical, and cultural opportunities.
- Clear and consistent guidance for balanced growth.
- Ample and efficient City services and infrastructure.
- Integrated local and regional transportation systems that serve residential and business needs.
- A peaceful community that minimizes noise disturbance.
- Clean air that provides a healthy environment.
- A safe community.
- A community that minimizes waste and protects its natural resources (Culver City, 1995).

The following policies and goals that pertain to population and housing and are applicable to the Project are as presented below.

Land Use Element

The Land Use Element places an emphasis on quality of life issues in order to improve and enhance the development of the City. The following goals, objectives and policies are applicable to the Project and population and housing:

Goal: Residential neighborhoods that offer residents the qualities of a peaceful, small-town environment.

Objective 2. Housing Supply: Encourage the retention and creation of housing throughout the City.

Objective 3. Affordable Housing: Encourage the provision of housing opportunities for all members of the community.

Objective 4 Neighborhood Conditions: Establish and maintain quality living environments throughout the City.

Policy 1.A: Support residential planning efforts by neighborhoods. The City's neighborhoods shall include features, design components, themes and programs (such as parks, community gathering places, streetscape amenities, signage/graphic systems, and community beautification and celebration programs) that reflect and focus the area's identity.

Policy 2.B: Continue to allow and encourage multiple family housing opportunities in areas designated for such development.

Policy 3.B: Provide housing assistance programs for moderate-, low- and very low-income groups.

Policy 4.A: Balance opportunities for additional housing with potential effects on adjacent lower density neighborhoods.

City of Culver City 2021-2029 Housing Element

The Housing Element was created to provide an assessment of current and future housing needs, and the constraints in and resources for meeting those needs. It also identifies and prioritizes the housing needs of the City and outlines the goals, policies, and programs to address those needs while balancing community character, objectives, and resources. State law requires Housing Elements to be updated at least every six years to reflect a community's changing housing needs. The most recent update was approved in October 2022 and covers an eight-year period, extending from October 2021 through October 2029. The primary issues addressed in the Housing Element include: 1) preservation and improvement of the existing housing stock, 2) housing availability for special needs populations, 3) planning for a sufficient supply of new housing to meet the city's fair share of regional need, and 4) fair housing. The 2021-2029 Housing Element indicated that the total housing growth need for the City during the 2021-2029 planning period is 3,341 units.

Housing Element Housing Plan Chapter

The Housing Plan chapter is found within the City of Culver City's Housing Element, discussed below. The Housing Plan is an assessment of the community's housing needs identified through the City's demographic, socioeconomic, and housing characteristics and the nature and extent of housing needs.

Goal 1: A city that proactively provides equitable access to safe, healthy, and affordable housing for all income levels to create a balanced jobs-to-housing ratio and commits to addressing the housing needs of persons experiencing homelessness and special needs populations.

Goal 2: A city with a variety of rental and ownership housing opportunities that complement and enhance the city's goals for continued economic vitality and prosperity.

Goal 3: A city that plans to grow sustainably and intelligently by revisiting policies and programs frequently to update and adjust if they are not meeting goals.

Goal 4: A city that affirmatively furthers fair housing to reverse the legacy of segregation and provide housing and opportunity for historically disenfranchised groups.

Objective 1. Housing Maintenance: Encourage a high level of housing maintenance to promote the availability of decent housing and to protect the quality of neighborhood environments.

Policy 1.B: Maintain quality neighborhood living environments throughout the entire city.

Policy 1.C: Assist low and moderate income and special needs households to encourage the rehabilitation and adequate maintenance of existing housing units.

Policy 1.F: Promote sustainable development through energy conservation, water consumption, and waste reduction measures to reduce future operating costs, and ensure local regulations support environmental justice that protects public health and open space, and expands the tree canopy.

Objective 2. Housing Supply: Expand opportunities for developing a variety of housing types.

Policy 2.A: Provide for a residential lifestyle that is environmentally sound and aesthetically pleasing and that places a high priority on quality development.

Policy 2.C: Promote mixed use residential development that is sensitive to adjacent residential uses and reinforce the compatible nonresidential uses of the area.

Policy 2.D: Encourage the incremental infilling of residential neighborhoods to enhance housing affordability and supply through the provision of smaller units.

Policy 2.E: Promote programs that seek to provide housing opportunities to meet the needs of people who work in the city.

Objective 3. Housing Affordability: Encourage a diverse range of rental and ownership housing opportunities that are compatible with the needs of all socioeconomic segments of the community.

Policy 3.A: Encourage the inclusion of affordable housing units in new housing developments by granting incentives as called for by the Zoning Code and the State Density Bonus law.

Policy 3.B: Actively support affordable housing development by private and non-profit housing developers.

Policy 3.F: Encourage an equitable distribution and the production of affordable housing in areas that have historically not accommodated affordable housing or have excluded diverse housing opportunities, especially in the highest opportunity areas, to help overcome historic patterns of segregation. Explore strategies like public funding, incentives, infrastructure investments, and a “Right to Return” program to support historically displaced families and individuals in Culver City with housing.

Policy 3.J: Incentivize housing development on surface parking lots on underused sites that would not displace existing residents.

Objective 4. Housing Access: Improve access to quality housing for all members of the community by eliminating discrimination, reducing governmental and non-governmental constraints, increasing the number of affordable housing units, and supporting access to emergency shelters.

Policy 4.A: Promote efforts aimed at the development of housing available to all income and age levels.

Policy 4.B: Promote housing opportunities for households of all income levels to help maintain the family-oriented character of the city into the future.

Existing Conditions

The Project Site is currently developed with an approximately 30,672 square foot two-story office building. The remainder of the Project Site includes surface parking and associated landscaping. The Project Site's current land use designation is Regional Center, which allows large-scale commercial uses and is intended to support existing and anticipated regional-serving commercial developments. The Regional Center land use designation does not support residential and/or residential mixed-use projects. Per the Culver City Zoning Code (Zoning Code), the Project Site is zoned Commercial Regional Business Park (CRB). The CRB Zoning District identifies areas appropriate for large-scale office and business park developments with shared parking, including specific light industrial uses and does not permit residential uses. Pursuant to the City's adopted 2021-2029 Housing Element, the Property's preferred land use designation is Mixed-Use High, which would allow for high-density residential uses including mixed-use development. The 2021-2029 Housing Element's preferred Mixed-Use High designation permits a residential density of 100 dwelling units per acre. In addition, the draft Land Use Element under consideration as part of Culver City's General Plan 2045 Update, includes the draft Land Use Map and Land Use designations with appropriate draft densities. The Project Site's draft land use designation and density is Mixed-Use High and 100 dwelling units per acre, consistent with the Housing Element preferred designation and density.

SCAG's Connect SoCal, which was approved in September 2020, includes the most updated and available information on demographic projections for the City. Current and future projected population, housing, and employment estimates for the City are based on data included in the SCAG's Connect SoCal.[8] The 2020 RTP/SCS is based on growth projections for population, housing, and employment prepared for regional, county, and local jurisdictional areas. Connect SoCal reports demographic data for 2016, and projections for 2045.[9] Connect SoCal forecasts represent the likely growth scenario for the Southern California region in the future, taking into account recent and past trends, reasonable key technical assumptions, and local or regional growth policies. The 2020 baseline population and growth projections for the SCAG 2045 Horizon Year, are shown in **Table 4.9-1**, *Projected Population, Housing, and Employment Estimates for Culver City,* and discussed below.

Connect SoCal and the City's current 2021-2029 Housing Element are based on SCAG's 6th Cycle RHNA, which addresses the housing needs for the City from October 2021 to October 2029. As noted in both the Housing Element and the 6th Cycle RHNA, the total housing growth need for the City of Culver City during the 2021-2029 planning period is 3,341 units.

8 Southern California Association of Governments (SCAG), Connect SoCal (2020-2045 Regional Transportation Plan and Sustainable Communities Strategy [2020 RTP/SCS]), September 2020, https://scag.ca.gov/post/connect-socal-2020. Accessed July 3, 2023.

9 SCAG, 2020 RTP/SCS: Demographics and Growth Forecast (Technical Report), September 2020, page 34, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579. Accessed July 3, 2023.

TABLE 4.9-1
PROJECTED POPULATION, HOUSING, AND EMPLOYMENT ESTIMATES

		SCAG 2045 Horizon Year		
	2020 Baseline	2045 Projection For Culver City	Total Growth	Percentage Increase as Compared to 2020
Population	40,307	41,600	1,293	3.2%
Housing	17,138	18,000	862	5.0%
Employment	59,962	64,100	4,138	6.9%

SOURCE: 2020 RTP/SCS: Demographics and Growth Forecast (Technical Report), September 2020. 2020 baseline numbers calculated by interpolating data from 2016 and 2045 projections.

4.9.3 Environmental Impacts

Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the CEQA Guidelines. A project would result in significant adverse impacts related to Population and Housing if it would:

- **POP/H-1** Induce substantial unplanned 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); or
- **POP/H-2** Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Potentially significant impacts related to population and housing are discussed and analyzed further below.

The City determined in the Initial Study that POP/H-2 would result in no impacts and, therefore, is scoped out of this Draft EIR. Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding the following issue area:

Would the Project:

- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

As detailed in the Initial Study, the Project Site is currently developed with a two-story office building and no residential uses exist on-site. As such, Project implementation would not displace existing people or housing. Therefore, no impact would occur due to displacement of people or housing that would require the construction of replacement housing. No further analysis of this issue is therefore included in this Draft EIR. This Draft EIR evaluates potential population and housing impacts that relate to threshold of significance POP/H-1.

Methodology

The analysis of population and housing impacts evaluates whether the Project's contribution to population, housing, and employment growth are consistent with the future growth projections and related policies outlined above in order to assess the potential for impacts on the physical environment. Pursuant to the CEQA Guidelines and the thresholds used by the City to determine the significance of impacts to population and housing, as described further below, the focus of the analysis is on whether the Project would induce substantial unplanned population growth in an area either directly or indirectly, which would result in physical impacts on the environment due to the need for construction of unplanned homes, businesses, or infrastructure.

Connect SoCal is the most recently adopted regional plan that provides population, housing, and employment projections for the City for the period between 2016 and 2045. Therefore, for the purpose of the Project's analysis, population, housing, and employment projections based on Connect SoCal for the City are analyzed with the Project and considered as part of the impact analysis. As Connect SoCal provides data and projections for 2016 and 2045 only, projections for Project Baseline Year 2020 are based on SCAG data[10]. In addition to Connect SoCal, the City will be expected to meet the household provision goals provided in the 6th Cycle RHNA for the period between 2021 and 2029. Therefore, the Project's provision of households is also compared to the total allocation for the City based on the 6th Cycle RHNA.

The Project's estimated residential population was calculated based on the Citywide Person Per Household Factor for average household size provided by the 2020 SCAG City of Culver City 2022 Spatial and Statistical Summary.[11] The employment estimates for the Project are based on the employees per square foot of commercial development generation factors provided in Table 14 of the 2020 Developer Fee Justification Study for the Culver City Unified School District.[12] The Project's estimated contribution to population, housing, and employment are compared to projections from SCAG's Connect SoCal and to the goals of the 6th Cycle RHNA for the City of Culver City.

Project Design Features

No specific Project Design Features are proposed with regard to population, housing, and employment.

10 SCAG, City of Culver City 2022 Spatial and Statistical Summary, https://scag.ca.gov/sites/main/files/file-attachments/culver-city-atlas.pdf?1660027073. Accessed August 22, 2023.

11 SCAG City of Culver City 2022 Spatial and Statistical Summary, https://scag.ca.gov/sites/main/files/file-attachments/culver-city-atlas.pdf?1660027073. Accessed August 22, 2023.

12 Culver City Unified School District (CCUSD), 2020 Developer Fee Justification Study, March 2020, page 12, https://4.files.edl.io/4db8/03/17/20/192657-7c8c44c2-15f7-4980-b79e-a87920d26d89.pdf. Accessed August 28, 2023.

Analysis of Project Impacts

Induce Substantial Unplanned Population Growth

Threshold Pop/H-1: The Project could have a significant impact if it would induce substantial unplanned 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).

Impact Analysis

The Project would involve demolition of the existing office building on the Project Site to support a mixed-use development with residential and retail uses. As shown in **Table 4.9-2**, *Projected Increases in Population, Housing, And Employment,* the Project would increase the residential population of Culver City by introducing 309 residential units that would generate an estimated population of 733 residents at the Project Site.[13] In addition, the Project would include approximately 5,600 sf of retail use, which would generate an estimated increase of approximately 20 employees on the Project Site.[14] When taking into account the demolition of 30,672 sf of existing office uses on the Project Site and associated estimated employment based on the Employment Generation Factor identified in the Culver City Unified School District 2022 Developer Fee Justification Study, the Project would result in a net decrease of 127 employees, as shown in Table 4.9-2.

TABLE 4.9-2
PROJECTED INCREASES IN POPULATION, HOUSING, AND EMPLOYMENT

Housing Units and Population			
Use	**Amount**	**Average Household Size[a]**	**Total Population**
Residential	309 units	2.37	733
Existing Employees			
Use	**Amount**	**Employment Generation Factor (per 1,000 square feet)[b]**	**Existing Number of Employees**
Office	30,672 square feet	4.78	147
		Total Existing Employees	147
Projected Employees			
Use	**Amount**	**Employment Generation Factor (per 1,000 square feet)[b]**	**Number of Employees**
Retail	5,600 square feet	3.62	20
		Total Projected Employees	20
		Net Employees	-127

[a] SCAG, 2022 Spatial & Statistical Summary, City of Culver City, May 2022, page 6. Accessed August 22, 2023.
[b] Culver City Unified School District, 2022 Developer Fee Justification Study, March 2020, page 12.
SOURCE: ESA, 2023.

13 As described in Table 4.9-2, the total population is estimated based on the number of units multiplied by the average household size for Culver City based on SCAG's 2022 Spatial & Statistical Summary. Available here: https://scag.ca.gov/sites/main/files/file-attachments/culver-city-atlas.pdf?1660027073.

14 As described in Table 4.9-2, the number of employees is based on the square footages by land use multiplied by employment generation factors provided by LAUSD's Developer Fee Justification Study.

As shown in **Table 4.9-3**, *Projected Population, Housing, and Employment Increases for the City*, and based on Connect SoCal projections, the City's population, household, and employment growth is expected to increase by 879 persons, 159 households, and 17,073 jobs between 2020 and 2045, respectively. The Project's estimated 733 person increase in population would fall within SCAG's growth forecast for the City for the period running from 2020 to 2045.

TABLE 4.9-3
PROJECTED POPULATION, HOUSING, AND EMPLOYMENT INCREASES FOR THE CITY

	Project Increase[a]	SCAG Forecasted Growth Between 2020 and 2045[b]	Project's Percentage of Forecasted Growth[c]
Population			
2020 - 2045 Projection Horizon	733	1,293	57%
Housing Units			
2020 - 2045 Projection Horizon	309	862	36%
Employment			
2020 - 2045 Projection Horizon	-127	4,138	-0.3%

[a] From Table 4.9-2, Projected Increases in Population, Housing, And Employment.
[b] From Table 4.9-1, Projected Population, Housing, and Employment Estimates for Culver City.
[c] Percentages are rounded.

SOURCE: Compiled by ESA, 2023. Based on SCAG Connect SoCal projections.

As shown in Table 4.9-3, the Project's residents would comprise 57 percent of SCAG's projected population increase for the City from 2020 to 2045. The Project's 309 units would comprise approximately 36 percent of SCAG's Connect SoCal projected housing increase for the City from 202 to 2045. Compared to existing uses, the Project would result in a decrease of 127 employees, approximately -0.3 percent of SCAG's projected employment increase for the City from 2020 to 2045. The Project's increases in population and housing would be within SCAG's Connect SoCal 2045 projections for the City.

The Project would support and not conflict with relevant goals, objectives, and policies in the City's General Plan. Most notably, the Project would provide high-quality infill housing through the provision of 309 residential units with a diverse mix of dwelling types, containing both market-rate and 27 Very Low Income units, with a range of household sizes. These characteristics of the Project would support Land Use and Housing objectives and policies for increasing housing supply and affordable housing in the City and promoting access to affordable housing through the use of State and local incentives. The Project's residential and retail uses would promote the General Plan's policy for mixed-use development that would be sensitive to adjacent residential uses and reinforce the commercial use of the area.

Additionally, the Culver City October 2021-2029 Housing Element, which is based on the 6th Cycle RHNA allocations, indicates the total housing growth need for the City during this planning period is 3,341 units. These allocations show the City's allocation of housing between October 2021 and October 2029 to be 3,341 units. Accordingly, the Project's proposed housing would constitute 9.2

percent of the 6th Cycle RHNA allocations between 2021 and 2029. Further, the Housing Element contemplates a residential density of 100 dwelling units per acre for the Project Site. In conjunction with state density bonus law, the Project fulfills the City's density goal for the Project site. Therefore, the Project would promote fulfillment of the City's future updated Housing Element goals and the 6th Cycle RHNA allocation.

As further detailed in Section 4.7, *Land Use and Planning,* of the Draft EIR, SCAG established goals for development that reduces reliance on individual automobiles, with related lessening of impacts on the environment. The Project would support these goals by providing a mixed-use development with residential and retail uses, located in proximity to existing public transit, including proximity to the Westfield Culver City Transit Center (approximately 0.7 mile west) and a municipal bus line along Hannum Avenue, which would serve to reduce vehicle miles traveled (VMT). The Project would further support Connect SoCal's goal of improving mobility, accessibility, reliability, and travel safety for people and goods based on the Project Site's proximity to a transit center, multiple regional and local bus line and the provision of bicycle facilities to maximize mobility and accessibility. In addition, residents would be located within a reasonable walking distance to surrounding retail and office uses. The Project would create a pedestrian-friendly environment with internal walkways that connect the pedestrian access points to off-site pedestrian and transit facilities. Within walking distance of several bus stops, the Project would promote alternate modes of transit and promote the use of bicycles through the provision of secure bike storage locations on Levels P1, P2, and the first floor. The Project would encourage development of diverse housing types in areas that are supported by multiple transportation options. Thus, the Project, which is infill development, would contribute to a growth pattern that is encouraged in SCAG policies for development that reduces reliance on individual automobiles, with associated environmental benefits.

The Project would link with and tie into existing infrastructure in the Project area. As described in in Section 4.13, *Utilities and Service Systems,* of the Draft EIR, new infrastructure for public service and utility systems that would be required, such as service connections to local water and sewer network and electricity and natural gas utilities would be sized to serve only the Project's needs. Project operation would modify access from streets that surround the Project Site as described. However, these modifications represent improvements that would not induce substantial population growth indirectly through the extension of roads or other infrastructure into undeveloped areas. The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the Project would represent infill development and would utilize the existing transportation and utility infrastructure to serve the Project.

Based on the analysis above, the Project would not induce substantial population growth in the area, either directly or indirectly that cannot be reasonably accommodated, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Project-specific impacts related to population and housing would be less than significant.

Cumulative Impacts

Chapter 3, *Environmental Setting*, of this Draft EIR provides a list of 12 related projects that are planned or are under construction within an approximately 1.0-mile radius of the Project Site. Of these 12 related projects, eight (8) are located within the City of Culver City and four (4) are located within the City of Los Angeles. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3.

The calculation of the cumulative number of housing units, population, and employees attributable to the related projects is provided in **Table 4.9-4***, Related Projects Housing, Population And Employment*. SCAG projections for the 2045 horizon year incorporate regional policies and are based on long-term demographic trends that average out short-term variations (e.g., foreign and domestic migration).

As shown in Table 4.9-4, the related projects within the City, along with the Project, would generate 2,539 residents, 1,071 housing units, and 3,059 employees. When accounting for related projects within the City of Los Angeles, a total of 4,241 residents, 1,789 housing units, and 3,089 employees would be generated.

Table 4.9-5, *Cumulative Population, Housing, and Employment Impacts,* compares projected cumulative growth, inclusive of the Project, to Connect SoCal's 2045 horizon year projections for the City of Culver City. As shown below, related projects that are outside of the boundaries of the City of Culver City (e.g., the projects within the City of Los Angeles) are not included as the table below presents a comparison to SCAG projected growth for the City of Culver City.

As shown below, the projected cumulative population and household growth for the related projects within the City of Culver City and the Project would exceed the 2045 SCAG projections identified in Connect SoCal for the City. Employment projections would be within those anticipated by SCAG's 2020 RT/SCS. Despite the cumulative population and household growth exceeding the SCAG projections, they are consistent with the 6th Cycle RHNA allocations. The increases in population (approximately 196 percent) and households (approximately 124 percent) show that the City is actively increasing the housing stock within the City to meet the housing growth need based on the Housing Element and the 6th Cycle RHNA allocations. The 1,071 cumulative households would constitute 32 percent of the City's allocation of housing between October 2021 and October 2029 of 3,341 units. The increase in housing stock in the City provides opportunities to reduce the demand for development in lower-density areas and achieving greater efficiency in the provision and use of existing services and infrastructure.

TABLE 4.9-4
RELATED PROJECTS HOUSING, POPULATION AND EMPLOYMENT

Development[a]	Use	Amount	Population Generation Factor (persons/ household)[b]	Employee Generation Factor (per 1,000 sf)[c]	Population	Housing Units	Hotel Rooms	Employees
City of Culver City Only								
5800 Bristol Parkway/ 5801 Hannum Avenue	Office	281,000 sf	--	4.78	--	--	--	1,345
6221 Bristol Parkway	Residential	712 du	2.37	--	1,687	712	--	--
	Live/Work	50 du	2.37	--	119	50	--	--
	Retail	20,767 sf	--	3.62	--	--	--	75
6101 Slauson Ave	Showroom	8,046 sf	--	3.62	--	--	--	29
6001 Centinela Ave	Burial Plots	--	--	--	--	--	--	2[d]
5645 Sepulveda Blvd.	Medical Office	38,712 sf	--	4.27	--	--	--	165
	Retail	3,193 sf	--	3.62	--	--	--	12
5840 Uplander Way	School	16,128 sf	--	2.55	--	--	--	41
6161 Centinela Blvd.	Creative Office	281,194 sf	--	4.78	--	--	--	1,344
11469 Jefferson Blvd.	Hotel	111,000 sf (183 rms)	--	1.55	--	--	183	172
Culver City Totals					**1,806 residents**	**762 du**	**183 rms**	**3,186 employees**
City of Los Angeles Only								
5645 Sepulveda Blvd	Residential	176 du	2.37	--	417	176	--	--
6711 Sepulveda Blvd	Residential	180 du	2.37	--	427	180	--	--
5208 Centinela Blvd	Restaurant	4,642 sf	--	3.62	--	--	--	17
6501 Sepulveda Blvd	Residential	362 du	2.37	--	858	362	--	--
	Restaurant	3,700 sf	--	3.62	--	--	00	13
City of Los Angeles Totals					**1,702 residents**	**718 du**	**0 rms**	**30 emp.**

TABLE 4.9-4
RELATED PROJECTS HOUSING, POPULATION AND EMPLOYMENT

Development[a]	Use	Amount	Population Generation Factor (persons/ household)[b]	Employee Generation Factor (per 1,000 sf)[c]	Population	Housing Units	Hotel Rooms	Employees
Related Projects and Project								
All Related Projects Totals					**3,508 residents**	**1,480 du**	**183 rms**	**3,216 employees**
Project					**733 residents**	**309 du**	**--**	**-127 employees (net)**
Culver City Related Projects and Project					**2,539 residents**	**1,071 du**	**183 rms**	**3,059 employees**
All Related Projects + Project Totals					**4,241 residents**	**1,789 du**	**183 rms**	**3,089 employees**

[a] A list of the 12 related projects is provided in Table 3-1 of Chapter 3 of this Draft EIR. 8 projects are located within the City of Culver City, and 4 projects are located within the City of Los Angeles.
[b] The City of Culver City average household size is based on SCAG's 2020 Profile of the City of Culver City: https://scag.ca.gov/sites/main/files/file-attachments/culver-city-atlas.pdf?1660027073
[c] The employment generation factors are based on the Culver City Unified School District, 2020 Developer Fee Justification Study, March 2020, page 12.
[d] ESA estimated two employees for maintenance associated with the burial plots.
[e] Schools did bot have a specific employment category in the Culver City Unified School District, 2020 Developer Fee Justification Study. Thus, ESA utilized the stated "average" employee generation factor of 2.55 employees/1,000 sf.

SOURCE: ESA, 2023.

TABLE 4.9-5
CUMULATIVE POPULATION, HOUSING AND EMPLOYMENT GROWTH FOR CITY

	Cumulative Increase, including Proposed Project	SCAG Projected Growth in City from 2020 to 2045[b]	Cumulative Percentage of Growth in City (SCAG)	RHNA Projected Growth in City from 2021 to 2029	Cumulative Percentage of Growth in City (RHNA)
Project					
Population	2,539	1,293	196%	--	--
Households	1,071	862	124%	3,341	32%
Employment	3,059	4,138	74%	--	--

[a] From Table 4.9-4.
[b] From Table 4.9-1.

SOURCE: ESA, 2023.

As discussed throughout Chapter 4 of this Draft EIR, no significant and unavoidable impacts associated with the operation of the Project have been identified associated with the Project. In addition, despite the increase over SCAG's 2045 projection, the Project would be consistent with the 6th Cycle RHNA allocations. For these reasons, the Project would not substantially contribute to a cumulatively considerable impact.

As discussed above, the Project would result in a net increase in jobs compared to existing conditions. However, the Project's employment opportunities would be adjacent to residential areas and public transit, which would support City and regional policies intended to reduce VMT. As such, the Project and related projects would not induce substantial unplanned population growth in an area, and cumulative impacts from related projects are considered less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Cumulative impacts related to population and housing would be less than significant.

This page intentionally left blank

4.10.1 Public Services – Fire Protection

4.10.1.1 Introduction

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site as provided by the Culver City Fire Department (CCFD). The analysis is based on information provided on the CCFD website and through written correspondence from CCFD, which is included in Appendix H-1 of this Draft EIR.[1]

4.10.1.2 Environmental Setting

Regulatory Setting

This section provides a summary of State and local fire protection regulations and policies applicable to the Project.

Federal

Occupational Safety and Health Administration

The Federal Occupational Safety and Health Administrations (OSHA as well as California OSHA (Cal/OSHA) enforce the provisions of the federal and state Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations (CFR). The fire-related requirements of the Federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

Disaster Mitigation Act of 2000

Disaster Mitigation Act (42 United States Code [USC] Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and Indian Tribal governments as a

[1] Culver City Fire Department (CCFD), Fire Marshal Dave Rindels, correspondence dated December 20, 2023. Provided in Appendix H-1 of this Draft EIR.

condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 USC Sections 5121–5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Disaster Mitigation Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of the Disaster Mitigation Act include the following:

- Funding pre-disaster mitigation activities
- Developing experimental multi-hazard maps to better understand risk
- Establishing state and local government infrastructure mitigation planning requirements
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP)
- Adjusting ways in which management costs for projects are funded

The mitigation planning provisions outlined in Section 322 of the Disaster Mitigation Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

State

California Building Code and California Fire Code

The California Building Code (California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including general fire safety standards for new buildings, which are presented with more detail in the California Fire Code (CCR Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by State agencies without change from a national model code, building standards based on a national model code that have been changed to address particular California conditions, and building standards authorized by the California legislature but not covered by the national model code. The 2022 edition of the California Building Code became effective on January 1, 2023.[2] The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by State agencies and local governing bodies. Typical fire safety requirements of the California Fire Code include: the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas.

[2] California Building Code (CCR, Title 24, Part 2).

California Governor's Office of Emergency Services

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Government Code Section 8607; Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local government requests assistance. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the State's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes, and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the State. It also serves as the lead agency for mobilizing the State's resources and obtaining federal resources. Cal OES coordinates the State response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the State through the statewide mutual aid system (see discussion of Mutual Aid Agreements, above). California Emergency Management Agency (Cal-EMA) maintains oversight of the State's mutual aid system.

California Mutual Aid System & Plan

The CCFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Emergency Management Agency, Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Air Plan (Mutual Aid Plan), as managed by the Governor's Office of Emergency Services (OES).[3] The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. Culver City is located in Region 1. Through the Mutual Aid Plan, the OES is informed of conditions in each geographic and organizational area of the state, and the occurrence or imminent threat of disaster. All OES Mutual Aid participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of the OES.

The CCFD is supported, when needed, through mutual aid agreements with fire departments in the City of Los Angeles and Los Angeles County. Under this automatic aid agreement, CCFD apparatus and personnel are deployed to portions of Los Angeles County west of the City and to the City of Los Angeles south of the City, as well as to the City's immediate borders. As the City is within mutual aid Region 1 of the Emergency Mutual Aid Region established by OES, mutual aid assistance is also provided by the fire departments in the cities of Beverly Hills, Santa Monica, and West Hollywood. The mutual aid agreements ensure that the CCFD and the neighboring assisting agencies have shared standard operating procedures and regularly participate in joint

[3] California Emergency Management Agency, Fire and Rescue Division, California Fire and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised February 2023.

training programs.[4] In the event of major emergencies or community disasters, the City of Los Angeles and Los Angeles County fire departments would provide immediate aid to the City, with the other cities of Beverly Hills, Santa Monica, and West Hollywood following, as needed.

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[5] The *Hayward* ruling also concluded that "assuming the city continues to perform its obligations, there is no basis to conclude that the project will cause a substantial adverse effect on human beings" and the "need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate."[6]

California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incident/calls. This section of the CVC states the following:

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety...(c) All pedestrian upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.*

4 City of Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 26.

5 *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, 847.

6 *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, 843, 847.

Local

City of Culver City General Plan

The 1975 Public Safety Element of the Culver City General Plan contains the following fire protection policies applicable to the proposed Project:[7]

- Reduce fire hazards associated with older buildings.
- Encourage improved fire protection for multi-story structures and high-hazard industrial facilities.
- Require all new development and selected existing development to comply with established fire safety standards.

CCFD 2019 Community Risk Assessment & Standards of Cover

CCFD's 2019 Community Risk Assessment & Standards of Cover (CRA) serves as the CCFD's Integrated Risk Management Plan. The CRA defines the process, known as "deployment analysis," as a written procedure which determines the distribution and concentration of fixed and mobile resources of an organization. The purpose for completing such a document is to assist the agency in ensuring a safe and effective response force for fire suppression, emergency medical services, and specialty response situations. The CRA serves as: (1) the basis for continually measuring service level performance; (2) a predictive tool for helping to determine workload and ideal unit utilization; (3) a management tool for determining apparatus type and staffing levels; (4) a descriptive tool for validating service levels; and (5) a baseline tool for defining service level objectives. Performance measures set forth in the CRA applicable to the Project include, but are not limited to, the following:[8]

Response Time Goals: Response time goals for fire suppression, technical rescue and HazMat are 7:00 minutes for the first due-in unit and 8:00 minutes for the Effective Response Force (ERF), 90 percent of the time. Response time goals for emergency medical services (EMS) are 6:20 minutes for the first due-in unit and 9:50 minutes for the ERF, 90 percent of the time. It is noted that the above are goals, not standards.

Fire Flow Requirements: Fire flow requirements range from 2,000 gallons per minute (gpm) in low-density residential areas up to 12,000 gpm in commercial and industrial areas.

High/Special Risk Fire Response: High and Special Fire Risk incidents in the City represent unique critical tasking situations where there is very little historical response information to base tasking upon. These types of incidents are addressed with the region's mutual aid agreements to help augment City resources. For example, the minimum mutual aid request to meet the demands of a high/special risk fire is an "A Assignment," (i.e., one truck company (5), three engine companies (12), two rescue ambulances (4), two battalion chiefs (4), and one EMS Supervisor (1), requiring 26 personnel to assist with the incident).

---

7 City of Culver City, Culver City General Plan, Public Safety Element, adopted August 25, 1975, https://www.culvercity.org/files/assets/public/documents/community-development/publicsafetyelement.pdf. Accessed December 27, 2023.

8 CCFD, Community Risk Assessment: Standards of Cover 2019.

City of Culver City Municipal Code

Sections of the City's Municipal Code applicable to fire protection and EMS services at the Project Site include, but are not limited to, the following:

Section 9.02 (Fire Prevention):

Section 9.02.005 (Adoption of the 2022 CFC): Adopts the 2022 CFC with amendments as the City of Culver City Fire Code (Fire Code).

Section 9.02.035 (Locks for CCFD Access): All noted exterior doors shall be provided with locksets and handles for Fire Department Access. Keys for required access shall be provided by the owner and made readily available in the KNOX Box.

Section 9.02.040 (Automatic Fire Sprinkler Systems): An automatic fire-extinguishing (sprinkler) system shall be installed in every new building in the city, including any new residential building, hereinafter constructed or moved into the city, regardless of area separation or type of construction.

Section 9.02.065 (Fire Hydrant Spacing): Fire hydrant spacing in commercial/industrial/ residential areas shall be 300 feet apart. The maximum distance of a fire hydrant to a Fire Department Connection (FDC) shall not exceed 100 feet.

Other sections of the CCMC applicable to fire protection services at the Project Site include, but are not limited to, the following:

Section 9.08.385 (Authority to Close Streets): This section requires coordination with the Public Works Department to notify the Police and Fire Department prior to street closure for construction or repair work.

Section 17.540 (Site Plan Review): This section provides procedures and standards for the comprehensive review of proposed development projects to: ensure compliance with the required standards, design guidelines, and ordinances of the City; minimize potential adverse effects on surrounding properties and the environment; and protect the integrity and character of the residential, commercial, and public areas of the City. As such, this section may require new projects to be reviewed by the CCFD to ensure that fire related measures are incorporated.

Section 17.560 (Comprehensive Plans): This section provides procedures and standards for Comprehensive Plans, including required findings to ensure that the proposed development is capable of creating an environment of sustained desirability and stability and will not be substantially detrimental to present and potential surrounding uses. As part of the Comprehensive Plan process, the Planning Department circulates project plans to other City departments for review and comment, including to the CCFD.

Existing Conditions

Fire Protection Facilities and Services

Fire protection and emergency medical services for the Project Site are provided by the CCFD, which is supported, when needed, through mutual aid agreements with fire departments in the City of Los Angeles and the Los Angeles County, with further assistance from the cities of Beverly Hills, Santa

Monica, and West Hollywood.[9] The CCFD provides fire protection to an existing population of approximately 40,000 persons and is made up of a total of 79 employees who are housed at three fire stations and three support stations. Each fire station is equipped with unique equipment and personnel needed to serve the community, with at least 18 sworn personnel on duty at all times. The CCFD utilizes a three-shift schedule, staffing each shift for a 24-hour period, seven days a week, and 365 days a year. Other facilities that serve the CCFD include the Community Risk Reduction and Fire Administration offices in City Hall, as well as a 4,965 square-foot Fire Drill Training Facility used for teaching firefighting techniques.[10] The City is divided into three fire districts, two rescue/EMS districts, and 15 metropolitan fire management zones (FMZs), with the fire and rescue/EMS districts evenly distributed by population and centerline miles of roads served, and the FMZs defined by occupancies within a given geographical area that share common fire risk.[11]

The Project Site is located within Fire District 3, FMZ 14, with first-in service to the Project Site provided by Fire Station 3, with Fire Stations 1 and 2 providing backup service.[12] FMZ 14, which covers approximately 0.44 square miles, comprises exclusively of commercial buildings, industrial buildings, and businesses.[13] **Figure 4.10.1-1**, *Culver City Fire Department Stations*, illustrates the Fire Districts and Fire Stations within Culver City, as well as the direct access route to the Project Site from Fire Station 3.

Table 4.10.1-1, *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. Fire Station 3's service boundaries cover approximately 1.75 square miles and has a service population of approximately 13,000 people.[14] Fire Station 3 houses a fire engine (three personnel), a ladder truck (four personnel), and a paramedic rescue ambulance (two personnel). In 2023, Fire Station 3 responded to a total of 2,859 incidents, including 1,985 EMS incidents, 92 fire incidents, 20 wildland fire incidents, 40 hazardous materials incidents, 60 technical rescue incidents, and 662 other incidents.[15]

9 City of Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 26, https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/5f52a1c3f0c7ef795c8edf66/1599250917520/CCGPU_ParksPublicFacilities_2020_0805_WebCovidMemo.pdf. Accessed December 27, 2023.

10 City of Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 22.

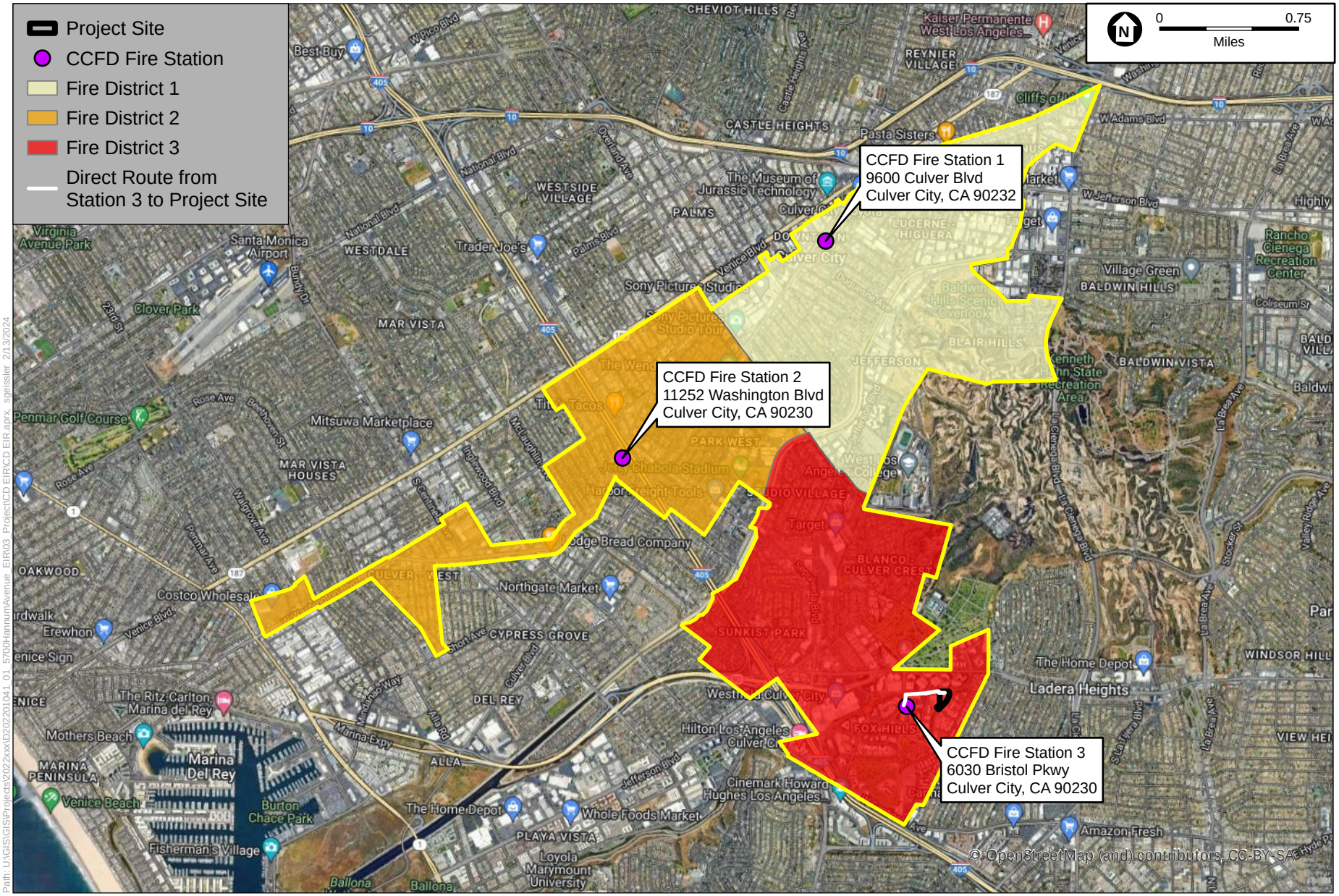
11 CCFD, Community Risk Assessment: Standards of Cover 2019, pages 18 and 38, https://www.culvercityfd.org/files/sharedassets/fire/crasoc_website_20190618.pdf. Accessed December 27, 2023.

12 CCFD, Fire Marshal Dave Rindels, correspondence dated December 20, 2023. Provided in Appendix H-1 of this Draft EIR.

13 CCFD, Community Risk Assessment: Standards of Cover 2019, pages 178 to 180.

14 CCFD, Fire Marshal Dave Rindels, correspondence dated December 20, 2023. Provided in Appendix H-1 of this Draft EIR.

15 CCFD Performance Management Dashboard, Station 3, https://dashboards.mysidewalk.com/culver-city-ca-fire-performance-dashboard/station-3. Accessed January 11, 2024.



Path: U:\GIS\GIS\Projects\2022xx\D202201041_01_5700HannumAvenue_EIR\03_Project\CD EIR\CD EIR.aprx, sgeissler 2/13/2024

SOURCE: Mapbox, 2023; City of Los Angeles Open Data: https://data.lacity.org/, Accessed February 2024; ESA 2024

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.10.1-1
Culver City Fire Department Stations

TABLE 4.10.1-1
CCFD FIRE STATIONS LOCATED IN THE VICINITY OF THE PROJECT SITE

Fire Station	Address	Driving Distance to Project Site[a]	Apparatus	Staff
Fire Station 3	6030 Bristol Parkway	0.3 miles southwest of Project Site	Engine Company	Captain, engineer, firefighter
			Paramedic Resources	2 firefighter/ paramedics with ALS certification
			Truck Company	Captain, engineer, 2 firefighters
Fire Station 2	11252 Washington Boulevard	2.6 miles northwest of Project Site	Engine Company	Captain, engineer, firefighter
			Ambulance	2 EMTs
Fire Station 1 (Headquarters)	9600 Culver Boulevard	3.7 miles north of Project Site	Engine Company	Captain, engineer, firefighter
			Paramedic Resources	2 firefighter/ paramedics with ALS certification
			Battalion Chief Command Vehicle	Battalion chief

NOTES:
ALS = Advanced Life Support

SOURCE: Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, pages 22 and 23.

With nine on-duty personnel, Fire District 3 would have an existing on-duty firefighter to population ratio of 1:1,445.[16] Based on the above, the existing on-duty firefighter to population ratios for the entire City is 1:2,000.[17]

According to the CCFD, no new fire stations are planned at this time.[18] However, as stated in the CCFD Strategic Plan and the 2019 CRA, improvements have been planned to increase CCFD performance regarding deployment, response time, data collection, and mutual aid. The CCFD plans to add a third rescue ambulance (2 staff) at Fire Station 2 and to augment employees by 7 additional staff.[19] The CCFD will continue to monitor response time and these improvement efforts, as well as improve data collection methods to improve CCFD's performance.

16 With 9 on-duty personnel and a service population of 13,000 people, Fire District 3 would have 9 personnel:13,000 people, which is approximately 1 personnel:1,445 people.

17 With 20 on-duty personnel based on Table 4.10.1-1 for all three fire stations and a total City population of 40,000 people, the City would have 20 personnel:40,000 people, which is 1 personnel:2,000 people.

18 CCFD, Fire Marshal Dave Rindels, correspondence dated December 20, 2023. Provided in Appendix H-1 of this Draft EIR.

19 Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 29.

In 2023, the CCFD responded to a total of 7,810 incidents, including fire, rescue, hazardous materials, and others.[20] Based on these statistics, the CCFD had a 2023 Citywide fire/EMS incident to population ratio of 7,810 incidents per 40,000 persons, or approximately 195 incidents per 1,000 persons. As detailed above, in 2023, Fire Station 3 had a total of 2,859 incidents, serving a population of 13,000 people, and therefore had an incident to population ratio of approximately 220 incidents per 1,000 persons.

The CCFD's response time standards differentiate between the type of an emergency response call (e.g., fire suppression, EMS, technical rescue, hazardous materials emergency response) and then by the type of risk (e.g., high, moderate, and low risk). The CCFD reports their response times based on the first due-in staff and the ERF. The first due-in staff is the first unit to arrive at the incident and has the responsibility of establishing command at the scene, evaluating the need for additional resources, and providing initial emergency response services. The ERF includes the total number of personnel necessary to address an emergency and/or terminate an incident.[21] **Table 4.10.1-2**, *CCFD Response Times,* shows the response time goals, for 90 percent of the time, and the five-year aggregate response times from 2019 to 2023.

While the 2019 to 2023 five-year aggregates did not completely meet CCFD's response time goals, the total response time goal in 2023 for first due-in units for all calls for Station 3, which would serve the Project Site, was met 76.6 percent of the time (compared to 69.9 percent of the time for all of CCFD).[22] In 2023, the average first arriving response time for all incidents for Fire Station 3 was 8:08 minutes, 90 percent of the time.

Emergency Access

The Project Site is located within an urbanized area that has a fully developed roadway system. Emergency access to the Project vicinity is provided by several arterials including Slauson Avenue and Bristol Parkway. Direct emergency access to the Project Site is provided by each of the streets bordering the Project Site, including Hannum Avenue and Buckingham Parkway.

A direct route is available from CCFD Fire Station 3, located at 6030 Bristol Parkway approximately 0.3 miles southeast of the Project Site, to the Project Site via Bristol Parkway to Hannum Avenue.

[20] CCFD Performance Management Dashboard, Monthly Incident Report, https://dashboards.mysidewalk.com/culver-city-ca-fire-performance-dashboard/incident-report. Accessed January 11, 2024.

[21] Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, pages 25 and 26.

[22] CCFD Performance Management Dashboard, Monthly Station Benchmark Reports. https://dashboards.mysidewalk.com/culver-city-ca-fire-performance-dashboard/station-3. Accessed January 11, 2024.

TABLE 4.10.1-2
CCFD RESPONSE TIMES

Incident Type	CCFD Goal[a]	Aggregate 2019-2023 Response Time[b]
High Risk Fire Incident		
First Due-In Unit	7:00	5:21
ERF	14:00	8:06
Moderate Risk EMS Incident		
First Due-In Unit	6:20	8:07
ERF	9:50	11:40
Moderate Risk Technical Rescue Incidents		
First Due-In Unit	7:30	5:09
ERF	12:00	N/A
Moderate Risk Hazardous Materials Incident		
First Due-In Unit	8:00	9:45
ERF	9:00	11:12
Moderate Risk Wildland Fire Incident		
First Due-In Unit	7:30	8:11
ERF	13:00	N/A

NOTES:

[a] Commission on Fire Accreditation International, 2019. Accreditation Report, Culver City Fire Department, pages 25 to 31. https://www.culvercityfd.org/files/sharedassets/fire/culvercityfdaccreditationr.pdf. Accessed January 2024.

[b] CCFD Performance Management Dashboard, 5-Year Total Baseline Performance Table. https://dashboards.mysidewalk.com/culver-city-ca-fire-performance-dashboard/baseline-performance. Accessed January 11, 2024.

Water Infrastructure/Fire Flow for Firefighting Purposes

Golden State Water Company (GSWC) currently provides water service to the Project Site. In general, fire flow pressure requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type of occupancy, and degree of fire hazard. Based on information provided in the Water Civil Technical Memorandum prepared for the Project by Kimley Horn (Appendix K) and as further detailed in Section 4.13.1, *Utilities and Service Systems – Water Supply*, fire flow to the Project Site is currently provided by 12-inch water main in Hannum Avenue. Additionally, a water meter is located along the street frontage of Hannum Avenue. There is a fire hydrant located across Hannum Avenue at the center of the Project Site, and another fire hydrant adjacent to the Project Site along Buckingham Parkway, also generally within the central portion of the Project Site.

Fire Hazard Area

The Project Site is in a highly urbanized area and is not located within an area designated by CAL FIRE or CCFD as a Very High Fire Hazard Severity Zone (VHFHSZ). [23,24] VHFHSZs are primarily

[23] Culver City Fire Department (CCFD), Very High Fire Hazard Severity Zones (VHFHSZ) Map, June 13, 2012, https://www.culvercityfd.org/files/sharedassets/fire/v/1/culvercityfiredepartmentve.pdf. Accessed December 27, 2023.

[24] CAL FIRE, California Fire Hazard Severity Zone Viewer, https://egis.fire.ca.gov/FHSZ/. Accessed December 27, 2023, 2022.

located in the hilly regions of the City of Culver City where wildland fires originating on brush-covered undeveloped hillsides can be affected by urban development and vice versa. The nearest VHFHSZ is located approximately 0.3 miles northeast of the Project Site. In addition, the Project Site is surrounded by urban development and is not adjacent to any wildlands or high fire hazard zones.

4.10.1.3 Environmental Impacts

Thresholds of Significance

The following threshold of significance is based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in a significant impact associated with fire protection if it would:

- **FIRE-1** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.

Methodology

Project effects on fire protection services are evaluated by CCFD on a project-by-project basis. A project's land use designation, project size and components fire-related needs including fire flow and fire hydrant sizing, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce or increase the demand for fire protection and emergency medical services, are taken into consideration. Further evaluation of impacts considers whether or not the development of the project would create the need for a new fire station, or expansion, relocation, or consolidation of an existing facility, to accommodate increased demand. Consultation with CCFD is also conducted to determine a project's effects on fire protection and emergency medical services.

The need for or deficiency in adequate fire protection services in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional fire protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact to the environment related to fire protection services resulting from a project is determined by whether the construction of new or expanded fire facilities is a reasonably foreseeable direct or indirect effect of the project.

Based on input received from CCFD, there are no current capital improvement plans for the construction or expansion of fire facilities in the local vicinity of the Project Site in the City of Culver City. Based on historical development of fire facilities, it is assumed that in the event Culver City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15332.

In regard to fire hydrant flow, GSWC performed a hydraulic analysis of their respective water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site.

Project Design Features

The Project would incorporate Fire Code requirements, including those summarized in the letter from CCFD included in Appendix H-1 of this Draft EIR. No specific project design features are proposed with regard to fire protection. However, as discussed in Section 4.11, *Transportation,* of this Draft EIR, pursuant to Project Design Feature TRAF-PDF-1, the Project would implement a Construction Management Plan that would include measures to ensure emergency access to the Project Site and adjacent properties. Project Design Feature TRAF-PDF-1 would minimize impacts to vehicular and other forms of circulation during construction.

Analysis of Project Impacts

Threshold FIRE-1: The Project would have a significant impact on fire protection if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.

Impact Analysis

Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. The Project Site is located 0.3 miles from CCFD Fire Station 3, the first due-in fire station for CCFD. CCFD Fire Station 3 includes an engine company, a paramedic rescue ambulance, and a truck company. While the average first arriving response time for Fire Station 3 in 2023 was 8:08 minutes, the CCFD has estimated that the rough estimate response time for the first due-in unit to the Project Site would be 4 minutes.[25] The drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic pursuant to Section 21806 of the CVC. Furthermore, Project construction activities would be short-term and temporary.

Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during construction, which are set forth in 29 CFR Part 1926, as discussed further above in Section 4.10.1.2, *Environmental Setting*. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA. Additionally, in accordance with the

[25] CCFD, Fire Marshal Dave Rindels, correspondence dated December 20, 2023. Provided in Appendix H-1 of this Draft EIR.

provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Project construction would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Project construction could also potentially impact the provision of existing CCFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. While most construction activities are expected to be primarily contained within the boundaries of the Project Site, construction could, if approved by the City of Culver City, encroach into the public rights-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on Hannum Avenue or Buckingham Parkway. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would not be impeded. In addition, a Construction Management Plan will be implemented during Project construction pursuant to Project Design Feature TRAF-PDF-1 set forth in Section 4.12, *Transportation*, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Specifically, Project Design Feature TRAF-PDF-1 requires the provision of an emergency access plan as well as review and approval of any proposed lane closures include coordination with the fire and police departments of each city to minimize potential effects on traffic flow and emergency response. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily impact emergency access. However, with implementation of Project Design Feature TRAF-PDF-1, the majority of construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter a.m. and p.m. peak periods, thereby reducing the potential for traffic-related conflicts. The Project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators) would also be implemented, as necessary, to ensure emergency access to the Project Site. Traffic control measures would also ensure that traffic flow is maintained on adjacent rights-of-way and would also minimize response times. Furthermore, pursuant to Section 21806 of the CVC, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic to respond to emergencies in a timely manner.

Based on the above, construction of the Project would not result in the need for a new fire station or the expansion of an existing facility, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Therefore, impacts to fire protection during Project construction would be less than significant.

Operation

Fire Protection Facilities and Services

As discussed in Section 4.9, *Population and Housing*, of this Draft EIR, the elimination of the existing on-site office uses would result in an estimated net decrease in employees on the Project Site of 127 employees. The development of the Project's 309 residential units would result in a total population of approximately 733 people. While there would be a decrease in employees on the Project Site, fire incidents are based on population or employees. Thus, without accounting for the decreased number of employees, this analysis conservatively analyzed incidents based on the residential population generated by the Project. Accordingly, based on the 2023 Fire Station 3 fire/EMS incident to population ratio of 220 incidents per 1,000 persons, the Project's anticipated increase of approximately 733 people would generate the potential for an estimated 161 additional fire/EMS incidents per year requiring CCFD response. The potential increase in the number of service calls associated with the Project would represent approximately two (2) percent of the total number of Citywide service calls. Nonetheless, as the Project would increase intensity of the Project Site, there would be an increase in the demand for fire protection services compared to existing conditions. As previously described, the Project Site is located 0.3 miles from CCFD Fire Station 3, the first due-in fire station. CCFD Fire Stations 1 and 2 would provide backup service to the Project Site.

The Project would comply with the applicable OSHA, Building Code, Fire Code, and other CCMC, and CCFD requirements, including installation of a fire sprinkler suppression system, a fire alarm system, an Emergency Responder Radio Coverage, and manual smoke evacuation systems in the underground parking structure on the Culver City Parcel; installation of Knox Boxes; provision of fire resistant doors, materials, walkways, stairwells, elevator systems (including emergency and fire control elevators), smoke detectors, and signage, among other fire prevention features.

The Project would also generate revenues to the City of Culver City (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate by each City.

Lastly, based on the analysis and the constitutional requirement started in the California Constitution Article XIII, Section 35(a)(2) to provide these services, and the *Hayward* ruling, it is reasonable to conclude that: (1) Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; (2) such services will be provided by a local jurisdiction; and (3) the Project would not inhibit CCFD emergency response. Also, as indicated previously, it is assumed that in the event Culver City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acre and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15332 or Mitigated Negative Declaration.

Compliance with applicable regulatory requirements and recommendations would ensure that adequate fire prevention features are provided that would reduce the demand on CCFD facilities and services without creating the need for new or expanded fire facilities.

Response Distance and Emergency Access

CCFD does not have a required response distance, but does have response time goals. As discussed previously, CCFD emergency response time goals consisting of all the various incident types shown in Table 4.10.1-2 for Fire Station 3, which would serve the Project Site, were met 76.6 percent of the time.[26] The CCFD has also estimated that the rough estimate response time for the first due-in unit (CCFD Fire Station 3) to the Project Site would be 4 minutes.[27] While precise response times cannot be predicted, this information suggests that the first due-in unit response goal of 7 minutes would be achieved.

The Project's new buildings would be required to install an automatic fire sprinkler system. The installation of fire sprinklers in the proposed buildings serve to provide a quick reaction to a building fire that reduce the risk of death or injury from a fire because they dramatically reduce heat, flames, and smoke, allowing building occupants time to evacuate before the fire protection services arrive. As described in Chapter 2, *Project Description*, of this Draft EIR, vehicular access to the Project Site would be provided via two driveways, the Hannum Driveway and the Buckingham Driveway. Both driveways would provide access to the parking structure, while both adjacent roadways could be utilized by emergency vehicles to park or provide fire-fighting services during an emergency event. In addition, there is a fire access lane on the west side of the building, as shown on Figure 2-3, Conceptual Site Plan, in Chapter 2*, Project Description*, of this Draft EIR. As part of the comprehensive plan review, the Project's access would be reviewed and approved by CCFD to ensure that emergency vehicle access to the Project Site would not be impeded. As such, emergency access to the Project Site would be adequately maintained.

The area surrounding the Project Site includes an established street system, consisting of primary and secondary arterials, and collector and local streets that provide regional, sub-regional, and local access and circulation within the local Project vicinity. The Project Site is located within a highly urbanized area of City of Culver City, and the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. In addition, emergency response is routinely facilitated, particularly for high priority calls, through the use of sirens to clear a path of travel (including bypassing of signalized intersections), driving in the lanes of opposing traffic pursuant to Section 21806 of the CVC, and multiple station response. Furthermore, because of the grid-like pattern of the local street system, each of the fire stations that serve the Project Site have multiple routes available to respond to emergency calls at the Project Site. In addition, CCFD is looking to reduce response times via: alarm handling improvements with its new dispatch center; use of turnout timers in stations to better monitor turnout times; and use of HAAS alerting systems in new engines that send messages to drivers and connected vehicles predicted to be in the path of the emergency vehicles preparing to

[26] CCFD Performance Management Dashboard, Monthly Station Benchmark Reports. https://dashboards.mysidewalk.com/culver-city-ca-fire-performance-dashboard/station-3. Accessed January 11, 2024.

[27] CCFD, Fire Marshal Dave Rindels, correspondence dated December 20, 2023. Provided in Appendix H-1 of this Draft EIR.

approach or arrive on-scene.[28] These CCFD improvements are likely to further reduce response times through increased efficiencies in turnout times and route clearing.

Based on the considerations above, despite potential increases in traffic, the Project would not significantly impair CCFD from responding to emergencies at the Project Site or the surrounding area.

Water Infrastructures/Fire Flow for Firefighting Purposes

Fire flow requirements are based on building size and construction type. The Project Site is served by a 12-inch water main in Hannum Avenue. There is a fire hydrant located across Hannum Avenue at the center of the Project Site, and another fire hydrant adjacent to the Project Site along Buckingham Parkway, also generally within the central portion of the Project Site. As detailed within Section 4.13.1, *Utilities and Service Systems – Water Supply*, the Project would have a minimum fire flow requirement of 1,500 gpm at 20 psi residual for a duration of 2 hours, in compliance with the CCMC Section 9.02. Per the Fire Service Pressure Flow Report provided by GSWC (located within Appendix K of this Draft EIR), the existing fire hydrant connected to the 12-inch water main in Hannum Avenue can provide 4,409 gpm at 20 psi for a duration of 2 hours. Additionally, according to correspondence with the CCFD (located within Appendix K), an additional fire hydrant would not be required as part of the Project. Therefore, the site's existing fire hydrant infrastructure would be sufficient to meet the Project's fire flow requirements. Furthermore, Project building plans would be submitted to the CCFD to review and approve the fire hydrant locations. All fire hydrant requirements and fire sprinkler designs would be subject to CCFD review and approval during the Project's design and permitting phase. Therefore, operational impacts to the City's fire water service facilities and infrastructure would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Impacts would be less than significant without mitigation.

Cumulative Impacts

Chapter 3, *Environmental Setting*, of this Draft EIR, identifies 12 related projects that are anticipated to be developed within a 1.0-mile radius of the Project Site. These projects are summarized in Table S3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3. As shown in Table 3-1, these related Projects occur in two separate jurisdictions, the City of Culver City and the City of Los Angeles. Of these related projects, eight occur within Culver City and, like the Project, would create a demand for fire protection service from the CCFD. All of the Culver City related projects are located within Fire District 3 where the Project Site is located.

[28] CCFD, Community Risk Assessment: Standards of Cover 2019, page 121.

Construction

As with the Project, each related project would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions, in combustible materials and coatings, and lighted cigarettes. However, similar to the Project, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the safety and health regulations for construction established by OSHA. Additionally, in accordance with the provisions established by OSHA for emergency response and fire safety operations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Construction of the related projects would also occur in compliance with applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

In the event that Project construction occurs concurrently with related projects in the local vicinity of the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Management Plan (refer to Project Design Feature TRAF-PDF-1), which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-ways. Since the Project would not require substantial narrowing of adjacent public rights-of-ways that may be hazardous to roadway travelers, the Project would not have significant impacts on access and safety. Each related project would implement similar design features during construction and would be subject to the applicable lead agency's routine construction permitting process. Furthermore, construction-related traffic generated by the Project and related projects would not significantly impact CCFD response times within the Project Site vicinity as drivers of fire and emergency vehicles have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes opposing traffic, pursuant to Section 21806 of the CVC. Finally, the Project in and of itself would not cause a significant impact to fire protection services during construction.

Operation

The total amount of development and associated population from the related projects located in the City are identified in **Table 4.9-4,** *Related Projects Housing, Population and Employment,* in Section 4.9, *Population and Housing,* of this Draft EIR. As indicated therein, the related projects in the City would generate an estimated daytime population of approximately 4,992 people (residents + employees), which, when combined with the net increase of approximately 606 people as part of the daytime population (733 Project residents + 20 Project employees – 147 existing employees) associated with the Project, would generate a cumulative daytime population of approximately 5,598 persons requiring fire protection service from the CCFD. With regard to the nighttime population, the Project and related projects would increase the 40,000 person existing nighttime population to approximately 42,539 (for an increase of approximately 2,539 persons).[29] As CCFD incident statistics are reported based on residential population (or nighttime population), applying the 2023 Citywide fire/EMS incident to population ratio of approximately 195 incidents

[29] Includes 733 Project residents plus 1,806 residents from Culver City related projects.

per 1,000 persons, the cumulative nighttime population would result in approximately 495 additional fire/EMS incidents per year requiring CCFD response.

The estimates provided above are conservative because the population generated from related projects would not all be net new residents and non-residents (i.e., these population projections do not take into account existing development and the associated existing resident and non-resident populations to be removed due to the development of the related projects). Additionally, the projections do not account for related projects that do not proceed beyond the application phase or ultimately are not built. The commercial-related projects would also be expected to provide on-site fire protection features, such as automatic sprinklers.

The development of the Project and the related projects may result in the need for increased staffing for existing facilities, additional fire protection facilities, and relocation of present fire protection facilities. With regard to facilities and equipment, similar to the Project, the related projects would be required to implement all applicable requirements regarding structural design, building materials, site access, fire-flow, storage and management of hazardous materials, and alarm and communications systems. Compliance with applicable CCMC requirements would ensure that adequate fire prevention features would be provided and reduce demand on CCFD facilities and equipment. As with the Project, other related projects may also include the installation of automatic fire sprinklers to enhance fire safety that would further reduce the demand placed on the CCFD facilities and equipment.

The Project, as well as the related projects, would also generate revenues to the City of Culver City (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate by the City. Furthermore, over time, CCFD would continue to monitor population growth and land development throughout its jurisdiction and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

In accordance with CCMC Section 9.02.040, all related projects within Culver City would be required to include installation of an automatic sprinkler system, regardless of area separation or type of construction. With regard to response distance, given that the related projects are generally located within an urban area, each of the related projects within the geographic scope would likewise be developed within urbanized locations serviced by one or more existing fire stations. As with the Project, the related projects would be required to comply with all applicable CCMC requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable CCMC requirements would be demonstrated as part of a site plan review.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic in the City of Culver City. Traffic from the Project and related projects has the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, as with the Project, related projects are expected to include design features and mitigation measures, as applicable, that would serve to reduce traffic impacts. Furthermore, as previously stated, emergency response vehicles can use a variety of options for

dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the CCFD from responding to emergencies at the Project Site or the surrounding area.

With regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection service is the responsibility of a City. Through the regular budgeting efforts for the City of Culver City, CCFD resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time, as appropriate. At this time, CCFD has not identified that it will be constructing a new station in the area impacted by this Project due to projects in the service area. As discussed above, CCFD did indicate that it plans to add a third rescue ambulance (2 staff) at Fire Station 2 and to augment employees by 7 additional staff.[30] If CCFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be expected to be located on parcels that are infill opportunities on lots that are typically between approximately 0.5 to 2 acres in size (such as the five stations identified as serving the Project Site), and (3) would likely qualify for a Categorical Exemption under CEQA Guidelines Section 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location for a new fire station or expansion or alteration of the existing fire stations which would service the Project Site and the related projects' sites, would be speculative and, therefore, beyond the scope of this Draft EIR.

Conclusion

Based on the above, the Project's contribution to cumulative impacts associated with the provision of new or physically altered fire facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection would not be cumulatively considerable, and cumulative impacts would be less than significant.

Based on the above, the Project would not substantially contribute to cumulatively considerable impacts regarding fire protection. Therefore, cumulative impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Cumulative impacts related to fire protection services would be less than significant.

[30] Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, p. 29.

4.10.2 Public Services – Police Protection

4.10.2.1 Introduction

This section addresses potential impacts on police services that could occur due to construction and operation of the Project. The analysis focuses on the Culver City Police Department (CCPD) facilities that currently serve the Project Site and the ability of the CCPD to provide police protection services to the Project. The analysis is based on information provided on October 12, 2023 in correspondence from the CCPD (CCPD Correspondence), included in Appendix H-2 of this Draft EIR. This analysis is also based on information provided on the CCPD's website and from other published sources.

4.10.2.2 Environmental Setting

Regulatory Framework

This section provides a summary of State, regional, and local police protection regulations and policies applicable to the Project Site.

State

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection services, and that it is reasonable to conclude that the City will comply with that provision to ensure that public safety services are provided.

California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incident/calls. This section of the CVC states the following:

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph*

(2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety...(c) All pedestrian upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

Regional

County of Los Angeles

The Office of Emergency Management (OEM), established by Chapter 2.68 of the County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization. The OEM's broad responsibilities include, among others, planning and coordination of emergency services on a County-wide basis.

The County of Los Angeles organizes a formal mutual aid agreement between all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. Formal mutual aid requests between police departments can be made under the purview of the Los Angeles County Sheriff's Department (LASD); however, additional informal agreements may be made directly between the police agencies. The Mutual Aid Operations Plan provides a structure of response should an emergency arise which requires immediate response by more law enforcement personnel than would be available to CCPD using all other available resources.

Local

City of Culver City General Plan

The City's General Plan does not identify any goals, objectives, policies, standards or guidelines specifically applicable to police protection for the Project.

City of Culver City Municipal Code

The Culver City Municipal Code (CCMC) contains the City's regulations and ordinances, which include general and traffic regulations enforced by the appropriate City departments, including, but not limited to, the CCPD, the Community Development Department (Enforcement Services and Building Divisions) and the Public Works Department (Environmental Programs and Operations Division).

Sections of the CCMC applicable to police protection services at the Project Site include, but are not limited to, the following:

Section 9.08.385 (Authority to Close Streets): This section requires coordination with the Public Works Department to notify the Police and Fire Department prior to street closure for construction or repair work.

Section 17.540 (Site Plan Review): This section provides procedures and standards for the comprehensive review of proposed development projects to: ensure compliance with the

required standards, design guidelines, and ordinances of the City; minimize potential adverse effects on surrounding properties and the environment; and protect the integrity and character of the residential, commercial and public areas of the City. As such, this section may require new projects to be reviewed by the CCPD to ensure that public safety and site security measures are incorporated.

Section 17.560 (Comprehensive Plans): This section provides procedures and standards for Comprehensive Plans, including required findings to ensure that the proposed development is capable of creating an environment of sustained desirability and stability and will not be substantially detrimental to present and potential surrounding uses. As part of the Comprehensive Plan process, the Planning Department circulates project plans to other City departments for review and comment, including to the CCPD.

Section 17.300.040 (Outdoor Lighting): This section requires that security lighting be provided at all building entrances and exits.

Section 11.04.030 (Suspension or Revocation of an Alarm Permit): This section allows the City to access services charges to property owners for each false alarm that results in a CCPD response in excess of three false alarms in a 12-month period.

Section 11.04.065 (Police Chief Discretion): This section states that the Chief of Police shall have discretion to enforce rules, regulations, policies, procedures and directives necessary to implement the provisions of Chapter 11.04, Alarm Systems. Such powers shall include, but are not limited to, the power to promulgate, execute and enforce a policy regarding dispatch of police to alarm signals, as well as the discretion to discontinue police response to alarm signals due to the user's failure to comply with the provisions of Chapter 11.04, or to properly repair alarm systems deemed to constitute runaway alarms.

Existing Conditions

Police protection for the Project Site is provided by the CCPD. The CCPD is responsible for providing visible patrol, preliminary criminal investigations, follow-up investigations, traffic accident investigations, and specialized investigations of crimes such as identify theft, vice offenses, and similar crimes. The CCPD promotes community safety through deterrence and prevention of crime, apprehension of offenders, and education of the public in self-protective measures to minimize victimization. Additionally, the CCPD collaborates with regional partners and the LASD, when needed, for large scale police-related emergencies, and contracts with the South Bay Regional Public Communications Authority for dispatch services.[1]

The CCPD is staffed with two full time K-9 units, an Emergency Response Team (ERT), and a Crisis Negotiation Team (CNT). In addition, the CCPD provides neighborhood and business watch programs to prevent criminal activities and offers a Citizens Police Academy designed to educate residents and local citizens on various aspects of law enforcement. Crime patterns are routinely analyzed and dispersed to patrol officers and special crime suppression units. Quarterly reports are prepared and made public that identify quarterly statistics and information related to crime and arrests, staffing, parking and traffic citations and traffic collisions.[2]

[1] Culver City Police Department (CCPD), Correspondence from Sergeant Carey Grant, Culver City Police Department Admin Sergeant, October 12, 2023. Provided in Appendix H-2 of this Draft EIR.

[2] CCPD, 2023 Mid-Year Quarterly Report, https://www.culvercitypd.org/Office-of-the-Chief-of-Police/Transparency-Reports. Accessed October 17, 2023.

The CCPD has approximately 109 sworn officers and 52 professional staff that serve an area of approximately five square miles with a residential (nighttime) population of approximately 40,000, and a daytime population of approximately 300,000.[3,4,5] The CCPD also has approximately 12 reserve police officers and 19 volunteers in patrol.[6] Based on the number of sworn officers provided by CCPD correspondence, the City has an officer to daytime population ratio of approximately 1:2,752 and a nighttime officer to population ratio of 1:367.[7]

The CCPD is divided into five patrol districts with a minimum staffing of six police officers per shift. The most current average response time documented in the CCPD 2023 Mid-Year Quarterly Report was 3 minutes and 40 seconds for emergency calls and 9 minutes and 22 seconds for non-emergency calls.[8]

The City's only CCPD station is located at 4040 Duquesne Avenue in Culver City on the northeast corner of Culver Boulevard and Duquesne Avenue, approximately 2.4 miles northeast of the Project Site. The Project Site is located within Patrol District 5, which covers the southern portion of the City, generally east of Interstate-405 and south of Slauson Avenue.[9]

Table 4.10.2-1, *Culver City 2022 Crime Statistics*, identifies crimes reported in the City in 2022 (the latest annual crime statistics). The crime statistics are based on the National Incident-Based Report System (NIBRS). As of January 1, 2021, the Federal Bureau of Investigation (FBI) made the nationwide implementation of NIBRS a top priority to provide a more useful statistics to promote constructive discussion, measures, and informed policing.

As indicated in Table 4.10.2-1, a total of 3,793 crimes were reported in the City in 2022. No homicides were reported in the city in 2022. It should be noted that in 2022, 2,146 (or approximately 56 percent) of the reported crimes were property crimes (burglary, larceny/theft, motor vehicle theft, and arson), compared to the 538 (or approximately 15 percent) reported violent crimes (assault, kidnapping, robbery, etc.) and 1,109 Other crimes (crimes such as vandalism, financial crimes, stolen property, drugs, weapons law violations, etc). Based on these numbers, and based on a residential nighttime population of approximately 40,000, the City has an existing nighttime annual crime rate of approximately 94.8 crimes per 1,000 residential population. Based on the City's daytime population of 300,000 people, the City has an existing annual daytime crime rate of approximately 12.64 crimes per 1,000 population.

3 CCPD, Correspondence from Sergeant Carey Grant, Culver City Police Department Admin Sergeant, October 12, 2023. Provided in Appendix H-2 of this Draft EIR.

4 CCPD, About CCPD, https://www.culvercitypd.org/Office-of-the-Chief-of-Police/About-CCPD. Accessed October 17, 2023.

5 Daytime population is the number of people in a city during the day, including commuters and tourists. Nighttime population is the number of people who live in a city, typically residents.

6 CCPD, About CCPD, https://www.culvercitypd.org/Office-of-the-Chief-of-Police/About-CCPD. Accessed October 17, 2023.

7 The ratio was calculated by taking the 40,000 population and dividing by 109 sworn officers.

8 CCPD, 2023 Mid-Year Quarterly Report, https://www.culvercitypd.org/Office-of-the-Chief-of-Police/Transparency-Reports. Accessed October 17, 2023.

9 CCPD, Patrol, https://www.culvercitypd.org/Bureau-Information/Operations-Bureau/Patrol. Accessed October 17, 2023.

TABLE 4.10.2-1
CULVER CITY 2022 CRIME STATISTICS

Crime Type	Number	Percent of Culver City Crime[a]
Murder	0	0%
Homicide	0	0%
Rape/Sexual Assault	26	1%
Aggravated Assault	144	4%
Simple Assault	243	7%
Kidnapping	11	<1%
Robbery	114	3%
Total Violent Crime	***538***	***15%***
Burglary	280	7%
Larceny/Theft	1,590	42%
Motor Vehicle Theft	264	7%
Arson	12	<1%
Total Property Crime	***2,146***	***56%***
Other Crimes	***1,109***	***29%***
Total	**3,793**	

[a] Percentages are rounded.
[b] Other Crimes includes crimes such as vandalism, financial crimes, stolen property, drugs, weapons law violations.

SOURCE: CCPD, 2023 Mid-Year Quarterly Report.

4.10.2.3 Environmental Impacts

Thresholds of Significance

The following threshold of significance is based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in a significant impact associated with police protection if it would:

- **POL-1** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.

Methodology

The analysis of impacts on police protection addresses the Project's effects on the ability of police personnel to adequately serve existing and future population in the Project vicinity, taking into consideration the Project's security and/or design features intended to reduce the demand for police protection services and potential need for new or expanded police facilities. The analysis is based on correspondence with the CCPD, which is provided in Appendix H-2 of this Draft EIR.

Additionally, the analysis below presents statistical data for the City, including the ratio of crimes to population and the ratio of sworn police officers to population. For the analysis provided below related to ratios of police officers to population served, the analysis conservatively assumes that the Project's residents and employees would occupy the Project Site as part of the daytime population, while the nighttime population would consist of the residential population only. Based on information provided by CCPD and the associated analyses provided in this section of the Draft EIR, the findings regarding police services focus on whether the CCPD would require the addition of a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact.

The need for or deficiency in adequate police protection services in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional police protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact to the environment related to police protection services resulting from a project is determined by whether the construction of new or expanded police facilities is a reasonably foreseeable direct or indirect effect of the project.

Based on input received of CCPD, there are no current capital improvement plans for the construction or expansion of police facilities in the local vicinity of the Project Site in the City. Based on historical development of police facilities, it is assumed that in the event the City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15332.

Project Design Features

Refer to Project Design Feature TRAF-PDF-1 (Construction Management Plan) in Section 4.11, *Transportation,* of this Draft EIR. In addition, the following project design feature related to police protection services during Project construction will be implemented as part of the Project:

> **POL-PDF-1 (Project Site Security and Access During Construction):** During construction of the Project, the Project Site will be fenced and gated with surveillance cameras to monitor the site during off hours.
>
> **POL-PDF-2 (Project Site Security and Access During Operation):** During operation of the Project, access to the parking structure will be controlled through gated entries, and the entry areas will be well illuminated. Project Site security would include controlled keycard access to office spaces, security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV).

Analysis of Project Impacts

Threshold POL-1: The Project would have a significant impact on police protection if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.

Impact Analysis

Construction

During construction, equipment, building materials, vehicles, and temporary offices, would be temporarily located on the Project Site, which could be subject to theft or vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. This could result in an increase in demand for police protection services.

As detailed in Project Design Feature POL-PDF-1, during construction of the Project, the Project Site would be fenced and gated with surveillance cameras to monitor the site during off hours, thereby reducing the potential need for police protection services from CCPD in order to avoid potential theft. Security measures would ensure that valuable materials (e.g., building supplies and metals, such as copper wiring), as well as construction equipment, are not easily stolen or vandalized. The specific type and combination of construction site security features would depend on the phase of construction. Implementation of these security features would minimize the Project's potential need for police protection services during the building construction phase.

Police vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Although minor traffic delays due to temporary lane closures needed to facilitate specific construction activities could occur, particularly during the construction of utilities and street improvements, impacts to police protection services would be considered less than significant for the following reasons:

1. Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by CCPD;
2. Construction impacts are temporary in nature and do not cause lasting effects; and
3. Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally 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, in accordance with Section 21806 of the CVC. Furthermore, within the City, the Project Site would adhere to CCMC Section 9.08.385, which requires coordination with the Public Works Department to notify the Police and Fire Department prior to street closure for construction or repair work. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

A Construction Traffic Management Plan (CMP), subject to review and approval by the City would be incorporated into the Project as provided in Project Design Feature TRAF-PDF-1. The CMP

would include street closure information, detour plans, haul routes, and staging plans and would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The CMP would also require that review and approval of any proposed lane closures include coordination with the fire and police departments of each city to minimize potential effects on traffic flow and emergency response.

Any potential CCPD officers needed to patrol the Project Site would be existing officers at the CCPD police station. It is not anticipated that any additional officers from CCPD would be needed to monitor the Project Site during construction outside of the existing officers that patrol the area. Additionally, the various safety and control features that would be implemented during Project construction would reduce the potential for incidents that would require police responses.

Based on the above, Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically-altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Therefore, impacts to police protection during Project construction would be less than significant.

Operation

Operational activities associated with the Project would increase demand for police protection services. As discussed in Section 4.9, *Population and Housing*, the Project's 309 residential units and 5,600 sf of retail use is anticipated to result in 733 residents and 20 employees, or 753 total persons. The existing office use on the Project Site employs approximately 147 people, and the overall anticipated net increase of 606 people would represent an approximately 0.2 percent increase[10] in the existing daytime population of the City (approximately 300,000), while the anticipated added nighttime population of 733 residents would be an approximately 1.8 percent increase[11] in the existing nighttime population (approximately 40,000) of the City.

As discussed above, the Project Site would be served by CCPD, which has 109 sworn officers serving the daytime and nighttime populations. CCPD currently has an officer to daytime population ratio of approximately 1:2,752 and a nighttime officer to population ratio of 1:367. The anticipated net daytime increase in population of 606 people would reduce the existing officer to daytime population ratio of 1:2,752 to 1:2,758[12], and would reduce the existing officer to nighttime population ratio of 1:367 to 1:374.[13] The potential for an increase in officer to daytime and nighttime population ratios would represent increases of 0.2 and 1.9 percent, respectively. If it were determined that additional officers would be needed to maintain existing service ratios, the Project contribution would, without accounting for security features, generate an increase in demand for

[10] 606 new population/existing daytime population 300,000 = 0.002, or 0.2 percent increase in daytime population.
[11] 733 new residential population/existing nighttime population 40,000 = 0.018, or 1.8 percent increase in nighttime population.
[12] 300,000 existing daytime population + 606 new population = 300,606 new daytime population. The new 300,606 population/109 existing officers = one officer per 2,758 population.
[13] 40,000 existing nighttime population + 733 new population = 40,733 new nighttime population. The new 40,733 population/109 existing officers = one officer per 374 population.

0.2 additional CCPD sworn officers for the daytime population, and two additional CCPD sworn officers for the nighttime population, an increase of 0.2 percent and 2.0 percent, respectively.[14,15]

According to the CCPD, while staffing changes of up to two officers may be required as a result of the Project, no new or expanded police facilities would be needed as a result of Project implementation.[16] Moreover, the Project's operational demand for CCPD police protection services would be reduced as the result of the proposed security features set forth in Project Design Feature POL-PDF-2, as described further above. Implementation of these security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for CCPD services.

In addition, the Project would contribute revenue to the General Fund for the City which could fund CCPD expenditures as necessary to offset the cumulative incremental impact on police services. Through this process, CCPD would be able to provide adequate facilities to accommodate future growth and maintain acceptable levels of service. Additional increased demands for CCPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding), to which both the Project would contribute.

Lastly, given the (1) limited increases in demand for police services expected to be generated by the Project, (2) reduced demand for police services as the result of project design features, and (3) CCPD patrols in the local Project vicinity available to serve the Project Site, CCPD emergency response times are not expected to materially change under the Project. Although the Project would add traffic to surrounding roadways, CCPD has indicated that responses to calls to the Project Site is expected to remain within the current range of emergency response times.[17] Further, emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response. Emergency access to the Project Site and surrounding uses would be maintained at all times, and emergency vehicles would have priority and the ability to bypass signals and stopped traffic. Thus, Project-related traffic is not anticipated to impair the CCPD from responding to emergencies at the Project Site or the surrounding area. Accordingly, Project operational impacts associated with emergency response times and emergency access would be less than significant.

Based on the above analysis and with implementation of Project Design Feature POL-PDF-2, development of the Project is not anticipated to generate a demand for additional police protection services that could exceed the CCPD's capacity to serve the Project Site. Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance

14 606 new population X (one officer per 2,758 population) = 0.2 additional officers. (0.2 additional officers / 109 existing officers) X 100 = 0.2 percent increase in sworn officers.

15 733 new population X (one officer per 372 population) = 2 additional officers. (2 additional officers / 109 existing officers) X 100 = 2.0 percent increase in sworn officers.

16 CCPD, Correspondence from Sergeant Carey Grant, Culver City Police Department Admin Sergeant, October 12, 2023. Provided in Appendix H-2 of this Draft EIR.

17 CCPD, Correspondence from Sergeant Carey Grant, Culver City Police Department Admin Sergeant, October 12, 2023. Provided in Appendix H-2 of this Draft EIR.

objectives for police protection. Therefore, impacts to police protection during Project operation would be less than significant.

Mitigation Measures

Impacts regarding police protection services would be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts regarding police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Cumulative Impacts

Chapter 3, *Environmental Setting*, of this Draft EIR, identifies 12 related projects that are anticipated to be developed within a 1-mile radius of the Project Site. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3. As shown in Table 3-1, these related Projects occur in two separate jurisdictions, the City of Culver City and the City of Los Angeles. Of these related projects, eight occur within Culver City and, like the Project, would create a demand for police protection service from the CCPD.

Construction

In general, impacts to CCPD services and facilities during the construction of each related project would be addressed as part of each project's respective environmental review process conducted by respective city. Similar to the Project, each related project would be required to implement a construction traffic management plan to ensure that adequate emergency access to the property and neighboring properties is maintained. Related projects would also be required to implement similar security measures as under the Project to limit access to construction areas, such as installing construction fencing and gating and including security lighting. The specific type and combination of construction site security features would depend on the phase and duration of construction. The related projects would need to coordinate emergency accessibility with CCPD to their respective sites to ensure that emergency access would be maintained through temporary lane closures or marked emergency access points. Construction-related traffic generated by the Project and related projects would not substantially adversely affect CCPD service in the Project vicinity as drivers of police and emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Operation

The total amount of development and associated population from the related projects located in the City are identified in **Table 4.9-4,** *Related Projects Housing, Population and Employment,* in Section 4.9, *Population and Housing,* of this Draft EIR. As indicated therein, the related projects in the City would generate an estimated daytime population of approximately 4,992 people (residents + employees), which, when combined with the net increase of 606 population associated with the Project, would generate a cumulative daytime population of 5,598 persons requiring police

protection service from the CCPD. With regard to the nighttime population, the Project and related projects would increase the 40,000 person existing nighttime population to 42,539[18].

The cumulative increase in daytime population of 5,598 people would reduce the existing officer to daytime population ratio of 1:2,752 to 1:2,804.[19] The increase in residential population of 2,539 people (1,806 cumulative residential population plus 733 from the Project) would reduce the existing officer to nighttime population ratio of 1:367 to 1:390.[20] Applying the existing sworn police officer to daytime population ratio in the City of 1:2,752, this cumulative population would create a demand for approximately two additional CCPD sworn officers, an increase of 1.8 percent.[21] Applying the existing sworn police officer to the nighttime population ratio in the City of 1:367, this cumulative population would create a demand for approximately seven additional CCPD sworn officers, an increase of 6.4 percent.[22]

The estimates provided above are conservative because the population generated from related projects would not all be net new residents and non-residents (i.e., these population projections do not take into account existing development and the associated existing resident and non-resident populations to be removed due to the development of the related projects). Additionally, the projections do not account for related projects that do not proceed beyond the application phase or ultimately are not built. The projections also do not consider the potential reduction in criminal activity that is likely to occur as a result of development of the related projects, which include residential, commercial, office, school, and other uses, as the related projects would seek to activate their frontages and increase the amount of activity around their respective sites. The commercial-related projects would also be expected to provide on-site security, personnel and/or design features for their visitors and patrons.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic in the Project area. Traffic from the Project and related projects has the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, related projects are anticipated to include adequate security features similar to the security features of the Project, plus any required mitigation measures that would serve to reduce cumulative impacts to police protection service, if appropriate. Furthermore, as previously stated, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with Section 21806 of the CVC. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the CCPD from responding to emergencies at the Project Site or the surrounding area.

18 Includes 722 Project residents plus 1,806 residents from Culver City related projects.

19 300,000 existing daytime population + 5,598 new population = 305,598 population/109 existing officers = one officer per 2,804 population.

20 40,000 nighttime existing population + 2,539 new population = 42,539 new population. The new 42,539 population/109 existing officers = one officer per 390 population.

21 5,598 new population X (one officer per 2,752 population) = 2 additional officers. (2 additional officers / 109 existing officers) X 100 = 1.8 percent increase in sworn officers.

22 2,539 new population X (one officer per 367 population) = 7 additional officers. (7 additional officers / 109 existing officers) X 100 = 6.4 percent increase in sworn officers.

Additionally, the Project and the related projects would contribute revenue to the General Fund for the City which could fund CCPD expenditures as necessary to offset the cumulative incremental impact on police services. Through this process, CCPD would be able to provide adequate facilities to accommodate future growth and maintain acceptable levels of service. Additional increased demands for CCPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding), to which both the Project and related projects would contribute.

With regard to cumulative impacts on police protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. Through the regular budgeting efforts of the City, police department resource needs and possibly an expansion of the existing station or new station construction, would be identified and allocated according to the priorities at the time. At this time, CCPD has not identified that it will be constructing a new station in the area impacted by this Project due to projects in the service area. If CCPD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are typically between 0.5 and one acre in size, and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on police protection services would be less than significant.

Conclusion

Based on the above, the Project's contribution to impacts associated with the provision of new or physically altered police facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection would not be cumulatively considerable, and cumulative impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Cumulative impacts related to population and housing would be less than significant.

4.10.3 Public Services – Schools

4.10.3.1 Introduction

This section addresses whether new or physically altered school facilities would be required to provide school services to the Project, the construction of which could cause significant environmental impacts. The analysis estimates the number of students that would be generated by the Project and addresses whether Culver City Unified School District (CCUSD) school facilities would have sufficient capacity to accommodate these students. The analysis is based, in part, on written correspondence with CCUSD dated October 12, 2023, which is included in Appendix H-3 of this Draft EIR.

4.10.3.2 Environmental Setting

Regulatory Framework

State

California Education Code

Educational services and school facilities for the Project are subject to the rules and regulations of the California Education Code, the California Department of Education (CDE) and governance of the State Board of Education (SBE) (Gov. Code Section 33000, et seq.). The CDE is the government agency responsible for public education throughout the state. With the State Superintendent of Public Instruction, the CDE is responsible for enforcing education law and regulations and for continuing to reform and improve public elementary school, secondary school, childcare programs, adult education, and preschool programs. The CDE oversees funding, student testing, and achievement levels for all state schools. A sector of the CDE, the SBE is the 11-member governing and policymaking body of the CDE that sets Kindergarten through 12th Grade (K–12) education policy in the areas of standards, instructional materials, assessment, and accountability. The State also provides funding through a combination of sales and income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes. Further, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.[1]

Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998 (known as the Greene Act), enacted in 1998, is a program for funding school facilities largely based on matching funds. For new school construction, grants provide funding on a 50/50 State and local match basis. For school modernization, grants provide funding on a 60/40 State and local match basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.[2]

1 California Education Code Section 17620(a)(1).

2 State of California, Office of Public School Construction, *School Facility Program Guide*, October 24, 2012.

The Greene Act permits the local district to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. The Act also sets a maximum level of fees a developer may be required to pay. Pursuant to Government Code Section 65996, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to a less-than-significant level.[3]

Open Enrollment Policy

The Open Enrollment Policy is a state-mandated policy that enables students located in the CCUSD to apply to any regular, grade-appropriate CCUSD school with designated "open enrollment" seats. Open enrollment seats are granted through an application process that is completed before the school year begins. Under the Open Enrollment Policy, students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.[4]

Class Size Reduction Kindergarten–University Public Education Facilities Bond Act of 1998

Proposition 1A, the Class Size Reduction Kindergarten–University Public Education Facilities Bond Act of 1998 (Ed. Code, Section 100400–100405) is a school construction funding measure that was approved by the voters on the November 3, 1998 ballot. This Act created the School Facility Program where eligible school districts may obtain state bond funds.

Regional

CCUSD Facilities Master Plan

CCUSD adopted its Facilities Master Plan in 2014, which outlined planned improvements to school facilities throughout its campuses. These changes were designed to increase student safety and health, familiarize students with the use of technology, and facilitate student learning and engagement. Planned improvements include asbestos and hazardous materials removal, exterior/site illumination improvements, fire alarm upgrades, security system installation, construction of shade structures, seismic retrofitting of existing structures, and installation of technology/telecom systems and electrical infrastructure. Overall, the cost of improvements to all CCUSD facilities identified in the Facilities Master Plan, along with construction contingencies, cost escalations, general conditions, liability, and design costs was estimated at $165,300,161.[5] The CCUSD is currently in the process of developing an updated Facility Master Plan.[6]

3 California Government Code Section 65996 and 65997.

4 California Education Code Sections 48350, et seq.

5 Culver City Unified School District, 2014. Facilities Master Plan. https://www.ccusd.org/CapitalProjects/CCUSD_Facilities_Master_Plan.pdf. Accessed November 2023.

6 Culver City Unified School District, 2023. Culver City USD Future-Ready Facilities Plan. https://www.ccusdfutureready.org/. Accessed November 2023.

Local

City of Culver City General Plan

The City's General Plan does not identify any goals, objectives, policies, standards or guidelines specifically applicable to schools for the Project.

Existing Conditions

The city is served by CCUSD, which offers public school programs from preschool and K-12, as well as adult education courses. CCUSD is comprised of five elementary schools, one middle school, one high school, one independent learning academy, and one adult education school.[7] Each of the five elementary schools funnel students into Culver City Middle School for sixth grade through eighth grade, which then leads to enrollment in Culver City High School for ninth grade through twelfth grade. An alternative independent study program is available for students in grades K-12 through iAcademy (CCUSD iAcademy).

According to correspondence with CCUSD, three schools would serve the Project Site, including El Rincon Elementary School, Culver City Middle School, and Culver City High School.[8] Student enrollment for the 2023-2024 school year for these schools is shown in **Table 4.10.3-1**, *Enrollment of CCUSD Schools Serving the Project Site*. Per correspondence with CCUSD, CCUSD does not have school capacity information available, but indicated that each of the three schools are already at or just below capacity (see Appendix H-3).

TABLE 4.10.3-1
ENROLLMENT OF CCUSD SCHOOLS SERVING THE PROJECT SITE

School Campus	2023-2024 Existing Enrollment
El Rincon Elementary School	561
Culver City Middle School	1,557
Culver City High School	2,151
Total Enrollment	**4,269**

SOURCE: Correspondence with CCUSD, October 2023. Included as Appendix H-3.

4.10.3.3 Environmental Impacts

Thresholds of Significance

The following threshold of significance is based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in a significant impact associated with school facilities if it would:

- **SCHOOL-1** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered

[7] Culver City Unified School District. 2023. Our Schools. https://www.ccusd.org/. Accessed November 2023.

[8] CCUSD, Correspondence from Mike Reynolds, Interim Assistant Superintendent, October 12, 2023. Provided in Appendix H-3 of this Draft EIR.

governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for school facilities.

Methodology

The analysis of enrollment effects on schools is based in part on the ability of CCUSD school facilities and services to accommodate the potential increase in students generated from development of the Project. The student generation for the proposed multi-family residential is based on the rate provided by the CCUSD in its *Level I Developer Fess Study for Culver City School District* (March 2020), and considers whether CCUSD school facilities that serve the Project Site would have sufficient available capacity to accommodate these students at the time of Project buildout. The analysis addresses three levels of education facilities operated by CCUSD (i.e., elementary, middle, and high schools), and is centered on those schools that serve the Project Site. It also considers state regulations (i.e., SB 50) and development fees as a mechanism for providing school facilities and addressing school impacts of the Project.

Project Design Features

No specific Project Design Features are proposed with regard to schools.

Analysis of Project Impacts

Threshold SCHOOL-1: The Project would have a significant impact on schools if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools.

Impact Analysis

Construction

Construction of the Project would require employees who are anticipated to be hired from a mobile regional construction work force that moves from project to project. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the mobility and temporary durations of work at a particular site, and a large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate residences (and, therefore, a student population) within this region or move from other regions as a result of their temporary work on the Project Site. Therefore, Project construction would not result in a notable increase in the resident population or generate new students needing to attend local schools.

There are no public schools located in the immediate Project vicinity that would be affected by construction activities at the Project Site. The nearest CCUSD school, El Rincon Elementary School, is located approximately 0.7 mile northwest of the Project Site. There would be no Project-related construction staging or road closures at or adjacent to this or any other school. Therefore, construction activities would not adversely affect the operations of nearby schools.

Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, the construction of which would cause significant environmental impacts. Therefore, the Project's construction impacts on schools would be less than significant.

Operation

The Project would develop a mixed-use development with residential and retail uses. As detailed within Chapter 4.9, *Population and Housing*, the Project would increase the residential population of Culver City by introducing 309 residential units that would generate an estimated population of 733 residents at the Project Site. According CCUSD's *Level I Developer Fess Study for Culver City School District*, residential uses generate an average of 0.513 students per residence. Based on this generation rate, the number of students that could be generated by the Project is illustrated in **Table 4.10.3-2**, *Estimated Number of Students Generated by the Project*. As shown, the Project could generate an estimated 87 elementary school students, 25 middle school students, and 50 high school students for a total net increase of approximately 162 school students. The *Level I Developer Fess Study for Culver City School District* does not include a student generation factor for non-residential uses. Because the Project would include a relatively small amount of retail (5,600 sf) and corresponding number of employees (20), the Project's employees would contribute a negligible number of students to area schools. Furthermore, it can be expected that the Project's retail employees likely live in the local area, and the incremental number of associated students presumably already attend local schools. Regardless, any incremental increase in students would be more than offset by the existing office employees student generation, thus, the analysis of students generated by the Project is conservative in this regard.

TABLE 4.10.3-2
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE PROJECT

Land Use	Use	Generation Factor[a, b]	Elementary School Students	Middle School Students	High School Students	Total[c]
Proposed Project						
Residential Multi-Family	309 units	Elm: 0.28/unit MS: 0.08/unit HS: 0.16/unit	87	25	50	162

NOTES: ksf = 1,000 square feet

[a] Student generation rates for residential uses are based on a rate of 0.513 students per residence as stated in CCUSD's *Level I Developer Fess Study for Culver City School District*, March 2022, P. 9. The student generation rate is multiplied by the grade level assumptions below to calculate the generation factor for elementary, middle and high school students.

[b] Since the Developer Fee Study does not specify grade levels for the residential land uses, the students generated by the residential uses are assumed to be divided among the elementary school, middle school, and high school levels as follows: 55 percent elementary school, 15 percent middle school, and 30 percent high school.

[c] Input totals for elementary, middle and high schools have been conservatively rounded up based on generation factors to equal total number of students.

SOURCE: ESA, 2024.

This analysis is conservative in that it assumes that none of the future Project residents with families would already have students attending the schools that serve the Project Site. Furthermore, there is potential that a portion of the Project's school-aged children could attend non-CCUSD schools (e.g., private or charter schools), thus reducing attendance at CCUSD schools. For these reasons, the above analysis is considered conservative and likely overestimates the Project's actual potential to generate new students.

The projected 162 students generated by the Project would be added to the total number of students currently enrolled at CCUSD schools serving the Project Site (Table 4.10.3-1). With implementation of the Project, El Rincon Elementary School would serve 648 students, Culver City Middle School would serve 1,582 students, and Culver City High School would serve 2,201 students, for a total enrollment of 4,431 students (compared to 4,269 students currently enrolled). Per correspondence with CCUSD, CCUSD does not have school capacity information available, but indicated that each of the three schools are already at or just below capacity.[9] Therefore, it is conservatively assumed that the Project has the potential to result in a new seating shortage at all three schools.

As previously discussed, Project-related student generation is likely to be less than estimated in the above analysis. Additionally, CCUSD continually monitors enrollment numbers at all schools within the District. Seating shortages can be addressed through changes in attendance boundaries and new/expanded school facilities. Additionally, because actual enrollment is based on the number of students enrolled, whether they live inside or outside of the attendance boundary, actual enrollment tends to run lower than the resident enrollment, which is used in the projections above and is based on the number of students living in a school's attendance area. Nonetheless, based on the above, Project implementation could require new or expanded school facilities. Because the location and operational characteristics of any new or expanded school facilities have not yet been identified by CCUSD to specifically serve the Project, it would be speculative to determine how school capacity shortages would be addressed, including where and what type of expanded or new facilities might be provided. Therefore, at such time as the need for expanded or new school facilities are identified by CCUSD, the environmental impacts associated with construction of those facilities would be evaluated by CCUSD under CEQA as a project independent of the Project.

Pursuant to SB 50, the Project Applicant would be required to pay development fees for schools to CCUSD prior to issuance of building permits. Under Government Code section 65995 and 65996, the payment of these fees is considered full and complete mitigation of Project-related school impacts including any school-related consideration relating to a school district's ability to accommodate enrollment. Therefore, under state law, payment of the applicable development school fees to CCUSD would offset the potential impact of additional student enrollment at schools serving the Project Site.

[9] CCUSD, Correspondence from Mike Reynolds, Interim Assistant Superintendent, October 12, 2023. Provided in Appendix H-3 of this Draft EIR.

Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, the construction of which would cause significant environmental impacts. Therefore, operational impacts on schools would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Impacts would be less than significant without mitigation.

Cumulative Impacts

Chapter 3, *Environmental Setting*, of this Draft EIR, identifies 12 related projects that are anticipated to be developed within a 1-mile radius of the Project Site. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3. As shown in Table 3-1, these related Projects occur in two separate jurisdictions, the City of Culver City and the City of Los Angeles. Of these related projects, eight occur within Culver City and, like the Project, would create a demand for CCUSD schools.

To provide a conservative analysis of impacts, students generated by the related projects are added to the schools serving the Project Site, recognizing that students of some related projects would potentially attend other CCUSD schools.

No schools are in the immediate vicinity of the related projects, and would not be affected by construction of those projects. Nevertheless, each of the related projects would be required to consult with CCUSD to ensure that their respective construction activities or road/sidewalk closures and detours would not affect routes to schools or other operational aspects of nearby schools. Furthermore, these schools are located at a distance from the Project Site such that the Project would not contribute to a cumulative impact associated with those schools.

Similar to the Project, the number of students anticipated to be generated by the related projects is based on the type of development proposed. The related projects, not including the Project, would provide approximately 762 residential units and generate approximately 3,186 employees. **Table 4.10.3-3**, *Cumulative Student Generation*, shows the number of students projected to be generated by the related projects, which are added to the number of students generated by the Project. As shown in Table 4.10.3-3, the Project in combination with related projects would potentially generate an estimated 604 elementary school students, 169 middle school students, and 337 high school students for a total of approximately 1,110 students.

TABLE 4.10.3-3
CUMULATIVE STUDENT GENERATION

Land Use	Amount [a]	Generation Factor [b, c]	Elementary School Students	Middle School Students	High School Students	Total
City of Culver City Related Projects						
Residential	762 units	Elm: 0.28/unit MS: 0.08/unit HS: 0.16/unit	214	61	122	397
Employees	3,186 employees	0.1724 students/emp	303	83	165	551
Total Students Generated by Culver City Related Projects			**517**	**144**	**287**	**948**
		Project Students	**87**	**25**	**50**	**162**
		Total Increase (Related Projects + Project)	**604**	**169**	**337**	**1,110**

NOTES:

[a] Related projects residential units and employee totals from Table 4.9-4, Total Cumulative Development, in Section 4.9, *Population and Housing*, of this Draft EIR.

[b] Student generation rates for residential uses are based on a rate of 0.513 students per residence as stated in CCUSD's *Level I Developer Fess Study for Culver City School District*, March 2022, P. 9. The student generation rate is multiplied by the grade level assumptions below to calculate the generation factor for elementary, middle and high school students.

[c] CCUSD's *Level I Developer Fess Study for Culver City School District*, does not include student generation rates for non-residential uses. Thus, for the non-residential uses, the total number of employees from the related projects are used to calculate the number of students based on factors included in Table 15 of the Los Angeles Unified School District (LAUSD) 2022 Developer Fee Justification Study (March 2022). The LAUSD study identifies a student per employee rate of 0.1724 for all commercial and industrial land uses. Thus, this rate was applied to the non-residential related project land uses. Since the LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school).

SOURCE: ESA, 2023

As shown in the Project level analysis above, per CCUSD, the three schools serving the Project are already at or just below capacity, and thus the Project has potential to contribute to a projected shortage of seats at El Rincon Elementary School, Culver City Middle School, and Culver City High School. Thus, the addition of students by the related projects would further the potential seating shortages at these schools.

Based on the analysis, the Project, in combination with the related projects, could require new or expanded school facilities. However, as exemplified by the CCUSD Facilities Master Plan, CCUSD continually monitors enrollment numbers at all schools within the District and seating shortages can be addressed through changes in attendance boundaries and new/expanded school facilities. Provided that the location and operational characteristics of any new or expanded school facilities have not yet been identified by CCUSD to specifically serve the Project and the related projects, it would be speculative to determine how school capacity shortages would be addressed, including where and what type of expanded or new facilities may be provided. Therefore, at such time as the need for expanded or new school facilities are identified by CCUSD, the environmental impacts associated with construction of those facilities would be evaluated by CCUSD under CEQA as a project independent of the Project.

Similar to the Project, the projected student population increase from related projects is likely to be conservative and overstated. As with the Project, projected student generation is likely to be less than estimated in the above analysis, as it assumes that none of the future residents or employees with families would already have students attending the schools listed above. A portion of the school-aged children could attend other non-CCUSD schools (e.g., private or charter schools), thus reducing attendance at CCUSD schools. This analysis also does not take into account projects that may not be constructed and occupied within the timeframe analyzed, projects that may be reduced in size, or demolition of existing housing or uses to accommodate the planned new development. For these reasons, the above analysis is considered conservative and likely overestimates the related projects' actual potential to generate new students.

As with the Project, pursuant to Government Code Section 65995, all related projects would be required to pay developer fees under the provisions of SB 50 to address the impacts of new developments on school facilities. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such fees is deemed full mitigation of a project's development impacts. Therefore, with the payment of the developer fees under the provisions of SB 50, the Project and related projects would not result in a substantial adverse physical impact associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Therefore, the cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts regarding schools were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Not applicable. Cumulative impacts to schools would be less than significant.

This page intentionally left blank

4.10.4 Public Services – Parks and Recreation

4.10.4.1 Introduction

This section addresses potential impacts of the Project on public parks and recreational facilities. The analysis focuses on physical impacts associated with the provision of new or altered facilities, the construction of which could cause significant environmental impacts and the physical deterioration of existing parks from new Project demands. The analysis is based on information provided in correspondence from the Culver City Parks, Recreation and Community Services (PRCS) Department on October 16, 2023, included in Appendix H-4 of this Draft EIR. This analysis is also based on information provided on the PRCS website and from other published sources.

4.10.4.2 Environmental Setting

Regulatory Framework

State

Quimby Act

California Government Code Section 66477, also known as the Quimby Act, was enacted by the California legislature in 1965. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative tract map or parcel map. As discussed below, the City implemented the Quimby Act in the City through the adoption of Culver City Municipal Code (CCMC) Chapters 15.01 and 15.06.

Local

City of Culver City General Plan Open Space Element

The City's General Plan Open Space Element, approved in 1996 and amended in 2004, includes the following park, recreation, and open space goals, objectives, and policies that relate to the Project[1]:

- **Objective 1:** Open Space Protection and Acquisition. Protect and expand Culver City's open space resources by pursuing land acquisition and encouraging private land contributions to achieve, in the long term, the standard of four acres of local park land and school playground space per 1,000 residents.
  - **Policy 1.A:** Provide three acres of local park land per 1,000 residents.
  - **Policy 1.B**: Provide one acre of school playground space per 1,000 residents.
  - **Policy 1.D:** Require contributions of park land from new private developments and/or in-lieu fees from projects which cannot provide actual park land on site.
- **Objective 2:** Active Recreation. Provide a wide range of active recreational opportunities accessible to all City residents.

[1] Culver City General Plan Open Space Element. https://www.culvercity.org/files/assets/public/v/1/documents/planning-amp-development/advance-planning/general-plan/openspaceelement.pdf. Accessed October 26, 2023.

- **Objective 3:** Passive Recreation. Provide passive recreational open space within walking distance of all City neighborhoods.
  - **Policy 3.C:** Seek opportunities to develop landscaped "parkettes" or urban plazas in highly visible areas adjacent to major arterials that are not feasibly developed with other uses and that can provide sitting and eating areas for public use.
  - **Policy 3.D:** Provide seating, bike racks, and drinking fountains in passive recreation areas.
  - **Policy 3.F:** Provide barrier free access to passive recreation areas.
- **Objective 5:** Visual Open Space and Urban Design. Extend the City's park-like qualities into neighborhoods and business districts through streetscape and urban design improvements.
  - **Policy 5.A:** Provide urban design amenities such as plazas, courtyards, and extended sidewalks as part of new developments to visually enhance public accessways in commercial areas.

City of Culver City Municipal Code

Chapter 15.10, Subdivisions, of the CCMC requires developers subdividing land for residential uses to dedicate parkland or pay an in-lieu fee. Chapter 15.10 is consistent with the Subdivision Map and Quimby Acts, which allow cities whose general plan contains policies and standards for park and recreation facilities to adopt by ordinance a parkland dedication requirement or in-lieu fees. Subdivisions in Culver City exempt from this requirement include those containing senior housing and/or low- or moderate-income housing. Parkland dedications and in-lieu fees are based on residential density of a proposed development. Chapter 15.10 does not establish a service radius for dedications, but states that the parkland dedication or fees "shall be used only for the purpose of developing new or rehabilitating existing neighborhood or community park or recreational facilities reasonably related to serving the subdivision."[2] The City must accept in-lieu fees for projects with 50 residential units or fewer per Chapter 15.10.

Further, Chapter 15.06 of the CCMC (Residential Development Park Dedication and In Lieu Parkland Fees Ordinance, also referred to as the Park Dedication Ordinance) requires all residential development, not just residential development that is a result of a subdivision, to dedicate parkland (three acres of parkland per 1,000 residents) or in-lieu fees. This allows the City to collect in-lieu fees from residential projects, additional units on the same property, and conversions of single-family homes to multi-family projects. Chapter 15.06 allows the City to acquire and dedicate parkland outside of the proposed residential development. For instance, if a developer owns a parcel adjacent to an existing park, and the City determines that this parcel would benefit the City's parks and recreation system, the City may allow the developer to dedicate that property instead of property within a proposed residential development.

The City, however, does not require non-residential developers to develop parkland or recreational facilities as a condition of development. Many other California cities, per the Fee Mitigation Act (Section 66000 of California Government Code), require non-residential developers to dedicate parkland or pay in-lieu fees. Park and public space dedications from non-residential development are negotiated between the City and developers on a project-to-project basis as conditions of development approval.

[2] CCMS Section 15.10.785, Limitation on Use of Land and Fees.

Existing Conditions

PRCS Facilities and Ratios

The Culver City PRCS Department is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City. These facilities include parks, recreation centers, youth camps, sports programs, and programs for senior citizens. The PRCS Department also supervises construction of new facilities and improvements to existing ones. Currently, the PRCS Department maintains 13 parks, a regional Senior Center, the Culver City Pool (also known as The Plunge), the Boneyard Dog Park, and the Culver City Skate Park.[3]

The City uses a classification system to divide parks and open spaces into eight types: regional parks, community parks, neighborhood parks, parkettes/mini parks, linear parks, special use areas, natural open space, and undeveloped land. These types vary in size, function, and amenities offered to residents, employees, and visitors of Culver City (see **Table 4.10.4-1**, *Culver City Parks and Recreation Master Plan - Park and Open Space Classifications*).

TABLE 4.10.4-1
CULVER CITY PARKS AND RECREATION MASTER PLAN - PARK AND OPEN SPACE CLASSIFICATIONS

Type	Description
Regional Parks	Large recreation areas designed to serve the entire region beyond city limits. The City does not own any regional parks.
Community Parks	Usually between 15 and 40 acres, community parks are designed to serve people within a two- to three-mile radius. They provide for a variety of passive and active uses.* Community parks may include sports fields (lit or unlit), basketball courts, restrooms, indoor facilities, picnic areas, and specialized facilities (such as dog parks and skateparks).
Neighborhood Parks	Neighborhood parks are intended to serve neighborhood residents within a mile of the park and are usually between three and 15 acres. Neighborhood parks may have playgrounds, picnic areas, trails, open grass areas for passive use, outdoor basketball courts, and multi-use open grass areas for sports.
Parkettes/Mini Parks	Less than three acres, parkettes/mini parks are typically designed for use by small children or as green oases in the middle of an urban context. Parkettes/mini parks may have open grass areas, playgrounds, and a small picnic area.
Linear Parks	Linear parks are developed landscaped areas and other lands that follow linear corridors such as rivers, creeks, abandoned railroad rights-of-way, canals, powerlines, and other elongated features. This type of park usually contains trails, landscaped areas, viewpoints, and seating areas.
Special Use Areas	Special use areas are sites often occupied by a specialized recreation facility. Some uses that fall into this category include waterfront parks, boat ramps, botanical gardens, community gardens, single purpose sites used for a particular field sport, or sites occupied by recreation buildings.
Natural Open Space	Natural open space is defined as undeveloped land primarily left in its natural form with recreation uses as a secondary objective. It is usually owned or managed by a governmental agency and may or may not have public access. This type of land may include wetlands, steep hillsides, or other similar spaces. In some cases, environmentally sensitive areas are considered open space and can include wildlife habitats, stream and creek corridors, or unique and/or endangered plant species.
Undeveloped Land	This land is undeveloped and has not yet been designated for a specific park use.

* The term “passive use” refers to recreational activities that do not require specialized park equipment and management, such as walking, biking, and picnicking. “Active uses” require the use of special facilities, courses, fields, or equipment. Examples of active uses include playing basketball, swimming, and using playground equipment.

SOURCE: Culver City, 2009. Parks and Recreation Master Plan. Chapter 3, pages 1 to 3.

[3] PRCS, Parks & Recreation, https://www.culvercity.org/Explore/Parks-Recreation, accessed October 26, 2023.

The City maintains park service standards for city parks, regional parks, and joint use facilities to evaluate park service. The park service ratio, or ratio of number of acres of parks per 1,000 residents, is a metric the City uses to measure park service and calculate park dedication requirements for new development. A higher service ratio indicates more acres of park per 1,000 residents.

The City's current park service standard, established in the 1968 General Plan, aimed to provide 10 acres of park space per 1,000 residents.[4] One acre per 1,000 residents may be satisfied with joint use agreements with the Culver City Unified School District (CCUSD) and six acres per 1,000 residents may be satisfied by regional parks, leaving at least three acres per 1,000 residents to be satisfied by City-owned parks. According to the Culver City Parks and Recreation Master Plan, using a population of 40,000, the 10 acres per 1,000 population standard would require the City to have access to 400 acres of parkland to meet its General Plan Parkland Standard. The City's current population is estimated at approximately 41,000.[5] Thus, based on this estimate, 410 acres of parkland are needed to meet the General Plan Parkland Standard. According to the Culver City Parks and Recreation Master Plan, 348.63 acres of parkland were available as of 2009 (consisting of 240 acres of regional parkland, 30 acres of school parkland, and 78.63 acres of City-owned parkland).[6] It is acknowledged that the parkland acreage may have increased slightly since 2009, however, for purposes of this analysis, the data cited in the Parks and Recreation Master Plan is conservatively cited herein as the potential minor increase in parkland acreage is not available. Therefore, based on this conservative baseline assumption, the City has a current parkland deficit of 61.37 acres (consisting of 11 acres of school parkland, 44.37 acres of City-owned parkland, and 6 acres of regional parkland), and does not meet the City's standards for 10 acres per 1,000 residents.[7,8,9]

In addition to the General Plan park service standard, the City's Park Dedication Ordinance (Chapter 15.06 of the CCMC) states that public interest requires three acres of community park or recreation facilities for each 1,000 residents should be provided and maintained for community parks. As the City has 41,000 residents, 123 acres of community parks or recreation facilities would be needed to meet this standard. As the City has 78.63 of City-owned parkland (or community parks, as called for in the Ordinance), the City has a deficit of 44.37 acres and does not meet the City's Ordinance standard of three acres of community park per 1,000 residents.

Existing Parks in the Project Area

The Project Site is currently developed and no existing parks or recreational facilities are located on-site. According to correspondence with the PRCS Department, and as detailed in **Table 4.10.4-2**,

4 Culver City, 2009. Parks and Recreation Master Plan.

5 See Section 4.9, *Population and Housing*, of this Draft EIR, Table 4.9.1, *Projected Population, Housing, And Employment Estimates*, which provides population estimates for the City.

6 Culver City, 2009. Parks and Recreation Master Plan. Chapter 6, page 3.

7 The City has a School District parkland standard of 1 acre per 1,000 residents. As Culver City has 41,000 residents, 41 acres of school parkland would be needed to meet this standard. However, only 30 acres of School District parkland are available, leaving a deficit of 11 acres.

8 The City has a City-owned parkland standard of three acres per 1,000 residents. As Culver City has 41,000 residents, 123 acres of City-owned parkland would be needed to meet this standard. However, there are only 78.63 acres of City-owned parkland available, leaving a deficit of 44.37 acres.

9 The City has a regional parkland standard of 6 acres per 1,000 residents. As Culver City has 41,000 residents, 246 acres of regional parkland would be needed to meet the standard. As 240 acres of regional parkland are available, there is a regional parkland deficit of 6 acres.

Culver City Parks in a Two-Mile Radius of the Project Site, the following parks are within a 2-mile radius of the Project Site: two regional parks, three community parks (including a dog park); six neighborhood parks; and two parkettes. These parks are shown in **Figure 4.10.4-1**, *Culver City Parks and Recreational Facilities Located in the Vicinity of the Project Site*.

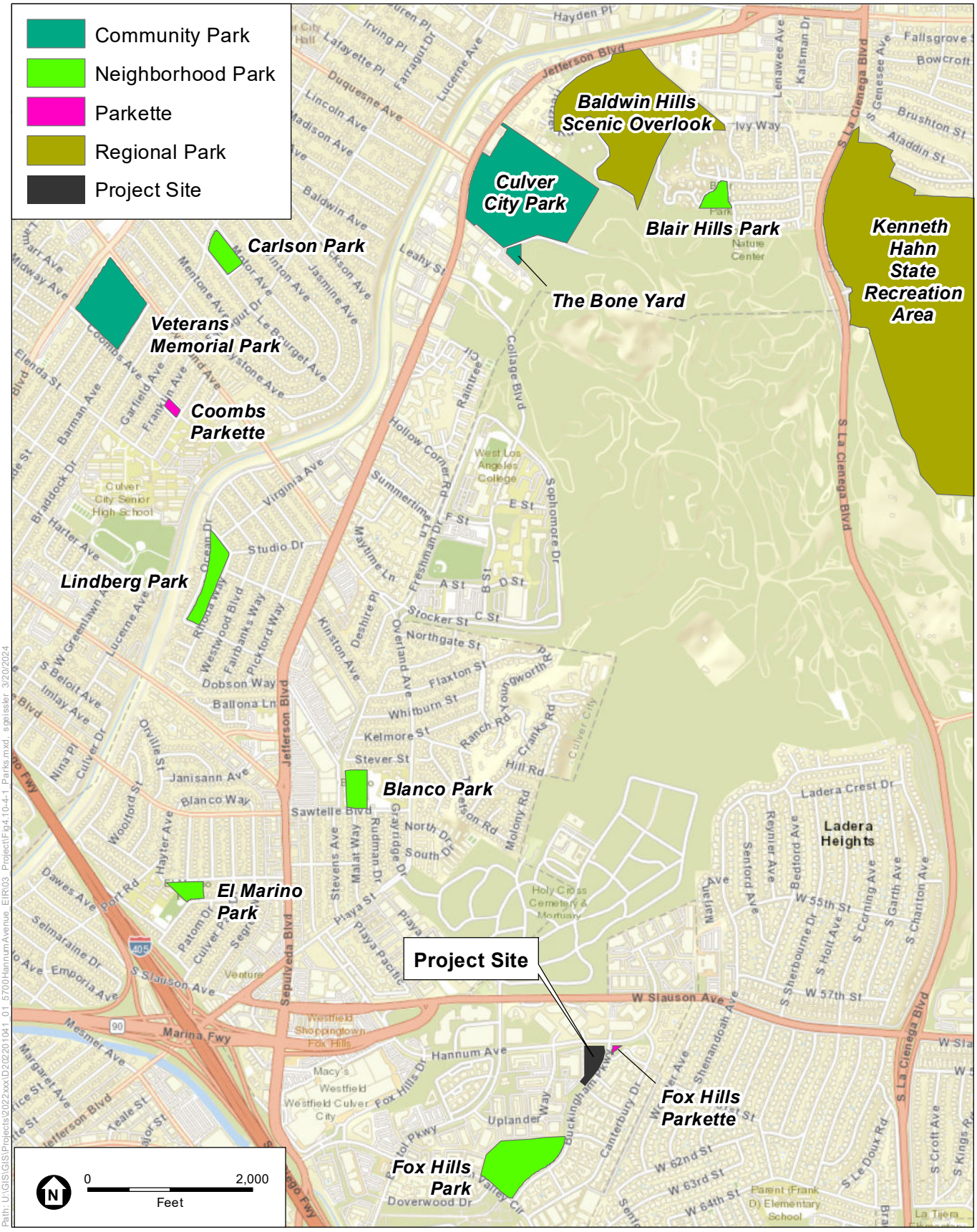
TABLE 4.10.4-2
CULVER CITY PARKS IN A TWO-MILE RADIUS OF THE PROJECT SITE

Facility	Miles from Project Site	Classification	Amenities
Fox Hill Parkette	0.05	Parkette	Benches
Fox Hill Park	0.24	Neighborhood Park	Basketball court, BBQ, picnic tables, recreation hut, restrooms, playground, tennis court, volleyball court, walking/jogging oath
Blanco Park	0.79	Neighborhood Park	Basketball court, BBQ, picnic tables, recreation building, restrooms
El Marino	1	Neighborhood Park	Basketball court, BBQ, handball wall, kitchen, lighting, picnic tables, playground, recreation building, restrooms, ceramics hut with kiln
Lindberg Park	1.37	Neighborhood Park	Basketball court, BBQ, kitchen, picnic tables, playground, recreation building, restrooms, tennis courts
Kenneth Hahn State Recreational Area[a]	1.58	Regional Park	Baseball fields, soccer fields, volleyball courts, picnic tables, children's play areas, community centers, restrooms, BBQ, basketball courts, concession stands, fishing lake, fitness par courses, group picnic shelters, hiking trails
Coombs Parkette	1.73	Parkette	No amenities, open turf area
Culver City Park	1.78	Community Park	Basketball court, BBQ, dog park, picnic tables, playground pooch path, recreation hut, skate park, walking/jogging path, restrooms, ropes course concession, interpretive nature trail, trail access to Baldwin Hills Overlook, rose garden
The Bone Yard	1.78	Community Park	Dog park
Baldwin Hills Scenic Overlook[b]	1.93	Regional Park	Hiking trails
Blair Hills	1.94	Neighborhood Park	Basketball court, BBQ, picnic tables, recreation hut, restrooms, playground
Veterans Memorial Park	1.94	Community Park	Basketball court, BBQ, handball wall, kitchen, picnic tables, playground pooch path, recreation building, skate park, walking/jogging path, restrooms, Veterans Memorial Building, Culver City Teen Center, and Culver City Pool
Carlson Park	1.96	Neighborhood Park	BBQ, picnic tables

[a] Kenneth Hahn State Recreational Area is located in the County of Los Angeles and is maintained by the Los Angeles County Parks & Recreation Department.

[b] Baldwin Hills Scenic Overlook is located in the County of Los Angeles and is maintained by the California Department of Parks and Recreation.

SOURCES: PRCS Department, Correspondence from Dani Cullens, October 16, 2023. Provided in Appendix H-4 of this Draft EIR; Los Angeles County Parks & Recreation Department, Kenneth Hahn State Recreation Area, available at https://parks.lacounty.gov/kenneth-hahn-state-recreation-area/#. Accessed November 2023; California Department of Parks and Recreation, Baldwin Hills Scenic Overlook, available at https://www.parks.ca.gov/?page_id=22790, accessed November 2023.



5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.10.4-1
Culver City Parks and Recreational Facilities
Located in the Vicinity of the Project Site

4.10.4.3 Environmental Impacts

Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in a significant impact associated with park and recreation facilities if it would:

- **PARK-1** Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks.
- **PARK-2** 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.
- **PARK-3** Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Methodology

The analysis of parks and recreation is based on an estimate of the Project's residential population (based on the number of units), and the potential for increased demand to result in the need for construction of new facilities with associated impacts on the physical environment, or to result in the deterioration of existing facilities. The Project's retail uses are not considered to generate appreciable additional demand for park and recreational facilities because they would not generate permanent residential populations that would utilize the parks and recreational facilities in the area. Therefore, the commercial uses are not considered in the analysis. In addition, the metrics and Citywide goals used by the PRCS Department are based on residential population. The analysis considers the Project's proposed open space features and whether the provision of those facilities could reduce Project-generated demand on existing parks and recreational facilities. It should be noted that the analysis contained in this section is based on the Project's potential demand on existing facilities and not on future facilities that are proposed and planned. However, if approved and constructed, planned, future open space and park improvements would further reduce demand for park facilities in the Project vicinity, which is noted in the analysis.

The estimated Project-generated population, as well as the Project-provided recreational facilities, are converted to a service ratio expressed as acres of parkland per 1,000 residents. The City's current park service standard, established in the 1968 General Plan and maintained in the current General Plan, aims to provide 10 acres of park space per 1,000 residents. However, under the authority of the Quimby Act and through the City's Park Dedication Ordinance, the City has adopted a parkland dedication requirement of three acres of parkland per 1,000 residents for each residential development that takes place in the City; thus, this is the service ratio used in this analysis.

Project Design Features

No specific Project Design Features are proposed with regard to parks and recreation beyond the open space and recreational amenities described in Chapter 2, *Project Description*, of this Draft EIR, and the additional details provided in the following impact analysis portion of this section.

Analysis of Project Impacts

Threshold PARK-1: The Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks.

Impact Analysis

Construction

During construction of the Project, there would be a temporary increase in construction workers on the Project Site. These construction workers would likely come from an existing local pool of construction employees within the region and would not likely relocate their households as a consequence of working on the Project. Therefore, the increased employment of construction workers on the Project Site would not result in an increase in the residential population of the area surrounding the Project Site. Accordingly, there would not be a corresponding residential demand or use of the existing parks and recreation facilities during this time as construction workers are more likely to use parks near their places of residence. A small number of construction workers may visit the parkette or other local parks to eat lunch or for recreational activity after a workday. However, construction workers are temporary employees with high turnover associated with the various phases of construction, so such park use would be rare and short-term. Thus, construction would not generate a substantial increase in demand for park and recreation facilities such that acceptable service ratios or performance objectives for parks would be exceeded. Therefore, impacts during construction would be less than significant.

Operation

As previously discussed, the City's current park service standard recommends three acres of park space per 1,000 residents[10]. As discussed in Chapter 4.9, *Population and Housing*, of this Draft EIR, the Project's 309 residential housing units would result in 733 residents on the Project Site. Based on the guideline of three acres of park space per 1,000 persons, the Project's recommended park space would total approximately 2.2 acres.

As described in detail in Chapter 2, *Project Description*, of this Draft EIR, the Project would provide 7,507 sf (0.17 acres) of publicly-accessible open space as part of the Hannum Plaza, located along Hannum Avenue. The Hannum Plaza would feature drought tolerant landscaping and a variety of seating areas, open to the community. The Project's 0.17 acres of publicly-accessible

[10] Culver City, 2009. Parks and Recreation Master Plan. https://www.culvercity.org/files/assets/public/documents/building-development/city-documents/1_2009_parksandrecreationm.pdf. Accessed October 26, 2023.

open space as part of the Hannum Plaza is less than the 2.2 acres required by the City's Park Dedication Ordinance for the Project's 733 additional residents.

However, overall, with the Hannum Plaza, plus 19,526 sf of private open space and 27,123 sf of common open space (for residents), the Project would provide a total of 54,156 sf (or 1.24 acres) of open space. Amenities provided throughout the Project's open space areas would include shade trees, lounge seating, and gathering spaces. The Project's residential open space and amenity features would include a centrally located courtyard and a community room on the second floor. The courtyard would have a variety of seating areas, BBQs, and landscaping. An amenity deck and community room area and gym space would be located on the sixth floor. The sixth floor/roof level deck would include a pool and spa, open seating areas, private meeting areas, and a kitchenette. Occasional events for residents only would be held throughout the year within the courtyard or roof deck as an amenity for the residents. These events might include outdoor yoga, intimate food and beverage events, and/or outdoor movies. The property management team would have on-site staff, courtesy patrol, or hired service present at all times during such events.

Given the Project's open space and recreational amenities, the Project's recreational demand would be at least partially accommodated on the Project Site. While these privately owned open spaces are not under the jurisdiction of the PRCS Department, 7,507 sf of open space would be open to the public and, thus, has the potential to reduce Project-related recreational demand on PRCS facilities. Likewise, it can be reasonably assumed that residual off-site park usage would likely be dispersed among the neighborhood parks, community parks, and regional parks that are within a two-mile radius of the Project Site, as shown in Figure 4.10.4-1 above, as each park offers a range of different amenities.

Notwithstanding the on-site open space and recreational amenities proposed, and the private and public amenities in the Project vicinity, some Project residents would still be expected to utilize nearby public park amenities such as picnic areas, sports fields, and basketball courts. As a result, the Project could result in an incremental increase in the use of area neighborhood, community, and regional public parks.

However, compliance with regulatory requirements would ensure that the intent of the PRCS parkland guidelines would be addressed through compliance with state law (e.g., Quimby Act) as enforced through applicable CCMC requirements related to the provision and/or funding of parks and recreational spaces (e.g., provision of on-site recreational amenities and open space and payment of in-lieu fees, where applicable).

The Project would be subject to CCMC requirements intended to offset increased demand for parks and recreational facilities created by residential development projects. As previously discussed, CCMC Section 15.10 and 15.06 sets park and recreational facility dedication and/or in lieu fee requirements for new residential development.

The Project would include development of 309 residential units on the Project Site. The Project does not propose the dedication of any portion of the Project Site to the City for parks and recreational facilities and would be required to pay applicable in-lieu fees to satisfy CCMC requirements. As the Applicant would pay the in-lieu fees, as determined applicable, the Project would be consistent with CCMC requirements to support acquisition of new park space.

Conclusion

Based on the above, with the proposed on-site open space and recreational amenities, in addition to the required payment of in-lieu fees, as applicable, the Project would be consistent with and meet CCMC open space and parkland requirements. Implementation of regulatory requirements would ensure that the parkland standards would be addressed through compliance with applicable CCMC requirements. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Impacts regarding the construction of parks and recreation facilities would be less than significant.

Threshold PARK-2: The Project would 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.

Impact Analysis

Construction

The nearest PRCS Department park to the Project Site is the Fox Hill Parkette, located to the east of the Project Site at the southeast corner of Hannum Avenue and Buckingham Parkway. A small number of construction workers may visit the parkette or other local parks to eat lunch or for recreational activity after a workday. However, construction workers are temporary employees with high turnover associated with the various phases of construction, so such park use would be rare and short-term. As a result, Project construction activities would not result in increased use of parks such that substantial deterioration would occur. The Project does not include or require the construction of recreational facilities that might have an adverse physical effect on the environment.

Operation

This analysis evaluates the Project's proposed provision of open space and demand for parks and recreational amenities associated with new residents.

As previously stated under Threshold PARK-1, based on the Project's residential population of 733 residents, the Project would need to provide approximately 2.2 acres of parkland to meet the required Park Dedication Ordinance standard of 3 acres of parkland per 1,000 residents. As described in detail in Chapter 2, *Project Description*, of this Draft EIR, the Project would provide 7,507 sf (0.17 acres) of publicly-accessible open space, consisting of the Hannum Plaza. The Project's open space would thus not meet the recommended three acres of local parkland space per 1,000 persons (or 2.2 acres of parkland for the Project), based on the Project's projected residential population. However,

overall, with Hannum Plaza, plus 19,526 sf of private open space and 27,123 sf of common open space (for residents), the Project would provide a total of 54,156 sf (1.24 acres) of open space.

Although the Project would provide a considerable amount of open space and recreational features, it is assumed that some Project residents would still patronize existing public parks and recreational facilities, including use of public park amenities, such as playgrounds, nature trails, picnic areas, basketball courts, and sports fields. However, it is expected that Project resident use would be distributed across a number of recreational sites and facilities depending on the amenities offered at each location, such that substantial deterioration of facilities would not occur. Additionally, there is little potential that Project residents' and employees' use at any particular park or recreational facility would result in physical deterioration due to the Project's proposed open space and recreational amenities. There is also the potential for the 7,507 square feet of publicly-accessible open space that the Project would provide to reduce the existing demand on nearby parks and recreational facilities. In addition, the Project's private open space and amenities would reduce the Project's resident demand on nearby parks and recreational facilities by providing active (i.e., exercise facilities and pool) and passive (i.e., seating and lounge areas) recreational opportunities. Moreover, through the payment of required in-lieu fees for parks and recreational facilities, the Project would be consistent with the CCMC parkland requirements, which would require the Applicant to pay fees to offset park- and open space-related impacts of the Project. Therefore, the Project would not 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. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. The Project would not result in an increase in 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. Impacts would be less than significant.

Threshold PARK-3: The Project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact Analysis

Construction

As discussed above under Thresholds PARK-1 and PARK-2, the Project includes the construction of open space and recreational amenities. The construction of these Project components and the potential for adverse physical effects on the environment are addressed within the construction related analyses provided in the topical sections in Chapter 4, *Environmental Impact Analysis*, of this Draft EIR. Therefore, with implementation of mitigation measures detailed throughout Chapter 4, impacts during construction would be less than significant.

Operation

As discussed above under Thresholds PARK-1 and PARK-2, the Project's provision of open space and recreational amenities would help offset demand for such facilities, and it is expected that residents, guests, and employees are likely to use on-site open space and recreational facilities to a greater extent than off-site facilities. In addition, the Project would pay in-lieu park fees and comply with the CCMC, as applicable, which would help fund construction of future off-site recreational facilities when and where needed. As the Project would largely offset demand for recreational facilities through provision of its own recreational facilities, such as the gym facilities, pool deck, and other open space amenities, it would not require construction or expansion of new off-site recreational facilities. To the extent the Project would generate some incremental demand that could lead to the need for construction of new or expanded off-site recreational facilities, construction of such facilities and the potential for associated adverse effects on the physical environment are not foreseeable, particularly in light of facilities that are proposed in the area, such as potential improvements to Veterans Memorial Complex and Culver City Park[11], which are independent projects that would be required to go through their own environmental review process. Therefore, the Project would not include recreational facilities or require the construction or expansion of recreational facilities which would have an adverse physical effect on the environment. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. The Project would not include recreational facilities or require the construction or expansion of recreational facilities which would have an adverse physical effect on the environment and impacts would be less than significant.

Cumulative Impacts

Chapter 3, *Environmental Setting*, of this Draft EIR, identifies 12 related projects that are anticipated to be developed within a 1-mile radius of the Project Site. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3. As shown in Table 3-1, these related Projects occur in two separate jurisdictions, the City of Culver City and the City of Los Angeles. Of these related projects, eight occur within Culver City and, like the Project, would create a demand for park space from the PRCS Department.

The PRCS Department bases its evaluations of park space on the availability of park services for residents as opposed to employees or visitors to an area. Most park visits originate from people's homes and residents tend to prefer using local parks out of convenience. Typically, employees are engaged in their work during the day and do not contribute notable demand for parks. Given the PRCS Department methodology for evaluating park services, this cumulative analysis on parks and recreation focuses on the related projects that propose residential uses.

[11] PRCS Department, Correspondence from Dani Cullens, October 16, 2023. Provided in Appendix H-4 of this Draft EIR.

These related projects, in conjunction with the Project, would cumulatively generate the need for additional parks and recreational facilities. As analyzed in Section 4.9, *Population and Housing*, of this Draft EIR, the related projects containing residential components would have the potential to generate a cumulative population increase of approximately 1,806 people within the City of Culver City. The related projects, including the Project's estimated 733 residents, would generate a total of approximately 2,539 residents.

As is the case with the Project, impacts on local parks from related projects would be reduced by the provision of on-site open space and recreational amenities. The applicable related projects would be required to pay in-lieu fees pursuant to CCMC Section 15.10 and 15.06, which is the City's parkland dedication ordinance that ensures compliance with the Quimby Act. Moreover, the use of parks by related project residents can reasonably be expected to be distributed across the parks serving the Project and related projects, such that substantial physical deterioration of an individual park facility would be unlikely to occur.

The Project would introduce a new residential population to the area, which would increase demand for and use of existing recreational sites and facilities. However, all related projects with residential uses would be required to comply with CCMC Section 15.10 and 15.06, which require the provision of on-site open space and park facilities and/or payment of in-lieu fees to offset a project's impact to off-site park and recreational facilities. Payment of the fees by each respective related project, as applicable, would ensure that such substantial physical deterioration would not occur or be accelerated and that all facilities would be maintained.

Therefore, with on-site open space and park facilities and payment of the applicable fees, the Project and related projects would not 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; or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment; or result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks. Based on the above considerations, cumulative impacts on parks and recreational facilities would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Cumulative impacts regarding parks would be less than significant.

This page intentionally left blank

4.11 Transportation

4.11.1 Introduction

This section analyzes potential impacts related to transportation. The analysis is based on the Transportation Study for the Project prepared by Gibson Transportation Consulting, Inc, dated August 2023, included as Appendix I of this Draft EIR. The Transportation Study was prepared in accordance with the City of Culver City's (City) CEQA transportation thresholds of significance and the Transportation Study Criteria and Guidelines (TSCG) adopted in July 2020.[1] The base assumptions and technical methodologies to be used in the Transportation Study were established in a detailed Memorandum of Understanding (MOU) with the City, which was signed in July 2023 and provided in Appendix A of the Transportation Study.

4.11.2 Environmental Setting

Regulatory Framework

Federal

Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code (U.S.C.), beginning at Section 12101. Title III prohibits discrimination based on disability in "places of public accommodation" (businesses and non-profit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

State

Complete Streets Act

Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was signed into law by Governor Arnold Schwarzenegger in September 2008. As of January 1, 2011, the law requires cities and counties, when updating the part of a local general plan that addresses roadways and traffic flows, to ensure that those plans account for the needs of all roadway users. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians and transit riders, as well as motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets

[1] On July 13, 2020, the Culver City Council adopted a resolution formally implementing the City's updated transportation thresholds of significance for CEQA analyses and overall transportation study guidelines. The TSCG is the document providing the guidance for conducting both CEQA and non-CEQA transportation analyses.

as the policy covering all phases of State highway projects, from planning to construction to maintenance and repair.

Assembly Bill 32 and Senate Bill 375

With the passage of Assembly Bill (AB 32), the Global Warming Solutions Act of 2006, the State of California committed itself to reducing Statewide greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32.

On December 11, 2008, CARB adopted its Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (SB) 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

There are five major components to SB 375. First, regional GHG emissions targets: California ARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 andc2035 for each Metropolitan Planning Organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to prepare a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Certain residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments (TODs) also qualify if they (1) are at least 50 percent residential, (2) meet density requirements, and (3) are within 0.5 mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission. Regional Transportation Planning Agencies, cities, and counties are encouraged, but not required, to use travel demand models consistent with the California Transportation Commission guidelines.

California Vehicle Code

The California Vehicle Code (CVC) provides requirements for ensuring emergency vehicle access regardless of traffic conditions. Sections 21806(a)(1), 21806(a)(2), and 21806(c) define how motorists and pedestrians are required to yield the right-of-way to emergency vehicles.

Senate Bill No. 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic level of service (LOS). This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, which was an update to Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743, which was released on August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3, which is discussed further below, establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency (CNRA) finalized the updates to the CEQA Guidelines, and the updated guidelines became effective on December 28, 2018.

Based on these changes, the City of Culver City adopted its Transportation Study Criteria and Guidelines (TSCG) in July 2020; this guidance document sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts, pursuant to SB 743.

CEQA Guidelines Section 15064.3

As discussed above, recent changes to the CEQA Guidelines include the adoption of Section 15064.3, Determining the Significance of Transportation Impacts. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop[2] or a stop along an existing high quality transit corridor[3] should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the

2 "Major transit stop" is defined in Public Resources Code Section (PRC) 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

3 "High-quality transit corridors" are defined in PRC Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, Culver City developed a VMT Tool to measure VMT for development projects.[4] The methodology for determining VMT based on the VMT Tool is consistent with CEQA Guidelines Section 15064.3.

Regional

Southern California Association of Governments 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

In compliance with SB 375, on September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by CARB. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, as well as the provision of services by the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system.

The 2020-2045 RTP/SCS builds on the long-range vision of SCAG's prior 2016-2040 RTP/SCS to balance future mobility and housing needs with economic, environmental and public health goals. A substantial concentration and share of growth is directed to Priority Growth Areas (PGAs), which include high quality transit areas (HQTAs), Transit Priority Areas (TPAs), job centers, Neighborhood Mobility Areas (NMAs) and Livable Corridors. These areas account for four percent of SCAG's total land area but the majority of directed growth. HQTAs are corridor-focused PGAs within one 0.5mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours. TPAs are PGAs that are within a 0.5 mile of a major transit stop that is existing or planned. Job centers are defined as areas with significant higher employment density than surrounding areas which capture density peaks and locally significant job centers throughout all six counties in the region. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds. Livable Corridors are arterial roadways, where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency; higher density residential and employment at key intersections; and increased active transportation through dedicated bikeways.

The 2020-2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Strategies to achieve the "Core Vision" include, but are not limited to, Smart Cities and Job Centers, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020-2045 RTP/SCS intends to create benefits

[4] Because the City of Culver City is the Lead Agency for the Project, the VMT analysis follows the City of Culver City's procedures identified in the TSCG and VMT Tool.

for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include, but are not limited to, a five percent reduction in VMT per capita, nine percent reduction in vehicle hours traveled, and a two percent increase in work-related transit trips.

Local

Culver City Municipal Code

Sections of the City's Municipal Code (CCMC) applicable to transportation include, but are not limited to, the following:

- **Section 7.05.015 (Transportation Demand and Trip Reduction Measures):** Prior to issuance of a certificate of occupancy of any new development of 25,000 gross square feet (sf) of floor area or more, the property owner shall make lasting provisions for a bulletin board, display, case or kiosk displaying transit route, ridesharing, bicycle route, and carpool/vanpool information. Prior to the issuance of a certificate of occupancy of any new development of 50,000 gross sf of floor area or more, not less than 10 percent of the employee parking area shall be located as close as is practical to employee entrances and be reserved for potential carpool or vanpool vehicles. Additionally, preferential parking spaces reserved for employee vanpool services shall be accessible to vanpool vehicles. Furthermore, bicycle racks or other secure bicycle parking shall also be provided at a rate of four spaces for the first 50,000 sf of new development, and once space for each additional 50,000 sf. For projects of 100,000 gross sf of floor area or more, the following shall also be provided: (1) sidewalks or other designated pedestrian pathways following direct and safe routes from the external pedestrian circulation system, vehicle and bicycle parking areas and transit facilities, to each building in the development; (2) if determined necessary by the City to mitigate impacts, bus stop improvements; and (3) a safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers.
- **Section 17.320.020 (Number of Parking Spaces Required):** This section identifies that there are no minimum required parking spaces for any use, except as may be determined through a Comprehensive Plan. Any parking provided voluntarily or otherwise, shall comply with the development standards outlined in Chapter 17.320 *Off-Street Parking and Loading*, or other applicable section of this Title.
- **Section 17.320.030 (Accessible Parking):** Parking spaces for persons with disabilities shall be provided in compliance with the Uniform Building Code and the Federal Accessibility Guidelines. For each dwelling unit required to be designed to accommodate the persons with disabilities, or required to be made adaptable for the persons with disabilities, the required parking shall be provided in compliance with Cal. Admin. Code, Title 24, Part 2.
- **Section 17.320.045 (Bicycle Parking):** This section includes bicycle parking spaces requirements for residential and non-residential buildings. For residential buildings with more than 201 units, this section requires one (1) short-term space per 40 units and one (1) long-term space per four (4) units. For non-residential buildings, this section requires one (1) short-term space per 2,000 sf of retail/restaurant use and one (1) long-term space per 2,000 sf of retail/restaurant use. A minimum of two (2) short-term spaces is required for residential buildings and a minimum of two (2) short-term spaces and two (2) long term spaces is required for non-residential buildings.
- **Section 17.320.050.B (Loading Area Requirements):** Per this section, non-residential buildings with floor area between 2,501 and 7,500 sf shall be required to provide one (1) medium loading space. Loading area sizes are to meet the minimum dimensions in Section 17.320.050.B.

City of Culver City General Plan Circulation Element[5]

The Circulation Element, amended through 2004, includes the following traffic and parking designations, goals, objectives and policies that relate to the Project:[6]

- **Policy 1.A:** Facilitate movement of vehicles at intersections and along roadway links by increasing capacity, improving operation, and reducing volumes as appropriate and feasible.
- **Policy 1.F:** Reduce driveways and curb cuts on arterials in favor of side street and alley access, where appropriate, considering potential impacts on the neighborhoods served by the side streets.
- **Policy 2.C:** Maintain levels of transit service that are adequate to meet and encourage ridership demand.
- **Policy 2.H:** Encourage public transit links to sites of high trip-generating uses to maximize transit use by patrons and employees.
- **Policy 3.D:** Seek public and private contributions to provide support facilities for bicycle users (such as racks, secure storage, drinking fountains, etc.) where bikeways connect to turnouts, parks, and other open space areas, as appropriate.
- **Policy 3.G:** Encourage large business to include bike lockers or other secure bicycle storage and related facilities to support bicycle commuting by employees.
- **Policy 4.C:** Provide safe and attractive pedestrian walkways/sidewalks which link streets and parking areas to the entrances of major developments.
- **Policy 4.D:** Enhance the aesthetic qualities of pedestrian access routes by increasing amenities, such as trees, awnings, lighting, street furniture, and drinking fountains, etc.
- **Policy 6.B:** Reduce pressure on on-street parking through provision of private and public off-street parking facilities.

Culver City Short Range Transit Plan

The Culver City Short-Range Transit Plan (Culver CityBus, FY 2019-2020) provides a strategic blueprint designed to maintain a forward-thinking focus on improved mobility services with a continued dedication to customer service and fiscal responsibility. The plan provides an overview of the City's existing mobility services and policies that further improve mobility in the City, such as transit-oriented development and complete streets projects. Further, the plan proposes a variety of measures to improve mobility services, implement physical changes to transit facilities and roadways, and upgrade existing buses with fully electric vehicles.

In the Project area, the Plan identifies Culver CityBus system's Line 3 (Overland Avenue). Line 3 (Overland Ave.) serves Century City, Palms, West Los Angeles College, Fox Hills, and the Corporate Pointe area of Culver City. The Line 3 route operates 20.6 miles round trip. A more detailed description of Line 3 is discussed under Public Transit in the Existing Conditions section below.

---

5 The TSCG requires that the Transportation Impact Study must study the Circulation and Land Use Elements of the General Plan. However, the Land Use Element does not include transportation-related measures, objectives, or policies.

6 City of Culver City, General Plan Circulation Element, amended through 1995, https://www.culvercity.org/files/assets/public/documents/planning-amp-development/advance-planning/general-plan/circulationelement.pdf. Accessed July 5, 2023.

Culver City Bicycle & Pedestrian Action Plan

The City of Culver City Bicycle and Pedestrian Action Plan (Action Plan) establishes the visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Plan aims to provide a safe, convenient, and accessible active transportation network, accessible by users of all ages and abilities. The Plan uses Caltrans' four bicycle facility designations as follows:

- **Class I (Shared-Use Paths):** Shared-use paths, or paved trails, are facilities that provide completely separated, exclusive right-of-way for bicycling, walking, and other non-motorized uses.
- **Class II (Bicycle Lanes):** Bicycle lanes are striped lanes on roadways for one-way bicycle travel.
- **Class III (Bicycle Routes and Bike Boulevards):** Bicycle routes are signed routes where people riding bicycles share a travel lane with people driving motor vehicles.
- **Class IV (Separated Bikeways):** A separated bikeway, also known as a cycletrack, is an on-street facility that is physically separated from motor vehicle traffic by a vertical element or barrier, such as a curb, bollards, or vehicle parking aisle.

The Action Plan was adopted by City Council in June 2020, and supersedes the 2010 City's Bicycle and Pedestrian Master Plan. The Action Plan shows that Buckingham Parkway (from Hannum Ave. to Green Valley Circle), immediately adjacent to the Project Site, is planned as a Class IV Separated Bikeway. Additionally, Green Valley Circle (from Sepulveda Blvd. to Centinela Ave.) is planned to have a Class II Bicycle Lane within the Project study area. The following actions in the Action Plan are applicable to the Project:

- **Action AC-1.2:** Prioritize projects that create safe welcoming spaces for all people, with an added focus on ways to serve those who have the least access to financial and social resources.
- **Action HS-3.2:** Use current design guidelines to encourage development patterns that promote active transportation and allow for short trips between destinations.
- **Action HS-4.1:** Build an active transportation network that encourages Culver City residents to use means of transportation other than driving by providing safer, more comfortable biking and walking facilities.

Complete Streets Policy

The City adopted the Complete Streets Policy in January 2020. The Complete Streets Policy lays out a plan for designing safer, more vibrant streets, that are accessible to people, no matter how they travel. The Complete Streets Policy sets a variety of goals and standards in the application of complete streets principles including improving mobility for all road users, enhancing safety, and creating a standard set of criteria applicable to all city departments and private developers who construct within the public ROW. The following policies provided in the Complete Streets Policy are applicable to the Project:

- **Policy 5a.i:** The City will plan, design, operate, and maintain a transportation system that provides a connected network of streets and facilities that accommodate all modes of travel. The City will actively seek opportunities to repurpose or enhance rights-of-way to improve connectivity for pedestrians, bicyclists, and transit users.

- **Policy 5a.ii:** The City will pursue enhancements to the bicycle and pedestrian connectivity to public transit services, as well as to schools, parks, service retail, public facilities, regional connections, and business districts.
- **Policy 5b.ii:** The City will emphasize pedestrian access along and across City streets by, for example, providing convenient and protected crossing locations, shortening crossing distances through the use of curb extensions and tight curb radii, and enhancing signage and pavement markings.
- **Policy 5d.ii:** The City will coordinate street improvements with business owners along retail and commercial corridors to develop or enhance vibrant business districts.

Neighborhood Traffic Management Program (NTMP) Procedures Manual

The City adopted a series of procedures for the implementation of NTMPs, as defined in its Neighborhood Traffic Management Program (NTMP) Procedures Manual (November 22, 2004). The program requires a series of actions by the neighborhood and City/Engineering Division to determine the traffic issues, study them, develop a plan, test proposed improvements, and finalize the plan.

Gateway Neighborhood Design Guidelines

The City's Multi-Family Neighborhood Residential Design Guidelines – Gateway Neighborhood (Adopted March 24, 2010) is intended to encourage new residential projects to be compatible with, maintain the integrity of, and preserve the unique character and best features of the Gateway Neighborhood by promoting desirable design qualities, guiding change in ways that are compatible with the existing neighborhood development pattern, and respecting the diversity and vitality of the neighborhood. The Project is not located within the Gateway Neighborhood and, therefore, Multi-Family Neighborhood Residential Design Guidelines – Gateway Neighborhood does not apply to the Project.

Gateway Adjacent Neighborhood Design Guidelines

The City's Multi-Family Neighborhood Residential Design Guidelines – Gateway Adjacent Neighborhood (July 13, 2011) is intended to encourage new residential projects to be compatible with, maintain the integrity of, and preserve the unique character and best features of the Gateway Adjacent Neighborhood by promoting desirable design qualities, guiding change in ways that are compatible with the existing neighborhood development pattern, and respecting the diversity and vitality of the neighborhood. The Project is not located within the Gateway Adjacent Neighborhood and, therefore, Multi-Family Neighborhood Residential Design Guidelines – Gateway Adjacent Neighborhood does not apply to the Project.

Residential Parkway Guidelines

The City's Culver City Residential Parkway Guidelines (2016) informs the general public about parkway regulations and provides guidance on planning, creating, and maintaining a parkway landscape. Property owners are expected to maintain the parkway space adjacent to their properties, with the exception of street trees, which are maintained by the City. Sidewalk access and step-out strips are to be installed and maintained along all residential parkways in the City. The Project would comply with any applicable Culver City Residential Parkway Guidelines as determined appropriate in consultation with the City.

Upper Culver Crest Hillside Design Standards

Culver Crest: Recommendations for R-1 Neighborhood Hillside Development Standards (January 4, 2017) specifies a zoning code overlay for the Culver Crest residential community to ensure that the unique planning and development concerns of this hillside neighborhood are addressed. The Project is not located within the Upper Culver Crest community and, therefore, Culver Crest: Recommendations for R-1 Neighborhood Hillside Development Standards does not apply to the Project.

Local Road Safety Plan

The City's Local Roadway Safety Plan (November 2021) (LRSP) is a document that enables the City to determine potential traffic safety projects on roadways and intersections within the City. In an effort to eliminate fatal and severe injury collisions, the document provides a comprehensive collisions analysis through the LRSP to identify high-risk corridors and intersections with the highest collision frequency and severity.

Vision Zero

The City adopted the Vision Zero initiative in 2016 and has incorporated policies and infrastructure improvements into Culver City Bicycle & Pedestrian Action Plan. None of the streets located on the City's High Injury Network (HIN) are located adjacent to the Project Site and no Vision Zero improvements have been proposed adjacent to the Project Stie, as of June 2023.

Existing Conditions

Existing Street System

As described below, the Project Site and the transportation study area is well-served by a network of freeways and streets. The streets in the Study Area are under the jurisdiction of the City. Freeways are under the jurisdiction of the California Department of Transportation (Caltrans).

The existing street system in the Study Area consists of a regional roadway system including arterials and local streets that provide regional, sub-regional, or local access and circulation within the Study Area. These transportation facilities generally provide two to six travel lanes and left-turn lanes and usually allow parking on one or both sides of the street. Hannum Avenue provides Class II bicycle lanes. Typically, the speed limits range between 25 and 35 miles per hour (mph) on the streets and 55 mph on the freeways.

Street classifications for City roadways are designated in *Culver City General Plan Circulation Element* (adopted May 24, 2004) (Circulation Element). The Circulation Element defines specific street standards in an effort to effectively link and serve local and regional transportation systems. Per the Circulation Element, street classifications are defined as follows:

- **Freeways** are specialized arterials with limited access and are grade-separated from the City's street system. Their primary function is to carry large volumes of traffic at high speed throughout the region.
- **Primary Arterials** are major cross-town thoroughfares with desired ROW widths of 95 feet or more. Traffic flow on Primary Arterials is characterized as high volume and fast-moving. Direct access onto Primary Arterials from private driveways should be limited or prohibited. Where private driveways are prohibited, Primary Arterials are designed as controlled access streets.

- **Secondary Arterials** provide links between Collectors and Primary Arterials with desired ROW widths of 80 to 94 feet.
- **Collectors** provide a means for the movement of traffic from Local Streets to larger streets with desired ROW widths between 60 to 79 feet.
- **Neighborhood Feeders** are generally located within residential neighborhoods and provide direct routes between Local Streets and the adjacent arterials.
- **Local Streets** provide access for vehicles to travel between private parking and driveways to larger, non-Local Streets. Generally, Local Streets do not exceed 60 feet of ROW widths and are mostly in residential neighborhoods.

Primary regional access to the Project Site is provided by I-405 and SR 90. In proximity to the Project Site, the Study Area is served by arterial streets such as Hannum Avenue, Bristol Parkway and Slauson Avenue. The following is a brief description of the roadways in the Study Area, including their classifications under the Circulation Element:

Freeways

- **Interstate 405 (San Diego Freeway):** The San Diego Freeway runs north/south and is approximately 0.8 miles west of the Project Site. Access to the San Diego Freeway is available via interchanges at SR 90 and La Cienega Boulevard.
- **State Route 90 (Marina Freeway):** The Marina Freeway runs east/west and is approximately 0.5 miles west of the Project Site and links Marina Del Rey to Culver City. Access to the Marina Freeway is available via Slauson Avenue and Centinela Avenue.

Roadways

- **Hannum Avenue:** Hannum Avenue is a designated Secondary Arterial that runs in the east-west direction and is located adjacent to the northern boundary of the Project Site. It provides four travel lanes, two in each direction. On-street parking is generally prohibited within the Study Area. Travel lanes are typically 10 feet wide, and the total paved width is generally 75 feet.
- **Slauson Avenue:** Slauson Avenue is a designated Primary Arterial that runs in the east-west direction and is located north of the Project Site. It provides six travel lanes, three in each direction. On-street parking is generally prohibited within the Study Area. Travel lanes are typically 10 feet wide and the total paved width ranges from 80 to 100 feet.
- **Bristol Parkway:** Bristol Parkway is a designated Secondary Arterial that runs in the north-south direction and is located west of the Project Site. It provides four travel lanes, two in each direction, with a left-turn lane in the middle. On-street parking is generally prohibited within the Study Area. The total paved width ranges from 65 to 80 feet.
- **Buckingham Parkway:** Buckingham Parkway is a designated Secondary Arterial that runs in the north-south direction and is located at the eastern boundary of the Project Site. It provides four travel lanes, two in each direction. Unmetered on-street parking is generally provided on both sides of the street south of Hannum Avenue with restrictions. The total paved width is generally 60 feet.
- **Fox Hills Drive:** Fox Hills Drive is a designated Local Street that runs in the north-south direction and is located southwest of the Project Site. It provides two travel lanes, one in each direction as well as left-turn lanes at intersections. On-street parking is generally prohibited within the Study Area. The total paved width is generally 40 feet.

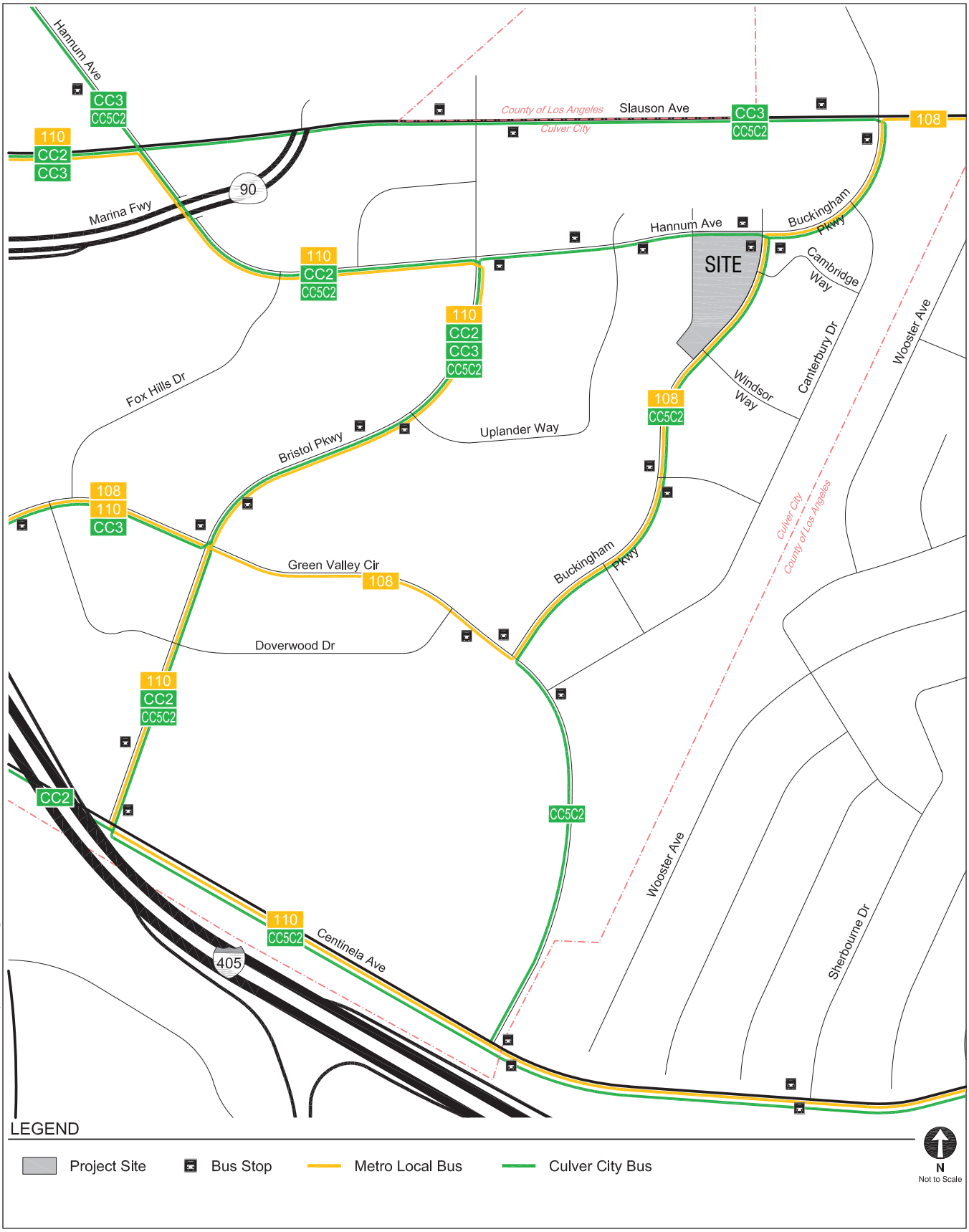
- **Uplander Way:** Uplander Avenue is a designated Local Street that runs in the north-south direction and is located to the southwest of the Project Site. It provides two travel lanes, one in each direction. Metered on-street parking is generally provided on both sides of the street. The total paved width is generally 50 feet.
- **Green Valley Circle:** Green Valley Circle is a designated Secondary Arterial that runs in the east-west direction and is located south of the Project Site. It provides four travel lanes, two in each direction with left-turn lanes. Limited unmetered on-street parking is provided on both sides of the street. The total paved width is generally 60 feet.
- **Centinela Avenue:** Centinela Avenue is a designated Primary Arterial that runs in the east-west direction and is located west of the Project Site. It provides four travel lanes, two in each direction with left-turn lanes. A Class II bike lane follows both sides of the street from Green Valley Circle to Bristol Parkway. Limited unmetered on-street parking is provided on the south side of the street. The total paved width is generally 50 feet.

Public Transit

The Project Site and Study Area is served by five bus lines. These bus lines are listed below and identified in **Figure 4.11-1**, *Existing Transit Service*:

- **Culver City Bus Line 2:** Line 2 is a local east/west line weekday community circulator connecting Washington and Lincoln Boulevards with the Westfield Culver City Mall and Corporate Pointe. It also intersects with Metro lines and Santa Monica's Big Blue Bus lines.
- **Culver City Bus Line 3:** Line 3 is a local north/south route travel from Culver City Fox Hills to Century City. It runs adjacent to the Project Site along Buckingham Parkway/Hannum Avenue on both weekdays and weekends. Line 3 also provides connection to Culver City Transit Center, the Culver Center, and the Palms neighborhood. The route intersects with six Metro bus lines, two Santa Monica's Big Blue Bus lines and the five other Culver CityBus lines. It serves two major regional shopping centers: the Westfield Culver City Mall and the Century City Mall.
- **Culver City Bus Line 5C2:** Line 5C2 is a local weekday circulator route that connects Overland Ave and Fox Hills to Washington Blvd via Braddock Drive. Primary destinations include Culver City Middle School, Culver City High School, Downtown Culver City, the Hayden Industrial Tract and La Cienega Boulevard. This service only operates on weekdays and when school is in session.
- **Los Angeles Metro Bus Local Line 108:** Line 108 is an east/west line from Venice to Pico Riviera on weekdays and weekends, running predominantly along Slauson Avenue. Bus 108 also provides service to the Metro Rail A Line at Slauson Station, to the Metro Bus J Line at Slauson Harbor Transitway Station, Hyde Park K Line Station, Culver City Transit Center/Westfield Mall and Venice Pier. This service operates on weekdays and weekends.
- **Los Angeles Metro Bus Local Line 110:** Line 110 is an east/west line from Playa Vista to Bell Gardens via Jefferson Boulevard and Gage Avenue. This service operates on weekdays and weekends.

The Culver City Transit Center is also located approximately 0.6 miles west of the Project Site. The Transit Center is not only serviced by Culver City Bus Lines 4, 6, and Rapid 6, but also Metro Lines 108/358 and 110.



D2022010411.01 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZUR\EIR

SOURCE: Gibson Transportation Consulting, Inc., 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.11-1
Existing Transit Service

ESA

Bicycle and Pedestrian Facilities

The City adopted the Culver City Bicycle & Pedestrian Action Plan in June 2020, which is comprised of a network of streets identified to prioritize bicyclists. and the Plan identifies Class I Shared-Use Paths, Class II Bicycle Lanes, Class III Bicycle Routes and Bike Boulevards, which provide sharrows and signage, and Class IV Separated Bikeways.

Adjacent to the Project Site, both sides of Hannum Avenue contain a Class II Bike lane. Additionally, a Class II bike lane follows both sides of Centinela Avenue from Green Valley Circle to Bristol Parkway, as shown in **Figure 4.11-2**, *Existing Bicycle Facilities*.

Pedestrian access is provided via sidewalks located along Hannum Avenue, Buckingham Parkway, and Uplander Way.

Marked crosswalks, including traverse lines and continental crosswalks, are provided at most major intersections throughout the City, and are present at junctions within the study area. The sidewalks that serve as routes to the Project Site provide proper connectivity and adequate widths for a comfortable and safe pedestrian environment. The sidewalks provide connectivity to pedestrian crossings at signalized intersections within the study area.

Existing Project Site Vehicular Access

There is currently one driveway to access the Project Site along Hannum Avenue. Access is also available via Uplander Way via an easement across the adjacent property.

4.11.3 Environmental Impacts

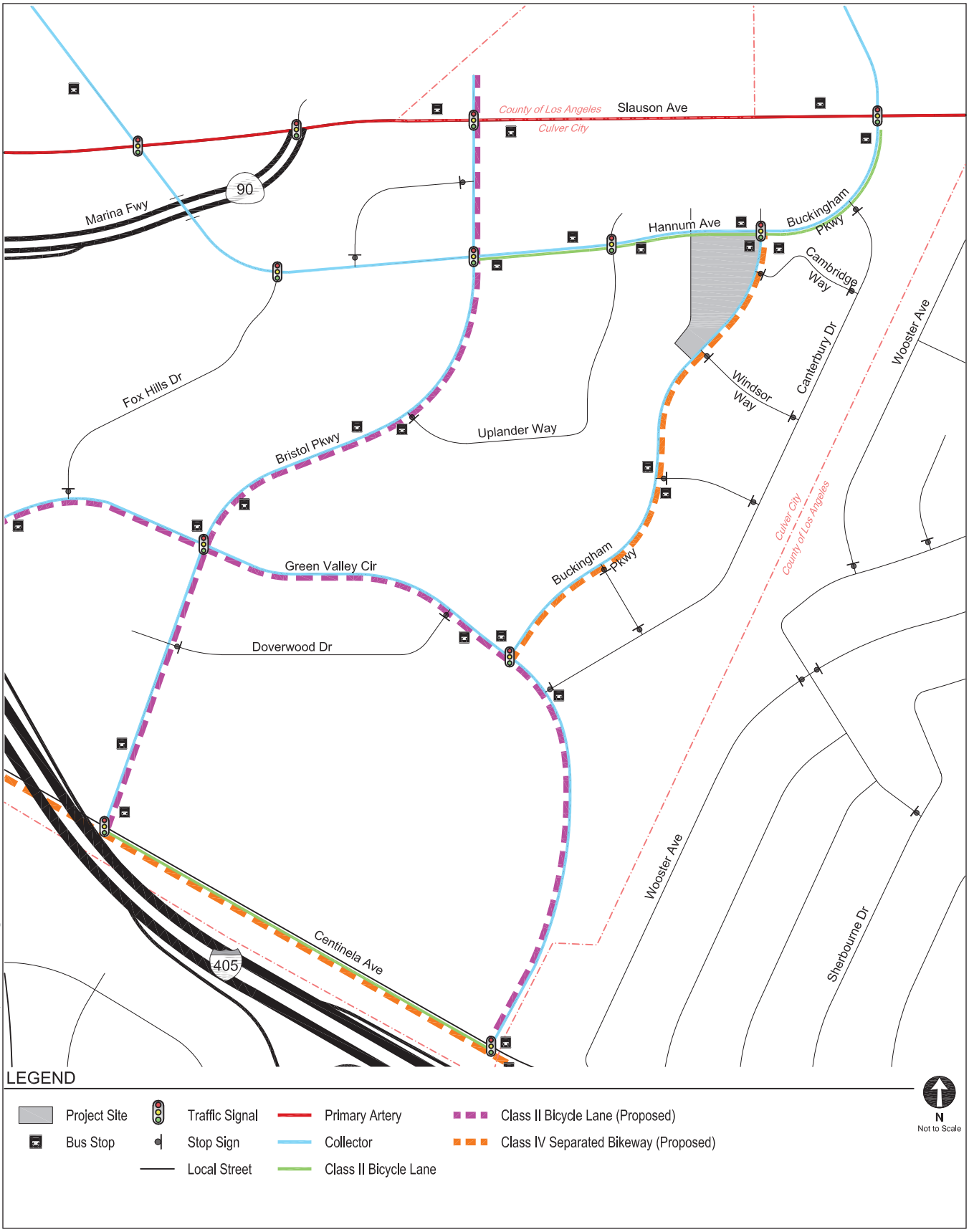
Thresholds of Significance

The following significance thresholds below are based on the Environmental Checklist contained in Appendix G of the CEQA Guidelines. A project would result in a significant adverse impact related to transportation if it would:

- **TRAF-1** Conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities;
- **TRAF-2** Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b);
- **TRAF-3** Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- **TRAF-4** Result in inadequate emergency access.

Methodology

The analysis of potential transportation impacts considers potential Project effects related to: 1) potential conflicts with transportation-related plans, ordinances or policies; 2) a substantial increase in VMT; 3) increased hazards due to a geometric design feature or incompatible use; and 4) emergency access.



D2022010411 - 5700 Hannum Avenue EIR\05 Graphics-GIS-Modeling-USE AZURE\EIR

SOURCE: Gibson Transportation Consulting, Inc., 2023

5700 Hannum Avenue Mixed-Use Residential and Commercial Project

Figure 4.11-2
Existing Bicycle Facilities

ESA

The scope of the analysis in the Transportation Study was developed in consultation with the City. The base assumptions and technical methodologies (i.e., trip generation, study locations, analysis methodology, etc.) were identified as part of the study approach and were outlined in a MOU with the City and signed in July 2023 (see Appendix A of the Transportation Study). The subsections below describe the methodologies to evaluate each significance threshold.

Review for Conflicts with Plans, Programs, Ordinances, or Policies

As noted in Section 4, CEQA Transportation Analysis Requirements of the TSCG, the TSCG requires review of whether a Project conflicts with transportation-related programs, plans, ordinances, and policies. The analysis addresses whether the Project would conflict with a program, policy, plan, or ordinance addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The focus is on policies or standards adopted to protect the environment and those that support multimodal transportation options and a reduction in VMT. If the Project does not implement a particular program, plan, policy, or ordinance, it would not necessarily result in a conflict as many of these programs must be implemented by the City itself over time, and over a broad area. Rather, the Project would result in a conflict if it would preclude the City from implementing adopted transportation-related programs, plans and policies. Furthermore, if a conflict is identified in association with the Project, under CEQA, it would only equate to a significant impact if precluding implementation of a given program, plan and policy would foreseeably result in a physical impact on the environment.[7]

Regarding cumulative impacts, each of the plans, ordinances, and policies are reviewed to assess potential conflicts that may result from the Project in combination with other development projects in the Project's study area. The analysis considers whether there would be a significant impact to the environment to which both the Project and related projects contribute. For instance, a cumulative impact could occur if the Project, as well as other future development projects located in the same project area, were to preclude the City's ability to serve transportation user needs.

VMT Analysis

The City of Culver City developed a VMT Tool to assess the VMT impacts of proposed development projects within the City. The VMT Tool also assesses the effectiveness of selected TDM measures proposed for a project based on available research. With the City of Culver City as the lead agency, the VMT analysis follows the City of Culver City's VMT procedures identified in the TSCG and VMT Tool.

The TSCG specifies Culver City's VMT screening criteria for development projects. Per the criteria, if a development project meets any of the below VMT screening thresholds, it would be exempted from having to conduct VMT impact analysis to comply with CEQA, and a less than significant impact is presumed.

1. Small projects that result in less than 250 daily or 25 peak hour trips.

[7] The rule of general plan consistency is that the project must at least be compatible with the objectives and policies of the general plan. (*Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717–718 [29 Cal. Rptr. 2d 182].

2. Projects within one-half mile from these key Transit Priority Areas (TPAs): Metro "E" Line Culver City Station, Metro "E" Line La Cienega Station, Westfield-Culver City Transit Center, or Sepulveda/Venice Boulevard intersection.
3. Projects located within any TPA where at least 15% of the on-site residential units are affordable.
4. Affordable housing projects where 100% of the dwelling units are affordable.
5. Local serving retail projects having less than 50,000 sf in size at a single store.

Since the Project does not meet any of the criteria, the Guidelines provide guidance for the further analysis of VMT, as discussed below.

The following details the methodology that vehicle trips and VMT are calculated in Culver City VMT Tool (October 2021) (VMT Calculator), as detailed in the Guidelines. The VMT Calculator estimates the project-specific daily number of trips as well as the daily household VMT per capita and daily work VMT per employee for developments within City limits.

As noted in Section 4B of the Guidelines, small-scale retail/restaurant components less than 50,000 sf of larger mixed-use development projects are not considered for the purposes of identifying significant work VMT per employee impacts, as those trips are assumed to be local serving and would have a negligible effect on VMT.

Table 2 of the Guidelines, as presented below, shows the citywide VMT thresholds by type of land use. Note that the table was modified to include the current threshold values for the City.

Use	Metric	Threshold	Threshold Value
Residential	Daily home-based daily VMT/capita	15% below existing levels (Existing level = 8.3)	7.1
Work	Daily home-based-work VMT/employee	15% below existing levels (Existing level = 10.1)	8.6
Regional Retail	Total VMT	Any net positive change in citywide VMT	N/A

The Project consists of residential and neighborhood serving retail uses, under 50,000 sf in size.

Transportation Demand Management

A TDM Program consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Strategies included in a typical TDM Program address a wide range of transportation factors, including parking, transit, commute trips, shared mobility, bicycle infrastructure, site design, education and encouragement, and management.

Geometric Design Feature or Incompatible Use Hazards

For vehicle, bicycle and pedestrian safety impacts, a review is conducted for all Project access points, internal circulation, and parking access from an operational and safety perspective (e.g., turning radii, driveway queuing, line-of-sight for turns into and out of project driveway[s]). Where

Project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), the analysis considers operational and safety issues related to the potential for auto/pedestrian and auto/bicycle conflicts and the severity of consequences that could result.

Emergency Access

For emergency access impacts, a review is conducted for Project access points, internal circulation, and parking access to determine if adequate emergency access is provided. The analysis considers the physical conditions of the Project Site and surrounding area, such as curves, slopes, walls, landscaping or other barriers. Also, a determination is made as to whether the Project would preclude adequate emergency access within the adjacent roadway network.

Project Design Features

The following project design features are applicable to the Project:

> **TRAF-PDF-1: Construction Management Plan.** A Final Construction Management Plan (FCMP) will be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities covering the entire Project Site as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP will be subject to review and approval by appropriate building officials, city traffic engineers, civil engineers, and planning managers for the City of Culver City, as required, prior to issuance of any Project demolition, grading or excavation permit. The FCMP will also be reviewed and approved by the respective fire and police departments.
>
> Prior to commencement of construction, the contractor will advise the City's public works inspector and building inspector (inspectors) of the construction schedule. As-needed construction management meetings shall be convened with appropriate Culver City staff and representatives of surrounding developments that may have overlapping construction schedules with the Project, to ensure that concurrent construction projects are managed in collaboration with one another. The FCMP will consider potential project construction disruptions to transportation facilities near the Project Site and provide effective strategies to limit the Project's use of the public right-of-way (streets and sidewalks) during peak traffic periods and will be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.
>
> Prior to approval of the FCMP and grading permits, the Applicant will conduct one (1) community meeting, 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).
11. Community notification procedures.

The FCMP will at a minimum include the following:

1. The name and telephone number of a contact person who can be reached 24 hours a day via telephone regarding construction or construction traffic complaints or emergency situations.
2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Maps showing access to and within the site and to adjacent properties will be provided.
3. Construction plans and procedures to address community concerns the City of Culver City personnel notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures included in the Project's Mitigation Monitoring Program and best practices to reduce disturbances to adjacent and nearby land uses.
4. Procedures for the training and certification of flag persons.
5. To the extent known, identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for use of protective devices, warning signs, and staging or queuing areas.
6. The location of temporary power, portable toilet and trash and materials storage locations.
7. The timing and duration of any street, sidewalk and/or lane closures will be approved in advance by ethe City of Culver City. As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Culver City, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As applicable at the time of construction, such notices will be made available in digital format for posting on each City website and distribution via email alerts on electronic platforms such as the County of Los Angeles' "Gov Delivery" system. The FCMP will be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP will require that review and approval of any proposed lane closures include coordination

with the Culver City Fire and Police Departments to minimize potential effects on traffic flow and emergency response.

8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and/or at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.

In addition, the Project proposes voluntary measures to reduce drive-alone vehicle trips to/from the Project Site as part of a TDM Program. The TDM Program would offer a wide variety of options to support employees who choose to use a commute alternative to reach their destination. This program is designed to make non-automobile commutes attractive and viable options by providing employees with mobility once they arrive at work, access to needed services during the day, or financial incentives to participate. The Project will implement the following project design feature:

TRAF-PDF-2: Transportation Demand Management (TDM) Program. The Project will implement TDM measures that include, but are not limited to, those listed below subject to Culver City Transportation Department review and approval prior to issuance of the first Temporary Certificate of Occupancy (TCO) for the Project in order to reduce drive-alone vehicle trips to/from the Project Site by residents, visitors and employees, as well peak hour traffic. The TDM strategies necessary comply with the TDM and trip reduction requirements of City Municipal Code Section 07.05.015, as well as City's design requirements for the Project:

On-Site Enhancements - The Project design will incorporate mobility features to encourage alternative transportation modes. The features will be designed in accordance with the City Municipal Code requirements and standards.

- Pedestrian Connections. The Project will provide exclusive pedestrian access separate from vehicular driveways. The Project will provide internal walkways that connect the pedestrian access points to off-site pedestrian facilities, rideshare, and transit.
- Bicycle Parking and Amenities. The Project will provide both short-term and long-term bicycle parking spaces on-site in accordance with the City Municipal Code requirements. Short-term bicycle parking, which will include bicycle racks, will be located near the pedestrian entrance. Long-term bicycle parking, which will include bicycle lockers or secure bicycle enclosures, will be placed in an accessible weather protected location.

Electric Vehicle (EV) Parking. In accordance with City Municipal Code Section 17.320.035.O.3, at least 40% of the onsite parking supply will have EV capability, including EV Capable spaces (20%), EV Ready spaces (10%), and Full EV Charger/Charging Stations (10%).

Off-Site Enhancements - The Project will improve and contribute toward improvements to off-site mobility facilities to encourage alternative transportation modes.

- Mobility Fees. In accordance with City Municipal Code Section 05.06.015, the Project will be subject to contributing its fair share toward funding the City's mobility infrastructure and improvement projects intended to reduce VMT and support housing and job growth. Pursuant to Resolution No. 2021-R055, the total mobility fee for the Project will be based on a rate of $3,394 per multi-family unit and $14.92 per sf of commercial space.

Other TDM Strategies - The Project will implement TDM strategies to reduce peak hour vehicular traffic and air emissions to and from the Project Site. The following details the minimum TDM strategies necessary to comply with the TDM and trip reduction requirements of City Municipal Code Section 07.05.015, as well as City's design requirements for the Project:

- Transportation Information Center (TIC). The Project will provide a TIC, a commuter information center where residents, employees, and visitors can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile. A TIC provides information about transit schedules, commute planning, rideshare, telecommuting, bicycle routes and facilities, and facilities and resources for carpoolers, vanpoolers, bicyclists, transit riders, and pedestrians. The TIC can be provided via a bulletin board, display case, or kiosk, as well as virtually, providing every resident, employee, and visitor access to commuter information through a website portal.
- Bicycle Parking and Amenities. The Project will support bicycling to work through the provision of bike storage facilities throughout the Project site. Bicycle parking will be provided in accordance with the City Municipal Code requirements for the Project and will include short-term facilities (e.g., bicycle racks) and secure long-term bicycle parking (e.g., fully enclosed rooms or bicycle lockers that protect the bicycle from inclement weather and accessible only to the owner).
- Pedestrian-Friendly Environment. The Project is designed to be pedestrian-friendly and accessible to the local neighborhood. The Project's pedestrian access points will be located separate from vehicular access points. To promote walkability within and around the Project site, internal pedestrian pathways will provide a safe and direct connection to external public pedestrian facilities. Safety measures will also be implemented at the Project driveway to ensure safe crossings to limit potential vehicular-pedestrian conflicts.
- Employee Parking. At least 10% of employee parking will be reserved, as signed on the spaces, for use by potential carpool or vanpool vehicles and located as close as practical to employee entrances. This preferential parking will be identified on the site plan accompanying the application for a building permit. Vanpool spaces will have a minimum parking space dimension of nine feet wide by 18 feet in length and provide a minimum interior vertical clearance of eight feet two inches. A safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers will also be provided.
- Bus Stop Improvements. If deemed necessary by the City, bus stop improvements will be provided to the satisfaction of the City Director of Transportation.

Plan/Program Management - The Project will take appropriate measures to help future residents and employees manage each TDM Plan element and maximize program participation through consolidation of information and proactive engagement. The following will be provided as part of the TDM Plan:

- Project Transportation Coordinator. A Transportation Coordinator will be designated for the site and will be responsible for implementing, coordinating, and maintaining the elements of the TDM Plan. The identity and contact information for the Transportation Coordinator will be supplied to the City and kept current.

- Transportation Information Packet for New Residents and Employees. Each new resident and employee will receive an information packet summarizing the transit and transportation alternatives available to Project tenants. The packet will emphasize the location of the TIC and include the contact information of the Transportation Coordinator.

Mobility Hub Support and Alternative Transportation - The Project will incorporate measures and design elements to support first-mile/last-mile service connection for transit users and reduce reliance on personal automobiles. The following will be provided as part of the TDM Plan:

- Bike Repair Station. The Project will provide an on-site bike parking station for use by Project residents and employees that has a space and basic tool set for bike repairs.
- Subsidized Shared-Ride/Uber/Lift Service. Employees who arrive to work via a means other than a single-passenger vehicle or utilize the carpool matching service will automatically be registered in a Subsidized Shared-Ride/Uber/Lift Service by which, upon request to the Transportation Coordinator, the employee will be given a voucher to travel home or Uber/Lyft (or similar shared ride service) in case of illness or emergency. The Project will provide up to $750 in total for this program every year. The subsidy will be for two years after Certificate of Occupancy over a two-year period.
- Transit Passes. The Project will provide up to $500 per pass per year of subsidies for up to five Transit Access Passes (TAP) cards for a period of three years for employees who opt to take Metro instead of personal vehicles and will not be provided on-site parking accommodations and not receive a car share subsidy.

Analysis of Project Impacts

Threshold TRAF-1: The Project would have a potentially significant impact on transportation if it would conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities.

Impact Analysis

As previously noted, the TSCG includes a list of transportation-related programs, plans, ordinances, and policies that should be consulted to identify the potential for conflicts with the Project. Upon review of the listed plans, the following were determined relevant to the Project and are analyzed in the Transportation Study and this Draft EIR: the City's General Plan Circulation Element, the Culver City Short Range Transit Plan, the Bicycle and Pedestrian Action Plan, the Complete Streets Policy, the NTMP Procedures Manual, Residential Parkway Guidelines, the Local Road Safety Plan and Vision Zero.

The analysis below includes a consistency analysis with the plans, policies and programs determined to be applicable to the Project.

General Plan Circulation Element

The Circulation Element includes numerous policies that are applicable to the Project. **Table 4.11-1**, *Consistency of the Project with Applicable Policies of the Circulation Element*, provides determinations of whether the Project would conflict with any of the applicable policies in the Circulation Element. As shown therein, the Project would not conflict with any of the applicable policies.

TABLE 4.11-1
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES OF THE CIRCULATION ELEMENT

Policy	Would the Project Conflict?
1.A. Facilitate movement of vehicles at intersections and along roadway links by increasing capacity, improving operation, and reducing volumes as appropriate and feasible.	**No Conflict.** The Project would provide a mixed-use development, allowing residents within the Project Site and in nearby areas to access retail services in the Project Site by walking or reducing the need to drive longer distances.
1.F. Reduce driveways and curb cuts on arterials in favor of side street and alley access, where appropriate, considering potential impacts on the neighborhoods served by the side streets.	**No Conflict.** The Project Site is bordered by Hannum Avenue and Buckingham Parkway, which are both Secondary Arterials, not Primary Arterials. Only one ingress/egress driveway would be provided along each roadway. With two driveways, vehicle traffic and queuing would be minimized as Project traffic would be dispersed among the two driveways. Regardless, the driveways and associated Project traffic would not substantially impede traffic for neighboring land uses.
2.C. Maintain levels of transit service that are adequate to meet and encourage ridership demand.	**No Conflict.** The Project includes a mix of commercial and residential land uses adjacent to frequently running transit lines, which would encourage ridership. The proposed TDM Program, would also encourage ridership through provision of a TIC, a commuter information center where residents, employees, and visitors can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile.
2.H. Encourage public transit links to sites of high trip-generating uses to maximize transit use by patrons and employees.	**No Conflict.** The Project includes a mix of commercial and residential land uses adjacent to frequently running transit lines, which would encourage ridership. The proposed TDM Program would also encourage ridership through provision of a TIC, a commuter information center where residents, employees, and visitors can obtain information regarding commute programs and individuals can obtain real-time information for planning travel without using an automobile.
3.D. Seek public and private contributions to provide support facilities for bicycle users (such as racks, secure storage, drinking fountains, etc.) where bikeways connect to turnouts, parks, and other open space areas, as appropriate.	**No Conflict.** The Project would provide a total of 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces in compliance with CCMC requirements. Additionally, bicycle rooms or lockers would be provided for residents and employees.
3.G. Encourage large business, commercial centers, and industrial parks to include bicycle lockers, or other secure bicycle storage and related facilities, to support bicycle commuting by employees.	**No Conflict.** The Project would provide a total of 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces in compliance with CCMC requirements. Additionally, bicycle rooms or lockers would be provided for residents and employees.
4.C. Provide safe and attractive pedestrian walkways/sidewalks which link streets and parking areas to the entrances of major developments.	**No Conflict.** The Project would provide new sidewalk and pedestrian facilities around and through the Project Site, as well as the Hannum Plaza which entails the first level outdoor area with seating outside the retail area at the intersection of Buckingham Parkway/ Hannum Avenue. The pedestrian facilities would be beautified by high quality architecture and ample landscaping and open space.

TABLE 4.11-1
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES OF THE CIRCULATION ELEMENT

Policy	Would the Project Conflict?
4.D. Enhance the aesthetic qualities of pedestrian access routes by increasing amenities, such as trees, awnings, lighting, street furniture, and drinking fountains, etc.	**No Conflict.** The Project would enhance the Project frontage sidewalks with street trees, lighting, and aesthetic treatments on building facades. Proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with the requirements of the CCMC. Hannum Plaza, the first level outdoor area with seating along Hannum Avenue and outside the retail area at the intersection of Buckingham Parkway/Hannum Avenue would be open to the public, with the site's other first level areas available to Project residents. Seating areas would be placed throughout Hannum Plaza to create spaces for rest, open to the community. Outdoor spaces would include lounge seating, gathering spaces, and small speakers installed in discreet areas to be used for low volume ambient sound and music.
6.B. Reduce pressure on on-street parking through provision of private and public off-street parking facilities.	**No Conflict.** The Project would provide an adequate amount of parking according to the CCMC and California Government Code. The Project would provide 428 vehicular parking spaces on the Project Site with 405 spaces for residential uses and 23 spaces for commercial uses. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. Forty-four (44) total spaces (41 residential + 3 commercial) would have EV charging stations.

SOURCE: ESA, 2023.

Culver City Short Range Transit Plan

The SRTP provides a service analysis of the current fixed route service and the impact of local and regional transit projects, and evaluation of main corridors and the on-demand services offered, such as Dial-A-Ride and microtransit. The SRTP focuses on public transportation services, enhancing fixed route and paratransit services, expanding micro mobility with scooters and bikes, and offering microtransit services. While the implementation of the SRTP is largely within the purview of the City rather than private developers, the Project would not preclude the implementation of the SRTP, and improvements made in the plan would likely enhance transit alternatives for residents and visitors to the site. Therefore, the Project would not conflict with the SRTP.

Culver City Bicycle & Pedestrian Action Plan

The Action Plan establishes visions and values that focus on establishing walking and cycling as viable modes of travel for all trip types. The Action Plan aims to provide a safe, convenient and accessible active transportation network, accessible by users of all ages and abilities. **Table 4.11-2**, *Consistency of the Project with Applicable Actions of the Culver City Bicycle & Pedestrian Action Plan*, provides determinations of whether the Project would conflict with any of the applicable actions of the Action Plan. As shown therein, the Project would not conflict with any of the applicable actions.

TABLE 4.11-2
CONSISTENCY OF THE PROJECT WITH APPLICABLE ACTION OF THE CULVER CITY BICYCLE & PEDESTRIAN ACTION PLAN

Action	Would the Project Conflict?
AC-1.2. Increase the supply of bicycle parking at neighborhood destinations like schools, medical centers, grocery stores, transit stations, and government offices	**No Conflict.** The Project would provide both short-term visitor and long-term tenant bicycle parking for the proposed residential and retail uses.
HS-3.2. Use current design guidelines to encourage development patterns that promote active transportation and allow for short trips between destinations.	**No Conflict.** The Project would develop a mixed-use building that encourages pedestrian trips and shorter trips between destinations. It also provides local serving retail to shorten trips for other residents of the area. Additionally, the proposed Buckingham Parkway driveway would intersect with the proposed southbound bicycle lane on Buckingham Parkway based on the proposed project design. However, the Project would meet City guidelines for driveway design and visibility, ensuring maximum visibility would be provided for all road users, including bicycles, pedestrians, and motorized vehicles. Furthermore, the Project would not preclude the installation of a bicycle lane on Buckingham Parkway or any other street within the Study Area that has been identified for bicycle and/or pedestrian improvements. The Project would also support active modes of transportation by providing bicycle parking and improving the pedestrian facilities adjacent to the Project frontage.
Action HS-4.1: Build an active transportation network that encourages Culver City residents to use means of transportation other than driving by providing safer, more comfortable biking and walking facilities.	The Project supports this action by implementing 92 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces. The Project Site frontage designs and access points would not preclude the implementation of the planned Class IV separated bikeway planned along Buckingham Parkway fronting the Project Site, or any other planned high-quality bicycle facilities. During the design of a new bicycle facility, planners and engineers will take into account existing and planned site access needs and accommodate those needs by employing best practices to alert all road users to the potential mixing zones and conflict areas with geometric design, signage and striping. The Project would also enhance pedestrian circulation and promote an active streetscape on both Hannum Avenue and Buckingham Parkway, featuring the Hannum Plaza, through increased sidewalk widths, enhanced parkway landscape and street trees along the site frontage.

SOURCE: ESA, 2023.

Complete Streets Policy

The City's adopted Complete Streets Policy includes numerous policies that are applicable to the Project. **Table 4.11-3**, *Consistency of the Project with Applicable Policies of the Complete Streets Policy*, provides determinations of whether the Project would conflict with any of the applicable policies in the Complete Streets Policy. As shown therein, the Project would not conflict with any of the applicable policies and programs.

TABLE 4.11-3
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES OF THE COMPLETE STREETS POLICY

Policy	Would the Project Conflict?
5.a.i. The City will plan, design, operate, and maintain a transportation system that provides a connected network of streets and facilities that accommodate all modes of travel. The City will actively seek opportunities to repurpose or enhance rights-of-way to improve connectivity for pedestrians, bicyclists, and transit users.	**No Conflict.** The Project supports this policy by introducing development that is conducive to walking, biking, and taking transit. The Project would introduce new bicycle parking and additionally would enhance pedestrian rights-of-way by introducing increased sidewalk widths, publicly available open space as part of the Hannum Plaza, and enhanced streetscape, landscape and street trees along Hannum Avenue and Buckingham Parkway. Existing transit options within close proximity to the Project Site would allow for pedestrian and bicycle access to public transit.
5.a.ii. The City will pursue enhancements to the bicycle and pedestrian connectivity to public transit services, as well as to schools, parks, service retail, public facilities, regional connections, and business districts.	**No Conflict.** The Project Site is located within an urban environment well served by public transit. The Project would support this policy by enhancing pedestrian circulation and promoting an active streetscape with access to alternative transportation options (bus and bicycle facilities) through increased sidewalk widths, enhanced streetscape, landscape and street trees along Hannum Avenue and Buckingham Parkway.
5.a.iii. The City will require larger-scale developments and redevelopment projects to maintain or enhance connectivity, such as through interconnected street networks with small blocks, walkways and bikeways. The City will require smaller projects to maintain or enhance walkways and bikeways when practical.	**No Conflict.** The Project Site is one contiguous parcel not separated smaller, blocks, walkways or parkways. The Project would provide internal walkways available to Project residents and sidewalks along the Project street frontages, with enhanced streetscape, landscape and street trees.
5.b.viii. The City will promote strong community identity through the implementation of streetscape plans, including street trees, pedestrian-scale lighting, street furniture, and other streetscape elements.	**No Conflict.** The Project supports this policy by introducing development that is conducive to walking. The Project would enhance pedestrian rights-of-way by introducing increased sidewalk widths, publicly available open space as part of the Hannum Plaza, and enhanced streetscape, pedestrian-scale lighting, landscape and street trees along Hannum Avenue and Buckingham Parkway.
5.b.xi. The City will require appropriate accommodations for pedestrians and bicyclists during construction activities in the public right-of-way. Whenever feasible, the City will not permit the closure of sidewalks or bikeways.	**No Conflict.** The Project will implement a Construction Management Plan (CMP) per Project Design Feature TRAF-PDF-1. Consistent with this policy, the CMP will provide appropriate accommodations to ensure pedestrians and bicyclists can safely navigate around the Project Site. Any temporary closure of sidewalks closure or traffic lanes would be minimized by the CMP.
5.d.ii. The City will coordinate street improvements with business owners along retail and commercial corridors to develop or enhance vibrant business districts.	**No Conflict.** The Project would provide a development that is conducive to walking, biking, and taking transit. The Project would enhance pedestrian rights-of-way by introducing street facing retail and landscaping along the sidewalks. Pedestrian connectivity throughout the Project Site would be enhanced with internal walkways connecting to existing sidewalks.

SOURCE: ESA, 2023

Residential Parkway Guidelines

Consistent with the City's Culver City Residential Parkway Guidelines (2016), the Project would maintain applicable parkway space adjacent to on-site properties, with the exception of street trees, which are maintained by the City. As applicable and determined necessary in consultation with

the City, sidewalk access and step-out strips would to be installed and maintained along Buckingham Parkway.

Neighborhood Traffic Management Program (NTMP) Procedures Manual

The City adopted a series of procedures for the implementation of NTMPs, as defined in its NTMP Procedures Manual (November 22, 2004). The program requires a series of actions by the neighborhood and City/Engineering Division to determine the traffic issues, study them, develop a plan, test proposed improvements, and finalize the plan. No streets would be considered significantly affected with the addition of Project-related traffic. Furthermore, the Project is not projected to lead to trip diversion along residential Local Streets, nor is the Project projected to add a substantial amount of automobile traffic to congested Arterial Streets that could potentially cause a shift to residential Local Streets. Therefore, the Project would not be required to propose an NTMP for the surrounding residential neighborhoods. In addition, the Project would not conflict with the Fox Hills NTMP or preclude any measures identified therein from being installed.

Local Road Safety Plan

The City's Local Roadway Safety Plan (November 2021) enables the City to determine potential traffic safety projects on roadways and intersections within the City. In an effort to eliminate fatal and severe injury collisions, the document provides a comprehensive collisions analysis through the LRSP to identify high-risk corridors and intersections with the highest collision frequency and severity. Of the several high-risk intersections and street segments identified in the plan, none are located adjacent to the Project Site. Thus, the Project would not preclude the City from implementing improvements to eliminate fatal and severe injury collisions as part of the LRSP.

Vision Zero

The City adopted the Vision Zero initiative in 2016 and has incorporated policies and infrastructure improvements into Culver City Bicycle & Pedestrian Action Plan. None of the streets located on the City's HIN are located adjacent to the Project Site and no Vision Zero improvements have been proposed adjacent to the Project Site, as of June 2023. Nevertheless, the Project would not preclude future Vision Zero Safety Improvements by the City. Thus, the Project does not conflict with Vision Zero.

Based on the above, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Project-specific impacts related to conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant.

Threshold TRAF-2: The Project would have a potentially significant impact on transportation if it would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b).

Impact Analysis

The Project is estimated to generate a total of 1,462 daily vehicle trips and a total daily VMT of 10,504. Additional details regarding the VMT analysis are available in Appendix C of the Transportation Study, which is provided in Appendix I of this Draft EIR. As noted above under the Methodology section, small-scale retail/restaurant components less than 50,000 sf of larger mixed-use development projects are not considered for the purposes of identifying significant work VMT per employee impacts, as those trips are assumed to be local serving and would have a negligible effect on VMT. The Project consists of residential and neighborhood serving retail uses, under 50,000 sf in size which meant no further analysis was required for the retail component as it is neighborhood serving.

The daily household VMT per capita for the Project is estimated at 6.8, which is below the citywide household VMT threshold of 7.1 per capita. This figure does not account for any project design features. Nonetheless, as previously detailed, the Project would implement strategies and action plans as part of a comprehensive TDM program (See Project Design Feature TRAF-PDF-2) in compliance with the requirements set forth in CCMC Section 07.05.015 to reduce single occupancy vehicle trips while promoting the use of alternative transportation modes, thereby reducing Project VMT. Thus, the Project would have a less than significant impact on household VMT per capita as estimated by the VMT Calculator. Although mitigation measures would not be required due to the Project falling below Citywide VMT thresholds, this impact would be further reduced through implementation of TRAF-PDF-2.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. The Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) and impacts would be less than significant.

Threshold TRAF-3: The Project would have a potentially significant impact on transportation if it would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis

Vehicular access to the Project Site would be provided via the Hannum Avenue driveway and Buckingham Parkway driveway. Both driveways would provide access to the parking structure, with the Hannum Driveway accessible to residents, employees, and visitors. The Buckingham Driveway would be restricted to residential vehicles only on levels P1 and P2. Pedestrian access to the Project would be provided via separate lobby and retail entrances along Hannum Avenue.

The section of Hannum Avenue along which the Hannum Driveway is situated provides four travel lanes, two in each direction, and metered parking on the south side of the street. With development of the Project, a few on-street parking spaces adjacent to the Project may be removed to accommodate the Hannum Driveway. Sidewalks are provided along the northern boundary of the Project Site. An existing Class II bike lane is provided on both sides of the street adjacent to the Project. Development of the Project would maintain the existing bike lane; however, the Hannum Driveway would intersect with the eastbound bike lane on the south side of Hannum Avenue. To ensure maximum visibility, the Hannum Driveway would meet all of the City's requirements and would provide adequate sight distance for drivers of vehicles entering and leaving the Project Site as well as bicyclists and pedestrians wishing to cross the driveway. No exceptional horizontal or vertical curvatures exist along this section of roadway that would create sight distance issues for Project traffic utilizing the proposed driveway.

The section of Buckingham Parkway along which the Buckingham Driveway is situated provides two travel lanes, one in each direction, and a two-way left-turn median. Unmetered parking is generally available on both sides of the street; however, a few spaces may be lost to accommodate the Buckingham Driveway and loading area on Buckingham Driveway adjacent to the entry driveway. Sidewalks are provided along the eastern boundary of the Project Site. While no existing bicycle lanes are provided on Buckingham Parkway, Culver City Bicycle & Pedestrian Action Plan calls for a Class IV bike lane to be installed. As previously mentioned, the design for this bicycle lane has not been finalized. However, the Buckingham Driveway would intersect the southbound bicycle lane on the west side of Buckingham Parkway. Similar to the Hannum Driveway, the Buckingham Driveway would ensure maximum visibility by meeting all of the City's driveway requirements and would provide adequate sight distance for drivers of vehicles entering and leaving the Project Site as well as bicyclists and pedestrians wishing to cross the driveway and loading area. No exceptional horizontal or vertical curvatures exist along this section of roadway that would create sight distance issues for Project traffic utilizing the proposed driveway. The Buckingham Driveway would be restricted to residential access only.

No unusual or new obstacles are presented in the Project design that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians. Access to the Project would be consolidated to two driveways in order to minimize potential hazards to pedestrians, bicyclists, and motorists along Buckingham Parkway and Hannum Avenue. All driveways will be subject to review by the City.

Furthermore, based on the trip generation estimates detailed in Appendix I, the Project would generate fewer than two vehicles per minute at either driveway. Thus, pedestrians and bicyclists would have adequate gaps in vehicular traffic at the driveways to safely cross and the Project is unlikely to result in an increase in vehicle-pedestrian and vehicle-bicycle conflicts. Additionally, Metro Line 108 has a bus stop located adjacent to the Project Site along Buckingham Parkway. As neither proposed driveway would interfere with the bus stop operation and adequate sight distance would be provided to ensure visibility between buses and vehicles at the driveway, no impact to transit activity or access would occur.

In addition, the Project Site is located on a sloping parcel that is generally level with some grade, along the Buckingham frontage with only slight changes in vertical elevation. Therefore, no line-of-sight issues would be caused by changes in elevation, and drivers would be able to safely identify approaching vehicles, pedestrians, and bicycles at both driveways. The driveways are designed to intersect the public ROW at right angles to the extent possible, with adequate building setback to allow pedestrians and bicyclists to observe vehicles within either driveway. Finally, the Project would be compatible with the surrounding residential uses to the east and south. Furthermore, no elements of the Project's uses or design would be considered incompatible.

Based on the above, the Project would have a less than significant impact regarding hazards due to geometric design features or incompatible uses.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Project-specific impacts related to design hazards and incompatible uses would be less than significant.

Threshold TRAF-4: The Project would have a potentially significant impact on transportation if it would result in inadequate emergency access.

Impact Analysis

The Project Site is located within an urbanized area with a fully developed roadway system. Direct emergency access is provided by each of the two streets bordering the Project Site, including Hannum Avenue and Buckingham Parkway. Emergency access is also available from Uplander Way through a shared access easement adjacent to the western boundary of the Project Site.

Construction of the Project is not anticipated to require road closures in public right-of-way; and it is feasible that construction staging would be within the Project Site. Construction traffic would be temporary and short -term and would cease after construction is completed. If required, the Project's contractor would implement construction traffic management measures to ensure that access for all road users is maintained near the Project Site and limit potential conflicts with traffic on local streets. In addition, emergency vehicle access to the Project Site and neighboring land uses would be maintained, and worker and construction equipment delivery would be scheduled to avoid peak traffic hours. Furthermore, Project construction contractors would coordinate with the Culver City Police Department (CCPD) and Culver City Fire Department (CCFD) concerning any planned temporary lane closures and other construction activities that could affect emergency access and emergency response times and arrange for traffic control devices and detours to minimize any potential impacts to traffic. Because of the short-term nature of the construction activities, the Project's construction activities would not require a new, or significantly interfere with an existing risk management, emergency response, or evacuation plan. The Project would not result in inadequate emergency access during construction.

Regarding Project operation, CCMC Chapter 17.540 requires that new projects be reviewed by the CCPD to ensure that public safety and site security measures are incorporated. Furthermore, as a condition of approval, CCFD would review and approve plans for the building, fire lanes, fire hydrant locations, and associated equipment, to ensure adequate access to and within the Project Site for emergency vehicles. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Accordingly, emergency access would be maintained during operation of the Project. Therefore, Project operation would result in a less than significant impact in this regard.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. The Project would not result in inadequate emergency access and impacts would be less than significant.

Cumulative Impacts

Chapter 3, *Environmental Setting*, of this Draft EIR provides a list of 12 related projects (eight in the City and four in the City of Los Angeles) that are planned or are under construction within an approximately 1.5-mile radius of the Project Site. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3. As shown in Figure 3-1, these related Projects occur in two separate jurisdictions, the City of Culver City and the City of Los Angeles.

As discussed under Threshold TRAF-1, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, which have been adopted to protect the environment and reduce VMT. Each of the related projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Collectively, the Project and the related projects would add development and density in an area with robust transit accessibility and high levels of pedestrian activity. As with the Project, related projects would be expected to support, include and/or enhance pedestrian, bicycle, and/or other alternative transportation facilities, thus, increasing access to the City's multi-modal transportation network. Thus, the Project and the related projects would not preclude the City's ability to serve transportation needs as defined by the City's transportation policy framework. Therefore, the Project, in combination with the related projects, would not create inconsistencies or result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

As the Project would generate per capita and per employee VMT that are below the City's thresholds of significance resulting in a less-than-significant impact on VMT and would consequently be consistent with the 2020-2045 RTP/SCS VMT reduction goals, the Project would

similarly result in a less-than-significant impact on VMT in cumulative conditions, and further analysis is not necessary.

With regard to design hazards, the Project would result in a less than significant impact for geometric hazards. Each related 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 bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, since modifications to access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not expected. Therefore, the Project's contribution to cumulative impacts associated with hazardous design conditions would not be considerable.

With regard to emergency access, the Project would not result in a significant impact. The Project Site and the surrounding area are located in an established urban area that is well-served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Similar to the Project, related projects would likely also implement a Construction Management Plan to ensure adequate emergency access is maintained in and around the related project sites throughout all construction activities. Coordination of these plans would ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. Furthermore, each of the related projects would be required to coordinate with CCFD and CCPD for site plan reviews and to ensure that emergency access is maintained at all times.

As such, cumulative impacts on transportation would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Cumulative impacts related to population and housing would be less than significant.

This page intentionally left blank

4.12 Tribal Cultural Resources

4.12.1 Introduction

This section evaluates potential impacts on tribal cultural resources. The analysis is based on a Sacred Lands File (SLF) search conducted by the California Native American Heritage Commission (NAHC), consultations between the City and Native American tribes, as well as the *5700 Hannum Avenue Mixed-Use Residential and Commercial Project – Archaeological Resources Assessment Report* (Archaeological Report) prepared by ESA,[1] that is provided in Appendix D of this Draft EIR. Confidential Native American consultation documentation materials provided by the Gabrieleño Band of Mission Indians–Kizh Nation is maintained by the City in a confidential appendix, which is referenced in this section, but not included.

4.12.2 Environmental Setting

Regulatory Framework

The following describes the primary State regulatory requirements (Assembly Bill 52 and Senate Bill 18) applicable to the Project.

Assembly Bill 52

Assembly Bill (AB) 52 was approved on September 25, 2014. The act amended California Public Resources Code (PRC) Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 is to involve California Native American Tribes early in the environmental review process and to establish a category of resources related to Native Americans, known as tribal cultural resources, that require consideration under CEQA. PRC Section 21074(a)(1) and (2) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. A tribal cultural resource is further defined by PRC Section 20174(b) as a cultural landscape that meets the criteria of subdivision (a) to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. PRC Section 20174(c) provides that a historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

PRC Section 21080.3.1 requires that, within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the

[1] Environmental Science Associates, 5700 Hannum Avenue Mixed-Use Residential and Commercial Project, Culver City, California, Archaeological Resources Assessment Report, prepared for Lincoln Property Company West, October 2023. Provided in Appendix D of this Draft EIR.

geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency of projects within their geographic area of concern.[2] Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation.[3]

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.[4]

In addition to other CEQA provisions, the lead agency may certify an EIR or adopt a mitigated negative declaration for a project with a significant impact on an identified tribal cultural resource, only if a California Native American tribe has requested consultation pursuant to Section 21080.3.1 and has failed to provide comments to the lead agency, or requested a consultation but failed to engage in the consultation process, or the consultation process occurred and was concluded as described above, or if the California Native American tribe did not request consultation within 30 days.[5]

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Confidentiality does not apply to data or information that are, or become, publicly available, are already in lawful possession of the applicant before the provision of the information by the California Native American tribe, are independently developed by the applicant or the applicant's agents, or are lawfully obtained by the applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency.[6]

2 Public Resources Code, Section 21080.3.1(b) and (c).
3 Public Resources Code, Sections 21080.3.1(d) and 21080.3.1(e)
4 Public Resources Code, Section 21080.3.2(b)
5 Public Resources Code, Section 21082.3(d)(2) and (3)
6 Public Resources Code, Section 21082.3(c)(2)(B).

Senate Bill 18

Senate Bill (SB) 18 (Statutes of 2004, Chapter 905), which went into effect January 1, 2005, requires local governments (city and county) to consult with Native American tribes before making certain planning decisions and to provide notice to tribes at certain key points in the planning process. The intent is to "provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."[7]

The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level, land use designations are made by a local government. The consultation requirements of SB 18 apply to general plan or specific plan processes proposed on or after March 1, 2005.[8]

According to the Tribal Consultation Guidelines: Supplement to General Plan Guidelines, the following are the contact and notification responsibilities of local governments:[9]

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code Section 65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period (Government Code Section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local government must send a notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code Section 65092).

Existing Conditions

Project Site

The Project Site is currently improved with an office building and associated surface parking. No subterranean parking exists on the Project Site. There is disagreement over the geologic mapping of the Project Site by geologists. Poland et al.[10] show the Project Site geology as the San Pedro Sand Formation from the lower or early Pleistocene. This geologic unit is a nearshore marine deposit.

7 Governor's Office of Planning and Research, Tribal Consultation Guidelines: Supplement to General Plan Guidelines, 2005.

8 As noted under Subsection 4.12.3, *Environmental Setting,* under Native American Consultation, the City submitted a request for consultation pursuant to SB 18 on October 9, 2020. As a General Plan Amendment is not requested as part of the Project, no further consultation is required pursuant to SB 18.

9 Governor's Office of Planning and Research, Tribal Consultation Guidelines: Supplement to General Plan Guidelines, 2005.

10 Poland, J.F., A. A. Garrett, and A. Sinnot, 1959, Geology, hydrology, and chemical character of ground waters in the Torrance-Santa Monica area, California: U.S. Geological Survey Water Supply Paper 1461, 425 p.

Dibblee and Minch[11] map the Project Site as Qop (Fox Hills paleosol), Qoa (older alluvium), and Qa (Holocene-age alluvium). Qa is surficial alluvium of Holocene age, "derived mostly from Santa Monica Mountains". Dibblee and Minch[12] assign a late Pleistocene age to the Qoa and the Qop. Geotechnologies, Inc.[13] reproduced the mapping of Poland et al.[14], but describe the soils in the northern portion of the Project Site as (marine) terrace deposits. That could be compatible with the San Pedro Sand Formation. Geotechnologies, Inc. (2022) also mention that during geotechnical exploration (consisting of placing two borings within the Project Site; one in the northern portion and another in the southern portion), fill materials were encountered from the surface down to depths of 1 and 3 feet bgs. Under the fill soils, marine terrace deposits (as mentioned above) were found, followed by bedrock (siltstone).

Ethnographic Setting

The Project Site is located in a region traditionally occupied by the Gabrielino. The term "Gabrielino" is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina[15]. Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino language was part of the Takic branch of the Uto-Aztecan language family.

The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison.[16] The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry. Community populations generally ranged from 50 to 100 inhabitants,

11 Dibblee and Minch, 2007, Geologic map of the Venice and Inglewood Quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. Scale 1:24000

12 Dibblee and Minch, 2007, Geologic map of the Venice and Inglewood Quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. Scale 1:24000

13 Geotechnologies, Inc. 2022. Preliminary Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 5700 Hannum Avenue, Culver City, California. Prepared for: LPC West, Inc., 915 Wilshire Boulevard, Suite 2050, Los Angeles, CA 90017. Prepared by: Geotechnologies, Inc., 439 Western Avenue, Glendale, CA 91201. 47 pp.

14 Poland, J.F., A. A. Garrett, and A. Sinnot, 1959, Geology, hydrology, and chemical character of ground waters in the Torrance-Santa Monica area, California: U.S. Geological Survey Water Supply Paper 1461, 425 p.

15 A. L. Kroeber, Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

16 Lowell J. Bean and Charles R. Smith. "Gabrielino, in California," edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538-549.

although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period.[17]

The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the Gabrielino.[18] Coming ashore near Malibu Lagoon or Mugu Lagoon in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino Indians. The Gabrielino are reported to have been second only to their Chumash neighbors in terms of population size, regional influence, and degree of sedentism.[19]

Maps produced by early explorers indicate that at least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river.[20] The closest named settlements to the Project Site are *Saa'anga* and *Waachnga.* Review of a map titled *Gabrielino Communities Located on the Los Angeles-Santa Ana Plain* by William McCawley[21] indicates that the settlement of *Saa'anga* was located approximately 1 mile north of the Project Site, while the settlement of *Waachnga* was situated approximately 1.25 miles south. Both of these settlements are depicted as located close to Ballona Creek.

South Central Coastal Information Center Records Search and Other Archival Research

As noted in the Archaeological Report, archival research was conducted for the Project, which included a records search at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC). The records search included a review of all recorded cultural resources and previous cultural resource studies within the Project Site and a 0.50-mile radius. The records search results indicate that seven cultural resources studies have been conducted within a 0.50-mile radius of the Project Site. Approximately 15 percent of the 0.50-mile records search radius has been included in previous cultural resources assessments. Of the eight previous studies, none overlap the Project Site. The records search results indicate that no cultural resources have been recorded within the 0.50-mile radius of Project Site. However, a total of six prehistoric archaeological resources have been recorded in the immediate vicinity of the 0.50-mile radius (see Table 4.3-1, *Previously Recorded Cultural Resources*, in Section 4.3, *Cultural Resources*, of this Draft EIR).

Additional archaeological resources (the report for which has not yet been archived at the CHRIS-SCCIC, as it is still in progress) were identified approximately 2.5 miles from the Project Site during ground disturbing activities in connection with a development project in Downtown Culver

17 A. L. Kroeber, Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

18 Wallace, William J. A Suggested Chronology for Southern California Coastal Archaeology. Southwestern Journal of Anthropology 11:214-230, 1955.

19 Lowell J. Bean and Charles R. Smith. "Gabrielino, in California," edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538-549.

20 Gumprecht, Blake, Los Angeles River: Its Life, and Possible Rebirth, The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

21 McCawley, William, The First Angelinos: The Gabrielino Indians of Los Angeles, (Malki Museum Press, Banning, California, 1996).

City.[22] These include two isolated prehistoric metates that were recovered in the upper six feet of disturbed fill sediments in an area of the property that had been previously developed with a large warehouse building. This property had a similar land use history as the Project Site.

Sacred Lands File Search

The Native American Heritage Commission (NAHC) maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on July 11, 2023, to request a search of the SLF. The NAHC responded to the request in a letter dated August 11, 2023, indicating that the results were negative. However, the NAHC noted that the absence of site information does not mean the absence of cultural resources in a project area.

Tribal Consultation

The City submitted notification and request to consult letters to the individuals and organizations listed below on January 5, 2024. In particular, tribal consultation letters were sent to the following California Native American tribes and individuals:

- Sandonne Goad and Samuel Dunlap, Gabrielino/Tongva Nation
- Charles Alvarez, Gabrielino-Tongva Tribe
- Andrew Salas and Christina Swindall, Gabrieleño Band of Mission Indians—Kizh Nation
- Robert Dorame and Christina Conley, Gabrielino Tongva Indians of California Tribal Council
- Anthony Morales, Gabrielino/Tongva San Gabriel Band of Mission Indians
- Joseph Ontiveros and Jessica Valdez, Soboba Band of Luiseño Indians
- Lovina Redner, Santa Rosa Band of Cahuilla Indians

The City received a consultation request from the Gabrieleño Band of Mission Indians–Kizh Nation (Tribe). The City has not received any other responses from the Native American community. The City had a conference call with the Tribe on February 20, 2024. During this meeting, the Tribe indicated that the Project Site has potential to encounter buried and previously unknown tribal cultural resources, because trade routes and villages existed in the vicinity of the Project area, such as the sacred community of *Huachongna*, which once was formerly located in Culver City. Based on this consultation, the City on February 22, 2024 provided the Tribe with proposed mitigation measures for addressing potential tribal cultural resources. The Tribe reviewed the mitigation and provided a single comment back to the City on March 6, 2024. The Tribe indicated that they are in acceptance of the proposed mitigation measures with the revision included based on their comment. On March 6, 2024 the City made the revision per the Tribe's comment and provided the Tribe with the final revised mitigation measures.

On March 14, 2024, the Tribe submitted an email to the City with digital materials including screenshots of maps and electronic documents (some of which also include screenshots), artifact photographs, and the Tribe reiterated the high potential to encounter tribal cultural resources during

[22] ESA. 2022. (in progress) Archaeological and Paleontological Monitoring Report for the Culver Studios Innovation Plan Project, City of Culver City, California. Report on file with ESA, Irvine, CA.

construction of the project. Many of the maps, electronics documents, and photographs were referenced during the aforementioned conference call with the City. The maps are from 1881 and 1898 depicting the general location of the Project Site (unknown source), and the Kirkman-Harriman Pictorial and Historical Map of Los Angeles County (1938). The electronic documents included: screenshots of *California's Gabrielino Indians* (1962) book identifying general information on La Ballona in Culver City and the term *Gaucho* (also referred to as *Huacho*); a screenshot of information (source unknown) on where villages were located (coast, valleys, and desert); and a screenshot of information on Rancho La Ballona (source unknown). The photographs depict prehistoric artifacts that were recovered during construction of another development project in Culver City in 2019.

The City did not receive any other responses from the Native American community.

4.12.3 Project Impacts

Thresholds of Significance

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the CEQA Guidelines. Accordingly, a significant impact to tribal cultural resources would occur if:

- **TCR-1:** The Project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
    i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
    ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Methodology

The analysis is based on a SLF search conducted by the NAHC, consultations between the City and Native American tribes, as well as the Archaeological Report prepared by ESA. Specifically, the City submitted notification and request to consult letters to Native American individuals and organizations and conducted follow-up Native American consultation. ESA also reviewed maps, photographs, and materials (confidential) provided by Gabrieleño Band of Mission Indians–Kizh Nation as part of their consultations with the City.

Project Design Features

There are no project design features relative to tribal cultural resources.

Analysis of Project Impacts

Threshold TCR-1: The Project would result in a significant tribal cultural resources impact if it would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis

As discussed in the Archaeological Report, no known prehistoric archaeological resources were identified within or immediately adjacent to the Project Site. However, a total of six prehistoric archaeological resources have been recorded in the immediate vicinity of the 0.50-mile radius records search. The SLF search conducted through the NAHC indicated that the Project Site was negative for known resources in the SLF database. The results of several geotechnical investigations at the Project Site revealed that fill was found from the surface down to approximately 1 to 3 feet below existing grade. The fill was underlain by various marine terrace deposits (as discussed above) and followed by bedrock (siltstone).

Per review of Kirkman's 1938 map that was provided to the City from Kizh Nation, the Project Site is depicted as located in the vicinity of old/ancient roads south of Baldwin Hills; however, no Native American villages are observed as located within the Project Site. The closest unnamed village to the Project Site is shown in the 1938 map as located approximately 2.2 miles north of the Project Site in Culver City and 2.5 miles east of the Project Site in Inglewood. Additionally, no villages with the name of *Huachongna* were observed in the 1938 map. A screenshot of a book titled *California's Gabrielino Indians* (1962) identifies the term *Gaucho/Huacho* (possibly in reference to *Huachongna*), which according to the text it is a Native American term for the cliffs of Ballona's easterly boundary. However, no additional information is provided in the text as to the exact location of *Gaucho/Huacho*. As a result, specific evidence of village locations located within or overlapping the Project Site was not provided. Therefore, no known tribal cultural resources, as defined in PRC Sections 21074(a)(1), or resources determined by the City in its discretion and supported by substantial evidence to be significant pursuant to PRC Section 5024.1 have been identified within the Project Site as a result of tribal consultation, or as a result of the SLF search through the NAHC and the SCCIC.

However, due to the Project Site being located in the vicinity of old/ancient roads (that could have been possibly used as prehistoric trade routes) and Ballona Creek, recent discoveries during other

construction projects in the vicinity, and the tribal consultation efforts, the Project Site appears to have a moderate to high potential for encountering previously unknown tribal cultural resources during construction. As a result, there is potential that the Project could cause a substantial adverse change in the significance of a tribal cultural resource as described in PRC Section 21084.2. Accordingly, impacts on tribal cultural resources are considered potentially significant, and mitigation measures are provided below.

Mitigation Measures

Refer to Mitigation Measure CUL-MM-2. The following mitigation measures are also required to address potentially significant impacts to tribal cultural resources during Project construction:

> **TCR-MM-1:** Prior to the issuance of a demolition permit for the Project, the Applicant shall retain a Native American Monitor from the Gabrieliño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe). The Native American Monitor shall be present during the following construction activities that have the potential for encountering tribal cultural resources: demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project, whether on the Project Site or in connection with Project off-site improvements (collectively "ground disturbing activities"). Notwithstanding the foregoing, Native American monitoring shall not be required for any moving of soils that have been monitored or observed prior to their disturbance and subsequently disturbed or displaced by Project-related construction. The Applicant shall prepare a monitoring agreement with the Kizh Nation that outlines the roles and responsibilities of the Native American Monitor and shall submit this agreement to the City of Culver City (City) prior to the issuance of demolition permit for the Project.
>
> Prior to commencement ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event. If the Native American Monitor is not present at the Project Site on any given workday, the ground disturbing activities may continue if the workers involved in such activities attended the training session.
>
> Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude no later than conclusion of ground disturbing activities.
>
> **TCR-MM-2:** The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Applicant and the City upon written request to the Tribe. The Applicant shall not be deemed to be out of

compliance with this measure if the Native American Monitor fails to complete or submit any such monitoring logs.

TCR-MM-3: In the event of a discovery of potential tribal cultural resources at the Project Site, the Qualified Archaeologist identified in Mitigation Measure CUL-MM-1 (after consultation with the Native American Monitor) shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor and the Applicant, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

Within three (3) business days of such discovery, a meeting shall take place between the Applicant, the Qualified Archaeologist, the Tribe, and the City to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe, the Applicant, and the Qualified Archaeologist, the City determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe as necessary, and with the concurrence of the City's Planning Director. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources.

If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the Qualified Archaeologist (including, but not limited to, the size of the buffer set forth above), the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the Archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant shall pay all costs and fees associated with the mediator.

The Applicant may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in the above paragraphs.

The recovered Native American resources may be placed in the custody of the Tribe, who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Tribe nor an

institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

Notwithstanding the above paragraph, any information determined to be confidential in nature by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code Section 6254(r).

Level of Significance after Mitigation

In the event unknown tribal cultural resources are unearthed during construction of the Project, with implementation of the above mitigation measures, potentially significant impacts on tribal cultural resources would be reduced to a less than significant level.

Cumulative Impacts

As demonstrated above, prior to mitigation, the Project would have a potentially significant impact on tribal cultural resources even though there are no resources listed or determined eligible for listing, on the national, State, or local register of historical resources, and the Lead Agency determined that no resources were identified during tribal consultation that are eligible for listing under the criteria in PRC Section 5024.1(c). This significant impact finding is due to the potential to encounter tribal cultural resources at depth during construction. This potential exists due to the Project Site being located in the vicinity of old/ancient roads (that could have been possibly used as prehistoric trade routes) and proximity to Ballona Creek, given recent discoveries during other construction projects in the vicinity, and Native American consultation efforts.

As with the Project, each related project would also be required to engage in tribal consultation with Native American tribes in order to identify any tribal cultural resources that could potentially be impacted by the related project and to address potentially significant impacts, if identified. The related projects may require mitigation similar to that applicable to the Project, especially if those related projects are in areas of heightened sensitivity similar to the Project Site.

Accordingly, in light of the Project's mitigation measures and similar anticipated mitigation requirements for Projects in areas of heightened sensitivity, the Project's contribution to cumulative impacts regarding tribal cultural resources would not be cumulatively considerable and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts regarding tribal cultural resources were determined to be less than significant with mitigation. Therefore, no additional mitigation measures to address cumulative impacts are required.

Level of Significance after Mitigation

Cumulative impacts regarding tribal cultural resources would be less than significant with mitigation.

This page intentionally left blank

4.13.1 Utilities and Service Systems – Water Supply

4.13.1.1 Introduction

This section evaluates potential Project impacts on water supply and whether the Project would require or result in the construction of new water treatment facilities, including conveyance infrastructure, the construction of which would cause significant environmental effects. The Golden State Water Company (GSWC) supplies water within its Service Area of the City of Culver City (City) and the Project Site. This section describes GSWC's available water supplies, current and projected regional water demand, municipal water infrastructure serving the Project Site, and the adequacy of water supplies and infrastructure to meet Project demand.

4.13.1.2 Environmental Setting

Regulatory Framework

State

California Urban Water Management Planning Act

The California Urban Water Management Planning Act (Water Code, Section 10610, et seq.) addresses several State policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires Urban Water Suppliers to develop Urban Water Management Plans (UWMPs) every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Urban Water Suppliers are defined as water suppliers that either serve more than 3,000 customers or provide more than 3,000 acre-feet per year (AFY) of water to customers.

Senate Bill 610, Senate Bill 221, and Senate Bill 7

Two of the State laws addressing the assessment of water supply necessary to serve large-scale development projects, Senate Bill (SB) 610 and SB 221, became effective January 1, 2002. SB 610, codified in Water Code Sections 10910–10915, specifies the requirements for Water Supply Assessments (WSAs) and their role in the California Environmental Quality Act (CEQA) process, and defines the role UWMPs play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 sf of floor space;

- Commercial office buildings employing more than 1,000 persons or having more than 250,000 sf of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sf of floor area
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a)).

The Project does not meet the above criteria, and, therefore, a WSA is not required.

In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past five years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

SB 221 also addresses water supply in the land use approval process for large residential subdivision projects. However, unlike SB 610 WSAs, which are prepared at the beginning of a planning process, SB 221-required Water Supply Verification (WSV) is prepared at the end of the planning process for such projects. Under SB 221, a water supplier must prepare and adopt a WSV indicating sufficient water supply is available to serve a proposed subdivision, or the local agency must make a specific finding that sufficient water supplies are or will be available prior to completion of a project, as part of the conditions for the approval of a final subdivision map. SB 221 specifically applies to residential subdivisions of 500 units or more. However, Government Code Section 66473.7(i) exempts "…any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses; or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses; or housing projects that are exclusively for very low and low-income households."

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20 percent per capita water consumption reduction by the year 2020 statewide, as described in the "20 x 2020" State Water Conservation Plan.[1] As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

[1] California State Water Resources Control Board, 20 x 2020 Water Conservation Plan, February 2010.

Senate Bill X7-7 – Water Conservation Act

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.[2] Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.[3] Following a multi-year drought and improvements to hydrologic conditions, statewide potable water savings reached 14.7 percent in August 2017 as compared to August 2013 potable water production.[4] As provided in GSWC's 2020 Urban Water Management Plan, in accordance with SB X7-7, GSWC developed a final reported 2020 target of 142 gallons per capita per day (GPCD). GSWC's actual GPCD in 2020 was 116 GPCD, less than the 2020 target.[5]

Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act (SGMA) of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities.[6] The SGMA requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017. The SGMA provides 20 years for groundwater sustainability agencies to implement plans and achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

California Code of Regulations

Title 20

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures such as showerheads, lavatory faucets, and water closets (toilets). Among the

2 State Water Resources Control Board, Fact Sheet, February 2017 Statewide Conservation Data, February Conservation Summary, updated April 4, 2017.

3 State Water Resources Control Board, Media Release, "Statewide Water Savings Exceed 25 Percent in February; Conservation to Remain a California Way of Life," April 4, 2017.

4 State Water Resources Control Board, Fact Sheet, August 2017 Statewide Conservation Data, August Urban Water Production Summary, updated October 3, 2017.

5 Golde State Water Company. Culver City Service Area 2020 Urban Water Management Plan, page 4-2.

6 California Department of Water Resources, SGMA Groundwater Management, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management. Accessed October 2023.

standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018, is 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi); and lavatory faucets manufactured after July 1, 2016, is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016, is 1.28 gallons per flush.[7]

CALGreen Code

Part 11 of Title 24, the title that regulates the design and construction of buildings, establishes the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The mandatory measures for water conservation provide limits for fixture flow rates, which are the same as those for the Title 20 efficiency standards listed above. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

Plumbing Code

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets and outlines minimum requirements for plumbing fixture quantities based on proposed use and occupant load. The 2022 California Plumbing Code, which is based on the 2021 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2023.

Executive Order B-37-16

In 2018 the California State Legislature enacted two policy bills: SB 606 and Assembly Bill (AB) 1668 to establish a new foundation for long-term improvements in water conservation goals and drought planning to adapt to the longer and more intense droughts climate change is causing in California.

The 2018 legislation applies to the actions of the California Department of Water Resources (DWR), the California State Water Resources Control Board (SWRCB), and water suppliers. DWR and the SWRCB will work closely together to develop new standards for:

- Indoor residential water use standard will be 55 gallons per capita daily until January 2025; the standard will become stronger over time, decreasing to 50 gallons per capita daily in January 2030. For the water use objective, the indoor use is aggregated across population in an urban water supplier's service area, not each household;
- Outdoor residential water use standard will be based on land cover (landscaping), climate, and other factors, i.e., geography, pastures and other irrigated lands, or open space determined by the DWR and the SWRCB.

[7] California Code of Regulations, Title 20, Section 1605.3(h).

- Commercial, industrial, and institutional water use for landscape irrigation with dedicated meters; and
- System water losses, formerly known as unaccounted for water.

In October 2022, DWR provided recommendations to the SWRCB to support the development of these standards. Urban water suppliers must stay within annual water budgets based on these standards for their service areas. The 2018 legislation also supports drought planning. In urban areas, drought plans will be primarily led by local water suppliers. DWR and the SWRCB will develop recommendations to strengthen drought planning in rural areas and areas served by small water systems by coordinating with counties and other stakeholders.

Executive Order B-40-17

Executive Order B-40-17 was issued on April 7, 2017. Cities and water districts throughout the State are required to report their water use each month and bans wasteful practices, including hosing off sidewalks and running sprinklers when it rains.

Executive Order N-10-21

On July 8, 2021, Executive Order N-10-21 was issued calling for voluntary cutbacks of water usage by 15% from 2020 usage levels. The Order lists common sense measures Californians can undertake to achieve water usage reduction goals and identifies the SWRCB for tracking of monthly reporting on the State's progress.

Executive Order 7-77

On March 28, 2022, Governor Newsom issued Executive Order No. 7-77, meant to provide guidance on emergency drought relief. The Order states that the "21st century to date has been characterized by record warmth and predominantly dry conditions, and the 2021 meteorological summer in California and the rest of the western United States was the hottest on record" and "the ongoing drought will have significant, immediate impacts on communities with vulnerable water supplies, farms that rely on irrigation to grow food and fiber, and fish and wildlife that rely on stream flows and cool water."

Within the Order, the Governor ordered the SWRCB to evaluate the adoption of regulations and the relaxations of permitting for drought positive measures. These regulations include banning irrigation of "non-functional" turf (or grass), such as decorative grass adjacent to large industrial and commercial buildings. The ban would not include residential lawns or grass used for recreation, such as school fields, sports fields and parks. Further, the Order asks the SWRCB to prepare municipal water agencies for drought restrictive measures. More specifically, the SWRCB asks these urban water suppliers to prepare to activate, at a minimum, Level 2 of their customized Water Shortage Contingency Plans. These plans are developed by local water agencies to navigate extreme drought and each plan is customized based on an agency's unique infrastructure and management. Triggering Level 2 of these plans involves implementing water conservation actions to prepare for a water shortage level of up to 20 percent.

Regional

Metropolitan Water District 2020 Urban Water Management Plan

As discussed in detail below, the Metropolitan Water District of Southern California (MWD) is a primary source of water supply within Southern California. Based on the water supply planning requirements imposed on its member agencies and ultimate customers, MWD has adopted a series of official reports on the state of its water supplies. As described in further detail below, in response to recent developments in the Sacramento Delta, the MWD has developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, including the City.

MWD's 2020 UWMP (MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2045.[8] Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions, i.e. under the most challenging weather conditions such as drought and service interruptions caused by natural disasters, is presented in Table 2-5 of the 2020 UWMP.[9] The analysis in the 2020 UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.[10] In the 2020 UWMP, the projected 2045 demand water during multiple-dry year conditions is 1,564,000 AFY, whereas the expected and projected 2045 supply is 2,239,000 AFY based on current programs, for a potential surplus in 2045 of 675,000 AFY.[11]

MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. MWD is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs.

2015 Integrated Resources Plan

The MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply such as water quality, climate change, and regulatory and operational changes. The most recent IRP (2015 IRP) was adopted in January 2016.[12] It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-

8 Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021.
9 Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. 2-19.
10 Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. 2-19.
11 Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021, p. 2-19.
12 Metropolitan Water District of Southern California, Integrated Water Resources Plan – 2015 Update, Report No. 1518, 2016.

quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

The 2015 IRP reliability targets identify developments in imported and local water supply, and in water conservation that, if successful, would provide a future without water shortages and mandatory restrictions under planned conditions. For imported supplies, MWD would make investments to maximize Colorado River Aqueduct deliveries in dry years. MWD would make ecologically-sound infrastructure investments to the SWP so that the water system can capture sufficient supplies to help meet average year demands and to refill the MWD storage network in above-average and wet years.

Planned actions to keep supplies and demands in balance include, among others, lowering regional residential per capita demand by 20 percent by the year 2020 (compared to a baseline established in 2009 state legislation), reducing water use from outdoor landscapes and advancing additional local supplies. IRP Table ES-1, 2015 IRP Update Total Level of Average-Year Supply Targeted (Acre-Feet), of the 2015 IRP, shows the supply reliability and conservation targets. As presented in the IRP, the total supply reliability target for each five-year increase between 2016 and 2040 would exceed the retail demand after conservation. In 2040, retail demand after conservation is estimated to be 4,273,000 acre-feet and the total supply reliability target is approximately 4,539,000 acre-feet, representing an excess of 266,000 acre-feet.[13]

As of October 2023, the 2020 IRP preparation process is underway. The 2020 IRP analyzes multiple scenarios that could plausibly unfold in the future due to climate change, economic growth, legislation and regulations affecting water sources and demands, and other variables. With the variability of these impacts in mind, MWD is developing four scenarios to help understand the challenges of the future and effectively plan to ensure water reliability in the face of those challenges. These four scenarios include (A) low demand, stable imports; (B) high demand, stable imports; (C) low demand, reduced imports; and (D) high demand, reduced imports. Refer to the *Existing Conditions* subsection below for additional information on the scenarios being evaluated as part of the 2020 IRP.

Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could

[13] Metropolitan Water District of Southern California, Integrated Water Resources Plan – 2015 Update, Report No. 1518, 2016, p. VIII.

be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.[14]

Long-Term Conservation Plan

The Long-Term Conservation Plan (LTCP) provides a framework of goals and strategies to reduce per capita water use through conservation and water use efficiency. The plan recognizes the challenges and uncertainties to achieving the IRP target. As a result, the LTCP uses adaptive management and strategies to adjust implementation approaches.

Water Supply Allocation Plan

While the WSDM Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, in February 2008, MWD adopted a water supply plan called the Water Supply Allocation Plan (WSAP). The WSAP includes a formula for determining equitable, needs-based reductions of water deliveries, with the potential application of a surcharge, to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs. The allocation period covers 12 consecutive months from July of a given year through the following June.

West Basin Municipal Water District 2020 Urban Water Management Plan

The West Basin Municipal Water District (WBMWD) was established in 1947 to mitigate over-pumping in the West Coast Subbasin. WBMWD is the fourth-largest member agency of the MWD and undertakes actions to protect groundwater supplies from seawater intrusion and augment the West Coast Subbasin supplies. The WBMWD imports water from MWD and delivers these supplies to investor-owned utilities, municipalities, a county waterworks district, and a groundwater agency to supplement locally available supplies.

As described in its most recent 2020 UWMP, WBMWD has an approximately 185-square-mile service area and provides wholesale potable water to 17 cities through three investor-owned utilities, four municipal water departments and one county waterworks district, in southwest Los Angeles County. WBMWD supplies recycled water to over 450 metered connections for municipal, commercial, and industrial use as well as for injection into the West Coast Basin Seawater Barrier to halt seawater intrusion and replenish the WCGB aquifers.[15]

WBMWD has been able to support the diversification of supplies available to its customer agencies by providing access to imported water supplies from MWD, as well as primarily through the development of recycled water supplies and conservation. These supplies are served directly to its

[14] Water Surplus and Drought Management Plan, Report No. 1150, 1999.
[15] West Basin Municipal Water District, 2020 Urban Water Management Plan, June 28, 2021, p. ES-3.

customer agencies and indirectly as the replenishment supplies necessary to maintain groundwater production. WBMWD is projected to increase current recycled water supplies as well as invest in ocean water desalination supply.

Local

Culver City General Plan

The General Plan Conservation Element (1972) does not address water supply or further water conservation measures.

Culver City Municipal Code

The City's policies regarding water supply are set forth in CCMC Chapter 5.03, Water Conservation and Water Supply Shortage Program. The purpose of this chapter is to adopt and enforce a conservation and supply shortage program as necessary to manage the City's potable water supply in the short- and long-term, and to avoid or minimize the effects of drought and shortage within the City. According to Chapter 5.03.010.C, careful water management that includes active water conservation measures not only in times of drought, but at all times, is essential to ensure a reliable minimum supply of water to meet current and future water supply needs.[16]

The water conservation and supply shortage program established under Chapter 5.03, is intended to reduce water consumption through conservation, and to enable effective water supply planning, assure reasonable and beneficial use of water, prevent waste of water, and maximize the efficient use of water within the City to avoid and minimize the effect and hardship of water shortage to the greatest extent possible.

Under Section 5.03.030, permanent water conservation requirements and prohibition against waste include limits on watering hours (Section 5.03.030.A), which prohibit watering or irrigating of lawn, landscape or other vegetated area with potable water between the hours of 8:00 A.M. and 7:00 P.M.; limit on watering duration (Section 5.03.030.B), which limit watering to no more than 10 minutes of watering per day, per station; prevention of excessive water flow or runoff (Section 5.03.030.C); and prohibition of washing down hard or paved surfaces (Section 5.03.030.D). Other measures (Section 5.03.030.E through O) include the obligation to fix leaks, breaks or malfunctions (Section 5.03.030.E); required re-circulation of water for decorative water fountains and decorative water features (Section 5.03.030.F), and prohibition of single-pass cooling systems (Section 5.03.030.J). The Code also requires that all pools and spas be covered in a manner to reduce evaporation (Section 5.03.030.N), and it prohibits irrigation of ornamental turf on public street medians Section 5.03.030.O).

Sections 5.03.035, 5.03.040, and 5.03.045, respectively, pertain to Level 1, Level 2, and Level 3 water supply shortage emergency conditions. The stages are cumulative and include permanent measures as well as measures from the preceding level. Level 1 water supply shortage requires additional water conservation measures including limits on water days; a 72-hour time limit on repairs of leak, breaks or malfunctions. Level 2 requires more stringent limits on watering days, a 48-hour time limit on repairs of leak, breaks or malfunction; prohibition on filling ornamental lakes

16 City of Culver City, Municipal Code, Chapter 5.03.010.C.

or ponds (except under specified conditions); and limits on washing vehicles at commercial car washing facilities. The use of potable water to wash or clean a vehicle, whether motorized or not, is prohibited at a commercial car washing facility that does not utilize a re-circulating water system. Level 3 prohibits watering or irrigating, unless maintenance of vegetation, including trees and shrubs, are watered with a hand-held bucket or similar container or a hand-held hose equipped with a positive, self-closing, water-shut-off nozzle or device. Maintenance of existing landscape necessary for fire protection, erosion control, or protection of protected species or certain other landscaped areas, such as public parks and playing fields, is allowed provided that such irrigation does not exceed two days per week and is conducted in accordance with the time restrictions. Level 3 also requires that all leaks, breaks, or other malfunctions in the water user's plumbing or distribution system be repaired within 24 hours of notification. At present, there are no City water restrictions beyond GSWC's Stage 1 restrictions, further detailed below.

Culver City Service Area Urban Water Management Plan

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at 5-year intervals. GSWC approved the Culver City Service Area 2020 UWMP (UWMP-Culver City) on June 15, 2021. The UWMP-Culver City describe GSWC's water supply reliability under single dry-year, multiple dry-year, and average year conditions, with projected information in 5-year increments for a minimum of 20 years.

It is also acknowledged that GSWC service areas are in Stage 1 of the Water Shortage Contingency and Staged Mandatory Water Conservation and Rationing plan.[17] In Stage 1, customers are encouraged to voluntarily reduce usage and to use water wisely, only using what is needed and not one drop more. GSWC may additionally charge customers who exceed their baseline drought allocation. Outdoor irrigation/watering is limited to no more than three days per week between the hours of 5 PM–9 AM. Outdoor irrigation/watering is limited to eight minutes per controller station/valve. Addresses ending in an even number must water only on: Sunday, Wednesday, or Friday. Addresses ending in an odd number must water only on: Tuesday, Thursday, or Saturday.

Existing Conditions

Water Infrastructure

GSWC currently provides potable water service to the Project Site. Based on information provided in the Water Civil Technical Memorandum prepared for the Project by Kimley Horn (Appendix J of this Draft EIR), there is an existing 12-inch water line in Hannum Avenue. Additionally, a water meter is located along the street frontage of Hannum Avenue. There is a fire hydrant located across Hannum Avenue at the center of the Project Site, and another fire hydrant adjacent to the Project Site along Buckingham Parkway, also generally within the central portion of the Project Site.

Water Demand

The Project Site is currently occupied by an approximately 30,672 square foot two-story office building. The remainder of the Project Site includes surface parking and associated landscaping. Based on information provided in the Water Civil Technical Memorandum (Appendix J of this

[17] City of Culver City website, Water Conservation, https://www.culvercity.org/City-Hall/Departments/Public-Works/Culver-City-Environmental-Initiatives/Water-Conservation. Accessed October 24, 2023.

Draft EIR), existing water usage on the Project Site is approximately 7,361 gallons per day (gpd), or approximately 8.3 AFY, as shown in **Table 4.13.1-1**.

TABLE 4.13.1-1
EXISTING ESTIMATED WATER CONSUMPTION

			Water Usage	
Existing Use	**Units**	**Water Use Rate[a]**	**gpd**	**AFY**
Commercial Office	30,672 sf	200/1,000 sf	6,134	6.9
Irrigation[b]	-	-	1,227	1.4
Total Existing Water Use	**-**	**-**	**7,361**	**8.3**

NOTES: gpd = gallons per day; sf = square feet, AFY = acre-feet per year.

[a] Estimated water usage is estimated as being equivalent to the estimated sewage generation for the Project. These rates are assessed using LA County Sanitation's Estimated Wastewater Generation Tables.

[b] 20% factor included to account for landscaping and irrigation consumption.

SOURCE: Kimley Horn, Water Civil Technical Memorandum, 2023 (Appendix J of this Draft EIR)

Water Supply

Golden State Water Company – Culver City Service Area

The water supply for the Culver City service area is mostly imported water purchased from the WBMWD, which is a member agency of MWD. While approximately 0.1 AF of groundwater was pumped from the Santa Monica Subbasin (DWR Basin No. 4-011.01) in 2020 by the GSWC, no groundwater was used in 2021 nor is groundwater projected for use within the City's service area through the 2045 planning horizon.[18] As such, further discussion of groundwater supplies are not included in this Draft EIR section.

Per the GSWC Culver City Service Area 2020 UWMP, the WBMWD provided GSWC's Culver City service area a total of 4,707 acre-feet in 2020, which sufficiently met the City service area total water demand.

The water purchased from WBMWD may be managed and moved between the GSWC Culver City service area and GSWC Southwest service area, depending upon the circumstances for supply availability in each particular service area.[19]

GSWC entered into a five-year purchase agreement between GSWC and WBMWD, effective January 1, 2008, through December 31, 2012. The agreement was extended an additional two years to December 31, 2014. This agreement provided GSWC with an annual maximum allocation of

[18] GSWC 2020 Urban Water Management Plan, June 15, 2021.

[19] The Southwest Service Area currently includes 54,994 customers in Southwest Los Angeles County, including all of Gardena and Lawndale, and portions of Carson, Compton, El Segundo, Hawthorne, Inglewood, Redondo Beach, and unincorporated Athens, Del Aire, El Camino Village, Lennox and Gardena Heights. Source: Golden State Water Company, https://www.gswater.com/southwest#:~:text=We%20currently%20serve%2054%2C994%20customers,Village%2C%20Lennox%20and%20Gardena%20Heights. Accessed October 24, 2023.

30,651 AFY with a total purchase commitment of 91,953 AF over the five-year term of the agreement, shared by all of GSWC's systems served by WBMWD.

WBMWD entered into a new 10-year term purchase order with MWD effective January 1, 2015, through December 31, 2024. For the first five years of the new purchase order term, MWD staff recommended to not enter into agreements with its customer agencies.

WBMWD acts as secondary wholesale water agency, purchasing water from MWD and reselling it to GSWC. MWD supplies imported water sourced from the SWP and the Colorado River via a series of pipelines and aqueducts.

The Colorado River was MWD's original source of water following its establishment in 1928. MWD has a legal entitlement to receive water from the Colorado River under a permanent service contract with the United States Secretary of the Interior. The Colorado River Aqueduct, which has a capacity of 1.25 million AFY, is owned and operated by MWD. It transports water from Lake Havasu, at the border of California and Arizona, approximately 242 miles west to its terminus at Lake Mathews in Riverside County and MWD's service area.

MWD also imports water from the SWP, which is owned by the State of California and operated by DWR. This project transports Feather River water stored in and released from Oroville Dam and conveyed through the Bay-Delta, as well as unregulated flows diverted directly from the Bay-Delta, south via the California Aqueduct to four delivery points: one from the California Aqueduct's West Branch at Castaic Lake and three from the East Branch along the northeastern portion of MWD's service area between Devil's Canyon Power Plant and Lake Perris.

MWD's 2015 IRP details a series of reliability goals, approaches, and targets for each of their water resource areas, with some focus on maintaining existing capabilities and increasing net quantities over the 25-year planning horizon. The goals identified are:

- Maintain Colorado River Aqueduct supplies;
- Stabilize state Water Project supplies;
- Achieve additional conservation savings; and
- Develop and protect local water supplies.

MWD published annual implementation reports on its progress towards the 2015 IRP goals. The most recent Implementation Report (2019)[20] highlights the progress on achieving the above resource and reliability goals established in the 2015 IRP as follows:

- MWD has worked closely with other agencies to improve reliability of its imported water supplies. MWD led efforts in crafting the Lower Colorado River Basin Drought Contingency Plan and supported efforts to make the Delta more resilient and support Governor Newsom's new direction to advance a single tunnel solution in the Delta.

[20] Metropolitan Water District of Southern California, Report on Integrated Water Resources Plan (IRP) Implementation, October 8, 2019.

- MWD continues to support and encourage local supply development through the Local Resources Program. MWD's board approved three projects with a total contract yield of 3,660 acre-feet per year from January 2019 to date. Seven additional applications for a total of 116,580 acre-feet per year are under consideration. MWD is also assessing the water supply benefits from stormwater through pilot programs.
- MWD continues to inform residents of water use efficiency through ongoing advertising campaigns and education. In addition to rebates for water efficient fixtures, MWD also implements programs targeting outdoor conservation with its landscape education and turf replacement programs. In 2019, MWD's board approved a conservation initiative that focuses on reaching disadvantaged communities.

The 2020 IRP is a two-phase process including a Regional Needs Assessment (Phase 1) and a One Water Implementation phase (Phase 2). The Draft Regional Needs Assessment was completed in April 2022, and includes the analysis of regional needs under a range of scenarios: (1) Scenario A, low demand and stable imports, (2) Scenario B, high demand and stable imports, (3) Scenario C, low demand and reduced imports, and (4) Scenario D, high demand and reduced imports.[21] The Draft Regional Needs Assessment found plausible reliability outcomes by the year 2045, with potential shortages ranging from no net shortage at all under Scenario A to as high as 1.2 million acre-feet under Scenario D, and identifies needs and opportunities related to five focus areas: (1) SWP dependent areas, (2) storage, (3) retail demand/ demand management, (4) MWD imported supplies, and (5) local supply. The Draft Regional Needs Assessment concludes that "[c]ollectively, these findings instill a sense of optimism about Southern California's water future. Metropolitan has identified the tools necessary to adapt to a variety of plausible futures successfully. It is also well within Southern California's control to avoid a fate with increased per- capita water use and higher demands that would prove unsustainable." It further notes that through the One Water Phase of the process, "the precise combination of actions will emerge as more is known about the future that we actually face. Southern California is poised to be agile enough to adjust its portfolio of water actions to keep up with our changing times."

As an additional acknowledgment, recycled water is not served to customers within the City service area and is not expected to supply the Project. It is noted, however, that wastewater generated within the service area is treated by the City of Los Angeles, and a portion of that treated wastewater is sold to WBMWD for further treatment for recycled water uses throughout the WBMWD service area. Although the City service area does not directly utilize recycled water, its customers contribute to the regional water supply reliability benefit achieved through WBMWD's distribution of recycled water.

[21] Metropolitan Water District of Southern California, 2020 IRP Regional Needs Assessment, April 12, 2022.

4.13.1.3 Project Impacts

Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would have a significant impact related to water supply if it would:

- **WS-1:** Require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects.
- **WS-2:** Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

Methodology

Water Infrastructure

The analysis of impacts to water infrastructure is based on the analysis in the Water Civil Technical Memorandum prepared for the Project by Kimley Horn (included as Appendix J of this Draft EIR). The analysis: (1) identifies the domestic water mains and fire hydrants that would serve the Project; (2) identifies the capacity and water pressures in the mains and associated fire hydrants based on flow; and (3) determines whether the subject water mains and fire hydrants have the capacity to serve the Project.

Based on the results of the Fire Service Pressure Flow Report provided by GSWC and correspondence with the Culver City Fire Department (CCFD), the Water Civil Technical Memorandum determines whether the Project has sufficient water flow and pressure. [22]

Water Supply

As previously detailed, SB 610 requires a discussion regarding the availability of water to meet projected water demands of large-scale projects. As defined in SB 610, large-scale projects include residential development projects of more than 500 residential units or shopping centers employing more than 1,000 persons or having more than 500,000 sf of floor space. The Project would include the development of 309 multi-family dwelling units and 5,600 sf of commercial floor area. As the Project proposes less than 500 dwelling units and less than 500,000 sf of commercial floor space, the Project does not meet the CEQA significance threshold of SB 610, and therefore, a water supply assessment and verification is not required for the Project.

Estimated water use for the Project was provided in the Water Civil Technical Memorandum (Appendix J of this Draft EIR). The Project's demand for domestic water was assessed in relation to GSWC's ability to supply water pursuant to the 2020 UWMP. The water demand was calculated based on wastewater generation factors provided by the Los Angeles County Sanitation District. This method of calculating future water demand for new development is a common practice in the Los Angeles region, including for Culver City. Additionally, the GSWC provided a Will Serve

[22] See Appendix J – Water Civil Memorandum, of this Draft EIR for correspondence provided by GSWC and CCFD.

Letter dated April 26, 2023 (located in Appendix J of this Draft EIR), stating that the Project Site would be supplied with water from the existing municipal system.

Project Design Features

The following project design features are applicable to the Project:

WATER-PDF-1 (Water Conservation): The Project will implement water conservation measures that include, but are not limited to, the following:

- Landscape and Irrigation
  - California Friendly® plants or native plants
  - Drip/ Subsurface Irrigation (Micro-Irrigation)
  - Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)

Analysis of Project Impacts

Threshold WS-1: The Project would have a potentially significant impact if it would require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects.

Impact Analysis

Construction

Water, such as soil watering for soil compacting and fugitive dust control, masonry, painting, clean-up, and other related activities, would be required during construction. Project construction is projected to begin in early 2025 and is expected to take approximately 30 months to complete. Full build-out is expected as early as the fourth quarter of 2027. Water for construction would be required for activities such as dust control, cleaning of equipment, excavation/export, removal and re-compaction. Non-potable water could be used for soil compacting and dust control purposes, if required, and would represent the majority of the water used during construction. Such practices are implemented by the contractor and use non-potable water trucked to a construction site. Project construction activities would create a demand for some potable water, such as drinking, cleaning of brushes and other items, and lavatories. According to the Water Civil Technical Memorandum, based on contractor estimates, construction water usage is estimated to be approximately 75 gpd for the Project Site. The estimated construction water use would be less than the existing domestic water use of approximately 7,360 gpd for the Project Site (as shown in Table 4.13.1-1). As such, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project.

The Project would also require construction of new, on-site water distribution lines to serve the Project. According to the Water Civil Technical Memorandum, the Project would include a proposed 8-inch domestic water line and an 8-inch fire water line connection to tie into the existing 12-inch water main in Hannum Avenue. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution

lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. No upgrades to existing water mains are anticipated at this time. As detailed in Chapter 4.11, *Transportation*, TRAF-PDF-1 would require implementation of a Construction Management Plan that would reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. Prior to ground disturbance, Project contractors would coordinate with GSWC to identify the locations and depth of all lines. Further, GSWC would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service and would be responsible for the installation of new meters and main connection, as well as work on water mains within the public right-of-way. Therefore, Project impacts on water associated with construction activities would be less than significant.

Operation

Water service to the Project Site would continue to be provided by GSWC, as under existing conditions. When analyzing the Project for infrastructure capacity, although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and are, therefore, the primary means for analyzing infrastructure capacity.

According to the Water Civil Technical Memorandum (Appendix J of this Draft EIR), the Project would have a minimum fire flow requirement of 1,500 gpm at 20 psi residual for a duration of 2 hours, in compliance with the CCMC Section 9.02. Per the Fire Service Pressure Flow Report provided by GSWC (located within Appendix J), the existing fire hydrant connected to the 12-inch water main in Hannum Avenue can provide 4,409 gpm at 20 psi for a duration of 2 hours. Additionally, according to correspondence with the CCFD (located within Appendix J), an additional fire hydrant would not be required as part of the Project. Therefore, the site's existing fire hydrant infrastructure would be sufficient to meet the Project's fire flow requirements.

Based on the above, the existing GSWC water infrastructure has adequate capacity and pressure to meet the Project's domestic and fire flow requirements. As such, Project operation would not require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects. Project operational impacts related to water infrastructure would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. The Project would not require the relocation or construction of new or expanded water facilities and impacts would be less than significant.

Threshold WS-2: The Project would have potentially significant impact if it would not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

Impact Analysis

Construction

As stated under Threshold WS-1, water would be required for Project construction activities, such as dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other related activities. Construction activities would be intermittent, with demand for water consumption variable but generally temporary in nature.

As stated above and in the Water Civil Technical Memorandum, an estimate of potable construction water demand would be approximately 75 gpd for the Project. The estimated construction water use would be less than the existing domestic water use of approximately 7,360 gpd for the Project Site. As such, it is anticipated that the existing water supply would meet the limited and temporary water demand associated with construction of the Project. Water use during construction would be temporary given that project construction activities would be temporary (approximately 30 months). It is, therefore, expected that Project construction activities would generate minimal potable water demand and would be met with existing water supplies provided by GSWC.

As analyzed below under Operational impacts, sufficient water supplies exist to meet the Project's projected operational water demand, in addition to the existing and planned future demands for normal, single-dry, and multiple-dry years on GSWC water supplies. As Project construction would require a nominal amount of water compared to Project operation, the Project's intermittent construction-related water demand would be met by GSWC's available water supplies. For these reasons, adequate water supplies would be available from existing entitlements and resources for Project construction activities.

Therefore, GSWC would have sufficient water supplies to serve the Project during construction and reasonably foreseeable future development during normal, dry, and multiple-dry years, and impacts on water supply during construction would be less than significant.

Operation

Project Water Demand

Estimated domestic water demand for the Project is shown in **Table 4.13.1-2**, *Project's Estimated Water Consumption,* which shows the net increase in potable water that would be required for the Project. As shown in Table 4.13.1-2, the net water demand for the Project would be 36,446 gpd, or 41 AFY.

Golden State Water Company Culver City Service Area Water Demand and Reliability Assessment

As discussed above, water purchased from WBMWD constitutes the primary source of supply for the GSWC Culver City service area, and is expected to be the sole source of supply within the 2045 planning horizon. The total projected potable supplies for the GSWC Culver City service area for normal, single dry, and multiple dry years are presented in **Table 4.13.1-3**, *Projected Normal Year Water Supply and Demand for Culver City Service Area*, **Table 4.13.1-4**, *Single Dry Year Water*

Supply and Demand for Culver City Service Area, and **Table 4.13.1-5**, *Five Consecutive Dry Years Water Supply and Demand through 2045 for Culver City Service Area*, respectively. As shown in the tables, GSWC has sufficient supplies to meet demand in normal, single dry, and multiple dry years without shortages.

TABLE 4.13.1-2
PROJECT'S ESTIMATED WATER CONSUMPTION

			Water Usage[b]	
Proposed Use	**Units**	**Water Use Rate[a]**	**gpd**	**AFY**
Residential				
Studio	39 units	75/unit	36,225	41
1 Bed	180 units	110/unit		
2 Bed	90 units	150/unit		
Commercial	5,600 sf	50/1,000 sf	280	0.3
Irrigation [b]	-	-	7,301	8
	Total Proposed Water Demand		**43,806**	**49**
Existing Site Demand			-7,360	-8
	Total Net Water Demand		**36,446**	**41**

NOTES: gpd = gallons per day; sf = square feet, AFY = acre-feet per year.

[a] Estimated water usage is estimated as being equivalent to the estimated sewage generation for the Project. These rates are assessed using LA County Sanitation's Estimated Wastewater Generation Tables.

[b] 20% factor included to account for landscaping and irrigation consumption.

SOURCE: Kimley Horn, Water Civil Technical Memorandum, 2023 (Appendix J of this Draft EIR)

TABLE 4.13.1-3
PROJECTED NORMAL YEAR WATER SUPPLY AND DEMAND FOR CULVER CITY SERVICE AREA

	2025	**2030**	**2035**	**2040**	**2045**
Normal Year Supply	5,002	5,086	5,175	5,269	5,370
Normal Year Demand	5,002	5,086	5,175	5,269	5,370
Difference	0	0	0	0	0

NOTE: All values in acre-feet.

SOURCE: GSWC, Culver City Service Area 2020 Urban Water Management Plan, June 15, 2021.

TABLE 4.13.1-4
SINGLE DRY YEAR WATER SUPPLY AND DEMAND FOR CULVER CITY SERVICE AREA

	2025	**2030**	**2035**	**2040**	**2045**
Single Dry Year Supply	5,502	5,594	5,692	5,796	5,907
Single Dry Year Demand	5,502	5,594	5,692	5,796	5,907
Difference	0	0	0	0	0

NOTE: All values in acre-feet.

SOURCE: GSWC, Culver City Service Area 2020 Urban Water Management Plan, June 15, 2021.

TABLE 4.13.1-5
MULTIPLE (FIVE) CONSECUTIVE DRY YEARS WATER SUPPLY AND DEMAND THROUGH 2045 FOR CULVER CITY SERVICE AREA

Year		2025	2030	2035	2040	2045
1	Dry Year Supply	5,502	5,594	5,692	5,796	5,907
	Dry Year Demand	5,502	5,594	5,692	5,796	5,907
	Difference	0	0	0	0	0
2	Dry Year Supply	5,520	5,613	5,712	5,817	5,907
	Dry Year Demand	5,520	5,613	5,712	5,817	5,907
	Difference	0	0	0	0	0
3	Dry Year Supply	5,538	5,633	5,733	5,839	5,907
	Dry Year Demand	5,538	5,633	5,733	5,839	5,907
	Difference	0	0	0	0	0
4	Dry Year Supply	5,557	5,652	5,754	5,862	5,907
	Dry Year Demand	5,557	5,652	5,754	5,862	5,907
	Difference	0	0	0	0	0
5	Dry Year Supply	5,575	5,672	5,775	5,884	5,907
	Dry Year Demand	5,575	5,672	5,775	5,884	5,907
	Difference	0	0	0	0	0

NOTE: All values in acre-feet.
SOURCE: GSWC, Culver City Service Area 2020 Urban Water Management Plan, June 15, 2021.

The WBMWD 2020 UWMP states that it will be able to serve 100 percent of projected demands in normal, single-dry and multiple-dry years. Because of this, GSWC expects that under all hydrologic conditions purchased water supplies will fully meet future purchased water demands. Therefore, consistent with the City service area 2020 UWMP, the available supplies to the GSWC Culver City service area are considered to be equal to demands under all conditions (i.e., current and projected, and for normal, single dry, and multiple dry years including a 5-year drought period).

Table 4.13.1-3, Table 4.13.1-4, and Table 4.13.1-5 show sufficient water supplies in all hydrologic years; however, in the event of a water supply shortage as described in the GSWC 2020 UWMP, GSWC can implement its Water Shortage Contingency Plan (WSCP).[23] The WSCP requires water response actions to six water shortage stages, which correspond to progressively severe water shortage conditions (up to 10 percent, 20 percent, 30 percent, 40 percent, 50 percent, and greater than 50 percent shortage) as compared to the normal reliability condition. The following six (6) Stages list the shortage response actions:

- Stage 1 (0 to 10% shortage) – Stage 1 is a "Water Alert" where voluntary conservation is encouraged.

[23] GSWC, Culver City Service Area 2020 Urban Water Management Plan, Chapter 6, June 15, 2021.

- Stage 2 (10% to 20% shortage) – Stage 2 is a "Moderate Shortage" and will be implemented if the Stage 1 restrictions are deemed insufficient to achieve necessary demand reductions due to water supply shortages.
- Stage 3 (20% to 30% shortage) – Stage 3 is a "Severe Shortage" that requires water allocations and mandatory conservation.
- Stage 4 (30% to 40% shortage) – Stage 4 is a "Critical Shortage" that includes all steps taken in prior stages regarding allocations and mandatory conservation.
- Stage 5 (40% to 50% shortage) – Stage 5 is a "Shortage Crisis" that includes all steps taken in prior stages regarding allotments and mandatory conservation. This stage will be implemented in the event that the source of supply is severely curtailed to the level that requires each customer to restrict their water use for only human health and safety purposes.
- Stage 6 (50% or greater shortage) – Stage 6 is an "Emergency Shortage" condition that includes all steps taken in prior stages regarding allotments and mandatory conservation.

Project Water Supply Availability

The water demand projections in GSWC's 2020 UWMP were developed based on SCAG's 2020–2045 RTP/SCS demographic projections. GSWC's 2020 UWMP identified water supplies to meet projected water demands through 2045. GSWC's water supply projections in their 2020 UWMP are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the 2020 RTP/SCS by SCAG.

The analysis included in this Draft EIR indicates that the Project would conform with the use and intensity of development permitted by the City's General Plan. The Project is also consistent with the demographic projections in the 2020 RTP/SCS. Thus, the anticipated water demand for the Project would be within GSWC's 2020 UWMP projected water supplies for normal, single-dry, and multiple-dry years through the year 2045 and is also within the GSWC 2020 UWMP's 25-year water demand growth projections. Table 4.13.1-3 to Table 4.13.1-5 show sufficient water supplies in all hydrologic years would be available by GSWC, as applicable.

Therefore, given that (1) the 2020 GSWC UWMP projections are inclusive of the Project and do not identify supply shortfalls under any hydrologic conditions evaluated; (2) the GSWC has the ability to implement a WSCP in the case of supply shortages, and demonstrated its effectiveness during the historic 2013–2017 drought; and (3) the increasing efficiency and drought planning requirements from the State, sufficient water supply is estimated to be available to GSWC to meet all future demands within the Culver City service area and those associated with the Project. Additionally, GSWC provided a Will Serve Letter dated April 26, 2023 (located in Appendix J of this Draft EIR) stating that the Project Site would be supplied with water from the existing municipal system.

Based on the above, there would be sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. Water supply impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Impacts regarding water supply would be less than significant.

Cumulative Impacts

Impact Analysis

The geographic context for the cumulative impact analyses on water infrastructure and water supply is the vicinity of the Project Site (i.e., the water infrastructure that would serve the Project and the GSWC service areas). Chapter 3, *Environmental Setting*, of this Draft EIR, identifies 12 related projects that are anticipated to be developed within a 1-mile radius of the Project Site. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3. As shown in Table 3-1, these related Projects occur in two separate jurisdictions, the City of Culver City and the City of Los Angeles. Of these related projects, eight occur within Culver City and, like the Project, would create a demand for water service from the GSWC.

Water Infrastructure

Development of the Project, in conjunction with the related projects, would cumulatively increase service demand on the existing water infrastructure system. However, each related project would be subject to the applicable city review, as applicable, to ensure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. All projects are required to perform a hydraulic analysis, based on flow testing of facilities, to verify that there is available service. Individual projects are required to improve facilities where appropriate and development cannot proceed without appropriate verification and approval. Furthermore, GSWC and the City's Department of Public Works conduct ongoing evaluations to ensure facilities are adequate and requires infrastructure system improvements as needed. Based on these facts and the above analysis relating to the Project's construction and operational impacts on the water infrastructure system, the Project's incremental effects on the water infrastructure system would not be cumulatively considerable. Cumulative impacts on water infrastructure would be less than significant.

Water Supply

As discussed above, as a public water service provider, GSWC is required to prepare and periodically update its UWMPs to plan and provide for water supplies to serve existing and projected demands. GSWC's 2020 UWMP accounts for existing development within its service area, as well as projected growth through the year 2045. Additionally, under the provisions of SB 610, GSWC is required to prepare a comprehensive WSA for every new development "project" (as defined by Section 10912 of the Water Code) that meets certain criteria, as required. The WSAs for such projects, in conformance with the UWMP, would evaluate the reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed, on a project-by-project basis.

The related projects would contribute, in conjunction with the Project, to overall water demand on GSWC. As shown in **Table 4.13.1-6**, *Estimated Cumulative Water Generation*, the related projects are anticipated to generate a total water demand of approximately 242 AFY in the GSWC Culver

City service area. With the Project, the cumulative demand would be approximately 283 AFY in the GSWC Culver City service area. For purposes of this analysis and to provide a conservative estimate of the related projects' water demand, the related projects' wastewater generation is assumed for the related projects water demand. This estimate is conservative (i.e., high) since the wastewater generation rates do not quantify code-required conservation or applicant conservation commitments that would reduce water demand by the related projects or deduct for existing uses and assumes all the related projects would be fully built out.

TABLE 4.13.1-6
ESTIMATED CUMULATIVE WATER GENERATION BY RELATED PROJECTS

Land Use	Quantity	Generation Factor[a]	Water Demand (gpd)
Residential [b]	762 du	150/du	114,300
Office	562.59 ksf	120/ksf	67,511
Medical Office	38.71 ksf	250/ksf	9,678
Retail	32.01 ksf	25/ksf	800
Hotel	183 rooms	130/room	23,790
Subtotal	--	--	**216,079 (242 AFY)**
Proposed Project Net	--	--	**36,446 (41 AFY)**
Total	--	--	**250,695 (283 AFY)**

du = dwelling units, ksf = 1,000 square feet , gpd = gallons per day, AFY = acre-feet per year

[a] Water demand is based on the wastewater generation factors from the City of Los Angeles Sewage Generation Factor for Residential and Commercial Categories, April 6, 2012.

[b] Assumes all two-bedroom units.

SOURCE: ESA, 2023.

The 283 AF water demand of the Project and related projects would represent approximately 6.0 percent of GSWC's 2020 Culver City service area water supply of 4,707 AF, with the Project's share of 41 AF representing approximately 0.8 percent of GSWC's 2020 Culver City service area water supply.

As previously stated, GSWC would be able to meet the water demand of the Project together with the existing and forecasted growth in the service area through 2045. Additionally, based on water demand projections through 2045 in the 2020 UWMP, GSWC has determined that they would be able to reliably provide water to its customers through the year 2045, based on demographic growth projections in SCAG's 2020–2045 RTP/SCS which includes the Project and likely the related projects. In addition, compliance of the Project and other future development projects with the numerous regulatory requirements that promote water conservation described above would also reduce water demand on a cumulative basis. For example, any related projects meeting the size criteria under SB 610 would be required to prepare and obtain GSWC approval of a WSA, as applicable, that demonstrates how the water demand associated with these projects would be met.

Overall, as discussed above, the 2020 GSWC UWMP demonstrate that the City will meet all new water demands from projected population growth, through a combination of water conservation

and water recycling. The 2020 UWMP outline sources of water and measures to ensure adequate supplies of water are available to meet the needs of the service area. Furthermore, GSWC will continue to update their UWMP every five years to ensure that sufficient water supply continues to be available.

Based on the above, it is anticipated that GSWC would be able to meet the water demands of the Project and future growth within its service area through at least 2045. Therefore, the Project together with the related projects would not result in a significant cumulative impact related to water supply, nor would the Project contribute considerably to significant cumulative water demand impacts. As such, cumulative water supply impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance After Mitigation

Not applicable. Cumulative impacts regarding water infrastructure and water supply would be less than significant.

This page intentionally left blank

4.13.2 Utilities and Service Systems – Electric Power, Natural Gas, and Telecommunications Facilities

4.13.2.1 Introduction

The following section analyzes the Project's potential impacts upon electric power, natural gas and telecommunications facilities. This section focuses on the existing facilities serving the project area and the potential for environmental impact to occur as a result of any physical improvements that may be necessary to accommodate the Project. Potential impacts associated with energy demand and energy conservation policies are discussed in Section 4.4, *Energy*, of this Draft EIR.

4.13.2.2 Environmental Setting

Regulatory Framework

Federal

United States Department of Energy (Energy Policy Act of 2005)

The United States Department of Energy (DOE) is the federal agency responsible for establishing policies regarding energy conservation, domestic energy production and infrastructure. The Federal Energy Regulatory Commission (FERC) is an independent federal agency, officially organized as part of the DOE which is responsible for regulating interstate transmission of natural gas, oil and electricity, reliability of the electric grid and approving of construction of interstate natural gas pipelines and storage facilities. The Energy Policy Act of 2005 has also granted FERC with additional responsibilities of overseeing the reliability of the nation's electricity transmission grid and supplementing state transmission siting efforts in national interest electric transmission corridors.

FERC has authority to oversee mandatory reliability standards governing the nation's electricity grid. FERC has established rules on certification of an Electric Reliability Organization (ERO) which establishes, approves and enforces mandatory electricity reliability standards. The North American Electric Reliability Corporation (NERC) has been certified as the nation's ERO by FERC to enforce reliability standards in all interconnected jurisdictions in North America. Although FERC regulates the bulk energy transmission and reliability throughout the United States, the areas outside of FERC's jurisdictional responsibility include state-level regulations and retail electricity and natural gas sales to consumers which falls under the jurisdiction of state regulatory agencies.

Federal Communications Commission

The Federal Communications Commission (FCC) requires all new cellular tower construction to be approved by the state or local authority for the proposed site and comply with FCC rules involving environmental review. Additionally, the Telecommunications Act of 1996 requires construction of new cellular towers to comply with the local zoning authority.

State

California energy infrastructure policy is governed by three institutions: the California Independent System Operator (California ISO), the California Public Utilities Commission (CPUC), and the California Energy Commission (CEC). These three agencies share similar goals but have different

roles and responsibilities in managing the State's energy needs. The majority of State regulations with respect to electricity and natural gas pertain to energy conservation. For a discussion of these regulations, refer to Section 4.4, *Energy*, of this Draft EIR. Regulations pertaining to infrastructure are discussed below.

California ISO

The California ISO is an independent public benefit corporation responsible for operating California's long-distance electric transmission lines. The California ISO is led by a five-member board appointment by the Governor and is also regulated by FERC. While transmission owners and private electric utilities own their lines, the California ISO operates the transmission system independently to ensure that electricity flows comply with federal operational standards. The California ISO analyzes current and future electrical demand and plans for any needed expansion or upgrade of the electric transmission system.

California Public Utilities Commission

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California such as Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). Public owned utilities such as the Los Angeles Department of Water and Power (LADWP) do not fall under the CPUC's jurisdiction.

The CPUC is overseen by five commissioners appointed by the Governor and confirmed by the State senate. The CPUC's responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines and permitting of electrical transmission and substation facilities.

California Energy Commission

The CEC is a planning agency that provides guidance on setting the State's energy policy. The CEC's responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the State, developing renewable energy resources and permitting thermal power plants 50 megawatts and larger. The CEC also has specific regulatory authority over publicly owned utilities to certify, monitor, and verify eligible renewable energy resources procured.

Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323), adopted in 2002, requires the development of an integrated plan for electricity, natural gas, and transportation fuels. Under the bill, the CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The 2021 Integrated Energy Policy Report, the latest report published by the CEC, provides the results of the CEC's assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emission vehicles, energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.[1]

[1] California Energy Commission (CEC), *2021 Integrated Energy Policy Report*, February 22, 2022.

Local

City of Culver City

Culver City Municipal Code

The City of Culver City participates in an environmental recognition program, California Green Communities. The program helps cities develop strategies to reduce carbon emissions and increase energy efficiency in their community. In addition, the City has adopted green building ordinances to reduce GHG emissions for new development. Pursuant to the Culver City Municipal Code (CCMC) Chapter 15.02.1005, the City requires 1 kilowatt (kw) of photovoltaic (PV) power installed per 10,000 square feet (sf) of new development. The CCMC includes an option to pay an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code. Under Chapter 17.320.035 of the CCMC, the City goes beyond California Green Building Standards (CALGreen) Building Code standards and requires at least 20 percent electric vehicle (EV) capable parking spaces, 10 percent EV ready parking spaces, and 10 percent EV charging stations for both new residential and retail developments.[2] Additionally, Sections 4.408.1 and 5.408.1 Construction Waste Management require the recycle and/or salvage for reuse a minimum of 75 percent of nonhazardous construction and demolition waste.

In 2009, the City adopted the Green Building Program as CCMC Chapter 15.02.100, which contains a number of GHG reducing features such as enhanced building insulation, low-flow water fixtures, and efficient lighting and heating, ventilation, and air conditioning (HVAC) systems. An example of the City's Green Building Program requirements would be all lighting has to be either fluorescent, light-emitting diode (LED) or other type of high-efficiency lighting, and specific features for parking garages would require all new lighting to be motion sensor controlled and the minimum base level lighting would use high efficiency lighting.

Culver City Municipal Code Section 11.20

Section 11.20 of the CCMC outlines rules and regulations related to telecommunications installation within Culver City. The intent of the CCMC is:

1. To enable the City to discharge its public trusts in a manner consistent with rapidly evolving federal and state regulatory policies, industry competition, and technology development.
2. To authorize and to manage reasonable access to the City's public right-of-way and public property for telecommunications purposes on a competitively neutral and nondiscriminatory basis.
3. To obtain fair and reasonable compensation for the City and its residents for authorizing the private use of the public rights-of-way and public property, which are recognized to be valuable public assets, held in trust by the City.
4. To foster and to promote competition in telecommunications services, minimize unnecessary local regulation of telecommunications service providers, and encourage the delivery of advanced and competitive telecommunications services on the broadest possible basis to local government and to the businesses, institutions and residents of the City.

[2] City of Culver City Zoning Code, Title 17, Sections 17.320, Off-Street Parking and Loading, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-52279#JD_17.320.020. Accessed July 12, 2022.

5. To establish clear local guidelines, standards and time frames for the exercise of local authority with respect to the regulation of telecommunication service providers, including establishment and enforcement of consumer service standards and technical standards.
6. To encourage the profitable deployment of advanced telecommunications infrastructures that satisfy local needs, deliver enhanced government services, and provide informed consumer choices in an evolving telecommunication market.

Clean Power Alliance

In February 2019 for residential customers and May 2019 for non-residential customers, Clean Power Alliance (CPA) became the new electricity supplier for the City of Culver City. With this change, CPA purchases the renewable energy resources for electricity and SCE delivers it to Culver City customers. The CPA is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Culver City are automatically defaulted to have 100 percent renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent or opt out of the CPA to remain with SCE as their provider. The Project's energy analyses conservatively assume the Project will remain with SCE as their electricity provider and does not take additional credit for renewable energy beyond the expected SCE renewable energy percentage for year 2022 based on the required renewables by year 2024 under SB 100.[3]

Culver City Information Technology Department

The City of Culver City Information Technology Department (IT) is responsible for providing computing, telecommunications, and network service to all departments and divisions within the City. IT provides project management, systems planning, design, and programming support for the enhancement of existing and new systems.[4]

IT also provides high-speed fiber-optic internet cables for Culver City businesses to promote economic development. Culver City's municipal fiber network, known as Culver Connect, has a 21.7-mile network backbone in three geographical network rings interconnected by "ring ties" of approximately 3.1 route miles of fiber. The network backbone is comprised of 576 strands of entirely undergrounded fiber. There are three hub facilities located in the City that house City-owned network electronics. The City leases two fiber connections to carrier hotels at One Wilshire in Los Angeles and Equinix (LA3) in El Segundo.

[3] For the purposes of estimating energy demand, the analysis conservatively assumes the Project would not switch electricity providers from SCE to the CPA (i.e., does not take any credit for 36 percent, 50 percent, or 100 percent renewable electricity, depending on the selected CPA plan). Should the Project switch electricity providers from SCE to the CPA, the Project's electricity-related emissions would be lower than those disclosed in this section.

[4] City of Culver City, Information Technology, https://www.culvercity.org/City-Hall/Departments/IT. Accessed July 12, 2022.

Existing Conditions

Electric Power

Electric Supplies

SCE provides electrical services to approximately 15 million people, 15 counties, and 180 incorporated cities, including the City of Culver City and a portion of the Project Site. It also provides services to approximately 5,000 large businesses, and 280,000 businesses throughout a 50,000-square-mile service area, across central, coastal and Southern California, an area bounded by Mono County to the North, Ventura County to the West, San Bernardino County to the East, and Orange County to the South.[5] SCE produces and purchases energy from a mix of conventional and renewable generating sources.

SCE generates power from a variety of energy sources, including large hydropower (greater than 30 megawatts), coal, gas, nuclear sources, and renewable resources, such as wind, solar, small hydropower (less than 30 megawatts), and geothermal sources. The annual electricity sale to customers in 2022 was approximately 84,218,000 megawatt-hours.[6]

Clean Power Alliance

In February 2019 for residential customers and May 2019 for non-residential customers, Clean Power Alliance (CPA) became the new electricity supplier for the City of Culver City. With this change, CPA procures and purchases the electricity and Southern California Edison (SCE) delivers it to Culver City customers. The CPA is a Joint Powers Authority made up of public agencies across Los Angeles and Ventura counties working together to bring clean, renewable power to Southern California. As of 2023, CPA serves over 3 million residents and businesses over 32 communities within Southern California.[7] In 2022, CPA procured over 1,700 MW of renewable energy and provided its customers with over 2,186,367 MWh of electricity. [8] With the recent switch in energy providers, electricity customers in Culver City are automatically defaulted to have 100 percent renewable energy serving their electricity needs. Alternatively, customers can opt to have their electricity power consisting of 50 percent renewable content or 36 percent or opt out of the CPA to remain with SCE as their provider.

Electricity Distribution System

The power supplied to SCE consumers is distributed through a network of approximately 104,000 miles of circuits, 700 substations, and approximately 1.5 million power poles.[9]

5 Southern California Edison (SCE), Who We Are, https://www.sce.com/about-us/who-we-are. Accessed October 2023.

6 Edison International and SCE, 2022 Annual Report, 2022, page 2, https://download.edison.com/406/files/20232/2022-eix-sce-annual-report.pdf?Signature=N0sq4yv8uPjj%2F32CHqD9P67Ydr0%3D&Expires=1696599567&AWSAccessKeyId=AKIAJX7XEOOELCYGIVDQ&versionId=bpeN_aiySep67UMc7RtP511pq9M5I127&response-content-disposition=attachment. Accessed October 2023.

7 CPA, 2022 Annual Impact Report, https://cleanpoweralliance.org/wp-content/uploads/2023/06/ImpactReport2022.pdf. Accessed October 2023.

8 CPA, 2022 Annual Impact Report, https://cleanpoweralliance.org/wp-content/uploads/2023/06/ImpactReport2022.pdf. Accessed October 2023.

9 SCE, About Us, 2022, https://www.sce.com/about-us/reliability. Accessed October 2023.

Natural Gas

Natural Gas Supplies

As discussed in Section 4.4, *Energy*, of this Draft EIR, SoCalGas provides natural gas resources to the City and most of Southern California and Central California from the City of Visalia to the U.S./Mexican border.[10] The availability of natural gas is based upon present conditions of gas supply and regulatory policies as SoCalGas is under the jurisdiction of the CPUC and other federal regulatory agencies. In addition, SoCalGas makes available to its customers energy-efficiency programs with rebates and incentives for the purpose of reducing natural gas consumption.

Natural Gas Distribution Systems

Interstate Distribution Systems

Natural gas is supplied to the Southern California region through a system of interstate pipelines. The 2020 California Gas Report projects that California natural gas demand is expected to decline at an annual rate of 1.5 percent per year from 2020 to 2035 in the SoCalGas service area.[11] Gas supply available to SoCalGas from California sources averaged 3,435 million cubic feet (cf) per day per day in 2022. This equates to an annual average of 1,253,775 million cf per year per year.[12]

Local Distribution System

SoCalGas provides natural gas resources to the City of Culver City through existing gas mains located under the streets and public rights-of-way. Natural gas services are provided in accordance with SoCalGas' policies and extension rules of the CPUC at the time contractual agreements are made. Natural gas is delivered to the Project Site through natural gas underground facilities within Buckingham Parkway.

4.13.2.3 Environmental Impacts

Thresholds of Significance

The following threshold of significance is based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in a significant impact related to electric power, natural gas, or telecommunications facilities if it would:

- **INF-1** Require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?[13]

Methodology

The analysis evaluates the potential impacts of the Project on existing energy infrastructure by comparing the estimated Project energy demand with available capacity. Project energy usage,

[10] Southern California Gas Company (SoCalGas), Company Profile, https://www.socalgas.com/about-us/company-profile. Accessed October 2023.

[11] California Gas and Electric Utilities, 2022 California Gas Report, 2022, p. 115.

[12] California Gas and Electric Utilities, 2022 California Gas Report.

[13] Refer to Section 4.13.1, *Utilities and Service Systems – Water Supply*, of this Draft EIR for a discussion of water infrastructure; Section 4.13.2, *Utilities and Service Systems – Wastewater*, of this Draft EIR for a discussion of wastewater infrastructure; and Section 4.8, *Hydrology and Water Quality*, of this Draft EIR for a discussion of storm water infrastructure. Also refer to the Initial Study provided in Appendix A of this Draft EIR for a discussion of telecommunication systems.

including electricity and natural gas, was calculated using CalEEMod Version 2022.1.1. During construction, energy would be consumed in the form of electricity associated with conveyance of water, lighting, and other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Operational energy consumption would include electricity and natural gas from uses such as heating/ventilation/air conditioning (HVAC); water heating, cooking, lighting, and use of electronics/appliances. Additional details regarding Project energy usage are provided in Section 4.4, *Energy*, and Appendix E of this Draft EIR.

For consistency with the emissions modeling provided in Section 4.2, *Air Quality*, Section 4.4, *Energy*, and Section 4.6, *Greenhouse Gas Emissions*, the Project's energy use was calculated assuming buildout would occur in 2027. This analysis assumes that the Project would comply with the same Title 24 Building Energy Efficiency Standards (currently the 2022 version). While the Title 24 standards are typically revised every 3 years with more stringent energy efficiency requirements, it is not known to what extent future revisions to the Title 24 standards would reduce the Project's energy demand. Therefore, it is not possible to accurately quantify the effects of future revisions to the Title 24 standards on the Project's energy demand.

The Project's estimated energy demands were analyzed relative to existing and planned energy supplies of SCE and SoCalGas in 2027 (i.e., the first full Project buildout year) to determine if these energy utility companies would be able to meet the Project's energy demands.

The Project's need for expanded telecommunication services was analyzed previously in the Initial Study and deemed to be less than significant. Therefore, no further analysis of telecommunications services is included within this Draft EIR. Please refer to Appendix A-2 of this Draft EIR for a copy of the Initial Study and additional information regarding telecommunication services.

Project Design Features

No specific project design features are proposed with regard to electric power and natural gas facilities. However, the Project includes project design features to improve energy efficiency, as set forth in Section 4.6, *Greenhouse Gas Emissions*, of this Draft EIR.

Analysis of Project Impacts

Impact INF-1: The Project could have a potentially significant impact if it would require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Impact Analysis

Electric Power

Construction

Construction activities at the Project Site would require limited and minor quantities of electricity for watering, lighting, power tools and other support equipment. Heavy construction equipment would be powered with diesel fuel. Construction electricity usage would be offset by the reduction

in the existing electricity usage at the Project Site from the removal of the existing buildings. As existing power lines are located in the vicinity of the Project Site, temporary power poles would be installed to provide electricity during Project construction. Existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project Site during construction or demolition. Electricity demand during project construction would be approximately 1.9 percent of the Project's net annual operational electricity consumption, of which would be within the supply and infrastructure capabilities of SCE.[14] Therefore, construction of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

With regard to existing electrical distribution lines, the Applicant would be required to coordinate electrical infrastructure removals or relocations with SCE and comply with site-specific requirements set forth by SCE, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within SCE easements are minimized.

Therefore, construction of the Project is not anticipated to adversely affect the electric power facilities serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

Operation

As reported in Table 4.4-5, *Summary of Annual Energy Use During Project Operation*, in Section 4.4, *Energy*, of this Draft EIR, the Project's annual net increase in operational electricity usage would be approximately 1,794 megawatt-hours (MWh) for the Project. The Project-related increase in annual electricity consumption would represent 0.002 percent of SCE's projected sales in 2027. During peak conditions, the Project would represent 0.002 percent of the SCE estimated system-wide peak load.

The CEC estimates energy forecasts for SCE using socioeconomic and environmental indicators including geographical and climatic factors, population growth, employments rates, transportation electrification, advances in efficiency and conservation, and demand response programs.[15] The CEC estimates that SCE would record system sales of approximately 101,171 GWh in 2027.[16]

The CEC California Energy Demand 2018–2030 Revised Forecast identifies adequate energy resources to support future generation capacity. The Project would not require additional infrastructure (i.e., a substation) beyond proposed utilities installed on-site during construction.

Based on the required load forecast projections by SCE, the utility would be expected to meet the Project's demand, and the Project's operational electricity services and supply and infrastructure impacts would be less than significant and would not require the construction of new energy

[14] The percentage is derived by taking the annual average amount of electricity usage during the construction period (43,767 kWh) and dividing that number by the annual amount of net electricity usage during operation (2,319,787 kWh).

[15] CEC, The California Energy Demand 2021–2035.

[16] CEC, The California Energy Demand 2018–2030, p. 97.

facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

Natural Gas

Construction

Construction activities, including the construction of new buildings and hardscape, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be expected to be supplied to support Project construction activities; thus, there would be no expected demand generated by construction.

The Project would involve installation of new natural gas connections to serve the retail uses of the Project Site.[17] Given that the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to grading/trenching activities in order to place the lines below surface. In addition, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Therefore, construction of the Project would not result in an increase in demand for, or an interruption in the delivery of, natural gas that would affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities. Further, the construction of the Project would reduce the consumption of natural gas at the Project Site during construction activities due to the removal of existing on-site uses and the inclusion of all-electric development except for the retail uses.

Therefore, the construction of the Project is not anticipated to adversely affect the natural gas facilities serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

Operation

As reported in Table 4.4-5, in Section 4.4, *Energy*, of this Draft EIR, the Project would result in a net decrease of approximately 272,201 cf of natural gas per year. Based on the Project's reduction in the total natural gas consumption for the region, ongoing SoCalGas long-range planning efforts to provide natural gas for this service region, and sufficient existing infrastructure, it is expected that SoCalGas' existing and planned natural gas supplies and infrastructure would be sufficient to meet the Project's demand for natural gas. Based on the required load forecast projections by SoCalGas, the utility would be expected to meet the Project's demand and natural gas services, and the Project's operation would not significantly affect the available natural gas supply or distribution infrastructure and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

[17] All other land uses would utilize all-electric appliances and infrastructure.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. Impacts regarding electric power or natural gas facilities were determined to be less than significant.

Cumulative Impacts

Impact Analysis

Cumulative impacts occur when the incremental effects of a project are significant when combined with similar impacts from other related projects in a similar geographic area. As presented in Chapter 3, *Environmental Setting*, of this Draft EIR, Table 3-1, the City has identified 12 related projects located within the vicinity of the Project Site. Of the 12 related projects, eight (8) are located within the City of Culver City and 4 are located within the City of Los Angeles. The geographic context for the analysis of cumulative impacts on electricity is SCE's and LADWP's service areas, and the geographic context for the analysis of cumulative impacts on natural gas is SoCalGas' service area, because the Project and related projects are located within the service boundaries of SCE, LADWP, and SoCalGas.

Electric Power

Construction

With regard to existing electrical distribution lines, related projects, as with the Project, would be required to coordinate electrical infrastructure removals or relocations with SCE and LADWP and comply with site-specific requirements set forth by SCE and LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within their respective utilities' easements are minimized.

Therefore, construction of the Project and related projects is not anticipated to adversely affect the electric power facilities serving the surrounding uses or utility system capacity and would not require the construction of new energy facilities or the expansion of existing facilities, the construction of which could cause significant cumulative environmental effects.

Operation

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SCE and LADWP. As described in CEC's California Energy Demand 2018–2030 Revised Forecast and LADWP's 2017 Power Strategic Long-Term Resource Plan, SCE and LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with SCE's and LADWP's environmental priorities and reliability standards. The 2017 Power Strategic Long-Term Resource Plan and California Energy Demand 2018–2030 Revised Forecast take into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. In addition, LADWP considers projected Los Angeles County building permit amounts when determining its load forecast and would therefore account for the Project's and the related project's electricity demand within its projections.

Development projects within the SCE and LADWP service areas would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Thus, SCE and LADWP consider growth from related projects within their service areas for the need for energy infrastructure, such as new or expanded energy facilities.

Each of the related projects would be reviewed by the local utility provider to identify necessary electricity service connections to meet the needs of their respective projects. In addition, the local utility provider would provide service letters for each related project confirming availability of adequate electricity supplies as part of the total load growth of the regional power system. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project Site area. Related projects would also be required to evaluate electricity demands and coordinate with the local utility provider for providing adequate service, in accordance with future projected supplies, to each of the related project sites. Related projects would be required to obtain evidence of service from SCE and LADWP, or the appropriate utility provider, to ensure that electric service would be available and provided to meet related project demands. Furthermore, the related projects are generally infill projects in a highly urbanized area already served by existing facilities and are generally residential, mixed-use, and commercial projects and not high-energy demand facilities, such as heavy industrial uses.

As such, the Project's contribution to cumulative impacts due to the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable, and cumulative impacts would be less than significant.

Natural Gas

Construction

As stated above, construction activities, including the construction of new buildings and hardscape, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be expected to be supplied to support related projects or Project construction activities; thus, there would be no expected cumulative demand generated by construction.

Operation

Natural gas infrastructure is typically expanded in response to increasing demand and system expansion and improvements by SoCalGas, as needed. Development projects within SoCalGas' service area, including the Project and related projects, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate.

Each of the related projects would be reviewed by SoCalGas to identify necessary natural gas service connections to meet the needs of their respective projects. In addition, SoCalGas would provide service letters for each related project confirming availability of adequate natural gas supplies as part of the total load growth of the regional natural gas system. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the natural gas infrastructure in the Project area. Related projects would also be required to evaluate natural gas demands and coordinate with the local utility provider for providing adequate service, in accordance with future projected supplies, to each of the related project sites. Related projects

would also be required to obtain evidence of service from SoCalGas, or the appropriate utility provider, to ensure that natural gas service would be available and provided to meet related project demands. Furthermore, the related projects are generally infill projects in a highly urbanized area already served by existing facilities and are generally residential, mixed-use, and commercial projects and not high-energy demand facilities, such as heavy industrial uses.

As such, the Project's contribution to cumulative impacts due to the relocation or construction of new or expanded natural gas facilities, the construction or relocation of which could cause significant environmental effects, would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

Mitigation Measures

No mitigation measures are required as impacts would be less than significant.

Level of Significance after Mitigation

Not applicable. Cumulative impacts regarding electric power or natural gas facilities were determined to be less than significant.

CHAPTER 5
Alternatives

5.1 Introduction

Under the California Environmental Quality Act (CEQA), and as indicated in California Public Resources Code (PRC) Section 21002.1(a), the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process intended to consider ways to mitigate or avoid the significant environmental effects of a project.

Guidance regarding the definition of Project alternatives is provided in CEQA Guidelines Section 15126.6(a) as follows:

> *[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*

The CEQA Guidelines indicate that the selection of project alternatives should be based primarily on the ability of the alternative to avoid or substantially lessen significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[1] The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are analyzed.[2]

The project alternatives selected for analysis in an EIR, must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).*

CEQA Guidelines Section 15626.6(e) requires the analysis of a "no project" alternative and, depending on the circumstances, evaluation of alternative location(s) for the project, if feasible.[3] Based on the alternatives analysis, an environmentally superior alternative is to be designated. In

1 CEQA Guidelines Section 15126.6(b).
2 CEQA Guidelines Section 15126.6(f).
3 CEQA Guidelines Sections 15126.6(e), 15126.6(f)(1).

general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.[4]

CEQA Guidelines Section 15126.6(d) states that the EIR is required to provide sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. It further states that, if an alternative would cause one or more significant effects in addition to those that would be caused by the proposed project, the alternatives analysis need not discuss those effects in the same level of detail as the significant effects of the project are discussed.

5.2 Objectives of the Project

Chapter 2, *Project Description*, of this Draft EIR, sets forth the Project Objectives defined by the Applicant and the Lead Agency. The underlying purpose of the Project is to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, and retail uses, as well as publicly accessible open spaces, to revitalize the Project Site, promote walkability, and enhance the City's economic base. The Project's specific objectives are as follows:

1. Develop new, high-quality infill housing with a diverse mix of residential dwelling types, containing both market-rate and affordable units.
2. Fulfill the City's housing goals by improving access to quality housing for all members of the community through the provision of affordable housing in proximity to open space and public transportation, while maintaining access to a wide range of services and goods.
3. Provide open space amenities that will enhance existing site conditions through publicly accessible open space (Hannum Plaza), as well as a unified landscape design with common open space areas for Project residents.
4. Provide for a mix of commercial and residential uses to promote pedestrian activity, reduce vehicle trips and vehicle miles traveled, and encourage active transportation while maintaining appropriate levels of vehicle parking.
5. Activate the Hannum Avenue and Buckingham Parkway frontages by providing street-oriented retail and residential uses, and a landscaping program that further enhances the pedestrian experience.
6. Utilize the state's Density Bonus laws to increase the permitted density at the Project Site in order to provide housing at a variety of income levels that will assist the City in meeting its Regional Housing Needs goals.
7. Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including a building form with vertical and horizontal breaks, generous setbacks, light materiality, landscape features, and active ground floor uses with open space amenities.
8. Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.

[4] CEQA Guidelines Section 15126.6(e)(2).

5.3 Overview of Alternatives Selected for Analysis

As stated above, the intent of the alternatives analysis is to determine if there are feasible alternatives that would avoid or substantially reduce the significant impacts of a proposed project. Based on the analysis in Chapter 4, *Environmental Impacts Analysis*, of this Draft EIR, implementation of the Project would result in significant construction impacts that cannot be feasibly mitigated to a less-than-significant level with regard to Project-level on-site construction noise if an extended hours permit was not obtained by the Project because they would occur outside of the City's allowable construction hours. The Project would not result in any significant operational impacts. The following alternatives to the Project have been selected to inform evaluation of the Project in light of the significant environmental impacts of the Project, the objectives established for the Project (listed above), the feasibility of the alternatives considered, public input received during the scoping period, and the existing zoning designation on the Project Site:

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Existing Zoning/Office Alternative
- Alternative 3: Reduced Project Alternative

Alternative 1 is a No Project/No Build Alternative pursuant to CEQA Guidelines Section 15126.6(e). Under the No Project/No Build Alternative, the Project would not be developed and existing on-site uses would remain as under the existing conditions.

In addition to the No Project/No Build Alternative, two development alternatives are included for analysis in this Draft EIR. Two alternatives (Alternatives 2 and 3) would reduce the amount of development and density that would reduce the total square footage (sf) of the proposed new uses as compared to the Project. The three alternatives, including the No Project/No Build Alternative, are listed below and described in more detail in this chapter. The alternatives considered for evaluation are compared to the Project, as summarized in **Table 5-1**, *Overview of the Project Alternatives*.

5.4 Alternatives Considered and Rejected

CEQA Guidelines Section 15126.6(c) describes that an EIR should identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives that have been considered and rejected from detailed consideration are discussed below.

TABLE 5-1
OVERVIEW OF THE PROJECT ALTERNATIVES

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Existing Zoning/ Office Alternative	Alternative 3: Reduced Density Alternative
Retail Use	5,600 sf	—	—	5,600 sf
Affordable Units	27 Units	—	—	—
Total Residential Units	309 Units	—	—	223
Residential Square Footage	356,996 sf	—	—	222,000
Office Use	—	30,672 sf (existing)	190,000 sf	—
Total Square Footage	362,593 sf	30,672 sf (existing)	190,000 sf	227,600 sf
Maximum Building Height	78 feet (6-stories)	Same as existing (~20 ft, 2-stories)	56 feet (4-stories)	56 feet (5-stories)
Publicly Accessible Amenity Area	7,507 sf	—	—	2,500 sf
Excavation Depth	27 feet bgs (2 levels of subterranean parking)	N/A	27 feet bgs (2 levels of subterranean parking)	15 feet bgs (1 level of subterranean parking)
Parking Spaces	428 spaces	Same as existing	380 spaces	212 spaces

NOTE: bgs = below ground surface
SOURCE: ESA, 2024.

5.4.1 Alternative Off-Site Location

CEQA does not require that analysis of alternative sites always be included in an EIR. However, if all the surrounding circumstances make it reasonable to consider an alternative site, then an alternative location should be considered and analyzed in the EIR. Per CEQA Guidelines Section 15126.6(f)(2), in making the decision to include or exclude analysis of an alternative site, the "key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR." If no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion. According to CEQA Guidelines Sections 15126.6(f)(1) and (f)(2), among the factors that may be considered when addressing the feasibility of an alternative site are general suitability, economic viability, availability of infrastructure, general plan consistency, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. The above is in light of the fact that, per CEQA Section 15126.6(a), "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project."

The Project's significant and unavoidable impacts, including Project-level on-site construction noise if an extended hours permit was not obtained by the Project, would be expected to occur if the Project were developed at other available locations in the area as the noise generation would be similar to the Project and would impact potential nearby sensitive receptors similarly. Therefore, moving the

location of the Project to another site would not necessarily reduce the nature and extent of such impacts. Accordingly, given the nature of the Project's significant unavoidable impacts, evaluation of an alternate location was not pursued as it would be likely to shift these impacts to another location rather than helping to avoid or substantially lessen the significant effects of the Project.

In addition, the Applicant does not have ownership or control of any other suitable site within Culver City designated for mixed-use development by the City's adopted 2021-2029 Housing Element and draft Land Use Element under consideration as part of Culver City's General Plan 2045 Update, which would permit and support the Project's proposed mix of uses. Therefore, the flexibility to develop a similar project on the same or similar scale at another location is not feasible.

For the reasons stated above, an off-site location alternative is not expected to meaningfully reduce the significant and unavoidable impacts of the Project, would likely not meet key Project objectives related providing housing at a variety of income levels that will assist the City in meeting its Regional Housing Needs goals, and a feasible alternate location for the Project has not been identified. Accordingly, an off-site alternative has not been carried forward for further analysis.

5.4.2 Alternatives to Further Reduce or Avoid Significant Noise Impacts during Construction

As discussed in Section 4.8, *Noise*, of this Draft EIR, the Project would result in significant and unavoidable impacts related to Project-level on-site construction noise impacts. No additional mitigation measures are available to reduce these impacts to a less-than-significant level.

Alternatives, including those that would reduce construction duration or Project scale/intensity, were considered to further reduce or avoid these significant and unavoidable impacts. Based on the thresholds upon which the construction noise analysis is based, a substantial reduction in the intensity and duration of the peak daily construction activities would be necessary to further reduce construction-related impacts. It is noted that the Project's significant and unavoidable impacts would only occur during construction activities between 7:00 a.m. and 8:00 a.m. Monday to Friday and 7:00 a.m. to 9:00 a.m. on Saturdays if an extended hours permit was not obtained by the Project because they would occur outside of the City's allowable construction hours. Thus, significant construction noise impacts within the Project Site would be expected to occur with most reduced development scenarios because construction activities are inherently disturbing, and the peak construction activity would be similar as the Project during the requested extended construction working hours, assuming similar extended construction hours would occur. The Project's proposed extended hours would allow for a 7:00 a.m. daily start Monday through Saturday during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction. The extended construction hours are being requested over the course of approximately four (4) months during construction. The other construction phases would occur per the allowable standard Culver City Municipal Code (CCMC) permitted construction hours. Should the extended hours not be granted, any reduction in the intensity and duration of daily construction activities would increase the overall duration of the construction period. Also, the early start time for the listed construction activities will reduce the impacts of traffic during peak hours from heavy trucking.

Furthermore, a large contributor to the need for extended construction hours is related to the concrete trucks needed for building foundations. To construct portions of a building foundation, concrete must be continuously poured in a strategic manner over a short period of time considering its drying time and need to properly cure without cracking and provide proper building support. Breaking up the concrete pours for specific sections over multiple days in a given area is not a feasible option to properly construct a building foundation, as such breaks in the concrete pours would not provide a stable foundation built to applicable building code and regulatory requirements. Thus, reducing or eliminating the number of concrete trucks in a given construction phase is not a feasible alternative to avoid the need for extended construction hours.

Therefore, additional alternatives to further reduce or avoid the Project's short-term noise impacts during construction were rejected as infeasible based on the inability to avoid significant environmental impacts under a reasonable construction schedule.

5.5 Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), three feasible alternatives to the Project are evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified in Chapter 2, *Project Description*, of this Draft EIR would be substantially attained by the alternative. The evaluation of each of the alternatives follows the format described below:

- A description of the alternative.
- The environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental issue area analyzed in the EIR are described. Where applicable, the evaluation is divided between temporary impacts that would occur during the Project's construction phase and impacts that would occur during the Project's operational phase.
- Environmental impacts of the alternative and the Project are compared for each environmental issue area evaluated in Chapter 4, *Environmental Impacts Analysis*, the Draft EIR. Where the impact of the alternative would be less adverse than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would be more adverse than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar." The evaluation also documents whether compared to the Project, an impact would be entirely avoided, whether a significant impact under the Project could be reduced to a less-than-significant level in the alternative, or whether a significant unavoidable impact under the alternative would be feasible to be mitigated to a less-than-significant level.
- The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives would be attained by the alternative.

At the end of the section, a comparison of the alternative's impacts and consistency with Project Objectives is provided. Pursuant to CEQA Guidelines Section 15126.6(e)(2) an Environmentally Superior Alternative is identified. The comparative impacts of the Project and the alternatives are summarized in Table 5-5 below.

5.5.1 Alternative 1: No Project/No Build Alternative

Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative (Alternative 1) for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, "in certain instances, Alternative 1 means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1 assumes that no new development would occur within the Project Site. As mentioned in Chapter 2, *Project Description*, of this Draft EIR, the Project Site is currently improved with an approximately 30,672 square foot, two-story office building built in the late 1970s. Under this alternative, the Project Site would continue to operate as an office building under existing conditions.

Environmental Impacts

Aesthetics

Applicable Zoning and Other Regulations Governing Scenic Quality

No new development would occur under Alternative 1 and, as such, no conflict with regulations that govern scenic quality would occur. Accordingly, because Alternative 1 would not change any conditions at the Project Site, no impacts would occur. As such, impacts under Alternative 1 would be less than the Project.

Supplemental Shading Analysis

Under Alternative 1, no new development would occur and, as such, no new shading would occur beyond existing conditions. No shading currently occurs on any adjacent shade sensitive uses, such as the Fox Hills Parkette. Accordingly, because Alternative 1 would not change any shading conditions at the Project Site, no impacts would occur. As such, impacts under Alternative 1 would be less than the Project.

Air Quality

Conflict with Air Quality Management Plan

While Alternative 1 would not involve any new construction, under this alternative, the existing office building is assumed to be fully occupied with office uses as it is currently fully leased. Since new development would not occur, Alternative 1 would not generate new construction emissions, and operational emissions from the existing office uses would continue to be nominal. As such, Alternative 1 would not cause the Air Basin's criteria pollutant emissions to worsen so as to impede the objectives of the Air Quality Management Plan (AQMP). As such, Alternative 1 would avoid the Project's less-than-significant impacts. Thus, impacts with regard to conflict with an Air Quality Management Plan would be less under Alternative 1 than the Project.

Cumulative Considerable Increase in Criteria Pollutants/Violation of Air Quality Standards

Construction

Alternative 1 would not involve construction or generate any new criteria pollutants related to construction. Accordingly, because Alternative 1 would not result in any new emissions generation,

no construction-related air quality impacts would occur. As such, Alternative 1 would avoid the Project's less-than-significant impacts. Thus, impacts with regard to air quality thresholds during construction would be less under Alternative 1 than the Project.

Operation

As Alternative 1 would include the continued operation of the existing office building, no increased emissions could occur over existing conditions. As such, Alternative 1 would avoid the Project's less-than-significant impacts. Thus, impacts with regard to a cumulatively considerable increase in criteria pollutants and violations of air quality standards would be less under Alternative 1 than the Project.

Sensitive Receptor Exposure to Pollutant Concentrations

Localized Emissions

Construction

Alternative 1 would not involve any construction at the Project Site. Accordingly, Alternative 1 would not generate any localized emissions and is considered to have no impact related to localized emissions during construction. As such, Alternative 1 would avoid the Project's less-than-significant impacts. Thus, impacts with regard to sensitive receptor exposure to pollutant concentrations during construction would be less under Alternative 1 than the Project.

Operation

As Alternative 1 would include the continued operation of the existing office building, no increased emissions could occur over existing conditions. As such, Alternative 1 would avoid the Project's less-than-significant impacts. Thus, impacts with regard to sensitive receptor exposure to pollutant concentrations during operation would be less under Alternative 1 than the Project.

Carbon Monoxide Hotspots

As Alternative 1 would include the continued operation of the existing office building, traffic would be similar to existing conditions. Alternative 1 would not generate new emissions that would contribute to carbon monoxide (CO) hotspots and is considered to have no impact related to CO hotspots. As such, Alternative 1 would avoid the Project's less-than-significant impacts. Thus, impacts with regard to CO hotspots would be less under Alternative 1 than the Project.

Toxic Air Contaminants

Construction

Alternative 1 would not involve any construction or new development at the Project Site compared to existing conditions. Accordingly, Alternative 1 would not generate any toxic air contaminant (TAC) emissions during construction and is considered to have no impact related to TAC emissions. The Project would result in potentially significant impacts related to TAC during construction activities. That is, maximum unmitigated health risk impacts to sensitive residential receptors would exceed the applicable South Coast Air Quality Management District (SCAQMD) cancer risk significance threshold of 10 per million. However, with implementation of Mitigation Measure AQ-1 (Tier 4 Construction Equipment), the maximum cancer risk and hazard index for sensitive receptors would be below the SCAQMD significance thresholds. As such Project impacts would be less than significant with mitigation. Because Alternative 1 would involve no construction activities,

Alternative 1 would avoid the Project's less-than-significant impacts with mitigation. Thus, impacts with regard to TACs during construction would be less under Alternative 1 than the Project.

Operation

As Alternative 1 would include the continued operation of the existing office building, no increased TAC emissions could occur over existing conditions. As such, Alternative 1 would avoid the Project's less-than-significant impacts. Thus, impacts with regard to TACs during operation would be less under Alternative 1 than the Project.

Cultural Resources

Archaeological Resources

Alternative 1 would not require any excavation activities that would potentially encounter previously undiscovered archaeological resources. Accordingly, because Alternative 1 would involve no excavation or ground disturbance, it would have no impact on archaeological resources. As such, Alternative 1 would avoid the Project's less-than-significant impacts (after Mitigation Measures ARC-1 to ARCH-3) related to an adverse change in the significance of an archaeological resource. Thus, impacts related to archaeological resources would be less under Alternative 1 than the Project.

Energy

Efficient Energy Consumption

Alternative 1 would not involve any construction at the Project Site and, as such, would have no impact relative to construction-related energy resources such as diesel, gasoline, and electricity. Construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, and, as such, energy impacts would be less than significant. Because Alternative 1 would have no impact related to construction-related energy demand, construction-related impacts would be less under Alternative 1 as compared to the Project's less-than-significant impact.

Alternative 1 would not involve any new or additional use of the Project Site compared to existing conditions and, as such, would have no impact relative to energy resources. Operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, and, as such, energy impacts would be less than significant. Operational impacts would be less under Alternative 1 as compared to the Project's less-than-significant impact. However, it is noted that the existing office building on the Project Site would not be as energy efficient as the proposed building under the Project.

Conflict with Plans for Renewable Energy or Energy Efficiency

As no new construction is proposed under Alternative 1 and given the similar operational energy use under this alternative, Alternative 1 would have no impact related to conflicts with plans for renewable energy and energy efficiency. The Project's design would comply with existing energy standards and incorporate project design features to reduce energy consumption. Therefore, the Project would not conflict with energy conservation plans and impacts would be less than significant. Because Alternative 1 would have no impact related to conflicts with plans for renewable energy and energy efficiency, impacts would be less under Alternative 1 as compared to

the Project's less-than-significant impact. However, it is noted that the existing office building on the Project Site would not be as energy efficient as the proposed building under the Project.

Geology and Soils

Paleontological Resources

Alternative 1 would not require any construction activities; therefore, it would have no potential to encounter previously undiscovered paleontological resources. Accordingly, because Alternative 1 would involve no excavation or ground disturbance, it would have no impact on paleontological resources. As such, Alternative 1 would avoid the Project's less-than-significant impacts (after Mitigation Measures GEO-1 to GEO-4) related to potentially destroying paleontological resources. Thus, impacts related to paleontological resources would be less under Alternative 1 than the Project.

Greenhouse Gas Emissions

Alternative 1 would not include the construction of any new buildings or provide for any changes in on-site occupancy of office building on the Project Site. Alternative 1 represents an absence of new development and would neither generate new GHG emissions nor conflict with applicable GHG reduction plans and policies. Since Alternative 1 would not provide for any increase or new use that would generate additional GHG emissions, Alternative 1 would have no GHG emissions impact. As such, Alternative 1 would avoid the Project's less than significant GHG impacts. Thus, impacts with regard to GHG emissions and conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs would be less under Alternative 1 than the Project.

Land Use and Planning

Alternative 1 would not change the existing land use. The existing parking lot, office use, and zoning/land use designations would remain. As no physical changes would occur on the Project Site, Alternative 1 would not conflict with any adopted plans, policies or regulations related to avoiding or reducing environmental impacts. Although Alternative 1 would not further regional and local policies applicable to the Project Site with the City of Culver City, such as providing new housing, enhancing pedestrian activity, and increasing transit use, this alternative would have no impacts with respect to conflicts with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. As such, Alternative 1 would avoid the Project's less-than-significant land use and planning impacts. Thus, impacts with regard to land use and planning would be less under Alternative 1 than the Project.

Noise

Substantial Temporary or Permanent Increase in Ambient Noise Levels

Construction – On-Site

Alternative 1 would not involve any construction activities, and, therefore, no on-site construction noise impacts would occur. As such, Alternative 1 would avoid the Project's potential Project-level significant and unavoidable on-site construction noise impacts at nearby noise-sensitive receptor locations should construction activities occur outside the City's permitted hours without an Approval for Extended Hours of Construction. Thus, impacts related to construction noise would be less under Alternative 1 than the Project.

Construction – Off-Site

Alternative 1 would not involve any construction activities, and, therefore, no off-site construction noise (via mobile sources) impacts would occur. As such, Alternative 1 would avoid the Project's construction off-site noise less-than-significant impacts. Thus, impacts related to off-site construction noise would be less under Alternative 1 than the Project.

Operation – On-Site

Occupancy and activity at the Project Site would remain as under conditions with Alternative 1. Thus, no new on-site noise impacts would occur under Alternative 1. As such, Alternative 1 would avoid the Project's less than significant operational on-site noise impacts. Thus, impacts related to on-site operational noise would be less under Alternative 1 than the Project.

Operation – Off-Site

Occupancy at the Project Site would remain as under conditions with Alternative 1. Accordingly, off-site noise from mobile sources would remain similar to existing conditions. Thus, no new off-site noise impacts would occur under Alternative 1. As such, Alternative 1 would avoid the Project's less than significant operational off-site noise impacts. Thus, impacts related to on-site operational noise would be less under Alternative 1 than the Project.

Vibration

Construction

Alternative 1 would not involve any new development or construction, and, therefore, no construction vibration impacts would occur. As such, Alternative 1 would avoid the Project's less-than-significant construction vibration impacts to nearby vibration sensitive receptor locations. Thus, impacts related to construction vibration would be less under Alternative 1 than the Project.

Operation

Occupancy and activity at the Project Site would remain as under conditions with Alternative 1. Thus, no new operational vibration impacts would occur under Alternative 1. As such, Alternative 1 would avoid the Project's less than significant operational vibration impacts. Thus, impacts related to operational vibration would be less under Alternative 1 than the Project.

Population and Housing

Induce Substantial Unplanned Population Growth

Alternative 1 would not involve any new construction or additional occupancy or employment opportunities compared to existing conditions, would have no impact related to population and housing, and would not contribute to SCAG or City housing growth objectives. Project impacts related to unplanned population growth under the Project during long-term operation would be less than significant. However, because Alternative 1 would result in no direct or indirect population growth, impacts would be less than the Project's less-than-significant impacts.

Public Services

Fire Protection

Under Alternative 1, no increased demand for fire protection and emergency medical services would occur compared to existing conditions and there would be no effect on emergency response

times or emergency access, as would occur under the Project from construction activities and project operations. While the Project would involve construction activities and intensify the use of the Project Site, impacts on fire protection and emergency access would be less than significant with incorporation of Project Design Features and compliance with applicable regulatory requirements. Further, under the Project, the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for physical impacts associated with construction of fire facilities are considered less than significant. Alternative 1 would result in no impacts to fire protection and emergency access. Therefore, the impact of Alternative 1 on fire protection and emergency access would be less as compared to the Project's less-than-significant impact.

Police Protection

Alternative 1 would not change existing conditions or increase the level of activity at the Project Site and therefore would not alter demand for police protection services or affect emergency response times. In contrast, the Project would result in construction and operational activities that could increase demand for police protection services. These impacts associated with the Project would be less than significant as the Project would incorporate Project Design Features POL-PDF-1 and POL-PDF-2, which provide on-site security features for construction and operation. Further, under the Project, the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for physical impacts associated with construction of fire facilities are considered less than significant. Alternative 1 would result in no impacts to police protection services. Therefore, the impact of Alternative 1 on police protection services would be less as compared to the Project's less-than-significant impact.

Schools

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions and would not increase student enrollments in the area. The Project, which would increase enrollments at the serving schools, would be required to pay development fees for schools to the Culver City Unified School District (CCUSD) prior to issuance of building permits. Under Government Code section 65995 and 65996, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, the Project's impact on schools would be less than significant. However, because Alternative 1 would not result in any new student enrollment, impacts associated with schools would be less than the Project's less-than-significant impact.

Parks and Recreation

Alternative 1 would not involve any new construction or additional occupancy or use of the Project Site compared to existing conditions and would not increase residential population or increase use of parks and recreational facilities. Alterative 1 would have no impact on parks and recreation facilities. Under the Project, with the provision of on-site open space and recreational facilities, in addition to the required payment of applicable fees to the City, the Project would meet CCMC open space and parkland requirements and would result in less-than-significant impacts on parks and recreational facilities. However, because Alternative 1 would not result in any changes to current parks usage, impacts would be less than the Project's less-than-significant impact.

Transportation

Conflict with Programs, Plans, Ordinances, or Policies Addressing the Circulation System, Transit, Roadways, Bicycle, and Pedestrian Facilities

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions and, as such, would have no impact regarding conflicts with programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities. While the Project would introduce new uses that would generate new sources of traffic and provide new transportation features within the Project Site, the Project would not result in any substantial conflicts with programs, plans, ordinances or policies addressing transportation issues and, therefore, impacts would be less than significant. However, because Alternative 1 would have no impact in this regard as it neither implements nor conflicts with any transportation plan objectives, impacts would be less than the Project's less-than-significant impact

Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. Thus, no impacts regarding vehicle miles traveled (VMT) would occur under Alternative 1. The Project's daily per capita resident and employee VMT would be below the City's thresholds and, therefore, impacts would be less than significant. However, because Alternative 1 would not generate any new vehicle trips or VMT, impacts would be less than the Project's less-than-significant impact.

Design Hazards

Alternative 1 would not generate any new vehicle trips or change the transportation design features in and around the Project Site. Alternative 1 would result no impacts regarding geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. The Project would reconfigure the driveways accessing the Project Site. However, no unusual or new obstacles or features are included in the Project design that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians. The Project would have a less-than-significant impact regarding hazards due to geometric design features or incompatible uses. However, because Alternative 1 would have no impact with respect to geometric design hazards, impacts would be less than the Project's less-than-significant impact.

Emergency Access

Alternative 1 would not generate any new vehicle trips or change the transportation design features in and around the Project Site. Alternative 1 would result no impact regarding emergency access. The Project would reconfigure the driveways accessing the Project Site. However, all driveways would be reviewed by the Culver City Fire Department to confirm adequate emergency vehicle access is provided per applicable CCMC requirements. The Project would have a less-than-significant impact regarding emergency access. However, because Alternative 1 would have no impact with respect to emergency access, impacts would be less than the Project's less-than-significant impact.

Tribal Cultural Resources

Alternative 1 would not involve any ground disturbance or excavation activities that would potentially encounter previously undiscovered tribal cultural resources and, as such, would have no

impact related to such resources. Excavation for the Project would be required for subterranean parking and building foundations. Potentially significant impacts related to tribal cultural resources during Project construction would be reduced to less than significant with Mitigation Measures TCR-MM-1 (Native American Monitor), TCR-MM-2 (monitoring logs), and TCR-MM-3 (halting of construction activity In the event that a prehistoric/Native American resource is unearthed). However, because Alternative 1 would have no impact related to tribal cultural resources, impacts would be less than the Project's less-than-significant impact (with mitigation).

Utilities and Service Systems

Water Supply

Water Infrastructure

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. No new impacts to water infrastructure would occur under Alternative 1. Under the Project, the existing Golden State Water Company (GSWC) water infrastructure has adequate capacity and pressure to meet the Project's domestic and fire flow requirements. Only minor connections to existing water supply lines would be necessary to support the Project. As such, Project operation would not require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects. Project operational impacts related to water infrastructure would be less than significant. However, because Alternative 1 would not generate any new water demand, impacts would be less than the Project's less-than-significant impact.

Water Supply

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. No impacts to water supply would occur under Alternative 1. Under the Project, GSWC has sufficient water supplies to serve the Project and, therefore, Project water supply impacts would be less than significant. However, because no change or increase in water demand over existing conditions would occur under Alternative 1, water supply impacts would be less than the Project's less-than-significant impact.

Electric Power, Natural Gas, Telecommunications Facilities

While Alternative 1 would not construct new buildings, under this alternative the existing office uses would continue to be fully occupied and operational. The electric power and natural gas infrastructure needs required under this alternative would be the same as under existing conditions. Accordingly, impacts relative to electric power and natural gas infrastructure would be less than significant. Thus, impacts with regard to electric power and natural gas infrastructure would be less under Alternative 1 than the Project.

Alternative 1 would not involve any new development that would increase existing electricity and natural gas demand or require additional energy infrastructure. Thus, no new impacts to electricity and natural gas infrastructure would occur under Alternative 1. The Project would result in an increase in operational electricity demand, but a decrease in natural gas demand. The Project's electrical demand would be within Southern California Edison's (SCE) projected electricity supplies. Also, the Project's natural gas demand would be within SoCal Gas's projected natural gas supplies. With the exception to connections to existing utility lines, the Project would not require

the construction of new energy facilities or the expansion of existing facilities. Under Alternative 1, the Project Site's existing on-site electrical and natural gas demands would continue. However, because Alternative 1 would not change existing conditions and would not result in any new electrical power or natural gas demand, impacts related to utility supply and infrastructure would be less than the Project 's less-than-significant impact with respect to the wasteful, inefficient, and unnecessary consumption of energy.

Relationship of the Alternative to Project Objectives

As described above, under Alternative 1 the Project Site would continue to operate as an office building as under existing conditions. Thus, Alternative 1 does not propose redevelopment of the Project Site and would not meet any of the eight Project objectives, which are listed below:

1. Develop new, high-quality infill housing with a diverse mix of residential dwelling types, containing both market-rate and affordable units.
2. Fulfill the City's housing goals by improving access to quality housing for all members of the community through the provision of affordable housing in proximity to open space and public transportation, while maintaining access to a wide range of services and goods.
3. Provide open space amenities that will enhance existing site conditions through publicly accessible open space (Hannum Plaza), as well as a unified landscape design with common open space areas for Project residents.
4. Provide for a mix of commercial and residential uses to promote pedestrian activity, reduce vehicle trips and vehicle miles traveled, and encourage active transportation while maintaining appropriate levels of vehicle parking.
5. Activate the Hannum Avenue and Buckingham Parkway frontages by providing street-oriented retail and residential uses, and a landscaping program that further enhances the pedestrian experience.
6. Utilize the state's Density Bonus laws to increase the permitted density at the Project Site in order to provide housing at a variety of income levels that will assist the City in meeting its Regional Housing Needs goals.
7. Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including a building form with vertical and horizontal breaks, generous setbacks, light materiality, landscape features, and active ground floor uses with open space amenities.
8. Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.

5.5.2 Alternative 2: Existing Zoning Alternative

Description of the Alternative

With development under the Existing Zoning Alternative (Alternative 2), the Project Site would be developed in accordance with the existing General Plan Land Use designation of Regional Center and existing zoning designation of Commercial Regional Business Park (CRB) for the Project Site. It is acknowledged that the draft Land Use Element under consideration as part of Culver City's General Plan 2045 Update includes a draft Land Use Map and Land Use designations with

appropriate draft densities. The Project Site's draft land use designation and density is Mixed-Use High and 100 dwelling units per acre, consistent with the City's adopted 2021-2029 Housing Element preferred designation and density.

Under this Alternative, the existing 30,672 square foot two-story office building built in the 1970s would be replaced with a modern 190,000 square foot, 4-story (56 feet) office building. There would be 380 parking spaces for the office employees and guest parking. The amount and extent of excavation [approximately 51,400 cubic yards and 27 feet below ground surface (bgs)] required for subterranean parking would be generally similar to the Project. This Alternative would provide no retail uses or public open space as compared to the Project.

As with the Project, Alternative 2 would require the demolition of the existing office building and associated paved surface parking areas on the Project Site. Although demolition and excavation would be largely similar to the Project, with an approximate 47 percent reduction in overall building square footage (362,596 sf vs 190,000 sf) proposed under Alternative 2, the overall duration of the building construction phase would be reduced by approximately 50 percent from 17 months to 9 months. Thus, overall construction under Alternative 2 would be approximately 22 months, as opposed to 30 months under the Project.

Environmental Impacts

Aesthetics

Applicable Zoning and Other Regulations Governing Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan. Alternative 2 would be developed in accordance with all applicable regulations as part of the existing zoning designation of Commercial Regional Business Park (CRB) for the Project Site. Similar to the Project, Alternative 2 redevelop the site with a high-quality new building subject to design review by the City. Alternative 2 would implement project design features that would require mechanical, electrical, and roof top equipment (including heating, ventilation, and air conditioning (HVAC) systems), as well as building appurtenances, to be integrated into the architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way. Compared to the Project, the overall massing and height of the building would be smaller and shorter, respectively. As with the Project, Alternative 2 would include a landscape and street tree program that meets City requirements along Hannum Avenue and Buckingham Parkway. However, this Alternative would not include a public plaza along Hannum Avenue, thus, the extent of streetscape, landscaping and heightened pedestrian activity would be less than the Project. Despite the aesthetic variations between the Project and Alternative 2, both would comply with applicable CCMC regulations that govern scenic character, such as building heights, setbacks, and screening. As such, neither the Project nor Alternative 2 would conflict with the policies of the CCMC that regulate scenic quality and impacts would be less than significant. When compared to the Project, impacts related to conflicting with regulations that govern scenic quality under Alternative 2 would be similar to the Project.

Supplemental Shading Analysis

Under Alternative 2, the proposed office building would be 4-stories (56 feet) over two levels of subterranean parking as compared to the Project's 6-story (up to a height of 78-feet) over two levels of subterranean parking mixed-use building. Under the Project, redevelopment of the Project Site would add limited incremental shadows to the Fox Hills Parkette during the winter season in the afternoon hours, and not shade any portion of the residential uses across Buckingham Parkway year around. Given the Project's limited shading of off-site routinely usable outdoor spaces, shading would not be an adverse effect of the Project's implementation. Under Alternative 2 with a reduced building height, there would be no shading of the Fox Hills Parkette or any portion of the residential uses across Buckingham Parkway year around. The extent of shadows cast by Alternative 2 would be less than the Project, with neither the Project nor Alternative 2 substantially affecting any off-site shade sensitive uses.

Air Quality

Conflict with Air Quality Management Plan

Similar to the Project, Alternative 2 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 2 would be consistent with the goals of SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to Connect SoCal, and growth projections in the 2016 AQMP, since the growth would occur in consistent with the existing zoning designation. As with the Project, Alternative 2 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 2 would also be consistent with applicable goals, objectives, and policies of the City of Culver City General Plan and Mandatory Green Building Program that support and encourage reducing single occupancy vehicle trips and VMT. As with the Project, Alternative 2 would develop a TDM program to reduce the amount single-occupancy vehicle trips and encourage use of alternative transportation. For all of these reasons, impacts under Alternative 2 with respect to conflicting or obstructing with AQMPs would be less than significant. When compared to the Project, impacts related to conflicting with the AQMP under Alternative 2 would be similar to the Project.

Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

Construction

As with the Project, Alternative 2's construction phases have the potential to generate daily emissions that would exceed the SCAQMD air quality standards through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities, such as the application of paint and other surface coatings. The maximum daily regional emissions under Alternative 2 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, regional construction emissions under Alternative 2 would not exceed SCAQMD numerical regional construction emissions significance thresholds and impacts would be less than significant. However, Alternative 2 would reduce the scale of development (or building square footage by approximately 47 percent compared to the Project and, thus, would reduce the overall building construction phase duration by approximately 8 months. As Alternative 2 would reduce construction duration, impacts

with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

Operation

During operation, Alternative 2 would generate emissions associated with vehicle trips, heating, lighting, other electric requirements, and architectural coatings. Similar to the Project, Alternative 2 would incorporate Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings. While there would be a reduction in the size of the building scale compared to the Project, Alternative 2 would generate more daily VMT than the Project resulting in higher mobile source emissions which is a primary factor in assessing regional emissions. While Alternative 2 would generate fewer daily trips compared to the Project (1,197 vs. 1,462 trips), Alternative 2's daily VMT would be approximately 13% higher than the Project (11,874 vs. 10,504 VMT).[5] As such, mobile source regional emissions would be greater under this Alternative. Both the Project and Alternative 2's regional emissions would be well below the applicable SCAQMD daily impact for VOC, NO_X, CO, SO_X, PM10, and PM2.5, and emissions related to air quality standards would be less than significant. Overall, despite Alternative 2 being developed at a lower intensity than the Project, since its mobile source regional emissions would be higher with a higher VMT than the Project, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be greater under Alternative 2 than the Project.

Sensitive Receptor Exposure to Pollutant Concentrations

Localized Emissions

Construction

As with the Project, Alternative 2's construction phases have the potential to generate daily emissions that would exceed the SCAQMD air quality standards through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities, such as the application of paint and other surface coatings. The maximum daily localized emissions under Alternative 2 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, localized construction emissions under Alternative 2 would not exceed SCAQMD numerical localized construction emissions significance thresholds and impacts would be less than significant. However, Alternative 2 would reduce the scale of development (or building square footage by approximately 47 percent compared to the Project and, thus, would reduce the overall building construction phase duration by approximately 8 months. As Alternative 2 would reduce construction duration, impacts with respect to construction-related localized emissions would be less than the Project.

Operation

As with the Project, Alternative 2 would generate localized emissions from area sources located on-site, such as landscaping equipment, architectural coating, and use of consumer products. Similar to the Project, Alternative 2 would incorporate Project Design Feature GHG-PDF-1 (Green

[5] See Appendix K, Alternatives Documentation, of the Draft EIR for supplemental information regarding trips and VMT for the Project alternatives.

Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings. Also, both the Project and Alternative 2 would comply with the Title 24 (2022) building energy efficiency standards, CALGreen Building Code, and the Culver City Mandatory Green Building Program. Both the Project and Alternative 2's localized emissions would be well below the applicable SCAQMD daily impact for NO_X, CO, PM10, and PM2.5, and emissions related to sensitive receptor exposure to pollutant concentrations would be less than significant. However, the reduction in building floor area under Alternative 2 would reduce daily operational localized emissions, such as those from consumer product usage, and architectural coatings usage. Also, it can be expected that less landscaping would be provided under Alternative 2 than the Project, so localized emissions associated with landscaping equipment would also decrease compared to the Project. Accordingly, impacts under Alternative 2 with respect to localized operational emissions would be less than the Project.

Carbon Monoxide Hotspots

Vehicle trips would be fewer under Alternative 2 than the Project. As with the Project, Alternative 2 would not cause or contribute considerably to the formation of CO hotspots, and impacts would be less than significant. However, because Alternative 2 would reduce the Project's daily vehicle trips, impacts would be less than the Project.

Toxic Air Contaminants

Construction

Under Alternative 2, as with the Project, temporary TAC emissions associated with diesel particulate matter (DPM) emissions from heavy construction equipment would occur during construction activities. The Project Site is not located within 500 feet of a freeway, 1,000 feet from a major service and maintenance rail yard or distribution center, or 500 feet of a dry cleaner; therefore, existing sources of TAC emissions are not located within the SCAQMD's screening distances of the future employees and visitors to the Project Site. Alternative 2 would comply with the California Air Resources Board (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; compliance with these CARB regulations would minimize emissions of TACs during construction. In addition, Alternative 2 would be required to implement Mitigation Measure AQ-MM-1, which would have co-benefits of reducing emissions of PM10 and PM2.5, which are correlated to DPM emissions, from heavy-duty diesel construction equipment. As with the Project, Alternative 2 would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. As Alternative 2 would reduce the duration of construction activities, impacts under Alternative 2 would be less than the Project.

Operation

Alternative 2, nor the Project, would include uses that generate a significant number of diesel emissions, such as a truck stop or warehouse distribution uses. As such, operations under both the Project and Alternative 2 would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance. Furthermore, trucks during operation of the Project and Alternative 2 would be required to comply with the applicable provisions of 13 California Code of Regulations (CCR), Section 2025 (Truck and Bus regulation) to minimize and reduce PM10, PM2.5, and NO_X emissions from existing diesel trucks. Therefore, as with the

Project, operation of Alternative 2 would not be considered a substantial source of DPM. With respect to the use of consumer products and architectural coatings, the office uses associated with Alternative 2 would be expected to generate minimal TAC emissions from these sources. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the proposed office use, operation of Alternative 2 would not expose sensitive receptors to substantial TAC concentrations and operational impacts would be less than significant, similar to the Project. Since neither the Project or Alternative 2 would include any sources that generate substantial emissions of TACs and both would comply with applicable existing regulations to avoid or minimize TAC emissions, impacts under the Project and Alternative 2 would be similar.

Cultural Resources

Archaeological Resources

Similar to the Project, excavation associated with Alternative 2 would reach a depth of approximately 27 feet bgs. The subsurface archaeological sensitivity assessment for the Project Site indicates that the potential for encountering prehistoric archaeological resources is moderate to high based on the fact that six prehistoric archaeological resources (village sites with human remains and associated artifacts, shell midden deposits, metates, mortars, etc.), water sources (which would have provided fresh water sources to prehistoric inhabitants), and Native American villages (Saa'anga and Waachnga) are situated in the vicinity of the Project Site. Therefore, impacts to previously unknown buried prehistoric archaeological resources are considered potentially significant. Alternative 2, as with the Project, would implement Mitigation Measures CUL-MM-1 through CUL-MM-3. With the implementation of these measures, Alternative 2, as with the Project, would provide for appropriate treatment and/or preservation of archaeological resources if encountered. Under Alternative 2, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. When compared to the Project, impacts related to archeological resources under Alternative 2 would be similar to the Project.

Energy

Efficient Energy Consumption

Similar to the Project, during construction of Alternative 2, energy would be consumed in the form of electricity on a limited basis for powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction of the Project and Alternative 2 would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction workers travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). Construction of the Project and Alternative 2 would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with Section 2485 in 13 CCR, and fuel requirements in accordance with 17 CCR Section 93115. Alternative 2 would have reduced square footage as compared to the Project. As such, the overall duration of construction would be less than that of the Project. A shorter construction length would mean less overall electricity and transportation energy usage during construction under Alternative 2 than the Project.

During operation of the Project and Alternative 2, energy would be consumed for multiple purposes, including, but not limited to, on-road mobile sources (i.e., transportation fuel), area sources (i.e., landscape maintenance equipment), energy (i.e., electricity), water conveyance and wastewater treatment, and solid waste. As with the Project, Alternative 2 would incorporate energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1, which requires achieving a LEED Certified Performance level or higher. The Project and Alternative 2 would include, but would not be limited to, water-efficient landscape design, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; electric vehicle (EV) charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; a solar photovoltaic system and active circulation. Similar to the Project, Alternative 2 would also concentrate its uses within an urban infill location in proximity to multiple public transit options. These measures would minimize operational transportation fuel demand consistent with State, regional, and City goals.

Section 4.4, *Energy*, of this Draft EIR concludes that the Project's energy requirements would not substantially affect local and regional supplies or capacity during construction or operation, and that the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. As discussed above, Alternative 2 with its energy saving features in addition to compliance with applicable regulations, would also result in less-than-significant impacts related to wasteful, inefficient, or unnecessary consumption of energy. While the floor area would be reduced under Alternative 2, the proposed office use would have a higher electrical demand than the Project's residential and retail uses. No natural gas is assumed to be under Alternative 2, and as such, natural gas usage and demand would be greater under the Project. With respect to transportation fuels, Alternative 2 would have a higher VMT than the Project (11,874 vs. 10,504 VMT), thus, energy demand related to transportation fuels would be greater under Alternative 2.[6] Overall, because electricity would be the primary source of energy for both the Project and Alternative 2, and with electricity demand being higher for Alternative 2, in addition to a higher transportation fuel energy demand, Alternative 2 would generate a higher long-term level of energy demand than the Project. Thus, while impacts related to efficient energy consumption would be less than significant under both the Project and Alternative 2, impacts with respect to efficient energy consumption would be greater under Alternative 2 than the Project.

Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, Alternative 2 would be designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. The Project and Alternative 2 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and California Green Building Standards (CALGreen) Building Code, which have been incorporated into Culver City's Green Building Program. In addition, Alternative 2, as with the Project, would be designed to achieve LEED Certified Performance level

[6] See Appendix K, Alternatives Documentation, of the Draft EIR for supplemental information regarding trips and VMT for the Project alternatives.

or higher including energy performance optimization features, including, water-efficient landscape design, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; solar photovoltaic system and active circulation. With respect to operational transportation-related fuel usage, the Project and Alternative 2 would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. Similar to the Project, Alternative 2 would include the implementation of a transportation demand management (TDM) Program that would encourage efficient transportation and reduce VMT.

Based on the above, similar to the Project, Alternative 2 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. When compared to the Project, impacts related to conflicting with plans for renewable energy or energy efficiency under Alternative 2 would be similar to the Project.

Geology and Soils

Paleontological Resources

Excavation associated with Alternative 2 would reach a maximum depth of approximately 27 feet bgs, same as the Project. Geologic mapping indicates that the surface of the Project Site is underlain by Pleistocene-age older alluvium (Qoa), Holocene-age alluvium (Qa), and possibly by the Pleistocene-age Baldwin Hills Paleosol (Qop), also known as the Fox Hills Paleosol. The Pleistocene alluvium, Qoa, and Baldwin Hills Paleosol have a high potential to yield paleontological resources. Since excavation at the Project Site is estimated to reach depths of up to 27 feet bgs under the Project and Alternative 2, which is deeper than previous excavations on the Project Site, there is the potential to impact older alluvium and possibly the Baldwin Paleosol, which have a high sensitivity for retaining paleontological resources as discussed above. Therefore, impacts on paleontological resources due to grading and excavation during construction are considered potentially significant for both the Project and Alternative 2. Similar to the Project, Alternative 2 would implement Mitigation Measures GEO-MM-1 to GEO-MM-4. With the implementation of these measures, impacts under the Project and Alternative 2 related to paleontological resources during Project construction would be reduced to a less-than-significant level. When compared to the Project, impacts related to paleontological resources under Alternative 2 would be similar to the Project.

Greenhouse Gas Emissions

Like the Project, construction and operation activities under Alternative 2 would increase GHG emissions. The smaller scale associated with Alternative 2 would generate lower total GHG emissions than the Project during the overall construction phase. During operation, as with the Project, Alternative 2 would incorporate applicable project design features, including Project Design Feature GHG-PDF-1, which requires achieving LEED Certified Performance level or higher, and Project Design Feature TRAF-PDF-1, which would include implementation of a TDM Program. GHG emission impacts under Alternative 2, as with the Project, would be less than significant.

Alternative 2, as with the Project, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's Socal Connect, Culver City's Green Building Program. As such, similar to the Project, impacts under Alternative 2 related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant. However, in consideration of Alternative 2's higher VMT (mobile source) and increased electricity energy demand compared to the Project, long-term GHG emissions can be expected to be higher under Alternative 2 than the Project. For this reason, impacts related to GHG emissions would be greater under Alternative 2 than the Project.

Land Use and Planning

Alternative 2 proposes the development of 190,000 sf of office use on the Project Site. The height of the building would be 4 stories or 56 feet. The size and scale of the building would be smaller than the Project. No publicly accessible space would be provided as part of Alternative 2. proposed square footage, building heights and setbacks would be consistent with the existing zoning designation of Commercial Regional Business Park (CRB) for the Project Site.

As with the Project, the density and location of Alternative 2 would not conflict with policies of regional and local land use plans adopted to avoid or mitigate environmental effects, including: SCAG's SoCal Connect, the Culver City General Plan, the Culver City Bicycle & Pedestrian Action Plan, the Culver City Urban Forest Master Plan, and the Culver City Municipal Code, and, as such, impacts with respect to land use would be less than significant. As no changes in zoning or land use designations would be required under Alternative 2, impacts related to land use and planning would be less than the Project.

However, it is acknowledged that the draft Land Use Element under consideration as part of Culver City's General Plan 2045 Update includes a draft Land Use Map and Land Use designations with appropriate draft densities. The Project Site's draft land use designation and density is Mixed-Use High and 100 dwelling units per acre, consistent with the City's 2021-2029 Housing Element preferred designation and density.

Noise

Substantial Temporary or Permanent Increase in Ambient Noise Levels

Construction

Construction activities under Alternative 2 would be similar to those of the Project and would generally include site demolition, site preparation, grading/excavation, drainage/utilities/trenching, foundations/concrete pour, building construction, architectural coating, and paving. Similar to the Project, maximum daily construction activities under Alternative 2 would increase noise levels at several sensitive receptor locations in the vicinity of the Project Site. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 2 would be similar to the Project. Based on a conservative impact analysis, construction noise levels would exceed the applicable noise significance thresholds at two nearby noise-sensitive receptors. Therefore, as with the Project, Mitigation Measures NOI-MM-1 and NOI-MM-2 would be implemented under Alternative 2 to reduce construction noise impacts at off-site noise-sensitive receptors. However, as with the Project, even with implementation of mitigation measures,

potentially significant on-site construction noise impacts would remain significant and unavoidable under Alternative 2 should construction activities occur during the morning hours if an extended hours permit was not obtained by the Project because they would occur outside of the City's allowable construction hours. With regard to off-site construction noise, the increase in noise levels of construction trips along any of the studied roadway segments would not exceed the significance threshold, and impacts would be less than significant. The overall duration of construction under Alternative 2 would be less than that of the Project. Therefore, the duration of construction noise would be shorter. As such, impacts related to construction noise under Alternative 2 would be less than the Project.

Operation

Alternative 2, as with the Project, would generate on-site composite noise associated with fixed mechanical equipment noise and parking structure noise. However, under the Project, outdoor open space noise would occur from various spaces within the Project Site. No outdoor opens spaces would occur under Alternative 2. Under the Project, operational composite noise levels, with the outdoor open space areas, would not exceed the ambient noise levels by 5 dBA at the nearby noise receptor locations. Because Alternative 4 would not support outdoor activities, operational noise impacts would be less than the Project's less-than-significant impacts.

Further, Alternative 2 would involve a smaller scale project with fewer overall off-site vehicle trips. Therefore, operational mobile source noise impacts would be incrementally less under Alternative 2 than the Project. Overall, impacts under Alternative 2 would be less than the Project.

Vibration

Construction

Construction of Alternative 2, as with the Project, would generate groundborne construction vibration from the operation of heavy equipment (i.e., backhoe, dozer, excavators, grader, loader, and haul trucks, etc.). As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 2 would be below the structural damage and human annoyance significance criteria at off-site building structures and vibration sensitive receptors. In addition, as with the Project, vibration impacts from off-site construction traffic would also be below the vibration significance criteria. Therefore, on-site and off-site vibration impacts would be less than significant. As the overall scale of development would be reduced under Alternative 2, the duration of construction and overall construction activity causing vibration would be less, and impacts under Alternative 2 would be less than the Project.

Operation

Day-to-day operations under Alternative 2, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would be passenger vehicle circulation within the proposed parking area. The potential vibration levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold. Therefore, similar to the Project, operational vibration impacts under Alternative 2 would be less than significant. While Alternative 2 would increase daytime occupancy of the Project Site compared to the Project, a change in off-site

groundborne operation vibration is not anticipated to be perceptible under Alternative 2 compared to the Project, and, as such, impacts under Alternative 2 would be similar to the Project.

Population and Housing

Induce Substantial Unplanned Population Growth

During operation, the Project would generate 733 new residents and 20 employees. Accounting for the existing 147 employees, the net decrease in employees under the Project would be 127 people. Alternative 2 would generate 908 employees with no new residential population. Alternative 2 and the Project's contribution to population and/or employee growth would continue an infill growth pattern that is encouraged locally. Neither Alternative 2 nor the Project would exceed projected growth SCAG forecasts for the City and region. However, Alternative 2 would not be consistent with regional and local policies that encourage mixed-use and higher density housing within the City and region. The Project's contribution of housing would help the City's ability to meet its housing obligation under SCAG's RHNA and goals of the Housing Element. Alternative 2 would indirectly induce population gain through employment opportunities but would not incorporate housing. As such, Alternative 2 would be less consistent with SCAG and City objectives which seek an increase in diverse housing options. However, because Alternative 2 would result in no housing and only an increased indirect demand for housing as compared to the Project, impacts with respect to induced direct or indirect substantial unplanned population growth would be less than the Project's less than significant population and housing impacts.

Public Services

Fire Protection

Construction

Alternative 2, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access. As with the Project, Alternative 2 would comply with all regulatory requirements including regulations set forth in the Safety and Health Regulations for Construction established by OSHA and compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. In addition, the Project and Alternative 2 would implement Project Design Feature TRAF-PDF-1 to provide a Construction Management Plan to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The implementation of regulatory requirements and project design features would facilitate emergency access. With such features, neither the Project nor Alternative 2 would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, similar to the Project, construction under Alternative 2 would result in less-than-significant impacts related to fire protection that are similar to the Project.

Operation

During operation, the Project would generate 733 new residents and 20 employees. Accounting for the existing 147 employees, the net decrease in employees under the Project would be 127 people. As such, the overall net daytime population (residents and employees) under the Project would be

606 people, while the nighttime population (residents only) would be 733 persons. Alternative 2 would generate 908 employees, thus, the net increase in the daytime population would be 761 persons. Alternative 2 would have no nighttime population. Alternative 2, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, CCMC, and Culver City Fire Department (CCFD) requirements, including installation of a fire sprinkler suppression system, a fire alarm system, an Emergency Responder Radio Coverage, smoke detectors, and signage, among other fire prevention features. Compliance with applicable requirements under both the Project and Alternative 2 would reduce demand on facilities and equipment without creating the need for new or expanded fire facilities. In addition, both buildings under the Project and Alternative 2 would be required to install an automatic fire sprinkler system. As the Project Site is located within a highly urbanized area accessed via an established street system, impacts on emergency response under the Project or Alternative 2 would not be significant. Alternative 2, as with the Project, would also be consistent with CCFD fire flow requirements. As such, the Project and Alternative 2 would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 2, as with the Project, would be less than significant. However, because Alternative 2 would not include a nighttime population despite its higher daytime population compared to the Project, impacts related to fire protection services under Alternative 2 would be less than the Project.

Police Protection

Construction

Alternative 2, as with the Project, would result in construction activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 2's construction phase, although of shorter duration than that of the Project, could increase demand for police protection services. To reduce Culver City Police Department (CCPD) demand during construction, Alternative 2, as with the Project, would implement security measures under Project Design Feature POL-PDF-1 to limit access to construction areas and provide for cameras to monitor the Project Site during off hours. Similar to the Project, construction activities under Alternative 2 may involve temporary partial lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. As with the Project, Alternative 2 would implement Project Design Feature TRAF-PDF-1. Under Project Design Features TRAF-PDF-1, a Construction Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Furthermore, it is not anticipated that any additional officers from CCPD would be needed to monitor the Project Site during construction outside of the existing officers that patrol the area. Additionally, the various safety and control features that would be implemented during construction would reduce the potential for incidents that would require police responses. With such features, neither the Project nor Alternative 2 would increase police services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. Therefore, impacts under Alternative 2 would be less-than-significant and similar to the Project.

Operation

During operation, the Project would generate 733 new residents and 20 employees. Accounting for the existing 147 employees, the net decrease in employees under the Project would be 127 employees. As such, the overall net daytime population (residents and employees) under the Project would be 606 people, while the nighttime population (residents only) would be 733 persons. Alternative 2 would generate 908 employees, thus, the net increase in the daytime population would be 761 persons. Alternative 2 would have no nighttime population. Impacts to police services are based on an increase in the ratio of officers to residential population. Consequently, since Alternative 2 would not directly increase the existing residential population in the Culver City Police Department (CCPD) service area, which has a current residential population of approximately 40,000, Alternative 2 would not directly impact officer per resident service ratios. As provided in Project Design Feature POL-PDF-2, both the Project and Alternative 2 would incorporate a security program to reduce demand for police services and to ensure the safety of occupants. The security program would reduce the potential for on-site crimes, including loitering, theft, and burglaries and would be reviewed for further suggestions by the CCPD. CCPD correspondence in response to the preparation of the Draft EIR stated that the Project would not result in the need for new or altered police facilities.[7] Given that Alternative 2 have no residential or nighttime population, the CCPD's determination is equally applicable to Alternative 2. Thus. neither the Project nor Alternative 2 would result in substantial adverse physical impacts associated with the provision of a new or physically altered police facility, the construction of which would cause significant environmental impacts. Impacts relative to police services would be less than significant under both the Project and Alternative 2. However, because Alternative 2 would remove the Project's residential population increase, impacts to police services would be less than the Project's less-than-significant impact.

Schools

Construction

Construction under either the Project or Alternative 2 would generate employees who are anticipated to be hired from a mobile regional construction work force. Given the mobility and temporary duration of work at a particular site, construction employees not residing locally would not be expected to relocate residences (and, therefore, generate a new student population). Therefore, construction of either the Project or Alternative 2 would not result in a notable increase in the resident population or new students needing to attend local schools. With the nearest public CCUSD school located approximately 0.7 mile northwest of the Project, no public schools would be physically affected by construction activities at the Project Site. Construction impacts on schools under both the Project and Alternative 2 would be less than significant. Impacts on schools under Alternative 2 would be similar to the Project's less-than-significant impacts.

Operation

As shown in **Table 5-2**, *Estimated Number of Students Generated by Alternative 2*, Alternative 2 would generate a total of 157 students. In comparison, the Project would generate 162 students from just its residential uses. Another few students (less than 5) could be generated by the Project's retail uses. Similar to the Project, under Alternative 2, El Rincon Elementary School, Culver City

[7] CCPD, Correspondence from Sergeant Carey Grant, Culver City Police Department Admin Sergeant, October 12, 2023. Provided in Appendix H-2 of this Draft EIR.

Middle School, and Culver City High School are conservatively assumed that the Project or Alternative 2 have the potential to result in a new seating shortage at all three schools.

TABLE 5-2
ALTERNATIVE 2 STUDENT GENERATION

Land Use	Amount [a]	Generation Factor [a]	Elementary School Students	Middle School Students	High School Students	Total
Employees	908 employees	0.1724 students/emp	86	24	47	157

NOTES:

a CCUSD's *Level I Developer Fess Study for Culver City School District* does not include student generation rates for non-residential uses. Thus, for the non-residential uses, the total number of employees from Alternative 2 are used to calculate the number of students based on factors included in Table 15 of the Los Angeles Unified School District (LAUSD) 2022 Developer Fee Justification Study (March 2022). The LAUSD study identifies a student per employee rate of 0.1724 for all commercial and industrial land uses. Thus, this rate was applied to the non-residential land uses. Since the LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school).

SOURCE: ESA, 2024.

Under either the Project or Alternative 2, pursuant to Senate Bill (SB) 50, the Project Applicant would be required to pay development fees to CCUSD prior to issuance of building permits. Under Government Code section 65995 and 65996, the payment of these fees is considered full and complete mitigation of school impacts. Therefore, neither the Project nor Alternative 4 would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities and impacts would be less than significant. Because Alternative 2 would result in a lower generation of students, operational impacts on schools would be less than the Project's less-than-significant impact.

Parks and Recreation

Construction

Construction activities under both the Project and Alternative 2 have the potential to affect parks and recreational facilities. A small number of construction workers may visit public parks to eat lunch or for recreational activity after a workday. However, because construction workers are temporary employees with high turnover during various phases of construction, the use of public parks would be uncommon and short-term. In addition, neither the Project nor Alternative 2 directly impact public park facilities. Construction of either the Project or Alternative 2 would not include or require the construction, alteration, or expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore, Alternative 2's impacts associated with parks and recreational facilities would be similar to the Project's less-than-significant impacts.

Operation

Alternative 2 would remove the Project's residential component by developing only office uses. Alternative 2's office uses would generate a nominal demand for public recreational uses with employees primarily visiting the Fox Hills Parkette for short periods of time during the work week. Also, Alternative 2 would result in an incremental indirect population gain through employment opportunities but would not incorporate housing. Nonetheless, because Alternative 2 would not

result in any direct (residential) population increase, or include housing impacts to public recreational and parks facilities would be less than significant and less than the Project.

Transportation

Conflict with Programs, Plans, Ordinances, or Policies Addressing the Circulation System, Transit, Roadways, Bicycle, and Pedestrian Facilities

Similar to the Project, Alternative 2 would support multimodal transportation options as well as promote transportation-related safety in the vicinity. Alternative 2, as with the Project, would not conflict with policies or procedures of the City's General Plan Circulation Element, the Culver City Short Range Transit Plan, the Bicycle and Pedestrian Action Plan, the Complete Streets Policy, the NTMP Procedures Manual, Residential Parkway Guidelines, the Local Road Safety Plan and Vision Zero. As with the Project, Alternative 2 would implement Project Design Feature TRAF-PDF-2, which would include implementation of a TDM Program that would help to reduce volumes on nearby roadways due to employee commute and encourage transit ridership through various programs. Similar to the Project, as Alternative 2 would not conflict with any of the policies and procedures contained in the above-mentioned City of Culver City transportation-related programs, plans, ordinances, and policies, impacts relative to plans and programs would be less than significant. When compared to the Project, impacts related to conflicting with programs, plans, ordinances, and policies, addressing the circulation system under Alternative 2 would be similar to the Project.

Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

Utilizing the City of Culver City VMT Calculator and not accounting for any TDM measures (as was calculated the Project in Section 4.11, *Transportation*, of this Draft EIR), the VMT for employees under Alternative 2 was calculated.[8] According to the VMT Calculator, Alternative 2 would generate 1,197 daily trips and 11,874 daily VMT. The daily work employee VMT would be 10.2, which is above the City's 8.6 threshold per employee. Comparatively, the Project would generate 1,462 daily trips and 11,874 VMT. The daily household VMT per capita for the Project is estimated at 6.8, which is below the citywide household VMT threshold of 7.1 per capita. It is assumed that Alternative 2 would implement TDM measures to reduce its VMT to below the employee threshold. By doing so, neither the Project nor Alternative 2 would result in VMT impacts that exceed the City's VMT thresholds. Impacts regarding VMT would be consistent with the City's Transportation Study Criteria and Guidelines and, thus, consistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT impacts under either the Project or Alternative 2 would be less than significant. Since Alternative 2 would have a higher daily VMT and the VMT per capita for the Project without any TDM measures would be below the City's threshold, unlike Alternative 2 exceedance of the employee VMT threshold without any TDMs, impacts would be greater under Alternative 2 than the Project's less than significant VMT impact.

Design Hazards

Alternative 2, as with the Project, would design driveways to comply with City of Culver City standards as outlined in the Culver City Municipal Code (Section 17.320.040). The driveways

[8] See Appendix K, Alternatives Documentation, of the Draft EIR for supplemental information regarding trips and VMT for the Project alternatives.

would be configured to avoid or minimize potential conflicts with transit services and pedestrian traffic by providing curb and sidewalk to separate pedestrian movements from vehicular movements. The Project or Alternative 2 would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project Site. As Alternative 2 would generate fewer trips to/from the Project Site, projected queue lengths would similarly not exceed the available storage lengths under Alternative 2. Impacts under Alternative 2 would be less than significant and similar to the Project.

Emergency Access

The Project Site is located within an urbanized area with a fully developed roadway system. Similar to the Project, Alternative 2 would include temporary construction activities (e.g., temporary lane closures) and traffic that could potentially affect emergency access to the Project Site and surroundings. The Project and Alternative 2 would implement Project Design Feature TRAF-PDF-1, which would require construction staging and construction worker parking to be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. In addition, emergency vehicle access to the Project Site and neighboring land uses would be maintained, and worker and construction equipment delivery would be scheduled to avoid peak traffic hours. In addition, future driveway and building configurations under the Project and Alternative 2 would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for visitors and employees. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 2, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 2 would be less than significant and similar to the Project.

Tribal Cultural Resources

The City complied with Assembly Bill (AB) 52 in its Native American tribal consultation and records searches conducted through South Central Coastal Information Center (SCCIC) and the Native American Heritage Commission (NAHC). No known prehistoric archaeological resources were identified within or immediately adjacent to the Project Site. No known tribal cultural resources, as defined in PRC Section 21074(a)(1), or resources determined by the City in its discretion and supported by substantial evidence to be significant pursuant to PRC Section 5024.1 have been identified within the Project Site as a result of AB 52 consultation, or as a result of the Sacred Lands File (SLF) search through the NAHC and the SCCIC. However, the Project Site appears to have a moderate to high potential for encountering previously unknown tribal cultural resources during construction. As a result, similar to the Project, Alternative 2 would implement Mitigation Measure CUL-MM-2 and Mitigation Measures TCR-MM-1 through TCR-MM-3. With implementation of mitigation measures, impacts under the Project and Alternative 2 would be reduced to less-than-significant levels. When compared to the Project, impacts related to tribal cultural resources under Alternative 2 would be similar to the Project.

Utilities and Service Systems

Water Supply

New or Expanded Water Facilities

Under Alternative 2, while construction duration would be reduced as compared to the Project, construction water use would be similar on a daily basis. The estimated construction water use would be less than the existing domestic water use of approximately 7,360 gpd for the Project Site (as shown in Table 4.13.1-1). As such, the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project or Alternative 2.

Water service for the Project or Alternative 2 would be provided by Golden State Water Company (GSWC), as under existing conditions. When analyzing infrastructure capacity, although domestic water demand is the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and are, therefore, the primary means for analyzing infrastructure capacity. The existing hydrants in the area of the Project Site would provide adequate fire flow meeting the requirements of CCFD for the Project. Given the relatively smaller size of the proposed building under Alternative 2 as compared to the Project, it can be expected that the existing hydrants serving the Project Site would also be able to provide adequate fire flow for Alternative 2. As such, operation of the Project or Alternative 2 would not require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects and impacts would be less than significant. When compared to the Project, impacts related to new for expanded water facilities under Alternative 2 would be similar to the Project.

Water Supplies

While construction duration would be reduced under Alternative 2 as compared to the Project, the estimated construction daily water use would be less than the existing domestic water use of approximately 7,360 gpd for the Project Site (as shown in Table 4.13.1-1). As such, the existing water supplies would be available to meet the temporary water demand associated with construction of the Project.

As with the Project, Alternative 2 would not require the preparation of a WSA per SB 610 since it would not employ more than 1,000 persons or have more than 250,000 sf of office floor space. Both the Project and Alternative 2 would increase long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Net domestic water demand (subtracting existing demand) for the Project would be 36,446 gpd, or 41 AFY. As shown in **Table 5-3**, *Alternative 2 Estimated Water Consumption*, using the office water demand factor in Table 4.13.1-6, *Estimated Cumulative Water Generation by Related Projects*, in Section 4.13.1, *Utilities and Service Systems – Water Supply*, based on a rate of 120 gpd/ksf, Alternative 2's 190,000 sf of office use would have a water demand of 27,360 with irrigation gpd day. Subtracting the existing 7,360 gpd, the net water demand would be approximately 20,000 gpd or 22.4 AFY.

TABLE 5-3
ALTERNATIVE 2 ESTIMATED WATER CONSUMPTION

			Water Usage [b]	
Proposed Use	**Units**	**Water Use Rate [a]**	**gpd**	**AFY**
Office	190,000 sf	120/1,000 sf	22,800	25.5
Irrigation [b]	—	—	4,560	5.1
		Total Proposed Water Demand	*27,360*	*30.6*
Existing Site Demand			-7,360	-8.2
		Total Net Water Demand	*20,000*	*22.4*

NOTES: gpd = gallons per day; sf = square feet, AFY = acre-feet per year.

[a] Estimated water usage is estimated as being equivalent to the estimated sewage generation for the Project. These rates are assessed using LA County Sanitation's Estimated Wastewater Generation Tables.

[b] 20% factor included to account for landscaping and irrigation consumption.

SOURCE: ESA, 2024.

Both the Project and Alternative 2 would be consistent with the demographic projections for the City in SCAG's SoCal Connect and, as such, the GSWC has sufficient water supplies as projected in its latest UWMP to serve the Project and Alternative 2 and the reasonably foreseeable future development during normal, dry, and multiple-dry years. Impacts regarding water supply during operation would be less than significant under both the Project and Alternative 2. However, because Alternative 2 would reduce overall water demand compared to the Project, Alternative 2's impacts would be less than the Project's less-than-significant water impacts.

Electric Power, Natural Gas, Telecommunications Facilities

Alternative 2, as with the Project, would utilize energy infrastructure to accommodate their respective demand for energy resources. Similar to the Project, Alternative 2's electricity and natural gas demands are expected to represent a small fraction of Southern California Edison (SCE) and Southern California Gas Company (SoCalGas) energy supplies and the service provider's existing infrastructure. Planned electricity and natural gas supplies would be sufficient to meet the Project's or Alternative 2's demand for electricity and natural gas. As with the Project, Alternative 2 would not result in an increase in demand for electricity, or natural gas, services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Similar to the Project, impacts with respect to the relocation or expansion of electric power or natural gas infrastructure under Alternative 2 would be less than significant. As off-site electric power and natural gas infrastructure would accommodate demand under Alternative 2, impacts would be similar to the Project.

Relationship of the Alternative to Project Objectives

As described above, with development under the Existing Zoning Alternative (Alternative 2), the Project Site would be developed in accordance with the existing General Plan Land Use designation of Regional Center and existing zoning designation of Commercial Regional Business Park (CRB) for the Project Site. Under this Alternative, the existing 30,672 square foot two-story office building

built in the 1970s would be replaced with a modern 190,000 square foot, 4-story (56 feet) office building. This Alternative would provide no retail uses or public open space as compared to the Project. Alternative 2 would not include a public plaza along Hannum Avenue, thus, the extent of streetscape, landscaping and heightened pedestrian activity would be than the Project. Compared to the Project, Alternative 2 would have an approximate 47 percent reduction in building square footage (362,596 sf vs 190,000 sf).

Alternative 2 would fully meet the following Project Objective similar to the Project:

8. Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.

Alternative 2 would partially meet the below Project Objective, but to a lesser extent than the Project since it would provide less landscape features and less active ground floor uses with open space amenities.

7. Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including a building form with vertical and horizontal breaks, generous setbacks, light materiality, landscape features, and active ground floor uses with open space amenities.

As described above, under Alternative 2 the Project Site would continue to operate as a larger office building as compared to existing conditions. Thus, Alternative would not meet the following Project objectives:

1. Develop new, high-quality infill housing with a diverse mix of residential dwelling types, containing both market-rate and affordable units.
2. Fulfill the City's housing goals by improving access to quality housing for all members of the community through the provision of affordable housing in proximity to open space and public transportation, while maintaining access to a wide range of services and goods.
3. Provide open space amenities that will enhance existing site conditions through publicly accessible open space (Hannum Plaza), as well as a unified landscape design with common open space areas for Project residents.
4. Provide for a mix of commercial and residential uses to promote pedestrian activity, reduce vehicle trips and vehicle miles traveled, and encourage active transportation while maintaining appropriate levels of vehicle parking.
5. Activate the Hannum Avenue and Buckingham Parkway frontages by providing street-oriented retail and residential uses, and a landscaping program that further enhances the pedestrian experience.
6. Utilize the state's Density Bonus laws to increase the permitted density at the Project Site in order to provide housing at a variety of income levels that will assist the City in meeting its Regional Housing Needs goals.

5.5.3 Alternative 3: Reduced Project Alternative

Description of the Alternative

Under the Reduced Project Alternative (Alternative 3) and similar to the Project, the Project Site would be redeveloped under the PD zone with an aesthetically succinct and unified development. Alternative 3 contemplates a 28 percent reduction in residential units (density) by reducing the Project's 309 units to 223 units. With this reduction, Alternative 3 would include a total of 222,000 sf of residential square footage, compared to the Project's 356,996 square feet of residential space. Under Alternative 3, there would be no affordable units provided and as such, the Project's Density Bonus incentives related to additional units and building height would not be applicable to Alternative 3.

Alternative 3 would include the same 5,600 square feet of retail floor space as the Project. The building height would be 5-stories (over 1-level of subterranean parking) or 56 feet. There would be 312 parking spaces between the 1st floor and P1 level compared to the Project's 428 spaces. The reduced parking would eliminate one of the Project's two subterranean parking levels, which would in turn reduce the amount of required soil excavation. Proposed vehicle circulation and loading area locations would be similar under the Project and Alternative 3. Publicly accessible open space on the ground level along Hannum would be reduced from 7,507 square feet under the Project to 2,500 square feet under Alternative 3. The retail space would be provided at the Project's northeastern corner adjacent to the Hannum Boulevard/Buckingham Parkway intersection. Under Alternative 3, unlike the Project, no residential units would be provided at the Buckingham Parkway street level. Instead there would be two levels of parking garage exposed along Buckingham Parkway.

As with the Project, Alternative 3 would require the demolition of the existing office building and associated paved surface parking areas on the Project Site. The amount and extent of excavation required for subterranean parking would be less than the Project. Under the Project there would be approximately 51,400 cubic yards of soil excavation reaching approximately 27 feet bgs. Although demolition and excavation would be largely similar to the Project, with an approximate 37 percent reduction in overall building square footage (362,593 sf vs 227,600 sf) and removal of one of the subterranean parking levels proposed under Alternative 3, the duration of the Project's excavation phase would be reduced from 4 months to 2.5 months and the building construction phase would be reduced by approximately 1.5 months from 17 months to 15.5 months. Thus, overall construction under Alternative 3 would be approximately 27 months, as opposed to 30 months under the Project.

Environmental Impacts

Aesthetics

Applicable Zoning and Other Regulations Governing Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan. Alternative 3 would be developed in accordance with applicable design and building regulations similar to the Project, but without additional density and height as per allowed with approval of the Project's requested Density and Other Bonus Incentives (DOBI) to allow increased density with affordable units incorporated into the

Project. Under Alternative 3 and similar to the Project, in order to provide an aesthetically succinct and unified development, the Alternative 3 would redevelop the Project Site under the PD zone. Similar to the Project, Alternative 3 redevelop the site with a high-quality new building subject to design review by the City. Alternative 3 would implement project design features that would require mechanical, electrical, and roof top equipment (including heating, ventilation, and air conditioning (HVAC) systems), as well as building appurtenances, to be integrated into the architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way. Compared to the Project, the overall massing and height of the building would be smaller and shorter, respectively. As with the Project, Alternative 3 would include a landscape and street tree program that meets City requirements along Hannum Avenue and Buckingham Parkway. However, this Alternative would include a reduced public open space area along Hannum Avenue, and no residential units along Buckingham Parkway. A parking garage would be visible at the ground level along Buckingham Parkway under Alternative 3. Thus, the extent of streetscape, landscaping and heightened pedestrian activity would be less than the Project. Despite the aesthetic variations between the Project and Alternative 3, both would comply with applicable CCMC regulations that govern scenic character, such as building heights, setbacks, and screening. As such, neither the Project nor Alternative 3 would conflict with the policies of the CCMC that regulate scenic quality and impacts would be less than significant. When compared to the Project, impacts related to conflicting with regulations that govern scenic quality under Alternative 3 would be similar to the Project.

Supplemental Shading Analysis

Under Alternative 3, the proposed building would be 5-stories (56 feet) over 1-level of subterranean parking as compared to the Project's 6-story (up to a height 78-feet) building over 2-levels of subterranean parking. Under the Project, redevelopment of the Project Site would add limited incremental shadows to the Fox Hills Parkette during the winter season in the afternoon hours, and not shade any portion of the residential uses across Buckingham Parkway year around. Given the Project's limited shading of off-site routinely usable outdoor spaces, shading would not be an adverse effect of the Project's implementation. Under Alternative 3 with a reduced building height, there would be no shading of the Fox Hills Parkette or any portion of the residential uses across Buckingham Parkway year around. The extent of shadows cast by Alternative 3 would be less than the Project, with neither the Project nor Alternative 3 substantially affecting any off-site shade sensitive uses.

Air Quality

Conflict with Air Quality Management Plan

Similar to the Project, Alternative 3 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 3 would be consistent with the goals of SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to Connect SoCal, and growth projections in the 2016 AQMP, since the growth would occur in consistent with the existing zoning designation. As with the Project, Alternative 3 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 3 would also be consistent with applicable goals, objectives, and policies of the City of Culver City General Plan and Mandatory Green Building Program that support and encourage reducing single occupancy vehicle trips and VMT. As with the Project, Alternative 3 would develop a TDM program to reduce the amount single-occupancy vehicle trips and encourage use of alternative transportation. For all of these

reasons, impacts under Alternative 3 with respect to conflicting or obstructing with AQMPs would be less than significant. When compared to the Project, impacts related to conflicting with the AQMP under Alternative 2 would be similar to the Project.

Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

Construction

As with the Project, Alternative 3's construction phases have the potential to generate daily emissions that would exceed the SCAQMD air quality standards through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities, such as the application of paint and other surface coatings. The maximum daily regional emissions under Alternative 2 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, regional construction emissions under Alternative 3 would not exceed SCAQMD numerical regional construction emissions significance thresholds and impacts would be less than significant. However, with an approximate 37 percent reduction in overall building square footage (362,593 sf vs 227,600 sf) and removal of one of the subterranean parking levels proposed under Alternative 3, the duration of the Project's excavation phase would be reduced from 4 months to 2.5 months and the building construction phase would be reduced by approximately 1.5 months from 17 months to 15.5 months. Thus, overall construction under Alternative 3 would be approximately 27 months, as opposed to 30 months under the Project. As Alternative 3 would reduce construction duration, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project.

Operation

During operation, Alternative 3 would generate emissions associated with vehicle trips, heating, lighting, other electric requirements, and architectural coatings. Similar to the Project, Alternative 2 would incorporate Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings. Not only would there be a reduction in the size of the building scale compared to the Project, Alternative 3 would generate fewer daily trips (1,094 vs. 1,462 trips), and VMT (7,883 vs. 10,504 VMT) than the Project resulting in lower mobile source emissions which is a primary factor in assessing regional emissions.[9] As such, mobile source regional emissions would be less under this Alternative. Both the Project and Alternative 3's regional emissions would be well below the applicable SCAQMD daily impact for VOC, NO_X, CO, SO_X, PM10, and PM2.5, and emissions related to air quality standards would be less than significant. Overall, with Alternative 3 being developed at a lower intensity than the Project and a corresponding reduction in daily vehicle trips and VMT compared to the Project, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less under Alternative 3 than the Project.

[9] See Appendix K, Alternatives Documentation, of the Draft EIR for supplemental information regarding trips and VMT for the Project alternatives.

Sensitive Receptor Exposure to Pollutant Concentrations

Localized Emissions

Construction

As with the Project, Alternative 3's construction phases have the potential to generate daily emissions that would exceed the SCAQMD air quality standards through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities, such as the application of paint and other surface coatings. The maximum daily localized emissions under Alternative 3 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. Similar to the Project, localized construction emissions under Alternative 3 would not exceed SCAQMD numerical localized construction emissions significance thresholds and impacts would be less than significant. However, with an approximate 37 percent reduction in overall building square footage (362,593 sf vs 227,600 sf) and removal of one of the subterranean parking levels proposed under Alternative 3, the duration of the Project's excavation phase would be reduced from 4 months to 2.5 months and the building construction phase would be reduced by approximately 1.5 months from 17 months to 15.5 months. Thus, overall construction under Alternative 3 would be approximately 27 months, as opposed to 30 months under the Project. As Alternative 3 would reduce construction duration, impacts with respect to construction-related localized emissions would be less than the Project.

Operation

As with the Project, Alternative 3 would generate localized emissions from area sources located on-site, such as landscaping equipment, architectural coating, and use of consumer products. Similar to the Project, Alternative 2 would incorporate Project Design Feature GHG-PDF-1 (Green Building Features) and would comply with SCAQMD Rule 1113 regarding architectural coatings. Also, both the Project and Alternative 2 would comply with the Title 24 (2022) building energy efficiency standards, CALGreen Building Code, and the Culver City Mandatory Green Building Program. Both the Project and Alternative 3's localized emissions would be well below the applicable SCAQMD daily impact for NO_X, CO, PM10, and PM2.5, and emissions related to sensitive receptor exposure to pollutant concentrations would be less than significant. However, the reduction in building floor area under Alternative 3 would reduce daily operational localized emissions, such as those from consumer product usage, and architectural coatings usage. Also, it can be expected that less landscaping would be provided under Alternative 3 than the Project, so localized emissions associated with landscaping equipment would also decrease compared to the Project. Accordingly, impacts under Alternative 3 with respect to localized operational emissions would be less than the Project.

Carbon Monoxide Hotspots

Vehicle trips would be fewer under Alternative 3 than the Project. As such, as with the Project, Alternative 3 would not cause or contribute considerably to the formation of CO hotspots, and impacts would be less than significant. However, because Alternative 3 would reduce the Project's daily vehicle trips, impacts would be less than the Project.

Toxic Air Contaminants

Construction

Under Alternative 3, as with the Project, temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. The Project Site is

not located within 500 feet of a freeway, 1,000 feet from a major service and maintenance rail yard or distribution center, or 500 feet of a dry cleaner; therefore, existing sources of TAC emissions are not located within the SCAQMD's screening distances of the future employees and visitors to the Project Site. Alternative 3 would comply with CARB's 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; compliance with these CARB regulations would minimize emissions of TACs during construction. In addition, Alternative 3 would be required to implement Mitigation Measure AQ-MM-1, which would have co-benefits of reducing emissions of PM10 and PM2.5, which are correlated to DPM emissions, from heavy-duty diesel construction equipment. As with the Project, Alternative 3 would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. As Alternative 3 would reduce the duration of construction activities, impacts under Alternative 3 would be less than the Project.

Operation

Alternative 3, nor the Project, would include uses that generate a significant number of diesel emissions, such as a truck stop or warehouse distribution uses. As such, operations under both the Project and Alternative 3 would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance. Furthermore, operation of the Project and Alternative 3 would be required to comply with the applicable provisions of 13 CCR, Section 2025 (CARB Truck and Bus regulation) to minimize and reduce PM10, PM2.5, and NO_X emissions from existing diesel trucks. Therefore, as with the Project, operation of Alternative 3 would not be considered a substantial source of DPM. With respect to the use of consumer products and architectural coatings, similar to the Project, the mix of residential and retail uses associated with Alternative 3 would be expected to generate minimal TAC emissions from these sources. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the proposed uses, operation of Alternative 3 would not expose sensitive receptors to substantial TAC concentrations and operational impacts would be less than significant, similar to the Project. Since neither the Project or Alternative 3 would include any sources that generate substantial emissions of TACs and both would comply with applicable existing regulations to avoid or minimize TAC emissions, impacts under the Project and Alternative 3 would be similar.

Cultural Resources

Archaeological Resources

Excavation associated with Alternative 3 would reach a depth of approximately 15 feet bgs, which is 12 feet less than the Project's excavation depth of 27 feet bgs. The subsurface archaeological sensitivity assessment for the Project Site indicates that the potential for encountering prehistoric archaeological resources is moderate to high based on the fact that six prehistoric archaeological resources (village sites with human remains and associated artifacts, shell midden deposits, metates, mortars, etc.), water sources (which would have provided fresh water sources to prehistoric inhabitants), and Native American villages (Saa'anga and Waachnga) are situated in the vicinity of the Project Site. Therefore, impacts to previously unknown buried prehistoric archaeological resources are considered potentially significant. Alternative 3, as with the Project, would implement Mitigation Measures CUL-MM-1 through CUL-MM-3. With the implementation of these measures, Alternative 3, as with the Project, would provide for appropriate treatment and/or preservation of archaeological resources if encountered.

Under Alternative 3, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. However, when compared to the Project, because the depth and extent of excavation would be less under Alternative 3, impacts related to archaeological resources under Alternative 3 would be less than the Project.

Energy

Efficient Energy Consumption

Similar to the Project, during construction of Alternative 3, energy would be consumed in the form of electricity on a limited basis for powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction of the Project and Alternative 3 would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction workers travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). Construction of the Project and Alternative 3 would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with Section 2485 in 13 CCR, and fuel requirements in accordance with 17 CCR Section 93115. Alternative 2 would have reduced excavation, density and scale as compared to the Project. As such, the overall duration of construction would be less than that of the Project. A shorter construction length would mean less overall electricity and transportation energy usage during construction under Alternative 3 than the Project.

During operation of the Project and Alternative 3, energy would be consumed for multiple purposes, including, but not limited to, on-road mobile sources (i.e., transportation fuel), area sources (i.e., landscape maintenance equipment), energy (i.e., electricity), water conveyance and wastewater treatment, and solid waste. As with the Project, Alternative 3 would incorporate energy-conservation measures beyond regulatory requirements as specified in Project Design Features GHG-PDF-1, which requires achieving a LEED Certified Performance level or higher. The Project and Alternative 3 would include, but would not be limited to, water-efficient landscape design, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; electric vehicle (EV) charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; a solar photovoltaic system and active circulation. Similar to the Project, Alternative 3 would also concentrate its uses within an urban infill location in proximity to multiple public transit options. These measures would minimize operational transportation fuel demand consistent with State, regional, and City goals.

Section 4.4, *Energy*, of this Draft EIR concludes that the Project's energy requirements would not substantially affect local and regional supplies or capacity during construction or operation, and that the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. With a reduction in the density and scale of development compared to the Project, Alternative 3's energy demand would be less than the Project. Thus, while impacts related to efficient energy consumption would be less than significant under both the Project and Alternative 3, impacts with respect to efficient energy consumption would be less under Alternative 3 than the Project.

Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, Alternative 3 would be designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. The Project and Alternative 3 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and California Green Building Standards (CALGreen) Building Code, which have been incorporated into Culver City's Green Building Program. In addition, Alternative 3, as with the Project, would be designed to achieve LEED Certified Performance level or higher including energy performance optimization features, including, water-efficient landscape design, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; solar photovoltaic system and active circulation. With respect to operational transportation-related fuel usage, the Project and Alternative 2 would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. Similar to the Project, Alternative 3 would include the implementation of a transportation demand management (TDM) Program that would encourage efficient transportation and reduce VMT.

Based on the above, similar to the Project, Alternative 3 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. When compared to the Project, impacts related to conflicting with plans for renewable energy or energy efficiency under Alternative 3 would be similar to the Project.

Geology and Soils

Paleontological Resources

Excavation associated with Alternative 3 would reach a maximum depth of approximately 15 feet bgs, which is 12 feet less than the Project's maximum depth of 27 feet bgs. Geologic mapping indicates that the surface of the Project Site is underlain by Pleistocene-age older alluvium (Qoa), Holocene-age alluvium (Qa), and possibly by the Pleistocene-age Baldwin Hills Paleosol (Qop), also known as the Fox Hills Paleosol. The Pleistocene alluvium, Qoa, and Baldwin Hills Paleosol have a high potential to yield paleontological resources. With excavations depths of 27 feet bgs and 15 feet bgs under the Project and Alternative 3, respectively, which are deeper than previous excavations on the Project Site, there is the potential to impact older alluvium and possibly the Baldwin Paleosol, which have a high sensitivity for retaining paleontological resources as discussed above. Therefore, impacts on paleontological resources due to grading and excavation during construction are considered potentially significant for both the Project and Alternative 3. Similar to the Project, Alternative 3 would implement Mitigation Measures GEO-MM-1 to GEO-MM-4. With the implementation of these measures, impacts under the Project and Alternative 3 related to paleontological resources during Project construction would be reduced to a less-than-significant level. However, when compared to the Project, because the depth and extent of excavation would be less under Alternative 3, impacts related to paleontological resources under Alternative 3 would be less than the Project.

Greenhouse Gas Emissions

Like the Project, construction and operation activities under Alternative 3 would increase GHG emissions. The smaller scale associated with Alternative 3 would generate lower total GHG emissions than the Project during the overall construction phase. During operation, as with the Project, Alternative 3 would incorporate applicable project design features, including Project Design Feature GHG-PDF-1, which requires achieving LEED Certified Performance level or higher, and Project Design Feature TRAF-PDF-1, which would include implementation of a TDM Program. GHG emission impacts under Alternative 3, as with the Project, would be less than significant.

Alternative 3, as with the Project, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's Socal Connect, Culver City's Green Building Program. As such, similar to the Project, impacts under Alternative 3 related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant. However, in consideration of Alternative 2's lower VMT (mobile source) and smaller overall building scale compared to the Project, long-term GHG emissions can be expected to be lower under Alternative 3 than the Project. For this reason, impacts related to GHG emissions would be lower than the Project.

Land Use and Planning

Alternative 3 proposes the development of 223 residential units and 5,600 square feet of retail space in a 56-foot, 5-story building over 1-level of subterranean parking, as compared to 309 residential units and 5,600 square feet of retail space in a 78-foot, 6-story (over 2-levels of subterranean parking) building use on the Project Site. Both the Project and Alternative 3 would include similar discretionary approvals for a General Plan Map Amendment from Regional Center to General Corridor; a Zone Change from Commercial Regional Business Park to Planned Development; and adoption of a Comprehensive Plan for the Project to develop standards for the new PD Zone District. However, Alternative 3 would not seek Density and Other Bonus Incentives (DOBI) to allow increased density with affordable units incorporated into the Project.

As with the Project, the density and location of Alternative 3 would not conflict with policies of regional and local land use plans adopted to avoid or mitigate environmental effects, including: SCAG's SoCal Connect, the Culver City General Plan, the Culver City Bicycle & Pedestrian Action Plan, the Culver City Urban Forest Master Plan, and the Culver City Municipal Code, and, as such, impacts with respect to land use would be less than significant.

However, it is acknowledged that the draft Land Use Element under consideration as part of Culver City's General Plan 2045 Update includes a draft Land Use Map and Land Use designations with appropriate draft densities. The Project Site's draft land use designation and density is Mixed-Use High and 100 dwelling units per acre, consistent with the City's 2021-2029 Housing Element preferred designation and density. Alternative 3 would meet the base density contemplated by the 2021-2029 Housing Element's preferred designation and density. However, with a fewer number of residential units, including no affordable units, Alternative 3 would not meet many of the goals of SoCal Connect and the objective/policies of City's General Plan that encourage affordable housing and development of diverse housing types in areas that are supported by multiple transportation options to the same extent as the Project. Also, Alternative 3 with less public open

space and no residential units fronting Buckingham Parkway, would create a less lively pedestrian and streetscape experience as would the Project. Thus, Alternative 3 would not meet pertinent policies that seek to enhance the pedestrian environment and provide the highest quality site design to the same extent as the Project.

Overall, as with the Project, Alternative 3 would not result in a substantial conflict with applicable land use plans, policies, or regulations and land use impacts. However, because Alternative 3 would not meet applicable policies to the same extent as the Project, especially housing policies the strive for increased density with affordable housing included, impacts would be greater than the Project's less-than-significant land use impacts.

Noise

Substantial Temporary or Permanent Increase in Ambient Noise Levels

Construction

Construction activities under Alternative 3 would be similar to those of the Project and would generally include site demolition, site preparation, grading/excavation, drainage/utilities/trenching, foundations/concrete pour, building construction, architectural coating, and paving. Similar to the Project, maximum daily construction activities under Alternative 3 would increase noise levels at several sensitive receptor locations in the vicinity of the Project Site. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 3 would be similar to the Project. Based on a conservative impact analysis, construction noise levels would exceed the applicable noise significance thresholds at two nearby noise-sensitive receptors. Therefore, as with the Project, Mitigation Measures NOI-MM-1 and NOI-MM-2 would be implemented under Alternative 3 to reduce construction noise impacts at off-site noise-sensitive receptors. However, as with the Project, even with implementation of mitigation measures, potentially significant on-site construction noise impacts would remain significant and unavoidable under Alternative 3 should construction activities occur during the morning hours if an extended hours permit was not obtained by the Project because they would occur outside of the City's allowable construction hours. With regard to off-site construction noise, the increase in noise levels of construction trips along any of the studied roadway segments would not exceed the significance threshold, and impacts would be less than significant. The overall duration of construction under Alternative 3 would be 3 months less than that of the Project. Therefore, the duration of construction noise would be shorter. As such, impacts related to construction noise under Alternative 3 would be less than the Project.

Operation

Alternative 3, as with the Project, would generate on-site composite noise associated with fixed mechanical equipment noise and parking structure noise. As with the Project, outdoor open space noise would occur from various spaces within the Project Site. Under the Project, operational composite noise levels, with the outdoor open space areas, would not exceed the ambient noise levels by 5 dBA at the nearby noise receptor locations. Because Alternative 3 would have a reduced public open space along Hannum Avenue and outdoor gathering spaces/pool deck compared to the Project, operational noise impacts would be less than the Project's less-than-significant impacts.

Further, Alternative 3 would involve a smaller scale project with fewer overall off-site vehicle trips. Therefore, operational mobile source noise impacts would be incrementally less under Alternative 3 than the Project. Overall, noise impacts under Alternative 3 would be less than the Project.

Vibration

Construction

Construction of Alternative 3, as with the Project, would generate groundborne construction vibration from the operation of heavy equipment (i.e., backhoe, dozer, excavators, grader, loader, and haul trucks, etc.). As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 3 would be below the structural damage and human annoyance significance criteria at off-site building structures and vibration sensitive receptors. In addition, as with the Project, vibration impacts from off-site construction traffic would also be below the vibration significance criteria. Therefore, on-site and off-site vibration impacts would be less than significant. As the overall scale of development would be reduced under Alternative 3, the duration of construction and overall construction activity causing vibration would be less, and impacts under Alternative 3 would be less than the Project.

Operation

Day-to-day operations under Alternative 3, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would be passenger vehicle circulation within the proposed parking area. The potential vibration levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold. Therefore, similar to the Project, operational vibration impacts under Alternative 3 would be less than significant. While Alternative 3 would decrease occupancy of the Project Site compared to the Project, a change in off-site groundborne operation vibration is not anticipated to be perceptible under Alternative 3 compared to the Project, and, as such, impacts under Alternative 3 would be similar to the Project.

Population and Housing

Induce Substantial Unplanned Population Growth

During operation, the Project would generate 733 new residents and 20 employees. Accounting for the existing 147 employees, the net decrease in employees under the Project would be 127 people. Alternative 3 would generate 529 new residents and 20 employees. Alternative 3 and the Project's contribution to population and/or employee growth would continue an infill growth pattern that is encouraged locally. Neither Alternative 3 nor the Project would exceed projected SCAG growth forecasts for the City and region. Alternative 3 would be consistent with regional and local policies that encourage mixed-use and higher density housing within the City and region, but to a lesser extent than the Project with fewer units. The Project and Alternative 3's contribution of housing would help the City's ability to meet its housing obligation under SCAG's RHNA and goals of the 2021-2029 Housing Element. Since Alternative 3 would not include any affordable housing units, Alternative 3 would be less consistent with SCAG and City objectives which seek an increase in diverse housing options. However, because Alternative 3 would result in less new residential population as compared to the Project, impacts with respect to induced direct or indirect substantial unplanned population growth would be less than the Project's less than significant population and housing impacts.

Public Services

Fire Protection

Construction

Alternative 3, as with the Project, would involve construction activities and intensify the use of the Project Site so that it could increase demand on fire protection and emergency medical services, as well as potentially affect emergency access. As with the Project, Alternative 3 would comply with all regulatory requirements including regulations set forth in the Safety and Health Regulations for Construction established by OSHA and compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. In addition, the Project and Alternative 3 would implement Project Design Feature TRAF-PDF-1 to provide a Construction Management Plan to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The implementation of regulatory requirements and project design features would facilitate emergency access. With such features, neither the Project nor Alternative 3 would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, similar to the Project, construction under Alternative 3 would result in less-than-significant impacts related to fire protection that are similar to the Project.

Operation

During operation, the Project would generate 733 new residents and 20 employees. In comparison, Alternative 3 would generate 529 new residents and 20 employees. Alternative 2, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, CCMC, and CCFD requirements, including installation of a fire sprinkler suppression system, a fire alarm system, an Emergency Responder Radio Coverage, smoke detectors, and signage, among other fire prevention features. Compliance with applicable requirements under both the Project and Alternative 3 would reduce demand on facilities and equipment without creating the need for new or expanded fire facilities. In addition, both buildings under the Project and Alternative 3 would be required to install an automatic fire sprinkler system. As the Project Site is located within a highly urbanized area accessed via an established street system, impacts on emergency response under the Project or Alternative 3 would not be significant. Alternative 3, as with the Project, would also be consistent with CCFD fire flow requirements. As such, the Project and Alternative 3 would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 3, as with the Project, would be less than significant. However, because Alternative 3 would include a reduced residential population compared to the Project, impacts related to fire protection services under Alternative 3 would be less than the Project.

Police Protection

Construction

Alternative 3, as with the Project, would result in construction activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 3's construction phase, although of shorter duration than that of the Project, could

increase demand for police protection services. To reduce CCPD demand during construction, Alternative 3, as with the Project, would implement security measures under Project Design Feature POL-PDF-1 to limit access to construction areas and provide for cameras to monitor the Project Site during off hours. Similar to the Project, construction activities under Alternative 3 may involve temporary partial lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. As with the Project, Alternative 3 would implement Project Design Feature TRAF-PDF-1. Under Project Design Features TRAF-PDF-1, a Construction Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Furthermore, it is not anticipated that any additional officers from CCPD would be needed to monitor the Project Site during construction outside of the existing officers that patrol the area. Additionally, the various safety and control features that would be implemented during construction would reduce the potential for incidents that would require police responses. With such features, neither the Project nor Alternative 3 would increase police services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. Therefore, impacts under Alternative 3 would be less-than-significant and similar to the Project.

Operation

During operation, the Project would generate 733 new residents and 20 employees. In comparison, Alternative 3 would generate 529 new residents and 20 employees. Impacts to police services are based on an increase in the ratio of officers to residential population. Consequently, since Alternative 3 would generate a lower residential population in the CCPD service area, which has a current residential population of approximately 40,000, Alternative 3 would result in an incrementally lower change to the officer per resident service ratios as compared to the Project. As provided in Project Design Feature POL-PDF-2, both the Project and Alternative 3 would incorporate a security program to reduce demand for police services and to ensure the safety of occupants. The security program would reduce the potential for on-site crimes, including loitering, theft, and burglaries and would be reviewed for further suggestions by the CCPD. CCPD correspondence in response to the preparation of the Draft EIR stated that the Project would not result in the need for new or altered police facilities.[10] Given that Alternative 3 have a lower residential population than the Project, the CCPD's determination is equally applicable to Alternative 3. Thus, neither the Project nor Alternative 3 would result in substantial adverse physical impacts associated with the provision of a new or physically altered police facility, the construction of which would cause significant environmental impacts. Impacts relative to police services would be less than significant under both the Project and Alternative 3. However, because Alternative 3 would reduce the Project's residential population, impacts to police services would be less than the Project's less-than-significant impact.

Schools

Construction

Construction under either the Project or Alternative 3 would generate employees who are anticipated to be hired from a mobile regional construction work force. Given the mobility and temporary duration of work at a particular site, construction employees not residing locally would

[10] CCPD, Correspondence from Sergeant Carey Grant, Culver City Police Department Admin Sergeant, October 12, 2023. Provided in Appendix H-2 of this Draft EIR.

not be expected to relocate residences (and, therefore, generate a new student population). Therefore, construction of either the Project or Alternative 3 would not result in a notable increase in the resident population or new students needing to attend local schools. With the nearest public CCUSD school located approximately 0.7 mile northwest of the Project, no public schools would be physically affected by construction activities at the Project Site. Construction impacts on schools under both the Project and Alternative 3 would be less than significant. Impacts on schools under Alternative 3 would be similar to the Project's less-than-significant impacts.

Operation

Alternative 3 would include 223 units, as compared to the Project's 309 units. Thus, with an approximate 28 percent decrease in units, there would be similar percentage reduction in students generated under Alternative 3. That is, the Project's 162 students would be decreased to approximately 117 students generated under Alternative 3. Similar to the Project, under Alternative 3, El Rincon Elementary School, Culver City Middle School, and Culver City High School are conservatively assumed that the Project or Alternative 3 have the potential to result in a new seating shortage at all three schools.

Under either the Project or Alternative 3, pursuant to SB 50, the Project Applicant would be required to pay development fees to CCUSD prior to issuance of building permits. Under Government Code section 65995 and 65996, the payment of these fees is considered full and complete mitigation of school impacts. Therefore, neither the Project nor Alternative 3 would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities and impacts would be less than significant. Because Alternative 3 would result in a lower generation of students, operational impacts on schools would be less than the Project's less-than-significant impact.

Parks and Recreation

Construction

Construction activities under both the Project and Alternative 3 have the potential to affect parks and recreational facilities. A small number of construction workers may visit public parks to eat lunch or for recreational activity after a workday. However, because construction workers are temporary employees with high turnover during various phases of construction, the use of public parks would be uncommon and short-term. In addition, neither the Project nor Alternative 3 directly impact public park facilities. Construction of either the Project or Alternative 3 would not include or require the construction, alteration, or expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore, Alternative 3's impacts associated with parks and recreational facilities would be similar to the Project's less-than-significant impacts.

Operation

Alternative 3 would reduce the Project's residential component by developing only 223 residential units, as compared to the Project's 309 residential units. Population increases under both the Project and Alternative 3 would increase demand for parks and recreational facilities. The Project and Alternative 3's publicly-accessible open space and private, common recreational amenities would fulfill some of the Project and Alternative 3's demand on park facilities. In addition, through the payment of required in-lieu fees for parks and recreational facilities, the Project and Alternative 3

would be consistent with the CCMC parkland requirements, which require the Applicant to pay fees to offset park- and open space-related impacts of a project. With the required payment of in-lieu fees, both the Project and Alternative 3 would meet CCMC open space and parkland requirements and impacts would be less than significant. As such, similar to the Project, Alternative 3 would not result in significant impacts to parks and recreational facilities. However, since Alternative 3 would generate less residential population and therefore result in a lower demand for parkland than under the Project, impacts on parks and recreational facilities would be less than the Project's less-than-significant impacts.

Transportation

Conflict with Programs, Plans, Ordinances, or Policies Addressing the Circulation System, Transit, Roadways, Bicycle, and Pedestrian Facilities

Similar to the Project, Alternative 3 would support multimodal transportation options as well as promote transportation-related safety in the vicinity. Alternative 3, as with the Project, would not conflict with policies or procedures of the City's General Plan Circulation Element, the Culver City Short Range Transit Plan, the Bicycle and Pedestrian Action Plan, the Complete Streets Policy, the NTMP Procedures Manual, Residential Parkway Guidelines, the Local Road Safety Plan and Vision Zero. As with the Project, Alternative 3 would implement Project Design Feature TRAF-PDF-2, which would include implementation of a TDM Program that would help to reduce volumes on nearby roadways due to employee commute and encourage transit ridership through various programs. Similar to the Project, as Alternative 2 would not conflict with any of the policies and procedures contained in the above-mentioned City of Culver City transportation-related programs, plans, ordinances, and policies, impacts relative to plans and programs would be less than significant. When compared to the Project, impacts related to conflicting with programs, plans, ordinances, and policies, addressing the circulation system under Alternative 3 would be similar to the Project.

Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

Utilizing the City of Culver City VMT Calculator and not accounting for any TDM measures (as was calculated the Project in Section 4.11, *Transportation*, of this Draft EIR), the VMT for employees under Alternative 3 was calculated.[11] According to the VMT Calculator, Alternative 3 would generate 1,904 daily trips and 7,883 daily VMT. The daily household VMT per capita would be 7.2. Comparatively, the Project would generate 1,462 daily trips and 11,874 VMT. The daily household VMT per capita for the Project is estimated at 6.8, which is below the citywide household VMT threshold of 7.1 per capita. It is assumed that Alternative 3 would implement TDM measures to reduce its VMT to below the household VMT per capita threshold. By doing so, neither the Project nor Alternative 3 would result in VMT impacts that exceed the City's VMT thresholds. Impacts regarding VMT would be consistent with the City's Transportation Study Criteria and Guidelines and, thus, consistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT impacts under either the Project or Alternative 3 would be less than significant. While Alternative 3 would have a lower daily VMT compared to the Project, the household daily VMT per capita for Alternative 3 would be higher than the Project (without any TDM measures). Since the City's transportation goals and policies seek to promote density in areas with available transit and which

[11] See Appendix K, Alternatives Documentation, of the Draft EIR for supplemental information regarding trips and VMT for the Project alternatives.

reduce VMT, Alternative 3's higher household daily VMT per capita is considered to meet the City's transportation goals and policies relevant to VMT reduction to a lesser extent than the Project. As such, impacts would be greater under Alternative 3 than the Project's less than significant VMT impact.

Design Hazards

Alternative 3, as with the Project, would design driveways to comply with City of Culver City standards as outlined in the Culver City Municipal Code (Section 17.320.040). The driveways would be configured to avoid or minimize potential conflicts with transit services and pedestrian traffic by providing curb and sidewalk to separate pedestrian movements from vehicular movements. The Project or Alternative 3 would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the Project Site. As Alternative 3 would generate fewer trips to/from the Project Site, projected queue lengths would similarly not exceed the available storage lengths under Alternative 3. Impacts under Alternative 3 would be less than significant and similar to the Project.

Emergency Access

The Project Site is located within an urbanized area with a fully developed roadway system. Similar to the Project, Alternative 3 would include temporary construction activities (e.g., temporary lane closures) and traffic that could potentially affect emergency access to the Project Site and surroundings. The Project and Alternative 3 would implement Project Design Feature TRAF-PDF-1, which would require construction staging and construction worker parking to be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. In addition, emergency vehicle access to the Project Site and neighboring land uses would be maintained, and worker and construction equipment delivery would be scheduled to avoid peak traffic hours. In addition, future driveway and building configurations under the Project and Alternative 3 would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for visitors and employees. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 3, as with the Project, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Alternative 3 would be less than significant and similar to the Project.

Tribal Cultural Resources

The City complied with Assembly Bill (AB) 52 in its Native American tribal consultation and records searches conducted through South Central Coastal Information Center (SCCIC) and the Native American Heritage Commission (NAHC). No known prehistoric archaeological resources were identified within or immediately adjacent to the Project Site. No known tribal cultural resources, as defined in PRC Section 21074(a)(1), or resources determined by the City in its discretion and supported by substantial evidence to be significant pursuant to PRC Section 5024.1 have been identified within the Project Site as a result of AB 52 consultation, or as a result of the Sacred Lands File (SLF) search through the NAHC and the SCCIC. However, the Project Site appears to have a moderate to high potential for encountering previously unknown tribal cultural resources during construction. As a result, similar to the Project, Alternative 3 would implement

Mitigation Measure CUL-MM-2 and Mitigation Measures TCR-MM-1 through TCR-MM-3. With implementation of mitigation measures, potentially impacts under the Project and Alternative 3 would be reduced to less-than-significant levels. However, when compared to the Project, because the depth and extent of excavation would be less under Alternative 3, impacts related to tribal cultural resources under Alternative 3 would be less than the Project.

Utilities and Service Systems

Water Supply

New or Expanded Water Facilities

Under Alternative 3, while construction duration would be reduced as compared to the Project, construction water use would be similar on a daily basis. The estimated construction water use would be less than the existing domestic water use of approximately 7,360 gpd for the Project Site (as shown in Table 4.13.1-1). As such, the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project or Alternative 3.

Water service for the Project or Alternative 3 would be provided by GSWC, as under existing conditions. When analyzing infrastructure capacity, although domestic water demand is the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and are, therefore, the primary means for analyzing infrastructure capacity. The existing hydrants in the area of the Project Site would provide adequate fire flow meeting the requirements of CCFD for the Project. Given the relatively smaller size of the proposed building under Alternative 3 as compared to the Project, it can be expected that the existing hydrants serving the Project Site would also be able to provide adequate fire flow for Alternative 3. As such, operation of the Project or Alternative 3 would not require or result in the relocation or construction of new or expanded water facilities, the construction of which would cause significant environmental effects and impacts would be less than significant. When compared to the Project, impacts related to new for expanded water facilities under Alternative 3 would be similar to the Project.

Water Supplies

While construction duration would be reduced under Alternative 3 as compared to the Project, the estimated construction daily water use would be less than the existing domestic water use of approximately 7,360 gpd for the Project Site (as shown in Table 4.13.1-1). As such, the existing water supplies would be available to meet the temporary water demand associated with construction of the Project.

Similar to the Project, Alternative 3 would not meet the minimum threshold criteria to require the preparation of a WSA per SB 610. Both the Project and Alternative 3 would increase long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Net domestic water demand (subtracting existing demand) for the Project would be 36,446 gpd, or 41 AFY. As shown **Table 5-4**, *Alternative 3 Estimated Water Consumption*, Alternative 3 would have a water demand of 31,674 gpd day. Subtracting the existing 7,360 gpd, the net water demand would be approximately 24,314 gpd or 27 AFY.

TABLE 5-4
ALTERNATIVE 3 ESTIMATED WATER CONSUMPTION

Proposed Use	Units	Water Use Rate [a]	Water Usage [b]	
			gpd	AFY
Studio	29 units	75/unit	26,115	29
1 Bed	129 units	110/unit		
2 Bed	65 units	150/unit		
Commercial	5,600 sf	50/1,000 sf	280	0.3
Irrigation [b]	—	—	5,279	6
		Total Proposed Water Demand	*31,674*	*35*
Existing Site Demand			-7,360	-8
		Total Net Water Demand	*24,314*	*27*

NOTES: gpd = gallons per day; sf = square feet, AFY = acre-feet per year.

[a] Estimated water usage is estimated as being equivalent to the estimated sewage generation for the Project. These rates are assessed using LA County Sanitation's Estimated Wastewater Generation Tables.

[b] 20% factor included to account for landscaping and irrigation consumption.

SOURCE: ESA, 2024.

Both the Project and Alternative 3 would be consistent with the demographic projections for the City in SCAG's SoCal Connect and, as such, the GSWC has sufficient water supplies as projected in its latest UWMP to serve the Project and Alternative 3 and the reasonably foreseeable future development during normal, dry, and multiple-dry years. Impacts regarding water supply during operation would be less than significant under both the Project and Alternative 3. However, because Alternative 3 would reduce overall water demand compared to the Project, Alternative 3's impacts would be less than the Project's less-than-significant water impacts.

Electric Power, Natural Gas, Telecommunications Facilities

Alternative 3, as with the Project, would utilize energy infrastructure to accommodate their respective demand for energy resources. Similar to the Project, Alternative 3's electricity and natural gas demands are expected to represent a small fraction of SCE and SoCalGas energy supplies and the service provider's existing infrastructure. Planned electricity and natural gas supplies would be sufficient to meet the Project's or Alternative 3's demand for electricity and natural gas. As with the Project, Alternative 3 would not result in an increase in demand for electricity, or natural gas, services that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Similar to the Project, impacts with respect to the relocation or expansion of electric power or natural gas infrastructure under Alternative 3 would be less than significant. As off-site electric power and natural gas infrastructure would accommodate demand under Alternative 3, impacts would be similar to the Project.

Relationship of the Alternative to Project Objectives

As described above, under Alternative 3, the Project would see a 28 percent reduction in residential units (density) by reducing the Project's 309 units to 223 units. Under Alternative 3, there would be no affordable units provided and as such, the Project's Density Bonus incentives related to additional units and building height would not be applicable to Alternative 3. Alternative 3 would

include the same 5,600 square feet of retail floor space as the Project. The building height would be 5-stories (over 1-level of subterranean parking) or 56 feet under Alternative 3. Publicly accessible open space on the ground level along Hannum would be reduced under Alternative 3 from 7,507 square feet under the Project to 2,500 square feet.

Alternative 3 would fully meet the following Project Objective similar to the Project:

8. Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.

Alternative 3 would meet the below Project Objectives, but to a lesser extent than the Project, since it would provide less landscape features, public open space and active ground floor uses with open space amenities, including no ground level housing units along Buckingham Parkway.

3. Provide open space amenities that will enhance existing site conditions through publicly accessible open space (Hannum Plaza), as well as a unified landscape design with common open space areas for Project residents.
4. Provide for a mix of commercial and residential uses to promote pedestrian activity, reduce vehicle trips and vehicle miles traveled, and encourage active transportation while maintaining appropriate levels of vehicle parking.
5. Activate the Hannum Avenue and Buckingham Parkway frontages by providing street-oriented retail and residential uses, and a landscaping program that further enhances the pedestrian experience.
7. Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including a building form with vertical and horizontal breaks, generous setbacks, light materiality, landscape features, and active ground floor uses with open space amenities.

While Alternative 3 would provide residential and retail uses similar the Project, it would not include affordable units and would provide these uses within a reduced building size and reduced residential occupancy. As such, Alternative 3 would partially meet the following Project Objectives:

1. Develop new, high-quality infill housing with a diverse mix of residential dwelling types, containing both market-rate and affordable units.

Alternative 3 would not meet the following objectives:

2. Fulfill the City's housing goals by improving access to quality housing for all members of the community through the provision of affordable housing in proximity to open space and public transportation, while maintaining access to a wide range of services and goods.
6. Utilize the state's Density Bonus laws to increase the permitted density at the Project Site in order to provide housing at a variety of income levels that will assist the City in meeting its Regional Housing Needs goals.

5.6 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an environmentally superior alternative is based on comparison of the alternatives to determine which among the alternatives would reduce or eliminate the impacts associated with the Project to the greatest degree. The comparative impacts of the Project and the Project alternatives are summarized in **Table 5-5**, *Comparison of the Impacts of the Project and Alternatives*, below. In addition, **Table 5-6**, *Ability of Alternatives to Meet Project Objectives*, is also provided to show a comparison of the ability of the analyzed alternatives to meet Project Objectives.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative, would be considered the environmentally superior because it would not involve new development and assumes the on-site office use would continue to operate similar to existing conditions. Alternative 1 would not meet any of the Project Objectives and would avoid all of the Project's potentially significant impacts and would have less impacts compared to the Project. However, because Alternative 1 has been identified as the environmentally superior alternative, identification of another environmentally superior alternative is required.

Alternative 2, the Existing Zoning Alternative, and Alternative 3, the Reduced Project Alternative, would both involve less development compared to the Project, and both alternatives would reduce, but not eliminate, the Project's significant unavoidable impacts related to Project-level on-site construction noise. As shown in Table 5-5, Alternative 2 would result in four (4) "greater" impacts (Operational regional emissions, Consumption of Energy Resources, GHG, and Transportation-VMT) for the issue areas analyzed compared to the Project, and 16 "less" impacts compared to the Project. Alternative 3 would result in two (2) "greater" impacts (Land Use and Transportation-VMT) for the issue areas analyzed compared to the Project, and 21 "less" impacts compared to the Project. Alternative 3 is considered the environmentally superior alternative, as it would reduce the magnitude of overall impacts compared to the Project to a greater extent than Alternative 2 since it would require less building construction and result in reduced residential occupancy at the Project Site.

However, because Alternative 3 would develop a smaller mixed-use development, the number housing units would be reduced and no affordable units would be provided. As such, Alternative 3 would not meet or meet to a lesser extent than the Project most of the Project Objectives related to: providing housing, including affordable housing, in accordance with the City's Regional Housing Needs goals; provision of publicly available open space; and promoting an active, landscaped pedestrian environment.

TABLE 5-5
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Existing Zoning Alternative	Alternative 3: Reduced Project Alternative
Aesthetics				
Regulations Governing Scenic Quality	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Air Quality				
Consistency or Conflict with Air Quality Management Plan	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Cumulatively Considerable Increase of Criteria Pollutants in Nonattainment Area				
Construction	Less than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less than Significant)
Sensitive Receptor Exposure To Pollutant Concentrations				
Construction – Localized Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less than Significant)
Operation – Localized Emissions	Less than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less than Significant)
Carbon Monoxide Hotspots	Less than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less than Significant)
Construction– Toxic Air Contaminates	Less Than Significant with Mitigation (Project-level and Cumulative)	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
Operation – Toxic Air Contaminates	Less than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Cultural Resources				
Archaeological Resources	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Energy				
Wasteful, Inefficient, and Unnecessary Consumption of Energy Resources	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Less (Less than Significant)
Conflict or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)

TABLE 5-5
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Existing Zoning Alternative	Alternative 3: Reduced Project Alternative
Geology and Soils				
Paleontological Resources	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Greenhouse Gas Emissions				
GHG Emissions/ Conflict with any Applicable Plan, Policy or Regulation Adopted for the Purpose of Reducing the Emissions of GHGs	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Less (Less than Significant)
Land Use and Planning				
Conflict with any Applicable Land Use Plan, Policy, or Regulation Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	Less than Significant	Less (No Impact)	Less (Less than Significant)	Greater (Less than Significant)
Noise				
Substantial Temporary or Permanent Increase in Ambient Noise Levels				
Construction – On Site	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
Construction – Off-Site (Mobile Source)	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation – On-Site	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation – Off-Site	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Vibration				
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less Significant)
Population and Housing				
Induce Substantial Unplanned Population Growth	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)

TABLE 5-5
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Existing Zoning Alternative	Alternative 3: Reduced Project Alternative
Public Services				
Fire Protection				
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Police Protection				
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Schools				
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Parks and Recreation				
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Transportation				
Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)
Geometric Design Hazards	Less than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Emergency Access	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)
Tribal Cultural Resources				
Tribal Cultural Resources	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)

TABLE 5-5
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Existing Zoning Alternative	Alternative 3: Reduced Project Alternative
Utilities and Infrastructure				
Water Supply				
Water Infrastructure	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Water Supply	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Electric Power, Natural Gas, and Telecommunications Facilities				
Electric Power, Natural Gas, And Telecommunications Infrastructure	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)

SOURCE: ESA. 2024

TABLE 5-6
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Existing Zoning Alternative	Alternative 3: Reduced Project Alternative
1. Develop new, high-quality infill housing with a diverse mix of residential dwelling types, containing both market-rate and affordable units.	Fully Meets Objective	Does Not Meet Objective	Does Not Meet Objective	Partially Meets Objective
2. Fulfill the City's housing goals by improving access to quality housing for all members of the community through the provision of affordable housing in proximity to open space and public transportation, while maintaining access to a wide range of services and goods.	Fully Meets Objective	Does Not Meet Objective	Does Not Meet Objective	Does Not Meet Objective
3. Provide open space amenities that will enhance existing site conditions through publicly accessible open space (Hannum Plaza), as well as a unified landscape design with common open space areas for Project residents.	Fully Meets Objective	Does Not Meet Objective	Does Not Meet Objective	Meets Objective (to a lesser extent than the Project)
4. Provide for a mix of commercial and residential uses to promote pedestrian activity, reduce vehicle trips and vehicle miles traveled, and encourage active transportation while maintaining appropriate levels of vehicle parking.	Fully Meets Objective	Does not Meet Objective	Does Not Meet Objective	Meets Objective (to a lesser extent than the Project)
5. Activate the Hannum Avenue and Buckingham Parkway frontages by providing street-oriented retail and residential uses, and a landscaping program that further enhances the pedestrian experience.	Fully Meets Objective	Does not Meet Objective	Does Not Meet Objective	Meets Objective (to a lesser extent than the Project)
6. Utilize the state's Density Bonus laws to increase the permitted density at the Project Site in order to provide housing at a variety of income levels that will assist the City in meeting its Regional Housing Needs goals.	Fully Meets Objective	Does not Meet Objective	Does Not Meet Objective	Does Not Meet Objective
7. Provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including a building form with vertical and horizontal breaks, generous setbacks, light materiality, landscape features, and active ground floor uses with open space amenities.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective (to a lesser extent than the Project)	Meets Objective (to a lesser extent than the Project)
8. Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions through such features as electric vehicle charging stations, energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective (Similar to Project)	Fully Meets Objective (Similar to Project)

SOURCE: ESA, 2024.

This page intentionally left blank

CHAPTER 6
Other CEQA Considerations

This section summarizes the findings of the Draft EIR with respect to: significant unavoidable environmental impacts; reasons why the Project is being proposed, notwithstanding significant unavoidable impacts; irreversible environmental changes; growth inducing impacts; potential secondary effects related to Project mitigation measures; and effects found to be less than significant.

6.1 Significant Unavoidable Impacts

CEQA Guidelines Section 15126.2(a) requires that an EIR describe significant environmental impacts of a project on the environment. Direct and indirect significant effects shall be clearly identified and described, giving due consideration to short-term and long-term effects. As evaluated in Section 4.8, *Noise*, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be mitigated with respect to Project-level on-site construction noise impacts.

Implementation of Mitigation Measures MM-NOI-1 (Sound Walls) and MM-NOI-2 (Construction Practices) would reduce the Project's on-site construction noise impacts at the off-site ground-level noise sensitive receptors, to the extent technically feasible.[1] With implementation of Mitigation Measures MM-NOI-1 and MM-NOI-2, the construction noise levels at all receptor locations would be reduced below the 5-dBA significance threshold. Therefore**,** with implementation of mitigation measures MM-NOI-1 and MM-NOI-2, impacts from on-site construction noise would be less than significant with approval of an extended hours construction permit. However, construction during off-hours (between 7:00 a.m. and 8:00 a.m. Monday to Friday and 7:00 a.m. to 9:00 a.m. Saturday) during the earthwork shoring/excavation, concrete pours (mat foundation and deck pours) and tower crane erection/disassembly phases of construction would remain significant and unavoidable if an extended hours permit was not obtained by the Project because they would occur outside of the City's allowable construction hours.

6.2 Reasons Why the Project Is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of the Project's significant unavoidable construction-related noise impact, Section 15126.2(c) of the State *CEQA Guidelines* also requires a description of the reasons why a project is being proposed, notwithstanding significant unavoidable impacts associated with a project.

[1] Technical infeasibility means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

The underlying purpose of the Project is to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, and retail uses, as well as publicly accessible open spaces, to revitalize the Project Site, promote walkability, and enhance the City's economic base.

The Project's residential component would help the City meet its housing needs established in the Southern California Associate of Governments (SCAG) Regional Housing Needs Assessment (RHNA). The Project would improve access to quality housing for all members of the community through the provision of affordable housing in proximity to open space and public transportation, while maintaining access to a wide range of services and goods.

The 2021-2029 Housing Element indicated that the total housing growth need for the City during the 2021-2029 planning period is 3,341 units. Under the approved Housing Element, the Project Site is designated as Mixed-Use High. Per the City's 2021-2029 Housing Element, Mixed-Use High land uses are permitted to develop up to 100 units per acre. The Project's 309 residential units, including affordable housing, would be consistent with the City's Housing Element objectives and policies that seek to expand the City's housing supply with a diverse range of housing options.

The Project would support the growth of the City's economic base by creating jobs during both Project construction and operation of the Project. The Project would also create commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs and housing for residents in support of local businesses.

The Project would provide a development that complements and improves the visual character of the area by connecting with the surrounding urban environment through a high level of architectural design, including a building form with vertical and horizontal breaks, generous setbacks, light materiality, landscape features, and active ground floor uses with open space amenities. The Project's mix of commercial and residential uses would activate the Hannum Avenue and Buckingham Parkway frontages by providing street-oriented retail and residential uses. The Project's open space amenities would enhance existing site conditions through publicly accessible open space (Hannum Plaza), as well as a unified landscape design with common open space areas for Project residents.

Furthermore, the Project's mix of uses would support policies that aim to reduce vehicle trips and vehicle miles traveled. As described in the 4.11, *Transportation*, of this Draft EIR, the Project proposes a CCMC Section 7.05.015 required Transportation Demand Management (TDM) Program as described in Project Design Feature TRAF-PDF-2. The Project's TDM Program (TRAF-PDF-2) includes TDM measures to reduce peak hour vehicular traffic and air emissions to and from the Project Site. The Project's TDM Program (TRAF-PDF-2) includes a comprehensive program of measures, design features, transportation services, education programs, and incentives intended to reduce the effect of Project traffic from residents, employees, and visitors to the Project Site during the most congested time periods of the day. The TDM measures include the following: Transportation Information Center (TIC); Bicycle Parking and Amenities, which includes 92 bicycle parking spaces (11 short-term and 81 long-term spaces), as required by CMCC Section 7.05.015; Pedestrian-Friendly Environment; Employee Parking; Bus Stop Improvements.

Additional TDM strategies that may be offered by the Project to further reduce VMT and reliance on single-passenger vehicles, and help future residents and employees manage each TDM element and maximize program participation include: Project Transportation Coordinator; Transportation Information Packet for New Residents and Employees; and Bike Repair Station (see Section 4.11, *Transportation*, of this Draft EIR for a detailed explanation of all TDM measures contained in TRAF-PDF-2). Thus, the Project would implement strategies and action plans as part of a comprehensive TDM Program (TRAF-PDF-2) in compliance with the requirements set forth in CCMC Section 07.05.015 to reduce single occupancy vehicle trips while promoting the use of alternative transportation modes, thereby reducing Project VMT.

The project would also meet or exceed applicable requirements of Title 24 California Code of Regulations as well as electricity requirements in the 2022 Building Efficiency Standards which encourage efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards. The Project would be designed with Project Design Feature GHG-PDF-1 and be required to comply with the Culver City Green Building Program and ordinances where the Project would achieve the USGBC LEED certified performance level or higher to improve building energy efficiency, and design features would include energy conservation, water conservation, TDM and mobility measures, and pedestrian- and bicycle-friendly site design. Also, as part of Project Design Feature GHG-PDF-1, the Project would directly support building electrification as the Project will utilize only electricity and no natural gas in all land uses except for the retail space. While building electrification would result in higher electricity usage, it would greatly reduce the use of a fossil fuel and the associated GHG emissions (i.e., natural gas combustion) from building energy demand since only the retail space still uses natural gas. A total of 86 parking spaces (81 residential + 5 commercial) would be electric vehicle (EV) capable. Forty-four (44) total spaces (41 residential + 3 commercial) would be EV ready. The Project would include 92 bicycle spaces, consisting of 11 short-term and 81 long-term bicycle parking spaces. As it also relates to energy conservation, the Project would include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances. As it relates to water conservation, the Project would incorporate efficient water management through low flow faucets and water-efficient landscape design with weather-based controllers and drip irrigation systems.

The Project would use tree landscaping to create passive solar shading and would use cool roof/pavement coatings to reduce an urban heat island effect. The Project would also comply with applicable solar installation regulatory requirements. The Project will focus on occupant wellness by incorporating healthy materials with low-volatile organic compounds (VOCs), abundant daylight, superior interior lighting quality, and accessible thermal comfort control to prevent sick building syndrome. Other building features would include such items as installation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; and dedicated on-site recycling areas. The Project will also incorporate indoor air quality best practices to provide clean ventilation for improved breathing.

For all the reasons stated above, the Project is being proposed notwithstanding its significant unavoidable impacts. It should also be noted that the Project's significant and unavoidable noise impacts are associated with temporary and periodic construction activities, similar to those occurring

at development sites in urban areas, particularly within infill locations. Furthermore, should the project's Approval for Extended Hours of Construction be granted by the City, it can be anticipated that the Project's significant and unavoidable construction noise impacts would not occur.

6.3 Irreversible Environmental Changes

According to CEQA Guidelines Sections 15126(c) and 15126.2(c), an EIR is required to address any significant irreversible environmental changes that would occur should the proposed Project be implemented:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

The Project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the Project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project Site. Project construction would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and diesel would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site. As stated in Section 4.4, *Energy,* of this Draft EIR, Project construction would utilize energy for necessary on-site activities and to transport construction materials, excavated fill, and demolition debris to and from the Project Site. Project construction would implement idling restrictions and the use of cleaner, energy-efficient equipment would result in less fuel combustion and energy consumption and thus reduce the Project's construction-related energy use.

Project operation would continue to expend nonrenewable resources that are currently consumed within the City. These include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Project, and the existing, finite supplies of these natural resources would be incrementally reduced. As discussed in Section 4.4, *Energy,* of this Draft EIR, buildout of the Project would result in an increase in on-site demand for electricity, natural gas, and transportation energy (e.g., petroleum-based fuels related to vehicular travel). Electricity and natural gas usage during Project operations would be minimized through incorporation of applicable Title 24 standards, applicable CALGreen Building Code

requirements, and Culver City's Green Building Code. Furthermore, as noted above, the Project incorporates energy-conservation measures that would achieve LEED rating system at a "certified" performance level or higher and would include all-electric development for all land uses except retail (refer to Project Design Feature GHG-PDF-1). The Project would implement PV solar in compliance with the City's Green Building Program which, at a minimum requires 1 kW of solar for every 10,000 square feet. The Project would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high-efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; and active circulation. Additionally, in accordance with Chapter 17.320.035 of the Culver City Municipal Code (CCMC), the City requires at least 20 percent EV capable parking spaces, 10 percent EV-ready parking spaces, and 10 percent EV charging stations for both new residential and retail developments. The Project would be required to and would provide a minimum of 86 EV capable spaces, 44 EV-ready spaces, and 44 spaces which would have full EV chargers and stations. Therefore, while the Project would result in a net increase in energy demand, the Project would be consistent with energy efficiency policies from the City, region, and State, and would also incorporate its own energy conservation measures to reduce energy usage.

Also, as analyzed in Section 4.3, *Energy,* the Project would result in a less-than-significant energy impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's electricity and natural gas usage would be consistent with future usage projections for the region. Electricity generation capacity and supplies of natural gas as well as transportation fuels would be sufficient to meet the needs of the Project construction and operational activities. Construction of the Project would utilize fuel-efficient trucks and equipment consistent with federal and State regulations, such as fuel efficiency regulations in accordance with CARB's Pavley Phase I and II standards (at a minimum through the model year 2020 standards depending on the outcome of the SAFE Vehicles Rule court challenge), the anti-idling regulation in accordance with CCR, Title 13, Section 2485, and fuel requirements in accordance with CCR, Title 17, Section 93115, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. The Project would also comply with Title 24 standards and applicable CALGreen Building Code requirements.

In addition, the Project would be consistent with the State's Assembly Bill (AB) 32 GHG reduction target and would result in a less-than-significant impact with respect to consistency with applicable plans, policies, or regulations to reduce GHG emissions (see Section 4.6, *Greenhouse Gas Emissions*). The Project would not conflict with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2020–2045 RTP/SCS, and Culver City's Green Building Program.

Continued use of such non-renewable resources would be on a relatively small scale and consistent with regional and local growth forecasts in the area, as well as State and local goals for reductions in the consumption of such resources. Furthermore, the Project would not affect access to existing resources, nor interfere with the production or delivery of such resources. The Project Site is

currently developed and contains no known energy resources that would be precluded from future use through Project implementation. Based on the above, the Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant.

6.4 Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(d) requires an EIR to discuss the ways a proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

The Project is located on land currently developed with office uses in a highly urbanized area that is well served by existing infrastructure. The Project would demolish the existing office uses (30,672 square feet [sf]) on the Project Site and develop 309 residential units and 5,600 sf of retail space, resulting in an increase of 497,767 sf in developed floor area on the Project Site. As discussed in Section 4.9, *Population and Housing*, of this Draft EIR, the Project would result in 733 new residents and 20 new employees and its contribution to population, housing, and employment compared to the growth projections for the City in SCAG's 6th Cycle Regional Housing Needs Assessment (RHNA) and the 2020-2045 RTP/SCS for both the Project's fully operational year (2027) and the 2020-2045 RTP/SCS horizon year (2045), would not result insubstantial induced population growth in the area directly through new housing and employment. The Project's residential development would represent a portion of the City's housing share of the RHNA approved by SCAG for the period through 2021 and 2029. Therefore, the Project would not generate growth beyond the range of development anticipated within the established SCAG regional forecast for the City. Rather than being unplanned, the Project's growth in population, housing, and employment would align with infill development priorities near available transit options consistent with State, regional, and local policies. As such, the potential for physical impacts on the environment due to unplanned population, housing, and employment growth would be less than significant.

The Project would develop residential and commercial uses, located in proximity to existing public transit, including proximity to the Culver City Transit Center (approximately 0.6 miles east) which serves Los Angeles County Metro Bus Lines 108 and 110, as well as Culver City Bus Line 6. Other transit operations in the vicinity of the site include Culver City Bus Line 5C2 – Overland/Fox Hills, which includes Stop 306 Hannum Ave/Buckingham Parkway, approximately 210 feet west of the Project Site. Therefore, the Project would concentrate employment growth in an area well-served by regional and local bus lines. As such, the Project would be consistent with SCAG's 2020-2045 RTP/SCS policies for the concentration of growth in proximity to transit.

The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the infill Project is located in an urbanized area that is served by current infrastructure (e.g., roads and utilities), and community service facilities. As further

described in Section 4.11 *Transportation*; Section 4.13.1*, Utilities and Service Systems – Water Supply* in the Project's Initial Study (see Appendix A of this Draft EIR), the Project's off-site infrastructure improvements would consist of tie-ins to or local upgrades of the existing utility mainlines already serving the Project area. Therefore, the Project would not include the construction of off-site infrastructure that would induce substantial growth and development in new areas. In addition, as further described in Section 4.10.1, *Public Services - Fire Protection*; Section 4.10.2; *Public Services - Police Protection*; Section 4.10.3, *Public Services - Schools*; Section 4.10.4, *Public Services - Parks and Recreation*, of this Draft EIR, the Project would not require the construction of new public services facilities that would impact the environment.

The Project's contribution to growth would also not be cumulatively considerable. As further evaluated in Section 4.9, *Population and Housing*, of this Draft EIR, related projects considered in association with the Project also represent infill development that would be served by available infrastructure and would result in growth falling within projected growth forecasts for the City and the region.

Overall, based on the above, as the Project would represent infill development and growth within the range of development anticipated in regional and local plans, and as the Project Site is well served by existing infrastructure, it would not remove obstacles to growth or induce unplanned growth beyond that associated with the Project that would require development and construction of new service facilities that would significantly affect the environment individually or cumulatively.

6.5 Potential Secondary Effects Related to Project Mitigation Measures

CEQA Guidelines Section 15126.4(a)(1)(D) requires that if a mitigation measure proposed to address the significant effects of the Project would cause one or more significant effects in addition to those caused by the Project, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the Project. Accordingly, the mitigation measures proposed to address significant Project impacts were evaluated to determine if significant secondary impacts associated with their implementation would occur. The following provides a discussion of the subject areas in which mitigation measures are required, as well as any potential secondary significant effects that could occur as a result of their implementation. For the reasons stated below, implementation of the Project's mitigation measures would not result in significant secondary impacts.

6.5.1 Air Quality

Mitigation Measure AQ-MM-1 requires the Applicant to maintain construction equipment to reduce exhaust emissions and to utilize equipment that meets USEPA Tier 4 Final off-road emissions standards or equivalent for equipment. Mitigation Measure AQ-1 also requires the use electrified tower cranes in place of diesel-fueled equipment. This mitigation measure for air quality would implement emissions control strategies that would reduce impacts to less-than-significant levels. As this mitigation measure includes control strategies for different construction equipment that the Applicant would use or install, no further impacts would occur with its implementation.

Therefore, the mitigation measure for air quality would not result in significant secondary impacts on the environment.

6.5.2 Cultural Resources – Archaeological Resources

Mitigation Measures ARCH-1 through ARCH-3 establish protections for archaeological resources and tribal cultural resources through monitoring plans to identify such resources should they be uncovered during construction at the Project Site. These measures also include treatment and reporting of resources should they be encountered. The mitigation measures ensure that resources would be treated consistent with CEQA Guidelines and regulatory provisions for the protection of these resources. The actions required for monitoring and treatment of resources if they are encountered would not require additional disturbance on the Project Site or cause changes in the physical environment that would result in significant secondary impacts on the environment.

6.5.3 Geology and Soils – Paleontological Resources

Mitigation Measures GEO-1 through GEO-4 establish protections for paleontological resources through identification, treatment, and preservation of such resources should they be discovered on the Project Site. These measures include treatment and reporting of resources should they be encountered. The mitigation measures ensure that resources would be treated consistent with CEQA Guidelines and regulatory provisions for the protection of these resources. Similar to the mitigation of archaeological resources described above, the activities involved with monitoring, treatment, and reporting would not require additional disturbance on the Project Site or cause changes in the physical environment that would result in significant secondary impacts on the environment.

6.5.4 Noise

Implementation of Mitigation Measure NOI-1 would reduce construction noise through provision of temporary 6 to 15-foot-tall construction noise barriers. The construction fence would be temporary, but would result in less than significant aesthetics impacts, which would be secondary and also temporary in nature. Once construction is completed, the construction noise barriers would be removed. As such, Mitigation Measure NOI-1 would not result in significant secondary impacts. Implementation of Mitigation Measure NOI-2 includes construction practices and strategies to minimize construction noise such as ensuring equipment is operating in good operating condition according to manufacturer specifications and use of proper noise mufflers. Mitigation Measure NOI-2 would be a control strategy for construction equipment and activities that the Applicant would implement or install, thus no further impacts would occur with this mitigation implementation. Therefore, these mitigation measures for construction noise would not result in significant secondary impacts on the environment.

6.5.5 Tribal Cultural Resources

Mitigation Measure TCR-MM-1 requires retention of a Native American Monitor, the provisions of a Tribal Cultural Resources Sensitivity Training session, and Native American monitoring. Mitigation Measure TCR-MM-2 requires completion of daily monitoring logs and Mitigation Measure TCR-MM-3 provides for provisions in the event of a discovery of potential tribal cultural resources. The mitigation measures ensure that resources would be treated consistent with CEQA

Guidelines and regulatory provisions for the protection of these resources. The actions required for monitoring and treatment of resources if they are encountered would not require additional disturbance on the Project Site or cause changes in the physical environment that would result in significant secondary impacts on the environment.

6.6 Impacts Found Not to Be Significant

CEQA Guidelines Section 15128 states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a Project were determined not to be significant and were not discussed in detail in the Draft EIR. The Initial Study, provided in Appendix A-2 of the Draft EIR, supports findings that the Project would result in less than significant impacts related to Agriculture and Forestry Resources; Air Quality (odors); Biological Resources; Cultural Resources (historic resources and human remains); Geology and Soils (all subtopics except for paleontological resources); Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning (physical division of an established community); Mineral Resources; Noise (airport noise), Population and Housing (displacement); Public Services (other public facilities); Utilities and Service Systems (wastewater and solid waste); and Wildfire. As such, the Initial Study concluded that these issues would not be evaluated further in the Draft EIR in accordance with CEQA Guidelines Section 15063(c)(3)(A). For further discussion of these issues and more detailed evaluation of potential impacts found not to be significant refer to the Initial Study provided in Appendix A-2 of this Draft EIR.

This page intentionally left blank

CHAPTER 7
References

4.1 Aesthetics

Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego, 139 Cal.App. 4th 249, 279 (2006).

California Department of Transportation (CA, California State Scenic Highway System Map – ArcGIS Online, https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed July 6, 2022.

City of Los Angeles, L.A. CEQA Thresholds Guide, Exhibit A.3-1, 2006.

City of Los Angeles Department of City Planning, General Plan Conservation Element. Originally adopted September 26, 2001.

City of Los Angeles Department of City Planning, General Plan Framework Element, originally adopted December 11, 1996 and readopted August 8, 2001.

City of Los Angeles Department of City Planning, General Plan Framework Element, Chapter 5, originally adopted December 11, 1996 and readopted August 8, 2001.

City of Los Angeles Department of City Planning, General Plan Framework, Executive Summary, originally adopted December 11, 1996 and readopted August 8, 2001.

4.2 Air Quality

42 United States Code Section 7401 et seq. (1970).

SCAG 2016–2040 RTP/SCS Final Growth Forecast by Jurisdiction.

California Air Resources Board (CARB), Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed on July 8, 2022.

CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health. Accessed July 8, 2022.

CARB, Visibility-Reducing Particles & Health. Last reviewed July 8, 2022.

City of Culver City, Culver City General Plan, Circulation Element, 1995.

City of Culver City, Municipal Code Chapter 15.02.1100, Green Building Program and Requirements.

City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.

City of Los Angeles, Plan for a Healthy Los Angeles, 2021.

Fehr & Peers, Crossings Campus Project Transportation Impact Study, Appendix D, July 2022.

San Joaquin Valley Air Pollution Control District (SJVAPCD), Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno, Filed April 13, 2015.

SCAG, Final 2016 RTP/SCS, 2016, https://scag.ca.gov/resources-prior-plans. Accessed July 8, 2022.

SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 2005.

SCAQMD, Air Quality Analysis Guidance, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#. Accessed July 8, 2022.

SCAQMD, Air Quality Significance Thresholds, April 2019.

SCAQMD, Amicus Brief in Support of Neither Party, Sierra Club v. County of Fresno, April 6, 2015.

SCAQMD, Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno.

SCAQMD, CEQA Air Quality Handbook 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). Accessed July 8, 2022.

SCAQMD, Cumulative Impacts White Paper, Appendix D.

SCAQMD, Final 2016 AQMP, March 2017. http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp. Accessed July 8, 2022.

SCAQMD, Final Localized Significance Threshold Methodology, June 2003 (Revised July 2008).

SCAQMD, Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds, 2006.

SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003.

SCAQMD, Localized Significance Thresholds. http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed July 8, 2022.

SCAQMD, Map of Jurisdiction, 1999.

SCAQMD, MATES V, http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v. Accessed July 8, 2022.

SJVAPCD, Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno.

South Coast Air Quality Management District (SCAQMD), Final 2016 Air Quality Management Plan, March 2017.

SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

Travel Model Improvement Program Time-of-Day Modeling Procedures: State-of-the-Practice, State-of-the-Art(2.0 Standard Approaches, http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm).

USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, Last Updated January 3, 2017.

USEPA, Clean Air Act, 1963.

USEPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table. Accessed July 8, 2022.

4.3 Cultural Resources

36 Code of Federal Regulations (CFR) 60.

A. L. Kroeber, Handbook of the Indians of California, Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

Byrd, Brian F., and Mark L. Raab, Prehistory of the Southern Bight: Models for a New Millennium. In California Prehistory: Colonization, Culture, and Complexity, 2007. edited by Terry L. Jones and Kathryn A. Klar, pp 215–227.

California Public Resources Code, Section 5024.1[b].

California Public Resources Code Section 21083.1(a).

California Public Resources Code, Section 5024.1[a].

Carole Cosgrove Terry, PhD, Frederick William Dohrmann (1842–1914), Immigrant Entrepreneurship, N.D, https://www.immigrantentrepreneurship.org/entries/frederick-william-dohrmann/. Accessed July 12, 2022.

CEQA Guidelines, Section 15064.5(b)(1).

CEQA Guidelines, Section 15064.5(c)(4).

CEQA Guidelines, Section 15064.5(b)(3).

Cheviot Hills History, N.D, The Spanish and Mexican Ranchos, https://www.cheviothillshistory.org/spanish-mexican-ranchos. Accessed July 12, 2022.

City of Culver City, Culver City Municipal Code, Chapter 15.05 Historic Preservation Program.

City of Los Angeles, Conservation Element of the General Plan, pp. II-3 to II-5.

City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.

City of Los Angeles, Los Angeles Municipal Code, Section 12.20.3.

City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.

Culver City Historical Society, N.D, Culver City Timeline: A Work in Progress, https://www.culvercityhistoricalsociety.org/about/culver-city-timeline/. Accessed July 11, 2022.

Dibblee, T.W., and H.E. Ehrenspeck, Geologic map of the Beverly Hills and Van Nuys (south ½) quadrangles, Los Angeles County, California. Dibblee Geological Foundation, Dibblee Foundation Map DF-31, 1:24,000; 1991, https://ngmdb.usgs.gov/mapview/?center=-118.386,34.029&zoom=15. Accessed July 12, 2022.

Environmental Science Associates (ESA), (in progress) Archaeological and Paleontological Monitoring Report for the Culver Studios Innovation Plan Project, City of Culver City, California, 2022. Report on file with ESA, Irvine, CA.

ESA, Archaeological and Paleontological Monitoring Report for the 8777 Washington Project, City of Culver City, California, 2021. Report on file with ESA, Irvine, CA.

ESA, Ivy Station Project, City of Culver City and City of Los Angeles, County of Los Angeles California: Archaeological and Paleontological Monitoring Report. Prepared for: Culver City Triangle Investor, Inc., c/o Lowe Enterprises Real Estate Group, 8740 Washington Boulevard, Suite A, Culver City, CA 90232. Prepared by: ESA, 626 Wilshire Boulevard, Suite 1100, Los Angeles, CA 90017, 2018. ESA, Archaeological and Paleontological Monitoring Results for the Ivy Station Project, City of Culver City and City of Los Angeles, County of Los Angeles, California, 2018. Report on file with the CHRIS-SCCIC, Fullerton, CA.

Evening Vanguard, Fire Destroys Zucca's Today, February 20, 1950.

Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022.

Gumprecht, Blake, Los Angeles River: Its Life, and Possible Rebirth, The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

Los Angeles County Department of Public Works, Map TR0022-044B, Tract No. 1778.

Los Angeles Department of City Planning, West Adams–Baldwin Hills–Leimert Community Plan, June 2016, 3-107.

Lowell J. Bean and Charles R. Smith, "Gabrielino, in California," edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538–549.

McCawley, William, The First Angelinos: The Gabrielino Indians of Los Angeles, 1996.

Nancy Hadley, Frederick H. Meyer (1876–1961), American Institute of Architects Historical Directory, December 18, 2018, https://aiahistoricaldirectory.atlassian.net/wiki/spaces/AHDAA/pages/35728413/ahd1030254. Accessed July 12, 2022; Pacific Coast Architecture Database, N.D, Albert John Evers (Architect), http://pcad.lib.washington.edu/person/764/. Accessed July 12, 2022.

Pacific Coast Architecture Database, N.D, Albert John Evers (Architect), http://pcad.lib.washington.edu/person/764/. Accessed July 12, 2022.

San Francisco Examiner, Broadway-Hale Sells Unit for $10 Million, November 2, 1961.

United States Department of the Interior, National Park Service, National Historic Landmarks Frequently Asked Question, 2021.

United States Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.

United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997.

United States Department of the Interior, National Register Bulletin #21: Defining Boundaries for National Register Properties Form, 1997, p. 12.

University of California Berkeley: Environmental Design Archives, N.D, Frederick H. Meyer Collection, 1904–1962, finding aid and biography via Online Archive of California, https://oac.cdlib.org/findaid/ark:/13030/tf809nb36t/admin/. Accessed July 12, 2022.

Wallace, William J., A Suggested Chronology for Southern California Coastal Archaeology. Southwestern Journal of Anthropology 11:214–230, 1955.

4.4 Energy

BP Global, Oil reserves, 2018, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html. Accessed July 11, 2022.

California Air Pollution Control Officers Association, California Emissions Estimator Model, 2021, http://caleemod.com/. Accessed July 11, 2022.

CARB, 2017 Scoping Plan, November 2017.

CARB, CalEEMod User's Guide, Appendix E, Section 5, September 2016. Factors for the prior Title 24 standard are extrapolated based on the technical source documentation.

CARB, Clean Car Standards – Pavley, Assembly Bill 1493. Last reviewed January 11, 2017, https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley. Accessed July 11, 2022.

California Building Standards Commission, Guide to the 2016 California Green Building Standards Code Nonresidential, 2018.

California Energy Commission (CEC), Annual Power Content Labels for 2020, 2021.

CEC, 2019 Building Energy Efficiency Standards, 2019.

CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, 2018.

CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2010–2020, https://www.energy.ca.gov/media/3874. Accessed July 11, 2022.

CEC, Tracking Progress – Energy Efficiency. Last updated September 2018.

California Gas and Electric Utilities, 2020 California Gas Report, 2020.

California Legislative Information, Senate Bill 100, California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases, Approved by Governor on September 10, 2018, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100. Accessed July 11, 2022.

California Public Utilities Commission, California Renewables Portfolio Standard (RPS), 2018.

California Public Utilities Commission, RPS Program Overview, 2018.

CEC, 2019 Integrated Energy Policy Report, February 2020, p. 228, https://efiling.energy.ca.gov/getdocument.aspx?tn=232922. Accessed July 11, 2022.

CEC, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2019, https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed July 11, 2022.

CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018.

City of Culver City Zoning Code, Title 17, Sections 17.320, Off-Street Parking and Loading, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-52279#JD_17.320.020. Accessed July 11, 2022.

City of Culver City, Bicycle & Pedestrian Action Plan, June 2020.

City of Culver City, Circulation Element, 1995, p. C-8.

City of Los Angeles, Sustainable City pLAn, 2015.

City of Los Angeles, VMT Calculator.

City of Los Angeles. LA's Green New Deal, 2019.

Edison International and Southern California Edison (SCE), 2020 Annual Report, 2021.

Edison International and SCE, 2021 Annual Report, 2022, p. 2, https://www.edison.com/home/investors/financial-reports-information/annual-reports.html. Accessed July 11, 2022.

KPFF Consulting Engineers, Crossings Campus Utility Infrastructure Technical Report: Water, Wastewater, and Energy, April 2022, Exhibits 4 and 11.

Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

Los Angeles Department of Water and Power (LADWP), 2017 Final Power Strategic Long-Term Resource Plan, December 2017.

LADWP, Briefing Book 2020-2021, p. 59.

LADWP, Facts & Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=xk0dbq6vu_4&_afrLoop=9598324856637&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9598324856637%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dfcfwtty0v_25. Accessed July 11, 2022.

National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.

Next 10 and Pacific Institute, The Future of California's Water-Energy-Climate Nexus, Table 4.

SoCalGas, Company Profile, https://www.socalgas.com/about-us/company-profile. Accessed July 11, 2022.

Southern California Association of Governments, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, December 2020.

SCE, Who We Are, April 2022.

U. S. Environmental Protection Agency (USEPA), Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, 2011.

U.S. Energy Information Administration, California Energy Profile Overview, 2021, https://www.eia.gov/state/?sid=CA#tabs-1. Accessed July 11, 2022.

U.S. Energy Information Administration, How much natural gas does the United States have, and how long will it last? Last updated April 9, 2018, https://www.eia.gov/tools/faqs/faq.php?id=58&t=8. Accessed July 11, 2022.

United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.

United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.

USEPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

USEPA, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, August 2011.

USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

USEPA, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, October 25, 2016.

USEPA, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.

USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, December 2021.

4.5 Geology and Soils

California Building Code, 2019 Part 2, Volume 1, Chapter 18, Soils and Foundations, Section 1803, Geotechnical Investigations.

City of Culver City, Culver City General Plan – Public Safety Element, July 1975.

City of Culver City, Culver City General Plan – Seismic Safety Element, May 1974, updated January 1977.

City of Los Angeles General Plan, Conservation Element, pp. II-6 to II-9.

Department of General Services, Building Standards Commission, California Building Standards Code, https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo/. Accessed January 11, 2022.

Dibblee, T.W., and H.E. Ehrenspeck, Geologic map of the Beverly Hills and Van Nuys (south ½) quadrangles, Los Angeles County, California. Dibblee Geological Foundation, Dibblee Foundation Map DF-31, 1:24,000; 1991, https://ngmdb.usgs.gov/mapview/?center=-118.386,34.029&zoom=15. Accessed July 12, 2022.

ESA, Archaeological and Paleontological Monitoring Report for the 8777 Washington Project, City of Culver City, California, 2021. Report on file with ESA, Irvine, CA.

ESA, Crossings Campus, City of Culver City and City of Los Angeles, California, Paleontological Resources Assessment Report, July 2022.

ESA, Ivy Station Project, City of Culver City and City of Los Angeles, County of Los Angeles California: Archaeological and Paleontological Monitoring Report. Prepared for: Culver City Triangle Investor, Inc., c/o Lowe Enterprises Real Estate Group, 8740 Washington Boulevard, Suite A, Culver City, CA 90232. Prepared by: ESA, 626 Wilshire Boulevard, Suite 1100, Los Angele, CA 90017, 2018.

Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Los Angeles, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022.

Los Angeles Regional Water Quality Control Board, Order No. R4-2013-0095, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, June 6, 2013.

Society of Vertebrate Paleontology (SVP), Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010.

SVP, Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines, Society of Vertebrate Paleontology News Bulletin 163:22–27, 1995.

SVP, Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources, 2010.

SWCA Environmental Consultants, Final Paleontological Resources Monitoring and Mitigation Report for the Washington National Project, Culver City, Los Angeles County, California. Prepared for: Greystar, 2615 Pacific Coast Highway, Suite 208, Hermosa Beach, CA 90254. Prepared by: SWCA Environmental consultants, 150 South Arroyo Parkway, Second Floor, Pasadena, CA 91105, 2016.

United States Environmental Protection Agency (USEPA), Clean Water Act, Section 402: National Pollutant Discharge Elimination System, https://www.epa.gov/cwa-404/clean-water-act-section-402-national-pollutant-discharge-elimination-system. Accessed January 11, 2022.

USGS, 2022, Areas of Land Subsidence in California, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed July 12, 2022.

ZIMAS, website check for Culver City methane zones, http://zimas.lacity.org/. Accessed July 12, 2022.

4.6 Greenhouse Gas Emissions

14 California Code of Regulations Section 15064.4(b).

84 FR 51310.

Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America, 2010, 107:12107-12109.

SCAG 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction.

California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, August 2010, p. 39.

California Building Standards Commission, 2010 California Green Building Standards Code, 2010.

California Climate Change Center, Our Changing Climate: Assessing the Risks to California, 2006.

California Code of Regulations (CCR) 17, Section 95800 to 96023.

California Department of Finance, E-6 Population Estimates and Components of Change by County, December 2021, https://dof.ca.gov/forecasting/demographics/estimates/estimates-e6-2010-2021/. Accessed July 14, 2022.

California Department of Water Resources, Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, July 2006.

CEC, 2019 Building Energy Efficiency Standards.

California Environmental Protection Agency (CalEPA), Climate Action Team (CAT), Climate Action Team Report to Governor Schwarzenegger and the Legislature, 2006.

California Legislative Information, SB-100 California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases.

California Natural Resources Agency (CNRA), CAT, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

California Natural Resources Agency, California Climate Adaptation Strategy, https://resources.ca.gov/Initiatives/Building-Climate-Resilience/2021-State-Adaptation-Strategy-Update. Accessed July 12, 2022.

CARB, 2014 Scoping Plan, May 2014.

CARB, 2017 Scoping Plan, Appendix G, November 2017.

CARB, Advanced Clean Cars Program – About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about. Accessed July 12, 2022.

CARB, California's Advanced Clean Cars Midterm Review, pp. ES-17, C-9.

CARB, CARB amends Low-Carbon Fuel Standard for wider impact, 2018, https://ww2.arb.ca.gov/index.php/news/carb-amends-low-carbon-fuel-standard-wider-impact. Accessed July 12, 2022.

CARB, Climate Change Scoping Plan, December 2008.

CARB, First Update to the AB 32 Scoping Plan, May 2014.

CARB, Low-Carbon Fuel Standard – About, https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/about. Accessed July 12, 2022.

CARB, OFFROAD Modeling Change Technical Memo, 2003.

CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets (2018).

CARB, Southern California Association of Governments' (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 2016.

CARB, Sustainable Communities & Climate Protection Program – About, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about. Accessed July 12, 2022.

CARB, California Greenhouse Gas Emissions for 2000-2019, 2021. Accessed July 12, 2022.

CCR 17, Section 95100-95158.

CCR 17, Section 95811(b).

CCR 17, Section 95811, 95812(d).

CCR 17, Section 95811, 95812.

CCR 17, Section 95812.

CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.

CEC, 2022 Building Energy Efficiency Standards Summary.

CEC, Scenarios of Climate Change in California: An Overview, February 2006.

City of Culver City, Bicycle & Pedestrian Action Plan, June 2020.

City of Culver City, Culver City Bicycle & Pedestrian Master Plan (BPMP), adopted by City Council, November 8, 2010.

City of Culver City, Municipal Code Chapter 15.02.1005, Solar Photovoltaic Systems.

City of Culver City, Municipal Code Chapter 15.02.1100, Green Building Program and Requirements.

City of Los Angeles, Air Quality Element, June 1991, pp. IV-1 to IV-4.

City of Los Angeles, Department of Public Works, LA Sanitation, Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=kq9mn3h5a_188. Accessed July 12, 2022.

City of Los Angeles, Green New Deal/Sustainable City pLAn, 2019.

City of Los Angeles, RENEW LA, Five-Year Milestone Report, 2011.

City of Los Angeles, Sustainable City pLAn, April 2015.

CNRA, CAT, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008.

EKI, Water Supply Assessment for Crossings Campus Building 1, March 31, 2022.

Energy and Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020.

E3, Deep Decarbonization in a High Renewables Future, Updated Results from the California PATHWAYS Model, June 2018.

Governor's OPR, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008.

IPPC, Intergovernmental Panel on Climate Change, Second Assessment Report, Working Group I: The Science of Climate Change, 1995.

IPCC, Intergovernmental Panel on Climate Change, Climate Change 2014: Synthesis Report, Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, Summary for Policy Makers, 2014, p. 5, http://ipcc.ch/report/ar5/syr/. Accessed July 12, 2022.

IPCC, Intergovernmental Panel on Climate Change, Fifth Assessment Report, Summary for Policy Makers, p. 20.

IPCC, Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research (OPR) to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.

National Research Council, Advancing the Science of Climate Change, 2010.

OPR, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review.

P. Friedlingstein et al.: Global Carbon Budget 2020, 2020.

Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

Parmesan, C. and Galbraith, H., Observed Ecological Impacts of Climate Change in North America. Arlington, VA: Pew. Cent. Glob. Clim. Change, 2004.

Parmesan, C., Ecological and Evolutionary Response to Recent Climate Change, first published on August 24, 2006.

Paul R. Epstein, et al., Urban Indicators of Climate Change, Report from the Center for Health and the Global Environment, (Harvard Medical School and the Boston Public Health Commission, August 2003), unpaginated.

Pew Center on Global Climate Change, Climate Change 101: Understanding and Responding to Global Climate Change.

SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), May 2020.

SCAG, 2020-2045 RTP/SCS Public Health Technical Report, May 2020, p. 53.

SCAG, 2020-2045 RTP/SCS, Demographics and Growth Forecast Technical Report, May 2020.

SCAG, 2020-2045 RTP/SCS, May 2020.

SCAG, The State of the Region—Measuring Regional Progress, December 2006, p. 121.

SCAQMD, Board Meeting, December 5, 2008, Agenda No. 31, http://www3.aqmd.gov/hb/2008/December/0812ag.html. Accessed July 12, 2022.

SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2. Accessed July 12, 2022.

14 California Code of Regulations Sections 15064.7; 15064.4.

CNRA, Final Statement of Reasons for Regulatory Action (December 2009), pp. 11-13, 14, 16

San Joaquin Valley Air Pollution Control District (SJVAPCD), CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR-2025, June 25, 2014

SCAQMD, Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project, SHC No. 2012041014 (October 2014)

SCAQMD Final Negative Declaration for Phillips 99 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014)

SCAQMD Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014)

SCAQMD Final Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (August 2015).

South Coast Air Quality Management District, Greenhouse Gases CEQA Significance Thresholds, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed July 12, 2022.

Southern California Association of Governments (SCAG), Final 2020–2045 RTP/SCS, Chapter 0: Making Connections, May 7, 2020, p. 5.

State of California, Department of Justice, Office of the Attorney General, Climate Change Impacts in California, https://oag.ca.gov/environment/impact. Accessed July 12, 2022.

State of California, SB No. 375, September 30, 2008.

The Cal-Adapt website: http://cal-adapt.org. Accessed July 12, 2022.

U.S. Environmental Protection Agency (USEPA), Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.

United Nations Framework Convention on Climate Change, Press Release—Vienna UN Conference Shows Consensus on Key Building Blocks for Effective International Response to Climate Change, August 31, 2007.

United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.

United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.

USEPA, Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gas, updated April 2021.

USEPA, Climate Change Indicators: Greenhouse Gases, https://www.epa.gov/climate-indicators/greenhouse-gases. Accessed July 12, 2022.

USEPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

USEPA, Federal Register / Vol. 86, No. 248 / Thursday, December 30, 2021 / Rules and Regulations, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.

USEPA, Global Greenhouse Gas Emissions Data, www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data. Accessed July 12, 2022.

USEPA, Mixed-Use Trip Generation Model. Accessed July 12, 20221. https://www.epa.gov/smartgrowth/mixed-use-trip-generation-model.

USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: Regulatory Update, December 2021.

LADWP, Water Supply Assessment - for the Crossings Campus Project, February 24, 2022.

4.7 Hazards and Hazardous Materials

California Health & Safety Code, Division 20, Chapter 6.95, Article 1; California Code of Regulations, Title 19, Sections 2620–2732; California Code of Regulations, Title 24, Part 9, Section 80.115; Los Angeles Municipal Code, Article 7 of Chapter V, Section 57.120.1, and 57.120.1.4.

City of Culver City Fire Department, CUPA/Hazardous Materials Disclosure Reporting Program, Business Reporting Forms and Emergency Plan Packet, July 2005.

Code of Federal Regulations (CFR), Title 49, Parts 100–180, Transportation, revised as of October 1, 2010.

County of Los Angeles Department of Public Works, Disaster Routes, Los Angeles County Operational Area, https://dpw.lacounty.gov/dsg/DisasterRoutes/. Accessed July 12, 2022.

EKI, Phase I Environmental Site Assessment and Results of Subsurface Investigation, Culver Crossing, 8879–880 Venice Boulevard, 8825–8829 National Boulevard, and 8771 Washington Boulevard, Culver City, California, October 18, 2021.

Federal Emergency Management Act (FEMA), History of FEMA, https://www.fema.gov/about/history. Accessed July 12, 2022.

Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022.

Los Angeles Regional Water Quality Control Board, Order No. R4-2013-0095, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, June 6, 2013.

The CalARP program encompasses both the federal “Risk Management Program,” established in the CFR, Title 40, Part 68, and the State of California program, in accordance with the Title 19 of the California Code of Regulations, Division 2, Chapter 4.5.

United States Department of Transportation (USDOT), Federal Hazmat Law, September 2021.

United States Environmental Protection Agency (USEPA), Emergency Planning and Community Right-to-Know Act Fact Sheet, Fall 2020.

4.8 Hydrology and Water Quality

Ballona Creek Watershed Management Group, Enhanced Watershed Management Program for the Ballona Creek Watershed, January 2016.

California State Water Resources Control Board, State Board Resolution No. 68-16, 1968.

California Water Code, Division 7, Water Quality, Section 13000 et seq.

City of Los Angeles Department of Public Works, Bureau of Sanitation (LASAN), Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5th Edition, May 2016.

Culver City Public Works Department, Culver City Stormwater Quality Master Plan, May 2021.

Dudek, Groundwater Sustainability Plan for the Santa Monica Groundwater Subbasin, January 2022.

EKI, Phase I Environmental Site Assessment and Results of Subsurface Investigation, Culver Crossing, 8879–880 Venice Boulevard, 8825–8829 National Boulevard, and 8771 Washington Boulevard, Culver City, California, October 18, 2021.

Geotechnologies, Inc., Evaluation of Soils and Geology Issues, Proposed Commercial Office Development, 8825 National Boulevard and 8771 Washington Boulevard, Culver City, California; 8876, 8884, 8886, and 8888 National Boulevard, Culver City, California, February 2, 2022.

KPFF Consulting Engineers, Crossings Campus Hydrology & Water Resources Technical Report, March 2022.

Los Angeles County Department of Public Works, Hydrology Manual, 2006.

Los Angeles Regional Water Quality Control Board, Order No. R4-2018-0125, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, 2018.

Los Angeles Regional Water Quality Control Board, Order No. R4-2013-0095, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, 2013.

Los Angeles Regional Water Quality Control Board, Order No. R4-2021-0105, NPDES Permit No. CAS004004, Regional Phase I MS4 NPDES Permit, Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit For Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles and Ventura Counties. September 11, 2021.

The National Flood Insurance Act of 1968, as amended, and The Flood Disaster Protection Act of 1973, 42 U.S.C. 4001 et. seq.

United States Environmental Protection Agency (USEPA), Clean Water Act, 2002.

USEPA, Clean Water Act, 2016.

USEPA, Water Quality Standards Handbook - Chapter 4: Antidegradation, 2010.

USEPA, Water Quality Standards, Establishment of Numeric Criteria for Priority Toxic Pollutants for the State of California, 2001.

4.9 Land Use and Planning

California Government Code, Title 7, Division 1, Chapter 3, Article 5. Authority for and Scope of General Plans, Sections 65302 – 65303.

City of Culver City, Bicycle & Pedestrian Action Plan, June 2020.

City of Culver City, Culver City Urban Forest Master Plan, 2015.

City of Culver City, Exposition Light Rail Transit and Station Design for Development, June 6, 2005, p. 2.

City of Culver City, General Plan Open Space Element, adopted 1996, amended through 2004, https://www.culvercity.org/home/showpublisheddocument?id=796. Accessed January 17, 2022.

City of Los Angeles Department of City Planning, General Plan Framework Element, originally adopted December 11, 1996 and readopted August 8, 2001, p. 5-1, et. seq.

City of Los Angeles Department of City Planning, General Plan Overview, https://planning.lacity.org/plans-policies/general-plan-overview. Accessed July 13, 2022.

City of Los Angeles, Department of City Planning, West Adams–Baldwin Hills–Leimert Community Plan, June 2016, p. 1-12

City of Los Angeles, Los Angeles Housing Element 2021-2029, p. 242.

Los Angeles Metropolitan Transit Authority (Metro), Active Transportation Strategic Plan (ATSP), in development, https://www.metro.net/projects/active-transportation-strategic-plan-atsp/. Accessed July 13, 2022.

4.10 Noise

American Journal of Audiology (AJA), Average Speech Levels and Spectra in Various Speaking/Listening Conditions, A Summary of the Pearson, Bennett, & Fidell (1977) Report, Vol. 7 21-25. doi:10.1044/1059-0889(1998/012), October 1998, https://aja.pubs.asha.org/article.aspx?articleid=1773811. Accessed July 13, 2022.

California Department of Transportation (Caltrans), Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

City of Los Angeles, Municipal Code, Chapter XI, Article I, Section 111.02-(b), https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193819. Accessed July 13, 2022.

City of Los Angeles, Noise Element of the Los Angeles City General Plan, adopted February 3, 1999, pp. 1.1-2.4.

Federal Highway Administration (FHWA), Roadway Construction Noise Model User's Guide, 2006, p. 3.

Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123, Prepared by John A. Volpe National Transportation Systems Center, Section 7.1.3, September 2018.

Fehr & Peers, Crossings Campus Project Transportation Impact Study, July 2022.

FHWA, Special Report – Measurement, Prediction, and Mitigation, Chapter 4 Mitigation, last updated June 28, 2017, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm . Accessed July 13, 2022.

State of California Governor's Office of Planning and Research (OPR), General Plan Guidelines, 2003.

United States Department of Labor, Occupational Safety and Health (OSH) Act of 1970, https://www.osha.gov/laws-regs/oshact/completeoshact. Accessed July 13, 2022.

United States Environmental Protection Agency (EPA), EPA Identifies Noise Levels Affecting Health and Welfare, EPA Press Release – April 2, 1974, https://archive.epa.gov/epa/aboutepa/epa-identifies-noise-levels-affecting-health-and-welfare.html#:~:text=The%20document%20identifies%20a%2024,preventing%20activity%20interference%20and%20annoyance, last updated on September 14, 2016.

World Health Organization, Environmental Noise Guidelines for the European Region, edited by Dr. Zsuzsanna Jakab, WHO Regional Director for Europe, 2018.

4.11.1 Public Services – Fire Protection

CAL FIRE, California Fire Hazard Severity Zone Viewer, https://egis.fire.ca.gov/FHSZ/. Accessed March 18, 2022.

California Building Code (CCR, Title 24, Part 2).

California Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised April 2019.

City of Culver City, Culver City General Plan, Public Safety Element, adopted August 25, 1975.

City of Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, p. 26.

City of Hayward v. Board of Trustees of California State University (2015) 242 Cal.App.4th 833, 843, 847.

City of Los Angeles Department of City Planning, General Plan Framework Element, Chapter 9: Infrastructure and Public Services, originally adopted December 11, 1996, and readopted August 8, 2001.

City of Los Angeles Department of Public Works, Bureau of Engineering, Newsletter No. 20-5, November 6, 2019.

City of Los Angeles, A 2002 Proposition Q Citywide Safety Bond Program Progress Report, February/March 2016.

Culver City Fire Department (CCFD), Community Risk Assessment: Standards of Cover, 2019.

Los Angeles Department of Transportation, Los Angeles Signal Synchronization Fact Sheet, February 14, 2016.

Los Angeles Fire Department, Department Overview – Our Mission, http://www.lafd.org/about/about-lafd/our-mission. Accessed March 18, 2022.

Los Angeles Fire Department, Find Your Station. https://www.lafd.org/fire-stations/station-results. Accessed March 21, 2022.

Los Angeles Fire Department, Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report, February–March 2016.

Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.

Los Angeles Fire Department, South Bureau, https://www.lafd.org/about/south-bureau. Accessed March 18, 2022.

Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

National Fire Protection Association (NFPA), NFPA 1710 – Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2020 Edition.

4.11.2 Public Services – Police Protection

Culver City Police Department (CCPD), About CCPD, https://www.culvercitypd.org/Office-of-the-Chief-of-Police/About-CCPD. Accessed March 30, 2022.

CCPD, Assistant Chief of Police Jason Sims, correspondence dated February 14, 2022.

CCPD, December 2021 Monthly Report.

CCPD, Patrol, https://www.culvercitypd.org/Bureau-Information/Patrol-Bureau/Patrol. Accessed March 30, 2022.

County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management, https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf. Accessed March 24, 2022.

LAPD, Andre Rainey, Lieutenant II, Office-In-Charge, Public Engagement Section, Office of Operations, correspondence dated March 13, 2022.

LAPD, COMPSTAT Citywide Profile 02/27/22–03/26/22.

LAPD, COMPSTAT, https://www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/crime-mapping-and-compstat/. Accessed March 24, 2022.

LAPD, Operations – West Bureau. Prepared by LAPD/PRD/GIS MAPPING January 2009.

LAPD, West Los Angeles Community Police Station, https://www.lapdonline.org/lapd-contact/west-bureau/west-los-angeles-community-police-station/. Accessed March 30, 2022.

4.12 Transportation

City of Culver City, General Plan Circulation Element, amended through 1995.

City of Culver City, Resolution Adopting 2022-2026 Short Range Mobility Plan, February 28, 2022.

City of Los Angeles Department of City Planning. Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan, November 2021.

City of Los Angeles Department of Transportation, LADOT Transportation Assessments – Interim Guidance for Freeway Safety Analysis, May 2020.

Federal Transit Administration (FTA), Shared Mobility Definitions, Microtransit, https://www.transit.dot.gov/regulations-and-guidance/shared-mobility-definitions, last updated February 28, 2020.

Fehr & Peers, Crossings Campus Project Transportation Impact Study, July 2022.

Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.

Los Angeles Department of Transportation (LADOT), Vision Zero Maps, https://ladotlivablestreets.org/programs/vision-zero/maps. Accessed June 30, 2022.

Public Resources Code, Section 21155.

Public Resources Code, Section 21064.3.

SCAG, High Quality Transit Areas (HQTA) 2016 – SCAG Region, February 22, 2021, https://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0/explore?location=34.018594%2C-118.361387%2C13.12. Accessed June 30, 2022.

Sequoyah Hills Homeowners Assn. V. City of Oakland (1993) 23 Cal.App.4th 704, 717–718 [29 Cal. Rptr. 2d 182].

4.13 Tribal Cultural Resources

ESA, Crossings Campus, Culver City and City of Los Angeles, California, Archaeological Resources Assessment Report, prepared for Culver Crossings Properties LLC, July 2022.

ESA, Archaeological and Paleontological Monitoring Report for the 8777 Washington Project, City of Culver City, California, 2021. Report on file with ESA, Irvine, CA.

ESA, (In Progress) Archaeological and Paleontological Monitoring Report for the Culver Studios Innovation Plan Project, City of Culver City, California. Report on file with ESA, Irvine, CA.

Geotechnologies, Inc. 2021. Geotechnical Engineering Investigation, Proposed Commercial Office Development, 8876 through 8888 West Venice Boulevard, and 8829 West National Boulevard, Los Angeles, California.

Gumprecht, Blake. Los Angeles River: Its Life, and Possible Rebirth, The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

L. Kroeber, Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78 (Washington, D.C.: Smithsonian Institution, 1925).

Lowell J. Bean and Charles R. Smith. "Gabrielino, in California," edited by R.F. Heizer, Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor (Washington, D.C. Smithsonian Institution, 1978), 538-549.

McCawley, William. The First Angelinos: The Gabrielino Indians of Los Angeles, (Malki Museum Press, Banning, California, 1996).

Public Resources Code, Section 21080.3.1(b) and (c).

Public Resources Code, Section 21080.3.2(b).

Public Resources Code, Section 21082.3(d)(2) and (3).

Wallace, William J. A Suggested Chronology for Southern California Coastal Archaeology. Southwestern Journal of Anthropology 11:214-230, 1955.

4.14.1 Water Supply

California Code of Regulations, Title 20, Section 1605.3(h).

California Department of Water Resources, SGMA Groundwater Management, https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management. Accessed April 2022.

California State Water Resources Control Board, 20 x 2020 Water Conservation Plan, February 2010.

CCFD, Battalion Chief David Rindels, correspondence dated April 25, 2022.

City of Culver City website, Water Conservation, https://www.culvercity.org/City-Hall/Departments/Public-Works/Culver-City-Environmental-Initiatives/Water-Conservation. Accessed July 13, 2022.

City of Culver City, Municipal Code, Chapter 5.03.

City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, originally adopted December 11, 1996, and readopted August 8, 2001.

City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response - Creating a Water Wise City, October 14, 2014.

City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

City of Los Angeles, Sustainable City pLAn, 2015.

GSWC, Culver City Service Area 2020 Urban Water Management Plan, Chapter 6, June 15, 2021.

KPFF Consulting Engineers, Culver Crossings Utility Infrastructure Technical Report: Water, Wastewater, and Energy, April 2022, p. 24.

Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021.

Metropolitan Water District of Southern California, Integrated Water Resources Plan – 2015 Update, Report No. 1518, 2016.

Metropolitan Water District of Southern California, Report on Integrated Water Resources Plan (IRP) Implementation, October 8, 2019.

State Water Resources Control Board, Fact Sheet, August 2017 Statewide Conservation Data, August Urban Water Production Summary, updated October 3, 2017.

State Water Resources Control Board, Fact Sheet, February 2017 Statewide Conservation Data, February Conservation Summary, updated April 4, 2017.

State Water Resources Control Board, Media Release, “Statewide Water Savings Exceed 25 Percent in February; Conservation to Remain a California Way of Life,” April 4, 2017.

Sustainable Groundwater Management Act [And Related Statutory Provisions from SB1168 (Pavley), AB1739 (Dickinson), and SB1319 (Pavley) as Chaptered], 2015 Amendments, effective January 1, 2019.

Golden State Water Company, https://www.gswater.com/southwest#:~:text=We%20currently%20serve%2054%2C994%20customers,Village%2C%20Lennox%20and%20Gardena%20Heights. Accessed July 13, 2022.

Water Surplus and Drought Management Plan, Report No. 1150, 1999.

West Basin Municipal Water District, 2020 Urban Water Management Plan, June 28, 2021, p. ES-3.

4.14.2 Wastewater

California Regional Water Quality Control Board Los Angeles Region, U.S. Environmental Protection Agency Region IX, Order R4-2017-0045, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

City of Los Angeles Bureau of Sanitation (LASAN), Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=yb7ued7kk_514&_afrLoop=1716841967525366#!. Accessed April 2022.

City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, originally adopted December 11, 1996, and readopted August 8, 2001.

City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, Water Integrated Resources Plan 5-Year Review FINAL Documents, June 2012.

City of Los Angeles Department of Public Works, Bureau of Engineering, Project Information Report, North East Interceptor Sewer (NEIS) Phase 2A.

City of Los Angeles Department of Public Works, Bureau of Engineering, Special Order No. 006-0691, Planning Period, Flow, and Design Criteria for Gravity Sanitary Sewers and Pumping Plants, effective June 6, 1991.

City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response - Creating a Water Wise City, October 14, 2014.

City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

City of Los Angeles, Ordinance No. 180,822.

City of Los Angeles, Ordinance No. 181,480.

Culver City, Amalgamated Agreement Between the City of Los and the City of Culver City for the Conveyance, Treatment and Disposal of Wastewater, April 1999.

KPFF Consulting Engineers, Crossings Campus Utility Infrastructure Technical Report: Water, Wastewater, and Energy, April 2022, pp. 15 and 16.

LASAN, Donald C. Tillman Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=yb7ued7kk_5&_afrLoop=1717100937245723#!. Accessed April 2022.

LASAN, Los Angeles-Glendale Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?_adf.ctrl-state=yb7ued7kk_5&_afrLoop=1717251119351961#!. Accessed April 2022.

LASAN, Sewer System Management Plan Hyperion Sanitary Sewer System, January 2019.

4.14.3 Solid Waste

Building Standards Commission, CALGreen, www.dgs.ca.gov/BSC/Codes. Accessed February 24, 2022.

California Public Resources Code Section 41821.

California Public Resources Code, Sections 41730 et seq.

CalRecycle, Jurisdiction Per Capita Disposal trends – Culver City, for reporting year 2020, December 16, 2021.

CalRecycle, Jurisdiction Per Capita Disposal Trends – Los Angeles, for reporting year 2020.

CalRecycle, Mandatory Commercial Organics Recycling, www.calrecycle.ca.gov/recycle/commercial/organics/. Accessed February 24, 2022.

CalRecycle, Senate Bill 1374 (2002), Last updated August 24, 2018, https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374. Accessed February 24, 2022.

City of Culver City website, Trash & Recycling, http://www.culvercity.org/live/home-property/residential-recycling-trash-services/trash-collections. Accessed March 14, 2022.

City of Los Angeles Bureau of Sanitation (LASAN), Construction and Demolition Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159. Accessed February 24, 2022.

City of Los Angeles Department of City Planning, Citywide General Plan Framework, Chapter 9, originally adopted December 11, 1996, and readopted August 8, 2001.

City of Los Angeles, Department of Public Works, LASanitation, Fact Sheet: The City's Solid Waste Policies and Programs, 2009.

City of Los Angeles, Ordinance No. 181,519, March 5, 2010.

County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan (CoIWMP) 2020 Annual Report, October 2021.

LASAN, Construction and Demolition Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_afrLoop=302750877623885&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=sc2bv57ho_155#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D302750877623885%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_159. Accessed February 24, 2022.

LASAN, Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl state=sc2bv57ho_78&_afrLoop=302690459702255&_afrWindowMode=0&_afrWindowId=ival6l59y#!%40%40%3F_afrWindowId%3Dival6l59y%26_afrLoop%3D302690459702255%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dsc2bv57ho_82. Accessed February 24, 2022.

LASAN, Solid Waste Integrated Resources Plan (SWIRP) – A Zero Waste Master Plan, October 2013, adopted April 2015.

LASAN, Solid Waste Integrated Resources Plan (SWIRP) A Zero Waste Master Plan, Frequently Asked Questions (FAQs), 2013.

LASAN, Zero Waste Progress Report, March 2013.

Los Angeles Municipal Code, City Ordinance No. 184,665.

4.14.4 Electric Power, Natural Gas, and Telecommunications Facilities

CEC, *2021 Integrated Energy Policy Report*, February 22, 2022.

California Gas and Electric Utilities, 2020 California Gas Report.

CEC, The California Energy Demand 2018–2030 Revised Forecast, 2018, April 19, 2018.

City of Culver City Zoning Code, Title 17, Sections 17.320, Off-Street Parking and Loading, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-52279#JD_17.320.020. Accessed July 12, 2022.

City of Culver City, Information Technology, https://www.culvercity.org/City-Hall/Departments/IT. Accessed July 12, 2022.

City of Los Angeles, Sustainable City pLAn, 2015.

City of Los Angeles. LA's Green New Deal, 2019.

Edison International and SCE, 2019 Annual Report, March 2020, p. 2.

LADWP, *2017 Retail Electric Sales and Demand Forecast*, September 15, 2017, p. 14.

LADWP, 2019 Power Content Label, Version: October 2020.

LADWP, Facts & Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=xk0dbq6vu_4&_afrLoop=9598324856637&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9598324856637%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dfcfwtty0v_25. Accessed July 12, 2022.

LADWP, 2017 Final Power Strategic Long-Term Resource Plan, December 31, 2017.

SCE, About Us, 2022, https://www.sce.com/about-us/reliability. Accessed July 12, 2022.

SCE, Who We Are, https://www.sce.com/about-us/who-we-are. Accessed July 12, 2022.

Southern California Gas Company (SoCalGas), Company Profile, https://www.socalgas.com/about-us/company-profile. Accessed July 12, 2022.

CHAPTER 8
List of EIR Preparers and Organizations and Persons Contacted

8.1 Lead Agency

Culver City Current Planning Division
9770 Culver Boulevard
Culver City, CA 90232-0507

- Emily Stadnicki, Planning Manager
- Jose Mendivil, Associate Planner

8.2 Project Applicant

5700 Hannum Owner, LLC
c/o Lincoln Property Company
390 N. Pacific Coast Hwy., Suite 3100
El Segundo, CA 90245

- Geoff Maleman

8.3 Environmental Impact Report Preparation

ESA
626 Wilshire Boulevard, Suite 1100
Los Angeles, CA 90017

- Mike Harden, Director – Project Director
- Janelle Firoozi, Environmental Planner
- Rid Hollands, Environmental Planner
- Meghan Gibson, Environmental Planner
- Claudia Watts, Environmental Planner
- Alan Sako, Air Quality and Noise Director
- Elbert Hsiung, Senior Associate
- Tim Witwer, Senior Associate
- Kyle Garcia, Principal Consultant, Cultural Resources

- Fatima Clark, Senior Consultant, Cultural Resources
- Denise Kaneshiro, Senior Graphics Manager
- Chance Scott, GIS
- Nicole Sanchez-Sullivan, Senior Word Processor
- Aaron Guzman, Senior Word Processor

Architect

KFA Architecture
3573 Hayden Avenue
Culver City, CA 90232

- Jonnathan Watts, AIA
- Scott Kepford, AIA
- Kristyn Cosgrove, AIA

Civil Engineering and Hydrology

Kimley-Horn and Associates, Inc.
660 South Figueroa Street, Suite 2050
Los Angeles, CA 90017

- Danh Duong, P.E., QSD

Geotechnical Engineer

Geotechnologies, Inc.
439 Western Avenue
Glendale, CA 91201

- Gregorio Varela, P.E., Principal Engineer

Hazards and Hazardous Materials

Ramboll US Consulting Inc.
350 South Grand Avenue, Suite 2800
Los Angeles, CA 90071

- Stephanie Eckelman, Senior Consultant
- Alexis Hilman, Senior Managing Consultant

Historic Resources

Architectural Resources Group
360 E. 2nd Street, Suite 225
Los Angeles, CA 90013

- Katie E. Horak, Principal

Transportation and Traffic

Gibson Transportation Consulting, Inc.
555 W. 5th Street, Suite 3375
Los Angeles, CA 90013

- Richard Gibson, Principal

8.4 Agencies Consulted

Culver City Police Department
4040 Duquesne Avenue
Culver City, CA 90232

- Carey Grant, Sergeant

Culver City Fire Department
9600 Culver Boulevard
Culver City, CA 90232

- Dave Rindels, Fire Marshal

Culver City Unified School District
4034 Irving Place
Culver City, CA 90232

- Mike Reynolds

Culver City Parks and Recreation
City of Culver City - City Hall
9770 Culver Boulevard
Culver City, CA 90232

- Dani Cullens

This page intentionally left blank

CHAPTER 9
Standard Terms, Acronyms, and Abbreviations

AAI	All Appropriate Inquiry
AB	Assembly Bill
ACM	asbestos-containing materials
ADA	Americans with Disabilities Act
ADT	average daily trip
AEGL	Acute Exposure Guideline Levels
AFY	acre-feet per year
ALUC	Airport Land Use Commission
AMI	Advanced Metering Infrastructure
ANSI	American National Standard Institute
AP	Accredited Professional
APPP	Art in Public Places Program
AQI	Air Quality Index
AQMP	Air Quality Management Plan
AR4	Fourth Assessment Report
AR5	Fifth Assessment Report
ASHRAE	American Society of Heating and Air-Conditioning Engineers
AST	regulatory program covering aboveground storage tanks
ATCM	Airborne Toxic Control Measure
ATSP	Active Transportation Strategic Plan
BACT	best available control technology
BAU	business-as-usual
BEN	Bicycle Enhanced Network
BEP	Business Emergency Plan
BERD	Built Environment Resources Database
BEV	Battery Electric Vehicle
BLS	basic life support
BMP	best management practice
BSD	Building Safety Division
BTEX	benzene, toluene, ethylbenzene, and xylenes
C_2F_6	hexafluoroethane
$C_2H_4F_2$	1,1-difluoroethane

C_2H_6	ethane
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalARP	California Accidental Release Program
CalEEMod	California Emissions Estimator Model
Cal-EMA	California Emergency Management Agency
CalEPA	California Environmental Protection Agency
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Standards
CalSTA	California State Transportation Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAS	Climate Adaptation Strategy
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CF	cubic feet
CCFD	Culver City Fire Department
CCMC	Culver City Municipal Code
CCPD	Culver City Police Department
CCR	California Code of Regulations
CCTV	closed-circuit television
CDFA	California Department of Food and Agriculture
CDR	carbon dioxide removal
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERFA	Community Environmental Response Facilitation Act
CF_4	tetrafluoromethane
CFC	California Fire Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_2FCF_3	1,1,1,2-tetrafluoroethane
CH_4	methane
CHC	Cultural Heritage Commission
CHF_3	trifluoromethane
CHRIS	California Historical Resources Information System
CI	compression ignition
CMP	Construction Traffic Management Plan
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	carbon monoxide

CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COG	Council of Governments
CoIWMP	Los Angeles Countywide Integrated Waste Management Plan
COMPSTAT	Computer Statistics Unit
CPA	Clean Power Alliance
CPIO	Community Plan Implementation Overlay
CPTED	Crime Prevention Through Environmental Design
CPUC	California Public Utilities Commission
CRA	Community Risk Assessment
CRT	Crisis Response Team
CTC	County Transportation Commission
CUPA	Certified Unified Program Agency
CVC	California Vehicle Code
CWA	Clean Water Act
CWC	California Water Code
CY	cubic yards
dB	decibels
dBA	A-weighted decibels
DFD	Design for Development
DNL	day-night average noise level
DOE	United States Department of Energy
DOSH	Division of Occupational Safety and Health
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
EIA	U.S. Energy Information Administration
EIR	environmental impact report
EISA	Energy Independence and Security Act of 2007
EMD	Los Angeles Emergency Management Department
EMD	Environmental Monitoring Division
EMMA	Emergency Managed Mutual Aid
EMS	emergency medical services
EO	Executive Order
EOC	Emergency Operation Center
EOO	Emergency Operations Organization
EPA	United States Environmental Protection Agency
EPCA	Energy Policy and Conservation Act of 1975
EPCRA	Emergency Planning and Community Right-to-Know Act
EPO	Environmental Programs and Operations
ERF	Effective Response Force
ERO	Electric Reliability Organization

ERP	Emergency Response Plan
ERT	Emergency Response Team
ESA	Environmental Science Associates
ESA	environmental site assessment
EV	electric vehicle
EVSE	electric vehicle supply equipment
EVSE	electric vehicle charging stations
EWMP	Enhanced Watershed Management Program
FAR	floor area ratio
FBI	Federal Bureau of Investigation
FCC	Federal Communications Commission
FCMP	Final Construction Management Plan
FDC	Fire Department Connection
FED	functional equivalent document
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FHWA	Federal Highway Administration
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FIRM	flood insurance rate map
FIS	flood insurance studies
FMZ	fire management zone
FPS	Fire Preemption System
FTA	Federal Transit Administration
FYE	Fiscal Year Ending
GHG	greenhouse gas
GIS	geographical information system
GSA	groundwater sustainability agency
GSP	Groundwater Sustainability Plan
GSWC	Golden State Water Company
GWh	gigawatt-hours
GWP	global warming potential
H_2S	hydrogen sulfide
HASP	health and safety plan
HazMat	hazardous materials
HCM	Historic-Cultural Monument
HCS	Historic Context Statement
HDV	heavy duty vehicle
HEC	historical environmental condition
HFC	hydrofluorocarbon
HI	hybrid industrial
HMBP	Hazardous Materials Business Plan
HMGP	Hazard Mitigation Grant Program

HMIS	Hazardous Material Identification System
HMMP	Hazardous Material Management Program
HMTA	Hazardous Materials Transportation Act
HPAC	Historic Preservation Advisory Committee
HPOZ	Historic Preservation Overlay Zone
HQTA	High Quality Transit Area
HSC	California Health and Safety Code
HVAC	heating, ventilation, and air conditioning
HWCL	Hazardous Waste Control Law
HWRP	Hyperion Water Reclamation Plant
IBC	International Building Code
IFC	International Fire Code
IFFAR	Information on Fire Flow Availably Request
IG	industrial general
IIPP	Injury and Illness Prevention Program
IL	light industrial
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Water Resources Plan
IT	information technology
ITA	Los Angeles Information Technology Agency
IWMA	Integrated Waste Management Act
kW	kilowatt
kWh	kilowatt-hour
LA3	Los Angeles and Equinix
LAA	Los Angeles Aqueduct
LACFCD	Los Angeles County Flood Control District
LADBS	Los Angeles Department of Building and Safety
LADOT	City of Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAGWRP	Los Angeles-Glendale Water Reclamation Plant
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	City of Los Angeles Bureau of Sanitation
LASD	Los Angeles County Sheriff's Department
LBP	lead-based paint
LDV	light duty vehicle
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent sound level over a specified period of time
LEV	low-emissions vehicle
LID	Low-Impact Development

LOS	level of service
LRT	light rail transit
LST	localized significance threshold
LTCP	Long-Term Conservation Plan
LTWA	Long Term Water Agreement
LUST	leaking underground storage tank
MCE	maximum credible earthquake
MCL	maximum contaminant level
MDV	medium duty vehicles
MET	mental health evaluation team
MLD	most likely descendant
MM	mitigation measures
MMBtu	million British thermal units
MMRP	mitigation monitoring and reporting program
MMT	million metric tons
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
MODRAT	modified rational method
MOU	Memorandum of Understanding
MPD	multiple property documentation
MPO	metropolitan planning organization
MPP	Policies and Procedures
MS4	Municipal Separate Storm Sewer Systems
MW	megawatt
MWD	Metropolitan Water District of Southern California
MWh	megawatt-hour
MXD	mixed-use development
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NC	noise criteria
NEHRP	National Earthquake Hazards Reduction Program
NEN	Neighborhood Enhanced Network
NERC	North American Electric Reliability Corporation
NF_3	nitrogen trifluoride
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NHMLAC	Natural History Museum of Los Angeles County
NHTSA	National Highway Traffic Safety Administration
NIBRS	National Incident-Based Report System
NMA	neighborhood mobility area
NO_2	nitrogen dioxide
NOA	Notice of Availability

NOC	Notice of Completion
NOI	Notice of Intent
NOP	Notice of Preparation
NO_X	nitrogen oxide/oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
OEHHA	California Office of Environmental Health Hazard Assessment
OEM	Office of Emergency Management
OHP	California Office of Historic Preservation
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OVA	organic vapor analyzer
PCB	polychlorinated biphenyls
PCE	perchloroethylene
PD	planned development
PDF	project design feature
PED	pedestrian enhanced district
PEV	plug-in electric vehicle
PFC	perfluorocarbons
PGA	peak ground acceleration
PGA	priority growth area
PHEV	plug-in hybrid electric vehicle
PHMSA	Pipeline and Hazardous Materials Safety Administration
PIP	partnership in policing
PM	particulate matter
PM10	respirable particulate matter
PPV	peak particle velocity
PRC	California Public Resources Code
PV	photovoltaic
PVC	polyvinyl chloride
PWD	Public Works Department
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RHNA	Regional Housing Needs Assessment
RMS	root mean square
RPS	Renewables Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SAR	Second Assessment Report
SAR	service advisory request
SB	Senate Bill

SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCAR	Sewer Capacity Availability Report
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SEL	sound exposure level
SEMS	Standard Emergency Management System
SF_6	sulfur hexafluoride
SFB	San Fernando Basin
SFHA	special flood hazard areas
SGC	Strategic Growth Council
SGF	sewage generation factors
SGMA	Sustainable Groundwater Management Act
SGMP	soil and groundwater management plan
SIP	state implementation plan
SLCP	short-lived climate pollutant
SLF	Sacred Lands File
SLM	sound level meter
SMGSA	Santa Monica Basin Groundwater Sustainability Agency
SMP	Stormwater Management Program
SO_2	sulfur dioxide
SO_{42}	sulfates
SoCalGas	Southern California Gas Company
SO_X	sulfur oxides
SRA	source receptor area
SRMP	Short-Range Mobility Plan
SRRE	Source Reduction and Recycling Element
SurveyLA	City of Los Angeles Historic Resources Survey
SUSMP	Standard Urban Stormwater Mitigation Plan
SVP	Society of Vertebrate Paleontology
SWAT	special weapons and tactics
SWIRP	Solid Waste Integrated Resources Plan
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWQDv	stormwater quality design volume
SWQMP	Culver City Stormwater Quality Master Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TAG	Transportation Assessment Guidelines
TCO	Temporary Certificate of Occupancy
TDM	transportation demand management

TDS	total dissolved solids
TEN	transit enhanced network
TeNS	Technical Noise Supplement
TMDL	total maximum daily load
TNM	Traffic Noise Model
TOD	transit-oriented development
TPA	Transit Priority Area
TPH	total petroleum hydrocarbons
TSCA	Toxic Substances Control Act
TSCG	Transportation Study Criteria and Guidelines
UFC	Uniform Fire Code
UFMP	Urban Forest Master Plan
ULARA	Upper Los Angeles River Area
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USGBC	United States Green Building Council
UST	underground storage tank
UWMP	Urban Water Management Plan
VCP	verified clay pipe
VdB	decibel notation
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WBMWD	West Basin Municipal Water District
WDI	Waiver of Dedication and Improvement
WDR	waste discharge requirement
WSA	water supply assessment
WSAP	Water Supply Allocation Plan
WSCP	Water Shortage Contingency Plan
WSV	water supply verification
ZEV	zero-emission vehicle
ZI	zoning information
ZNE	zero net energy

This page intentionally left blank