ATTACHMENT 11

Draft

10950 WASHINGTON BOULEVARD PROJECT

CEQA Guidelines Section 15168(c) and Public Resources Code Section 21080.66

Prepared for
City of Culver City

August 2025

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

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CHAPTER 1
Introduction

This document addresses the environmental effects of the proposed 10950 Washington Boulevard Project (Project) under Section 15168(c) of the California Environmental Quality Act (CEQA) Guidelines and Section 21080.66 of the Public Resources Code (PRC). Section 15168(c) of the CEQA Guidelines sets forth criteria to utilize a program Environmental Impact Report (EIR) for "later activities" within the scope of a program EIR. The City certified a programmatic EIR to evaluate the potential environmental impacts of approving the Culver City General Plan 2045 and Zoning Code Update Project in September 2024. The General Plan 2045 and Zoning Code Update Program EIR (State Clearinghouse No. 2022030144) (Programmatic EIR or Certified PEIR) evaluated the anticipated development within the City of Culver City (City), including the anticipated development on the Project Site.[1] Additionally, PRC Section 21080.66, which was added to the PRC on June 30, 2025, by Assembly Bill 130 (AB 130), statutorily exempts from CEQA certain qualifying infill housing development projects, as discussed below.

Hudson Pacific, the Applicant, proposes to develop a mixed-use development on an approximately 5.8-acre (250,932 gross square feet [sf]) site (Project Site) located at 10912-10950 Washington Boulevard within the Clarkdale neighborhood of Culver City. The Project Site is located on Assessor Parcel Numbers (APN) 4208-024-001, 4028-024-002, and 4208-025-018. The Project Site is currently developed with two currently vacant commercial/office buildings (an eastern "Building 1" and a western "Building 2") totaling approximately 160,438 sf of commercial floor area and two connected surface parking lots. One parking lot is adjacent to Building 1 (the "North Lot") and the other is located directly south of Building 2 (the "South Lot"). The Project Site is bound by Washington Boulevard to the north and northwest, commercial uses to the east, residential uses to the south, and a Mosque and residential uses to the west.

The Project would develop two new 5-story (up to a height of 61 feet) mixed-use buildings (Buildings A and B) over one level of subterranean parking with a total of 508 residential units (including 79 Low Income units) and 14,087 sf of commercial space. The Project would include a total of 114,169 sf of open space. Of this total, 20,450 sf would be provided as private open space within balconies or private patios distributed throughout the Project Site. The remaining 93,719 sf would be common open space, of which 9,240 sf would be publicly accessible. The Project would include a total of 715 vehicular parking spaces (685 residential and 30 commercial) within two parking levels—one at-grade and one subterranean. Two points of vehicular access would be provided to the Project Site via a north driveway and south driveway, both along Washington Boulevard. The Project would also provide a total of 154 bicycle spaces, consisting of 24 short-term (7 commercial and 17 residential) and 130 long-term (3 commercial and 127 residential) bicycle parking spaces in compliance with the Culver City Municipal Code (CCMC) requirements.

[1] A copy of the certified programmatic Final EIR for the General Plan 2045 can be found at https://www.culvercity.org/files/content/public/v/7/city-hall/city-departments/planning-and-development/advance-planning-division/zz.-general-plan-2045-environmental-review/final-peir.pdf.

Based on the Certified PEIR's analysis and pursuant to CEQA Guidelines Section 15168(c), the City has prepared this written checklist to evaluate the Project-specific environmental impacts and determine whether the Project-specific environmental effects would be within the scope of the Certified PEIR. As analyzed herein and demonstrated below, the Project is "within the scope" of the Certified PEIR pursuant to CEQA Guidelines Section 15168(c)(2), and no further environmental analysis is required.

For each impact area addressed under CEQA, this document describes and relies on the analysis in the Certified PEIR. This document relies on and incorporates the applicable and feasible mitigation measures from the Certified PEIR.[2]

In addition, the Project is also statutorily exempt from CEQA under PRC Section 21080.66, as shown below. While no additional CEQA review is necessary with the exemption, the City has nonetheless conservatively included environmental review conducted per CEQA Guidelines Section 15168(c)(2), as described above. This document includes the requisite analysis under both CEQA Guidelines Section 15168(c) and PRC Section 21080.66.

1.1 Statutory Authority and Regulations

1.1.1 CEQA Guidelines Section 15168(c)

CEQA Guidelines Section 15168(c) permits the lead agency to approve a subsequent activity or project if it is found to be "within the scope" of a certified Program EIR, provided that no subsequent EIR would be required pursuant to CEQA Guidelines Section 15162. Whether a later activity is within the scope of the Program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that the lead agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts and covered infrastructure as described in the Program EIR.[3]

CEQA Guidelines Section 15168(a) defines a program EIR as:

> [A]n EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:
>
> (1) Geographically,
>
> (2) As logical parts in the chain of contemplated actions,
>
> (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or

[2] The mitigation measures incorporated herein were taken from the General Plan 2045 and the Zoning Code Update Project PEIR Mitigation Monitoring Program (MMP), dated July 2024, https://www.culvercity.org/files/content/public/v/7/city-hall/city-departments/planning-and-development/advance-planning-division/zz.-general-plan-2045-environmental-review/final-peir.pdf.

[3] CEQA Guidelines Section 15168(c)(2).

(4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

CEQA Guidelines Section 15168(c) sets forth criteria to use a program EIR for "later activities." Specifically, CEQA Guidelines Section 15168(c) states the following:

(c) Use with Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.

(1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR a provided in Section 15152.

(2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.

(4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.

(5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

Section 15162 of the CEQA Guidelines requires the preparation of a Subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project and one or more of the following circumstances exist:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

There is no basis to find any of the criteria in Section 15162 have been met such that a major revision to the Certified PEIR is required. As an initial matter, the analysis provided below shows the Project would not result in a change to the Project analyzed in the Programmatic EIR that would result in any new significant impacts or more severe significant impacts than those identified in the Certified PEIR as the Project is within the scope of and is consistent with the City's General Plan 2045. Additionally, there have been no changes to the General Plan 2045 since its adoption that resulted in or will foreseeably result in new significant impacts or more severe significant impacts. Based on the number of projects that have been approved so far by the City, the increase in the number of residential dwelling units analyzed in the Certified PEIR has not been met for the General Plan 2045 buildout. There is no basis to find there has been a change to the project analyzed in the Certified PEIR such that there will be new or more severe significant impacts. Additionally, there have been no substantial changes with respect to the circumstances under which the project was undertaken that are expected to result in new or more severe significant impacts. There is no new information of substantial importance that was not known or could not have been known when the Programmatic EIR was certified and the General Plan 2045 adopted by the City. Finally, no mitigation measures were identified that were previously found not to be feasible that would in fact be feasible to substantially reduce the Project's significant impacts but that the Project applicant declined to adopt. Also, there are no mitigation measures that are considerably different from those analyzed in the Certified PEIR that would substantially reduce the Project's significant effects on the environment but that the Project applicant declined to adopt.

1.1.2 PRC Section 21080.66

Relevant excerpts to the Project from Section 21080.66 of the PRC include the following:[4]

21080.66. (a) Without limiting any other statutory or categorical exemption, this division does not apply to any aspect of a housing development project, as defined in subdivision (b) of Section 65905.5 of the Government Code, including any permits, approvals, or public improvements required for the housing

[4] See Section 21080.66 of the PRC for the entirety of Section 21080.66.

development project, as may be required by this division, if the housing development project meets all of the following conditions:

(1) (A) Except as provided in subparagraph (B), the project site is not more than 20 acres.

(B) The project site or the parcel size for a builder's remedy project, as defined in paragraph (11) of subdivision (h) of Section 65589.5 of the Government Code, or the project site or the parcel size for a project that applied pursuant to paragraph (5) of subdivision (d) of Section 65589.5 of the Government Code as it read before January 1, 2025, is not more than five acres.

(2) The project site meets either of the following criteria:

(A) Is located within the boundaries of an incorporated municipality.

(B) Is located within an urban area, as defined by the United States Census Bureau.

(3) The project site meets any of the following criteria:

(A) Has been previously developed with an urban use.

(B) At least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses.

(C) At least 75 percent of the area within a one-quarter mile radius of the site is developed with urban uses.

(D) For sites with four sides, at least three out of four sides are developed with urban uses and at least two-thirds of the perimeter of the site adjoins parcels that are developed with urban uses.

(4) (A) The project is consistent with the applicable general plan and zoning ordinance, as well as any applicable local coastal program as defined in Section 30108.6. For purposes of this section, a housing development project shall be deemed consistent with the applicable general plan and zoning ordinance, and any applicable local coastal program, if there is substantial evidence that would allow a reasonable person to conclude that the housing development project is consistent.

(B) If the zoning and general plan are not consistent with one another, a project shall be deemed consistent with both if the project is consistent with one.

(C) The approval of a density bonus, incentives or concessions, waivers or reductions of development standards, and reduced parking ratios pursuant to Section 65915 of the Government Code shall not be grounds for determining that the project is inconsistent with the applicable general plan, zoning ordinance, or local coastal program.

(5) The project will be at least one-half of the applicable density specified in subparagraph (B) of paragraph (3) of subdivision (c) of Section 65583.2 of the Government Code.

(6) The project satisfies the requirements specified in paragraph (6) of subdivision (a) of Section 65913.4 of the Government Code.

(7) The project does not require the demolition of a historic structure that was placed on a national, state, or local historic register before the date a preliminary application was submitted for the project pursuant to Section 65941.1 of the Government Code.

(8) For a project that was deemed complete pursuant to paragraph (5) of subdivision (h) of Section 65589.5 of the Government Code on or after January 1, 2025, no portion of the project is designated for use as a hotel, motel, bed and breakfast inn, or other transient lodging. For the purposes of this section, "other transient lodging" does not include either of the following:

(A) A residential hotel, as defined in Section 50519 of the Health and Safety Code.

(B) After the issuance of a certificate of occupancy, a resident's use or marketing of a unit as short-term lodging, as defined in Section 17568.8 of the Business and Professions Code, in a manner consistent with local law.

(Subsection (b) includes tribal consultation requirements which are not listed herein)[5]

(c) (1) (A) The local government shall, as a condition of approval for the development, require the development proponent to complete a phase I environmental assessment, as defined in Section 78090 of the Health and Safety Code.

(B) If a recognized environmental condition is found, the development proponent shall complete a preliminary endangerment assessment, as defined in Section 78095 of the Health and Safety Code, prepared by an environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity.

(C) If a release of a hazardous substance is found to exist on the site, the release shall be removed or any effects of the release shall be mitigated to levels required by current federal and state statutory and regulatory standards before the local government issues a certificate of occupancy.

(D) If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to levels required by current federal and state statutory and regulatory standards before the local government issues a certificate of occupancy.

(2) For any housing on the site located within 500 feet of a freeway, all of the following shall apply:

(A) The building shall have a centralized heating, ventilation, and air-conditioning system.

(B) The outdoor air intakes for the heating, ventilation, and air-conditioning system shall face away from the freeway.

(C) The building shall provide air filtration media for outside and return air that provides a minimum efficiency reporting value of 16.

(D) The air filtration media shall be replaced at the manufacturer's designated interval.

[5] See Section 21080.66 of the PRC for the entirety of Subsection (b).

(E) The building shall not have any balconies facing the freeway.

(Subsection (d) includes wage requirements to construction workers, which are not listed herein)[6]

(e) This section does not affect the eligibility of a housing development project for a density bonus, incentives or concessions, waivers or reductions of development standards, and reduced parking ratios pursuant to Section 65915 of the Government Code.

(f) For purposes of this section, the following terms apply:

(1) "Adjoins" includes parcels that are only separated by a street, pedestrian path, or bicycle path.

(2) "Construction worker" means one performing onsite work associated with construction, including work involving alteration, demolition, building, excavation, renovation, remodeling, maintenance, improvement, repair work, and any other work as described by Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code, and other similar or related occupations or trades.

(3) "Urban use" means any current or previous residential or commercial development, public institution, or public park that is surrounded by other urban uses, parking lot or structure, transit or transportation passenger facility, or retail use, or any combination of those uses.

1.2 Previous Environmental Documents Incorporated by Reference

Consistent with Section 15150 of the CEQA Guidelines, the following documents were used in preparation of this document and are incorporated herein by reference:

- General Plan 2045 and Zoning Code Update Program EIR, State Clearinghouse (SCH) No. 2022030144, 2024; and
- City of Culver City, General Plan 2045, 2024.

Pursuant to CEQA Guidelines Section 15150(b), the above documents are available for review at the following location during the hours of 7:30 A.M. and 5:30 P.M.

Culver City Hall
9770 Culver Boulevard, 2nd Floor
Culver City, CA 90232

The above documents are also available for review at the Planning and Development Department's webpage at:
General Plan 2045 Environmental Review - City of Culver City (https://www.culvercity.org/City-Hall/City-Departments/Planning-and-Development/Advance-Planning-Division/ZZ.-General-Plan-2045-Environmental-Review) and Advance Planning Division - City of Culver City (https://www.culvercity.org/City-Hall/City-Departments/Planning-and-Development/Advance-Planning-Division), respectively.

[6] See Section 21080.66 of the PRC for the entirety of Subsection (d).

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CHAPTER 2
Project Description

2.1 Project Location

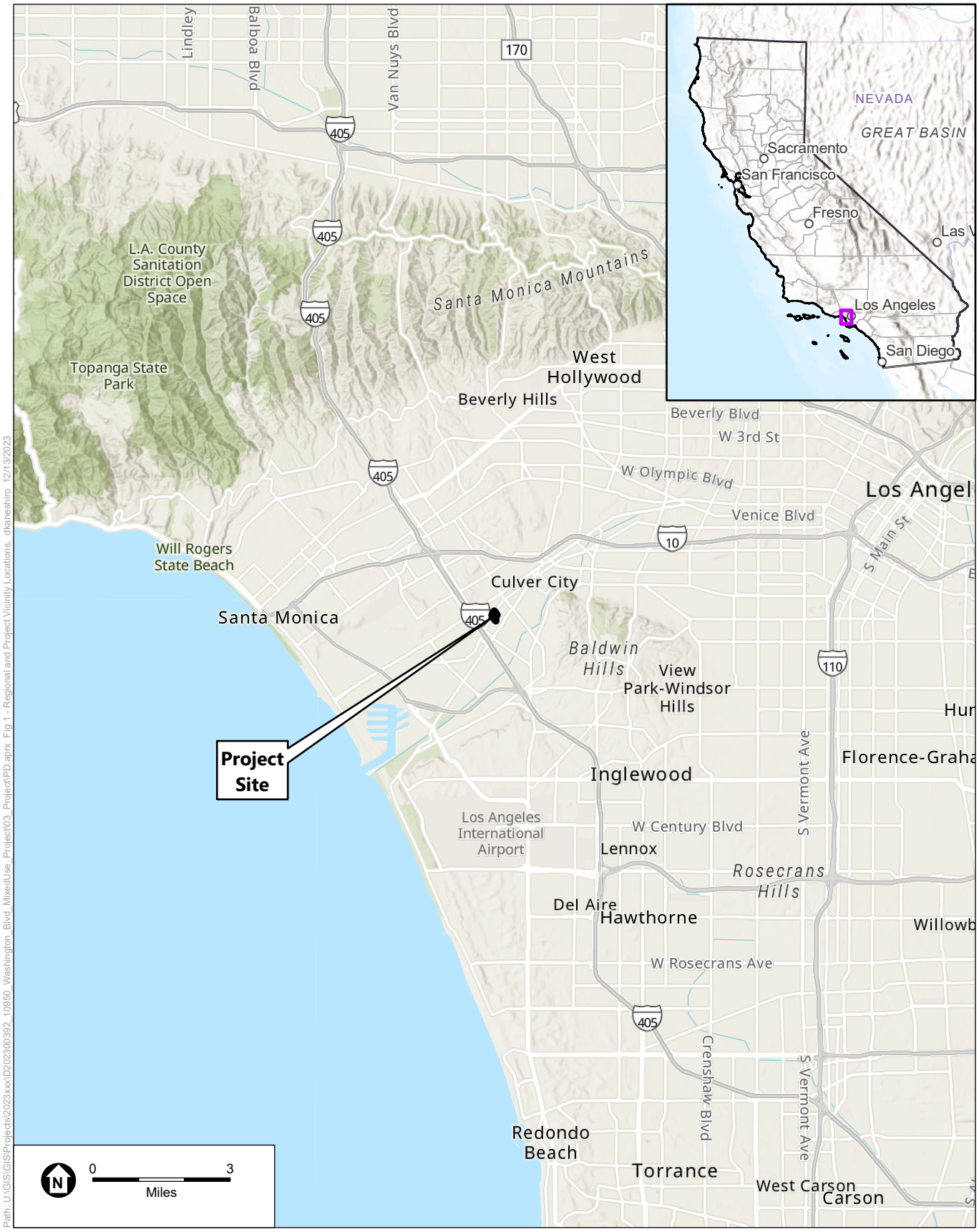
The Project Site is located in an urbanized, generally flat area of the central portion of the City with regional access provided by the San Diego Freeway (1-405) located approximately 0.4 miles west of the Project Site. Generally, the Project Site is located just beyond the southwest corner of the Washington Boulevard and Elenda Street intersection, with direct local access to the Project Site provided via Washington Boulevard. Direct access to the Project Site is not available from Elenda Street. The Project Site is also located 0.4 miles east of the Sepulveda Boulevard/Venice Boulevard intersection and is within one of the four Key Transit Priority Areas (TPAs) identified in Culver City's July 13, 2020 Transportation Study Criteria and Guidelines.

The Project Site is located on Assessor Parcel Numbers (APN): 4208-024-001, 4028-024-002, and 4208-025-018. The Project Site is bound by Washington Boulevard to the north and northwest, commercial uses to the east, residential uses to the south, and a Mosque and residential uses to the west. The Project Site is located within the Clarkdale neighborhood. See **Figure 1**, *Regional and Project Vicinity Locations*, for the location of the Project Site. See **Figure 2**, *Project Location – Aerial Photograph*, for an aerial image of the Project Site and surrounding development.

2.2 Existing Project Site Conditions

The approximately 5.8-acre (250,932 gross sf) Project Site is currently occupied by two commercial buildings (the eastern Building 1 and western Building 2) that total approximately 160,438 sf of commercial floor area. Building 1 is a one- and two-story building with a height of approximately 28.8 feet from grade. Building 1 contains approximately 70,808 sf of floor area. Building 2 is a three-story building with rooftop parking, with a height of approximately 49 feet from grade. Building 2 contains approximately 89,630 sf of floor area. The site also includes two connected surface parking lots (the "North Lot" and "South Lot"). The sidewalks adjoining the Project Site to the north are landscaped with street trees and trees are scattered throughout the existing surface parking lots.

Vehicle access to the Project Site is currently provided via two driveways located along Washington Boulevard. The single-lane northern driveway in the central portion of the Project Site is used for ingress to the site, while the southern two-lane driveway is used for egress from the Project Site. Through striping and signage, the ingress driveway leads vehicles to either the North Lot or the South Lot, before directing vehicles to exit through the southern driveway. Pedestrian and bicycle access to the Project occurs via Washington Boulevard. Washington Boulevard contains limited curbside parking. The Project Site currently provides a combined total of 439 parking spaces, including 259 standard spaces, 176 compact spaces, and 4 disabled-access spaces.



SOURCE: ESA, 2023

10950 Washington Boulevard Project

Figure 1
Regional and Project Vicinity Locations

ESA

Path: U:\GIS\GIS\Projects\2023xxx\D202300392_10950_Washington_Blvd_MixedUse_Project\03_Project\PD.aprx Fig 2 - Project Location – Aerial Photograph dkaneshiro 1/24/2025

SOURCE: ESA, 2023

10950 Washington Boulevard Project

Figure 2
Project Location – Aerial Photograph

ESA

2.3 Land Use and Zoning

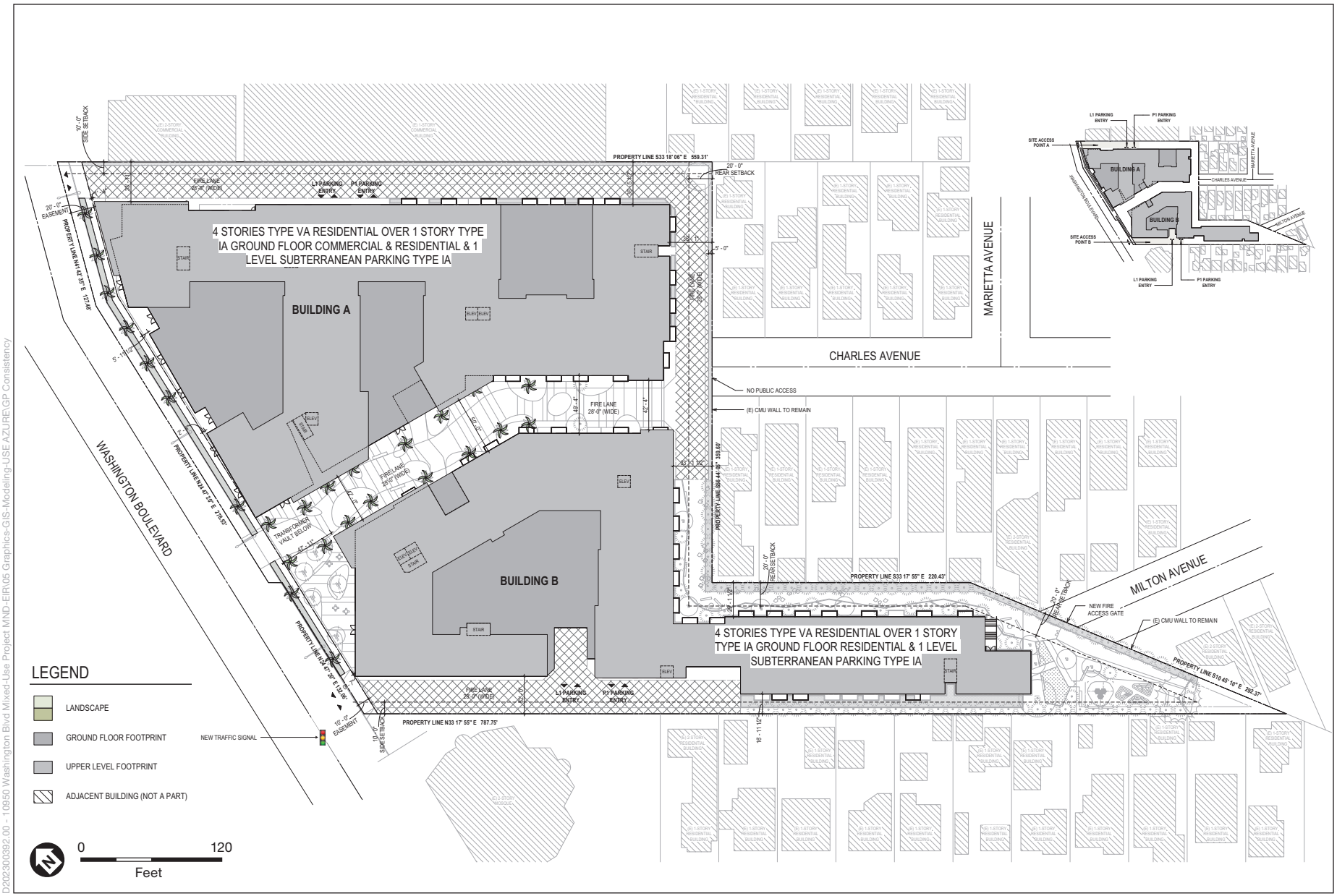
The Project Site is currently zoned Mixed Use Medium and designated for Mixed Use Medium use in the General Plan 2045. This designation allows medium scale mixed use, as well as stand-alone residential and commercial developments serving surrounding neighborhoods and nearby areas. The maximum density is 65 dwelling units per acre (du/ac) for residential uses and the maximum non-residential intensity is 3.0 floor area ratio (FAR).

2.4 Surrounding Uses

The area surrounding the Project Site is developed primarily with commercial, religious institutions, educational and residential uses. Land uses located adjacent to the Project Site include: La Ballona Elementary School and a three-story senior housing building to the north (across Washington Boulevard); a Mosque and single-family residential uses to the west along Huron Avenue; single-family residential uses to the south; and a two-story commercial building, one-story light industrial building and single-family residential uses to the east along Elenda Street. The land uses to the north of the Project Site across Washington Boulevard have General Plan land use designations of Mixed Use Corridor 1 (35 du/acre) and Mixed Use Corridor 2 (50 du/acre). The Mosque site to the west and the commercial uses to the east of the Project Site along Washington Boulevard are designated for Mixed Use Corridor 1 use. The residential uses to the west, south and east of the Project Site are designated by the General Plan for Two Family uses (17.4 du/ac). The residential uses along the west side of Elenda Street to the southeast of the Project Site are designated for Medium Density Multifamily use (50 du/acre). The commercial and light industrial uses along the west side of Elenda Street and directly east of the Project Site are designated as Mixed Use Medium and Mixed Use Corridor 2, respectively, by the General Plan.

2.5 Development Program

The Project would demolish all existing buildings and parking facilities on the Project Site and construct a new 5-story (up to a height of 61 feet) mixed-use development over one level of subterranean parking. The Project would include two, 5-story buildings (Building A and Building B) up to 61 feet in height that would include a total of 508 multi-family dwelling units (including 79 Low Income units) and 14,087 sf commercial use. The Project's 508 residential units would consist of 90 studio units, 241 one-bedroom units, and 177 two-bedroom units. The Project would include a total of 715 vehicular parking spaces (685 residential and 30 commercial), with 606 spaces provided within one subterranean level and 109 spaces provided on the enclosed first level of the building. **Figure 3**, *Conceptual Site Plan*, provides an illustration of the conceptual site plan for the Project. **Table 1**, *Project Development Summary*, provides an overview of the Project's proposed land uses and development components.



SOURCE: KFA, January 2025

10950 Washington Boulevard Project

Figure 3
Conceptual Site Plan

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TABLE 1
PROJECT DEVELOPMENT SUMMARY

	Building A	Building B	Project Total
Studio Units	36	54	90
1-BR Units	113	128	241
2-BR Units	99	78	177
Total Units	**248**	**260**	**508**
Residential Floor Area[a]	252,959 sf	235,285 sf	488,244 sf
Retail Square Footage[a]	14,087 sf	--	14,087 sf
Total Floor Area[a]	**267,046 sf**	**235,285 sf**	**502,331 sf**
Affordable (Low Income Units): Included in total units above	**39**	**40**	**79**
Private Open Space (Resident Only)	10,250 sf	10,200 sf	20,450 sf
Common Open Space (Resident only)	31,982 sf	39,353 sf	84,479 sf[b]
Public Open Space	--	--	9,240 sf
Total Open Space	**42,232 sf**	**49,553 sf**	**114,169 sf**
Commercial Vehicle Parking Spaces	--	--	30
Residential Parking Spaces	--	--	685
Total Vehicle Parking Spaces	**--**	**--**	**715**
Commercial Bicycle Parking Spaces	--	--	10
Residential Bicycle Parking Spaces	--	--	144
Total Bicycle Parking Spaces	**--**	**--**	**154**
Height[c]	5-Stories (61 feet)	5-Stories (61 feet)	--

NOTES:

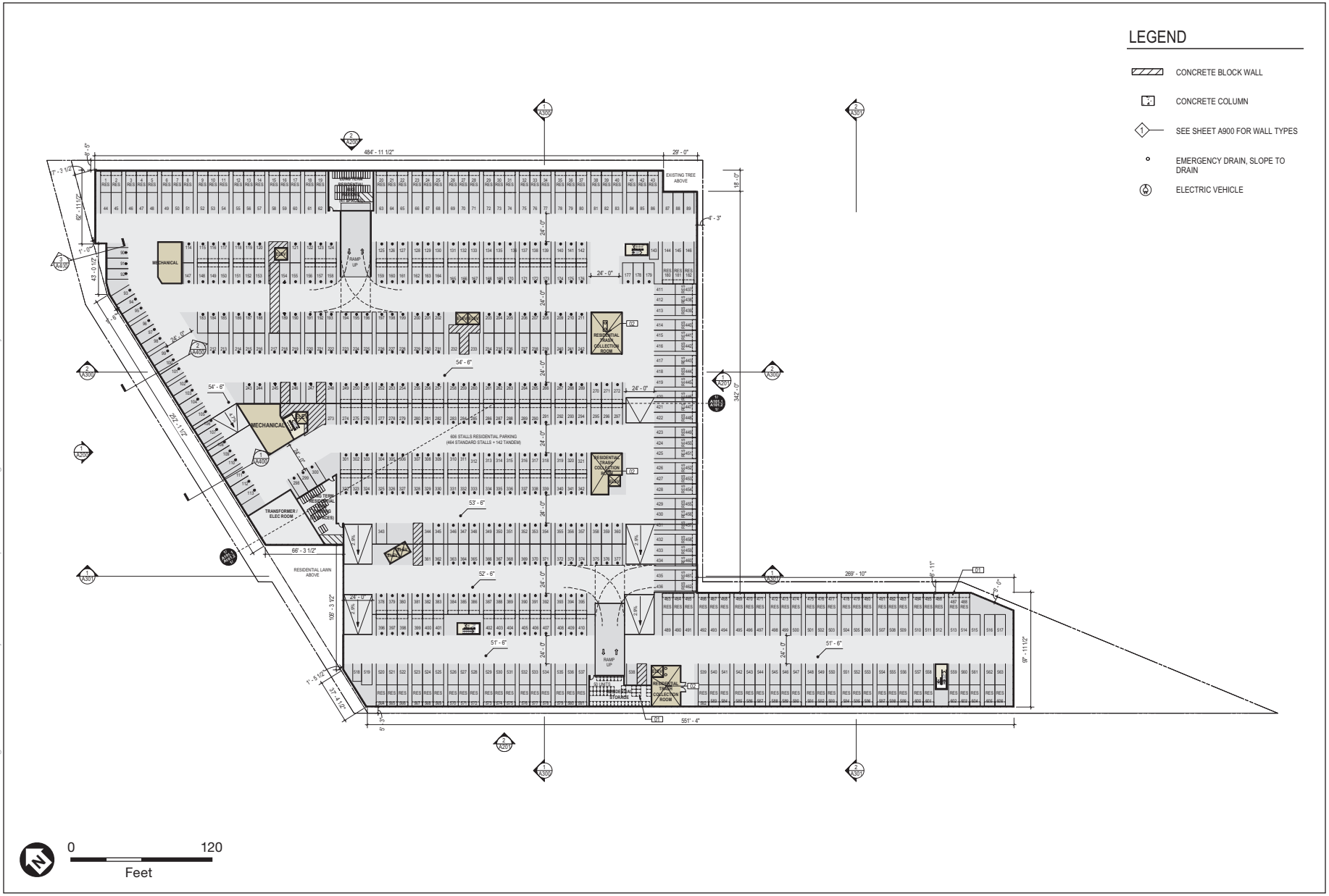
[a] Area for purposes of calculating Floor Area Ratio (FAR). Includes area to inside face of exterior wall, excludes elevator, stair shafts, and balconies. FLOOR AREA/SITE AREA = 502,331 SF/ 250,932 GSF = 2.0:1

[b] 13,144 sf of common open space is located between the two buildings.

[c] Stories include rooftop floors that include indoor structures (i.e., amenity rooms). The number of stories does not include subterranean parking levels.

SOURCE: KFA, 2025.

The Project's 488,244 sf of residential floor area plus the 14,087 sf of commercial floor area would result in a total floor area for the Project of 502,331 sf, which equates to a floor area ratio (FAR) of 2.0:1. As shown on **Figure 4**, *Level P1 Plan*, there would be 606 vehicular parking spaces located within the subterranean parking level (Level P1). Bicycle parking, residential trash rooms, and storage are also illustrated on the Level P1 Plan. The figure also illustrates the vehicular driveway/ramps from the subterranean parking level to outside of the parking garage. **Figure 5**, *Level 1 - Ground Floor Plan*, illustrates the layout of the first floor with commercial uses, a leasing office, residential lobbies, residential uses, amenity areas and parking. The Project's 14,087 sf of commercial space would be located along the Washington Boulevard frontage of Building A. The first floor also includes 109 parking spaces and 53 residential units dispersed amongst Buildings A and B. **Figure 6**, *Level 2 Floor Plan*, illustrates the mix of residential units and amenity areas that surround internal open space courtyard areas. Building A features three courtyards, one of which contains a pool, and Building B features one central courtyard, which also contains a pool. Level 2 would include a total of 112 residential units, including 56 units in Building A and 56 units in Building B.



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SOURCE: KFA, January 2025

10950 Washington Boulevard Project

Figure 4
Level P1 Plan

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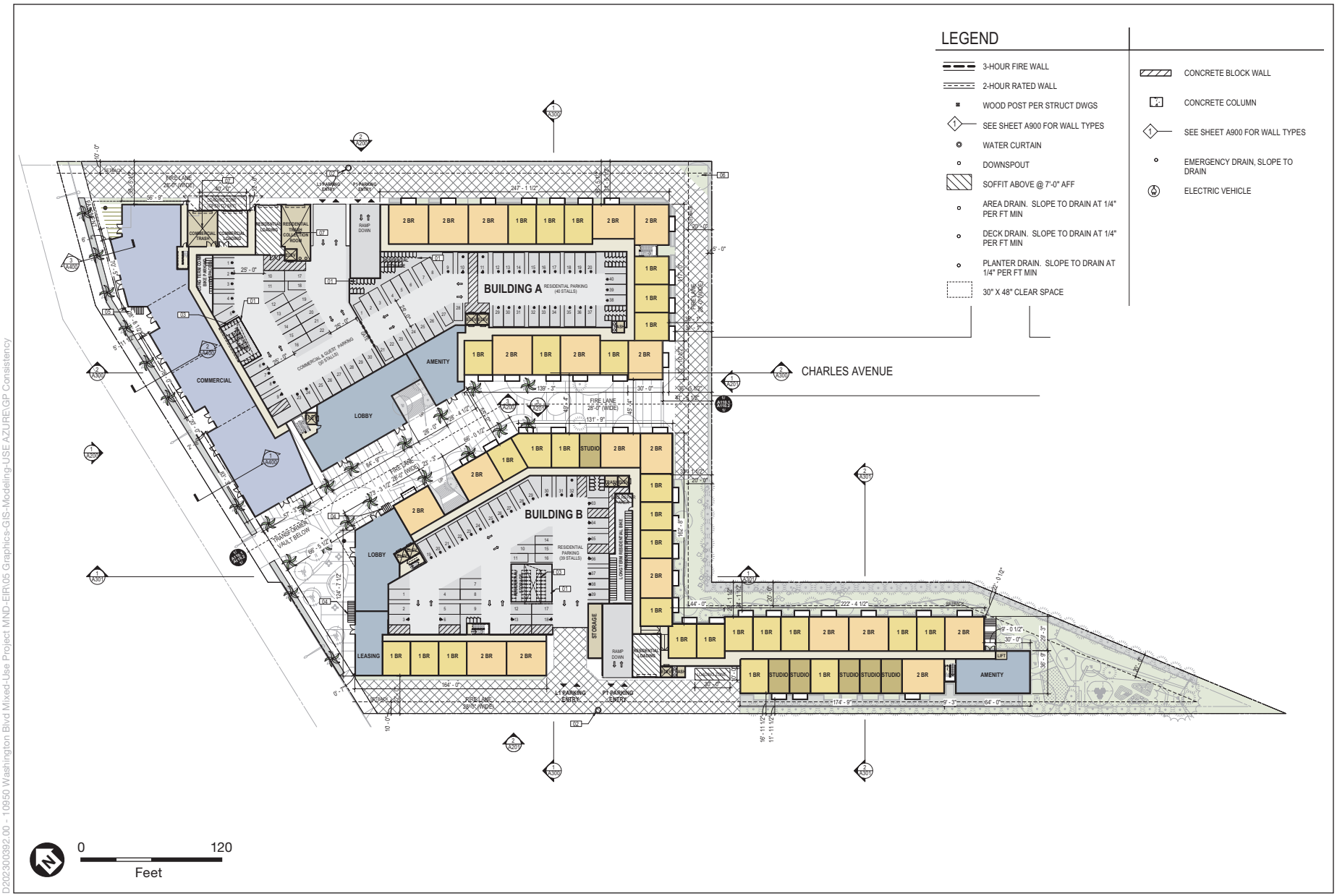

SOURCE: KFA, January 2025

10950 Washington Boulevard Project

Figure 5
Level 1 – Ground Floor Plan

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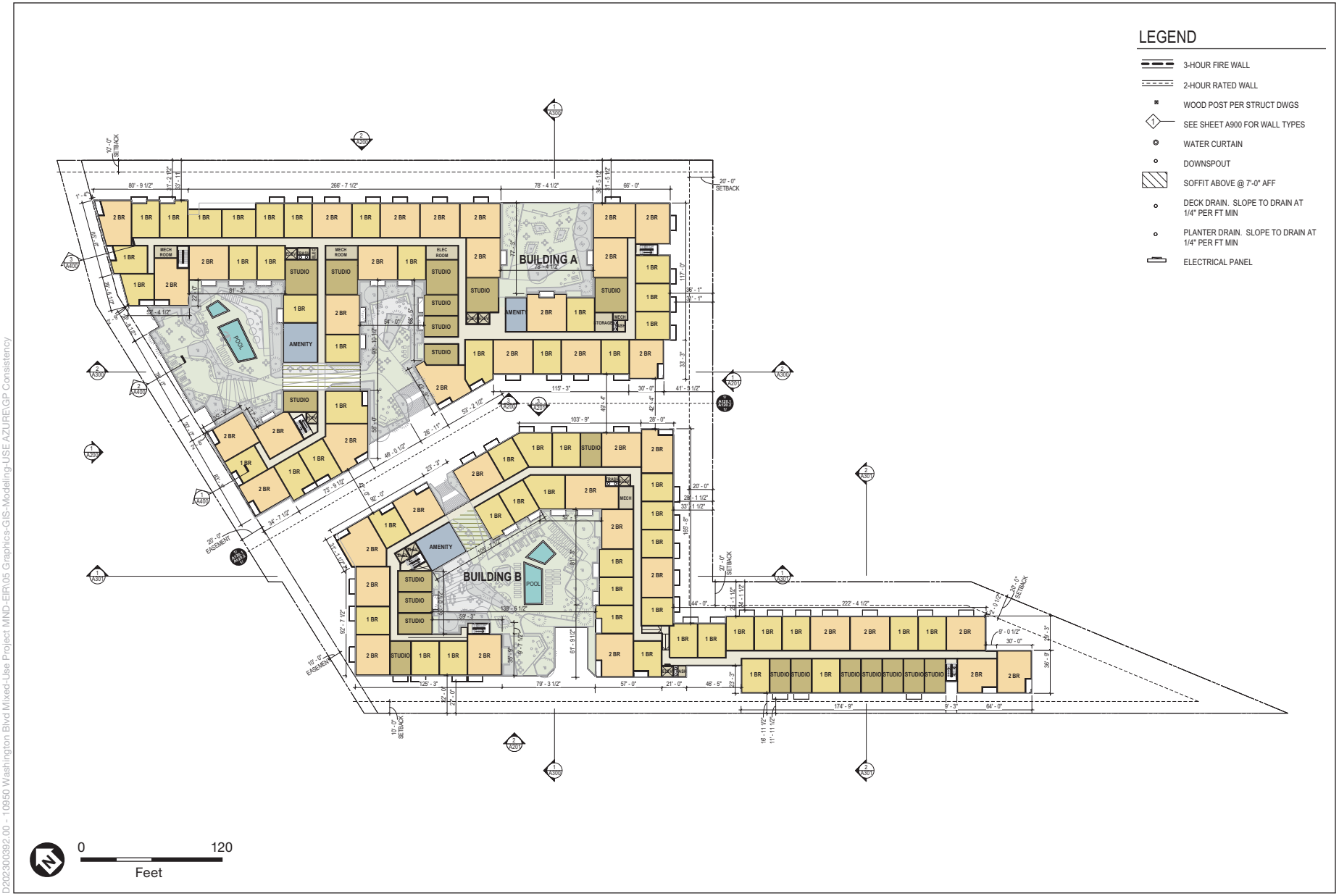

SOURCE: KFA, January 2025

10950 Washington Boulevard Project

Figure 6
Level 2 Floor Plan

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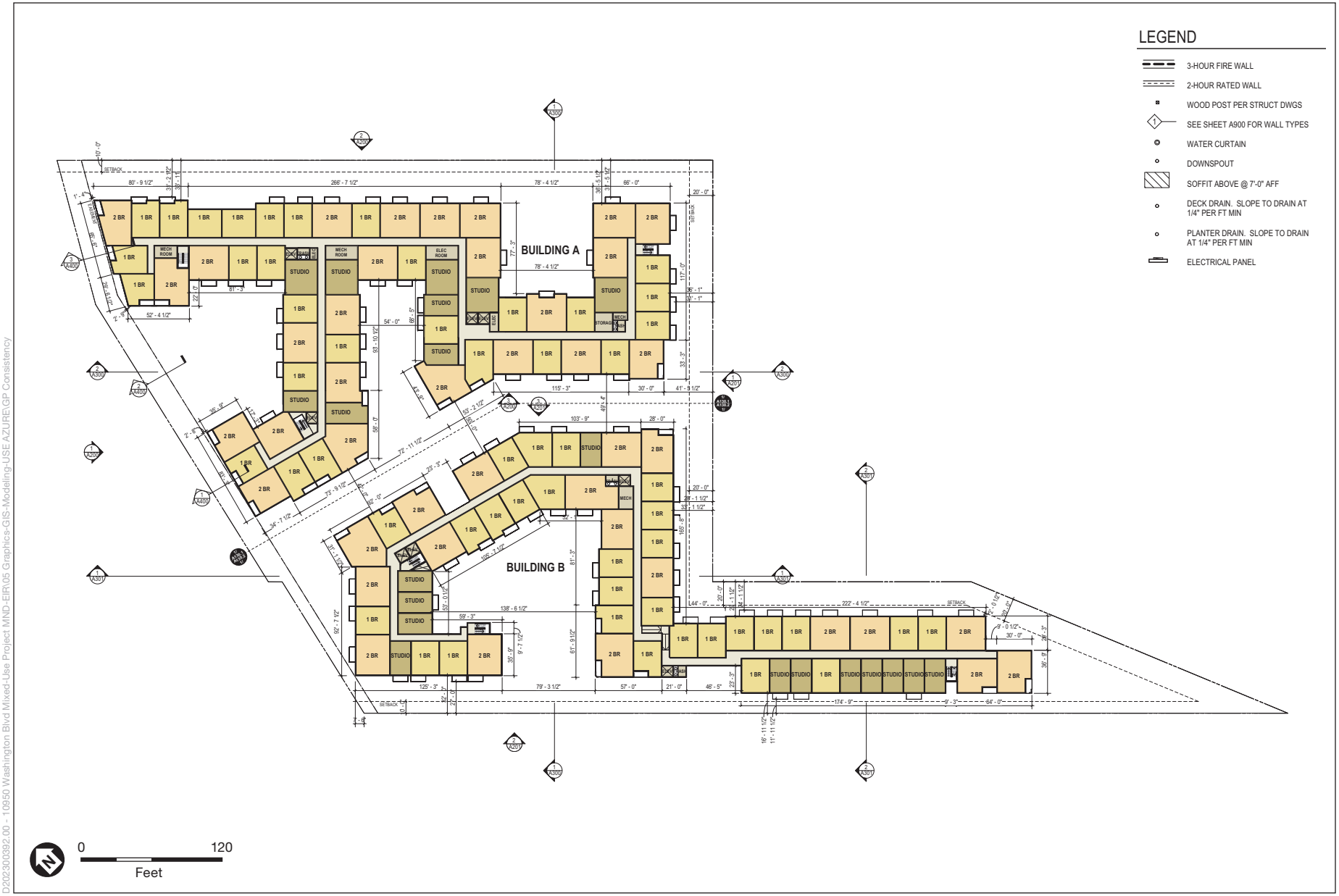
Figure 7, *Level 3 Floor Plan*, provides an illustration of the 118 residential units on Level 3 (including 60 units in Building A and 58 units in Building B). **Figure 8**, *Level 4 Floor Plan*, provides an illustration of 115 residential units on Level 4 (including 60 units in Building A and 55 units in Building B). Similarly, **Figure 9**, *Level 5 Floor Plan*, provides an illustration of 110 residential units on Level 5 (including 55 units in Building A and 55 units in Building B), as well as two amenity areas and associated decks located on the Washington Boulevard frontage of Building A.

2.5.1 Landscaping and Open Space

Open space and landscaping would be provided in accordance with CCMC requirements. The Project would incorporate public-facing ground floor landscaping along Washington Boulevard. Landscaping would also be provided between Buildings A and B and around the southern perimeter of the Project Site, adjacent to the residential uses to the east, south, and west, as shown in **Figure 10**, *Level 1 – Ground Floor Landscape Plan*. Planted perimeters at the ground level would buffer the Project site from Washington Boulevard and residential uses while leaving openings for community facing mixed use. Landscaping would also be incorporated within the four courtyards on Level 2, as shown in **Figure 11**, *Level 2 Landscape Plan*. Landscaped planter boxes would also be incorporated into the amenity deck on Level 5. The landscape design would be tailored for each of the landscaped open space areas with a compatible plant palette used throughout the Project Site.

The Level 1/ground floor would feature planting areas, walkways, trees, and seating areas. The first level outdoor area and commercial area along Washington Boulevard would be open to the public, as would a public open plaza adjacent to the north side of Building B. The site's other first level areas are available only to Project residents, including the lawns and playground areas in the southern corner of the Project Site, south of Building B. As shown in Figure 10, the existing palm trees along Washing Boulevard would be retained by the Project and new hedge screen plantings would be provided along the southern perimeters of the Project Site to provide a visual buffer from the adjacent residential uses. Irrigation would be provided by high efficiency drip systems on weather-based smart controllers. Landscaping would emphasize native, low water use, and drought tolerant plants (e.g., ornamental 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.

As summarized in Table 1, the Project would include a total of 114,169 sf of open space. Of this total, 20,450 sf would be provided as private open space within balconies or private patios distributed throughout the Project Site. The remaining 93,719 sf would be common open space. On the ground floor, shown in Figure 10, 9,240 square feet of the Project's common outdoor space would be publicly accessible, which includes the Project's frontage along Washington Boulevard and part of the centrally located landscaped area between Buildings A and B, which also serves as a fire lane. Level 2 of Buildings A and B would feature common outdoor courtyards and pool deck areas, as shown in Figures 6 and 11. The second floor pool decks would be enclosed by a 5-foot tall pool enclosure along the site perimeters. Building A would also include two additional landscaped outdoor common open space areas providing seating areas, which are illustrated in Figure 11. Level 5 of Building A would feature two outdoor decks facing Washington Boulevard that would include seating areas and built-in barbeques and counters for small gatherings. Two additional outdoor common open space decks would be located on Level 5 of Building A fronting Washington Boulevard, as shown in Figure 9.

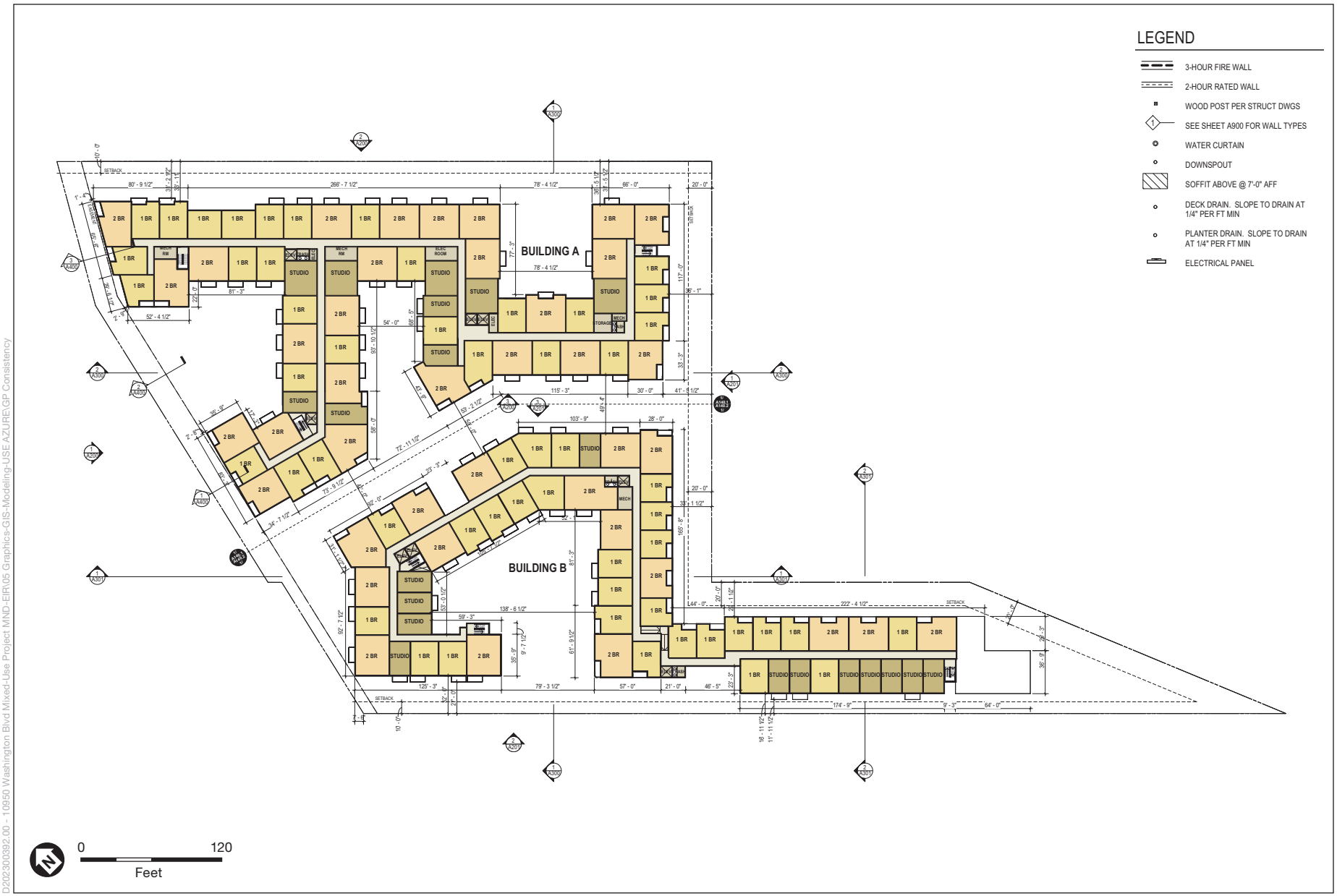


SOURCE: KFA, January 2025

10950 Washington Boulevard Project

Figure 7
Level 3 Floor Plan

ESA



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SOURCE: KFA, January 2025

10950 Washington Boulevard Project

Figure 8
Level 4 Floor Plan

ESA

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SOURCE: KFA, January 2025

10950 Washington Boulevard Project

Figure 9
Level 5 Floor Plan

ESA

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SOURCE: Artifact, February 2024

10950 Washington Boulevard Project

Figure 10
Level 1 – Ground Floor Landscape Plan

ESA

SOURCE: Artifact, February 2024

10950 Washington Boulevard Project

Figure 11
Level 2 Landscape Plan

ESA

Various amenity rooms would be provided throughout the Project Site within both buildings, which are illustrated on Figures 5 to 9. 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.

2.5.2 Height, Density, and Setbacks

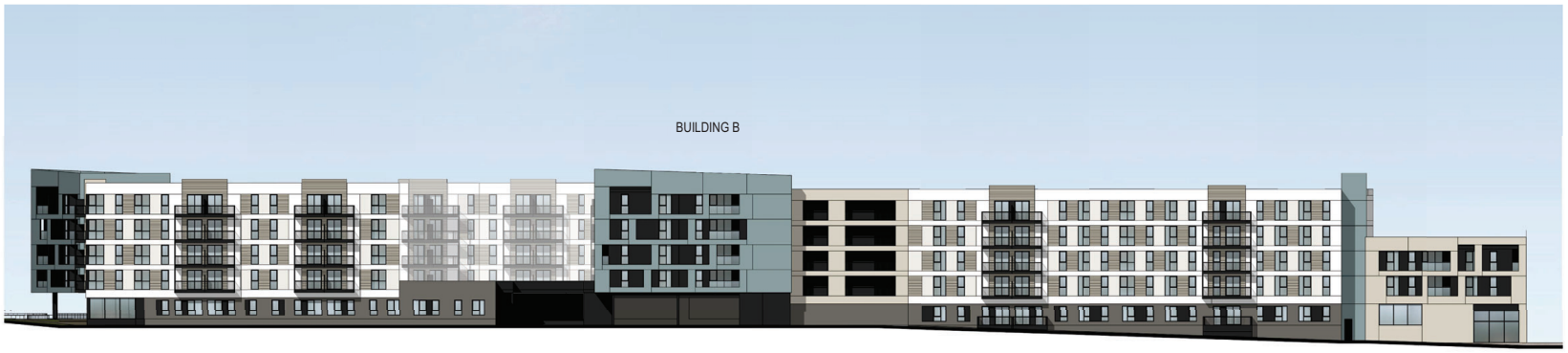
Per CCMC Section 17.220.020 Table 2-8, the maximum allowable height for the Project is 56 feet. However, the Project is proposing to include 79 units (21 percent of its allowed base density of 375 units based on 65 du/acre allowed by Mixed Use Medium designation per City's General Plan and Zoning Code) of its residential units as 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 5 feet beyond the maximum allowable height as a development incentive for providing affordable units. With this incentive, the Project would have maximum building heights of up to 61 feet to the top of the roof to accommodate grade changes.

Figure 12, *North and West Elevations,* illustrates the Project as viewed from Washington Boulevard (North Elevation) and from the Mosque and residential uses to the west (West Elevation). **Figure 13,** *South and East Elevations*, illustrates the Project as viewed from the residential uses to the south (South Elevation) and from the commercial/light industrial uses along Elenda Street to the east (East Elevation). **Figure 14,** *Building Sections*, illustrates the Project's proposed uses and heights by floor/level.

The Project would be available to receive up to a 100 precent density bonus per state density bonus law (Gov't Code § 65915). Per the City's General Plan and Zoning Code, Mixed Use Medium land uses are allowed to develop 65 units per acre. Thus, with the Project Site being 5.761 acres, up to 375 units could be developed without a density bonus. The Project includes 79 units (21 percent of base density) as Low Income affordable units. Providing this amount permits a 35.4 percent density increase under state density bonus law. At 508 units, the Project would thus be within the allowed number of units with the density bonus incentives included.

In addition to the Project's height and density incentives described above, the Project is requesting an incentive to provide relief from interior upper floor step backs requirement of the Mixed-Use Zoning District Development Standards where abutting an R1 or R2 parcel, which are 20 feet on rear yards if over 30 feet when adjacent to R1 or R2 zones. In addition, the Project is seeking a waiver for relief from the minimum 15-foot non-residential ground floor height requirement, as the Project is proposing to provide ground floor commercial heights between 12' - 5" to 15' - 0". Also, the Project is seeking a waver for relief from the maximum 5-foot non-residential street facing setbacks requirement. That is, the Project is proposing varied setback along Washington Boulevard to provide increased public open space area and an active pedestrian streetscape. Aside from these incentives and waivers, the Project would follow the applicable development standards included in CCMC Section 17.220.020, Mixed-Use Zoning District Development Standards, which provides development standards such as those related to setbacks, open space, parking frontage, and other development standards.

North Elevation



West Elevation

SOURCE: KFA, January 2025

10950 Washington Boulevard Project

Figure 12
North and West Elevations

ESA

South Elevation

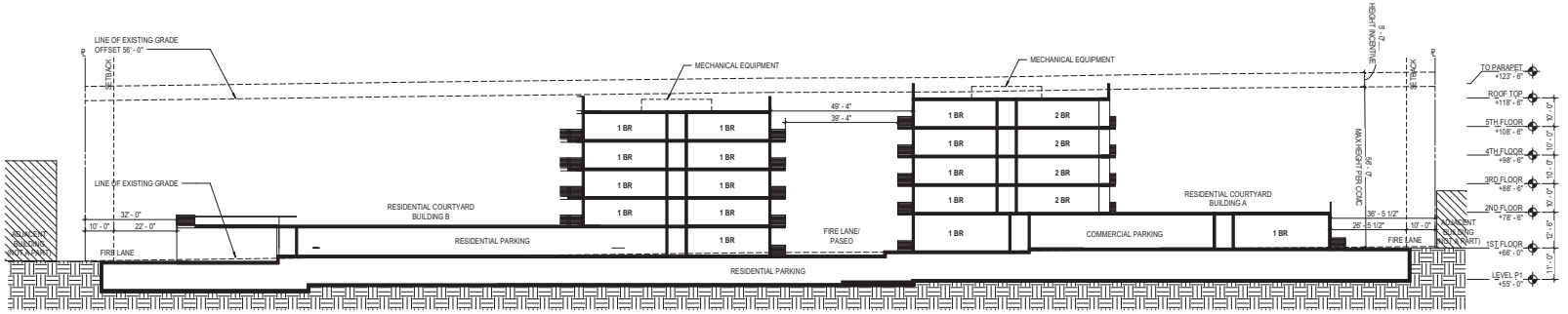
East Elevation

SOURCE: KFA, January 2025

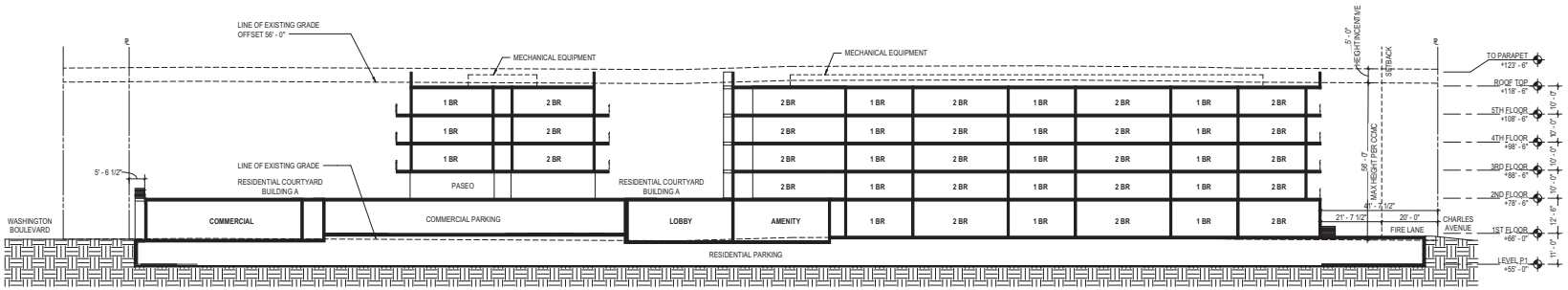
10950 Washington Boulevard Project

Figure 13
South and East Elevations

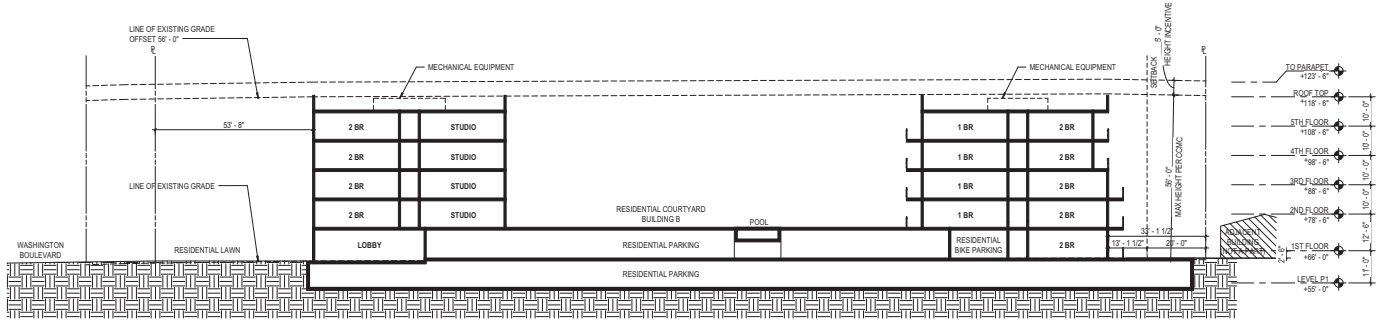
ESA



Section West and East 01



Section North and South 01



Section North and South 02

SOURCE: KFA, January 2025

10950 Washington Boulevard Project

Figure 14
Building Sections

ESA

2.5.3 Architectural Design

Figure 15, *Conceptual Project Rendering*, provides a southeasterly view of the Project as viewed from Washington Boulevard. **Figure 16**, *Conceptual Project Rendering—Public Open Space*, provides a focused southeasterly view of the Project's proposed publicly accessible open space area as viewed from Washington Boulevard. The Project would transform a decades-old office campus along Washington Boulevard into a community oriented, mixed-use development, providing a place for the community to gather. The design is intended to activate the street with a retail promenade, landscaping with planters and trees, a street-facing plaza, built-in seating, and nighttime lighting.

As shown in Figure 15, the Project design includes varied facades and massing components within Buildings A and B along Washington Boulevard. At the ground level, the commercial components would include varied storefront designs and landscaping to provide additional visual interest. The design concept includes a blend of colors on the various building components with a boulevard-inspired aesthetic punctuated by lacy, lightweight balconies with an accent color. This scheme is consistent between the two buildings, while the use of warm colors and cool colors distinguish the buildings from each other, creating a sense of place for the users. As Building B continues down the long leg of the southern part of the Project Site, it steps down with the natural grade, as well as reducing to 4 stories. The façades of the buildings that face the single family homes along Charles Avenue and Milton Avenue are set back 30 - 35 feet, in-set balconies are incorporated into the design at certain levels, and taller landscaping along the existing site walls will be provided, all for privacy for the adjacent community.

As shown Figure 16, the Project design addresses the neighborhood by breaking the street frontage into 2 separate buildings, with an inviting, landscaped paseo running between the buildings to the southeast. The front portion of this paseo will be open to the public, creating a place for gathering and community. The project activates the street frontage with retail spaces designed to have their own expression and to give users individual storefronts with canopies, signage and an outdoor patio. The landscape will frame public seating, rest areas and a plaza right off of Washington Boulevard.

2.5.4 Access, Circulation, and Parking

Vehicular and Pedestrian Access and Parking

Vehicular access to the Project's parking levels, as well as loading and trash areas, would be provided via two points of ingress/egress at driveways off of Washington Boulevard. Figures 3 and 5 illustrate the locations of the proposed driveways, which also provide emergency fire vehicle access within the Project Site. As shown on Figure 3, a new traffic signal would be installed at the Project's southern driveway along Washington Boulevard that aligns with Prospect Avenue. A fire lane would also be provided between Buildings A and B (grasspave landscaping would be provided in the fire lane as shown in Figure 10). Pedestrian access would be provided from entrances located along Washington Boulevard.

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SOURCE: KFA, September 2024

10950 Washington Boulevard Project

Figure 15
Conceptual Project Rendering

ESA

SOURCE: KFA, September 2024

10950 Washington Boulevard Project

Figure 16
Conceptual Project Rendering – Public Open Space

ESA

The Project would provide a total of 715 vehicular parking spaces, including 30 commercial and 685 residential parking spaces within one subterranean parking level and one at grade parking level. The Project would provide 10 commercial EV parking spaces (8 that are EV capable and 2 that have charging equipment) and 343 residential EV parking spaces (274 that are EV ready with receptacles and 69 that have EV chargers). Further, the Project would provide 154 bicycle parking spaces for residents, employees and visitors, including 24 short-term and 130 long-term spaces, in compliance with City codes.

Public Transit

The Project Site is located within the Sepulveda/Venice Intersection Transit Priority Area and is served by a variety of Culver City Bus transit options along Washington Boulevard and other nearby roadways provided by the City of Culver City. Directly across Washington Boulevard from the Project Site is a bus stop for Line 1 (Washington Boulevard). Just east of the Project Site (within 0.1 mile) at Elenda Street/Oregon Avenue is a bus stop for Line 5C1 (Braddick Boulevard). A bus stop for Line 3 (Crosstown) is located on Overland Avenue approximately 0.3 miles northeast of the Project Site. Also, a bust stop for Line 6 (Sepulveda Boulevard) is located along Sepulveda Boulevard approximately 0.4 miles southwest of the Project Site. Moreover, the Culver City and Palms light rail stations are each located approximately 1.5 miles east and north of the Property, respectively.

2.5.5 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. Project lighting would be designed to minimize light trespass from the Project Site and would comply with CCMC requirements. 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.

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. 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.

2.5.6 Site Security

The Project would incorporate security measures, including a 24-hour/seven-day video surveillance security program for the safety of employees, residents, and visitors to the Project Site. The cameras will be located to capture views at the perimeter of the proposed buildings; at main pedestrian and vehicular entries; at other outdoor locations as appropriate; and at stair/elevator lobbies. During construction of the Project, the Project Site would be fenced and gated with surveillance cameras to monitor the site during off

hours. During operation of the Project, access to the parking structure would be controlled through gated entries, and the entry areas would be well illuminated. Project Site security would include controlled keycard access, and perimeter lighting of entryways and public areas.

2.5.7 Sustainability Features

The Project is intending to incorporate sustainable design features equivalent to Leadership in Energy and Environmental Design (LEED) Silver standards or better.[7] 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. Design features would include energy conservation, water conservation, Transportation Design Management (TDM) and mobility measures, and pedestrian- and bicycle-friendly site design. EV parking and charging would be available for residential and commercial use, as described above. 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.

2.5.8 Project Construction and Phasing

A preliminary Construction Management and Traffic Plan, which defines the scope and scheduling of planned construction activities as well as the Applicant's proposed construction site management responsibilities, is required as part of the entitlement processing phase of the Project and would be prepared to ensure minimal impacts to neighboring land uses and to avoid interruption of pedestrian, vehicle, and alternative transportation modes and public transit. The Construction Management and Traffic Plan would require regular oversight by the City of Culver City and 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 of Culver City prior to starting any construction activity. The Construction Management and Traffic 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; and a construction parking management plan.

The Project Site would be fenced during construction for security purposes. The Project would require excavation to accommodate one level of subterranean parking, footings, and foundations. Earthwork would require a net export of approximately 88,000 cubic yards (cy) of soil. Construction staging would be largely internal to the Project Site, and encroachments into the right-of-way, if any, would be approved by the City. The Project would excavate to a maximum depth of 13 feet below grade.

[7] Per the United States Green Building Council, LEED is the world's most widely used green building rating system. LEED certification provides a framework for healthy, highly efficient, and cost-saving green buildings, which offer environmental, social and governance benefits. LEED certification is a globally recognized symbol of sustainability achievement, and it is backed by an entire industry of committed organizations and individuals paving the way for market transformation. USGBC website, https://www.usgbc.org/leed, accessed January 21, 2025.

Project construction is anticipated to commence in early 2027 and is expected to take approximately 37 months to complete. Full build-out is expected as early as 2030.

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. As part of its requested approvals, 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 phases of construction, which are expected to occur from approximately month 5 to month 11 of construction after the demolition activities are completed, as well as a 7:00 AM daily start on Sundays for the concrete-pouring portion of the concrete phase, which is expected to occur during approximately the first 40 days of the concrete activities during the 7th and 8th months of construction. The approximately four months of demolition activities prior to these phases and the remaining approximately 27 months after these phases would occur per the allowable standard CCMC permitted construction hours.

2.5.9 Necessary Approvals

Discretionary entitlements, reviews, and approvals required or requested for the Project may include, but would not necessarily be limited to, the following:

- Site Plan Review. (CCMC Section 17.540.010.B.)
- Density and Other Bonus Incentives (DOBI) to allow increased density and related concessions and waivers. (CCMC Section 17.580.010.)
- 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, and engineering permits.

2.5.10 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 this Section 15168(c) CEQA environmental clearance documentation. The Project Design Features are summarized in **Table 2**, *Summary of Project Design Features*, and are discussed further in Chapter 3, *Comparative Analysis of Impacts*, in this document. The Project Design Features are taken into account in the analyses of potential Project impacts.

TABLE 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 of Silver performance level 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 would provide 10 commercial EV parking spaces (8 that are EV capable and 2 that have charging equipment) and 343 residential EV parking spaces (274 that are EV ready with receptacles and 69 that have EV chargers). • 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.
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 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, an 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 open space areas 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 Culver City General Plan Noise

TABLE 2
SUMMARY OF PROJECT DESIGN FEATURES

Project Design Feature #	Project Design Feature Summary
	Element, as well as the Noise Ordinance upon its adoption, as applicable. A qualified noise consultant will provide written documentation that will be submitted to the 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).
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

TABLE 2
SUMMARY OF PROJECT DESIGN FEATURES

Project Design Feature #	Project Design Feature Summary
	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 and to keep the City of Culver City personnel notified of key construction activities, including 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 the 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 are 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. **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.Q, 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%).

TABLE 2
SUMMARY OF PROJECT DESIGN FEATURES

Project Design Feature #	Project Design Feature Summary
	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 15.06.500, the Project will be subject to contributing its fair share toward funding the City's mobility infrastructure and improvement projects intended to reduce vehicle miles travelled (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 are 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
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/Lyft 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 required for the first two years after a final Certificate of Occupancy for the Project is obtained. • 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 who will not be provided on-site parking accommodations and will 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 • California Friendly® plants or native plants • Drip/Subsurface Irrigation (Micro-Irrigation) • Proper Hydro-zoning/Zoned Irrigation (grouping plants with similar water requirements together)

SOURCE: ESA, 2025.

CHAPTER 3

CEQA Guidelines Section 15168(c) - Comparative Analysis of Project Impacts

This section provides an impact assessment of the Project. A Modified State CEQA Guidelines Appendix G Environmental Checklist Form was used to compare the anticipated environmental effects of the Project with those disclosed in the Certified PEIR to evaluate whether the Project's environmental effects would be within the scope of effects identified in the Culver City General Plan 2045 and Zoning Code Update PEIR in accordance with Section 15168 and to review whether any of the conditions set forth in Public Resources Code Section 21166 or CEQA Guidelines Section 15162 requiring preparation of a Supplemental or Subsequent EIR have been triggered. Note, that to the extent that a Project impact does not trigger the need for a supplemental or subsequent EIR pursuant to Section 15162, it is found to be within the scope of the impact analyzed in the Programmatic EIR pursuant to Section 15168(c)(4). The environmental effects for each of the following impact areas were evaluated:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The Certified PEIR evaluated impacts within the "Planning Area", which includes the City's jurisdictional boundaries and its Sphere of Influence (SOI), through the planning horizon year of 2045. Agricultural and Forestry Resources was scoped out of the Certified PEIR since the Planning Area evaluated therein does not contain agricultural uses or related operations and no areas are designated for farmland or forestry uses. Therefore, the Project would result in no impact to agricultural and forestry resources and has not been included in the analysis below.

The Environmental Checklist Form and evaluation below provides the following information for each of the environmental impact categories listed above:

Impact Determination in the Certified PEIR—This section lists the impact determination made in the Certified PEIR for each impact category evaluated in the PEIR.

Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?—Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this section indicates whether the Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact. This question also addresses whether the impact is within the scope of the impact analyzed in the EIR pursuant to Section 15168(c)(4). To the extent that the Project does not have an impact that triggers the need for a subsequent or supplemental EIR due to the involvement of a new significant impact or more severe significant impact, the impact is considered within the scope of the Certified PEIR.

Impact Determination for Project—This section lists the impact determination made for the Project, which is analyzed in detail for each impact category.

Mitigation Measures Addressing Impacts—This section indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, the mitigations have already been implemented. If "None" is indicated, a significant impact was not identified and mitigation was not required. Applicable mitigation measures from the Certified PEIR MMP that are being imposed on the Project are included after the analysis. In addition, for some topic issues, the Certified PEIR mitigation measures require site-specific analysis to determine and refine the appropriate mitigation for a development Project at a more refined level (i.e., air quality, cultural resources and noise/vibration) than that included in the Certified PEIR. In these instances, Project-specific mitigation measures are listed after the applicable Certified PEIR mitigation measures, as applicable.

Conclusion—For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

3.1 Aesthetics

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Aesthetics: Except as provided in Public Resources Code Section 21099, would the project:				
(a) Have a substantial adverse effect on a scenic vista?	Less than Significant	No	Less than Significant	N/A
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No	No Impact	N/A
(c) In non-urbanized 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?	Less than Significant	No	Less than Significant	N/A
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than Significant	No	Less than Significant	N/A

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" 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." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area." PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

PRC Section 21099 applies to the Project as it is a "mixed-use project" located on an infill site within a TPA (specifically, the Project is located within the Sepulveda/Venice Intersection Transit Priority Area). Therefore, the Project is exempt from aesthetic impacts. The discussion of aesthetics is for informational purposes only and not for determining whether the Project would result in significant impacts to the environment.

a) Would the Project have a substantial adverse effect on a scenic vista?

Impact Determination in the Certified PEIR

The Certified PEIR determined that impacts to scenic vistas would be less than significant. As discussed in the Certified PEIR, due to the highly urbanized nature of the Planning Area, the majority of the future development under the General Plan 2045 and Zoning Code Update would primarily occur on parcels that already contain existing development, and compliance with the applicable policies and development standards designed to minimize effects to scenic vistas would ensure that impacts would be less than significant. The City does not have any designated scenic vistas and is mainly characterized by urban environments, and as a result, scenic vistas are mostly limited to open space, vacant natural areas, and parks.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to scenic vistas, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Consistent with the aesthetics analysis included in the Certified PEIR which identified the Planning Area as mostly a highly urbanized environment, the Project Site is located in an urbanized area, with a mix of commercial, religious institution, educational, and residential uses in the nearby vicinity. The topography in the surrounding area is generally flat with only mild topographical variations. The grade of the Project Site descends gently to the south, with a site grade range of approximately 66 feet above mean sea level (AMSL) near the northern portion of the site to an approximate elevation of 52 feet AMSL at the southern portion of the site.[8] There are no ocean, notable mountain, or other scenic vistas that would be substantially affected by the Project. More specifically, the Pacific Ocean is approximately four miles to the west across relatively flat topography with intervening development. Further, the Project Site is not located in a scenic resource area or an area with protected views designated by the City. Consistent with the Certified PEIR, the Project would be subject to development and planning review and would be required to comply with other applicable regulations regarding aesthetic qualities that are established to protect visual resources, such as building heights, building setbacks, lighting, landscaping, and signage. Therefore, development of the Project would not have a substantial adverse effect on a scenic vista and would be within the scope of impacts analyzed in the Certified PEIR.

Furthermore, as the Project is a mixed-use project that would be located on an infill site within a TPA, pursuant to SB 743, aesthetics impacts of the Project are not considered significant impacts on the environment. Impacts would be less than significant, consistent with the Certified PEIR.

[8] Geotechnologies, Inc., Geotechnical Investigation for the Proposed Mixed-Use Development 10950 Washington Boulevard, November 17, 2023. Included in Appendix F of this document.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact Determination in the Certified PEIR

Impacts to scenic resources within a state scenic highway were evaluated in the Initial Study prepared as part of the Certified PEIR, and it was determined that no impacts would occur in this regard because the Planning Area does not have any City- or State-designated scenic highways.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to scenic resources within a state scenic highway, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is located in an urbanized area and is currently developed with two commercial buildings, areas of asphalt-paved surface parking, and ornamental landscaping. Consistent with the aesthetics analysis in the Certified EIR, 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 any designated historic buildings.[9] Therefore, development of the Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway and would be within the scope of impacts analyzed in the Certified PEIR.

Furthermore, as the Project is a mixed-use project that would be located on an infill site within a TPA, pursuant to SB 743, aesthetics impacts of the Project are not considered significant impacts on the environment. Therefore, the impact conclusion for scenic resources in a state scenic highway is no impact, consistent with the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

[9] City of Culver City, Historic Preservation, https://www.culvercity.org/Explore/Arts-Culture/Preservation#section-2. Accessed December 22, 2024.

c) In non-urbanized areas, would the Project 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?

Impact Determination in the Certified PEIR

The Certified PEIR determined that impacts related to conflicts with applicable zoning and other regulations governing scenic quality would be less than significant. The General Plan 2045 policies intend to complement and improve the existing scenic quality and resources in the City as well as to implement the City's vision for the future character of the City. The Zoning Code Update provides development standards, including setbacks, floor area ratio, building heights and lot coverage that establish the form and mass of future buildings that will occur under General Plan 2045. Future development would be reviewed by the City for compliance with applicable requirements prior to project approval and issuance of a building permit.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to conflicts with applicable zoning and other regulations governing scenic quality, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

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 (UFMP), the Culver City Residential Parkways Standards and Guidelines, and in the CCMC. Section 3.10, *Land Use and Planning*, includes further analysis of the Project's consistency with applicable plans and specific relevant policies governing scenic quality, which are summarized herein. Generally, the two existing commercial buildings and associated surface parking lots within the Project Site have low aesthetic value.

Element 4, Land Use and Community Design, of the Culver City General Plan 2045 includes various policies that are relevant to development of the Project. Policy LU-4.3: Mixed use development, states that on large nonresidential sites, study relaxing of development standards and raising of height limits to allow concentrated, new vertical residential development to maintain existing commercial, industrial, and studio uses, and to create horizontal mixed use development on the site. Consistent with this policy, the Project would introduce high-density vertical residential development at up to heights of 61 feet through its incorporation of a density bonus incentive due to the Project's inclusion of affordable housing as allowed by State Density Bonus Law. By doing so, the Project would help meet the City's need for additional housing in a concentrated area, which will allow other areas within the City to maintain existing commercial, industrial, and studio uses. Policy LU-14.2: Create an attractive pedestrian environment, seeks to facilitate a diverse and attractive pedestrian environment through the provision of street furniture, lighting, and other amenities. Consistent with this policy, the Project would incorporate public-facing ground floor landscaping along Washington Boulevard. Landscaping would also be provided between

Buildings A and B and around the southern perimeter of the Project Site, adjacent to the residential uses to the east, south, and west. Planted perimeters at the ground level would buffer the Project site from Washington Boulevard and residential uses while leaving openings for community facing mixed use. The landscape design would be tailored for each of the landscaped open space areas with a compatible plant palette used throughout the Project Site. The Level 1/ground floor would also feature a publicly-accessible plaza with landscaping and built-in seating areas. Policy LU-14.5: Plazas and gathering places, seeks to improve existing and create new plazas and public gathering places throughout the city. A portion of the first level outdoor area between Buildings A and B and the commercial area along Washington Boulevard would be open to the public, creating gathering areas consistent with this policy. Policy LU-15.1: Walkable and inviting buildings and spaces, requires building design that creates walkable and inviting spaces, such as locating parking behind buildings, allowing for outdoor plazas and dining, and locating building frontages in close proximity to the sidewalk edge, where appropriate. The Project would include ground floor commercial spaces fronting Washington Boulevard, as well as public open space between Buildings A and B, featuring landscaped areas, seating areas, and gathering space to activate the street frontage and pedestrian experience along Washington Boulevard. Parking would be located interior to the buildings or in a subterranean level out of view from the public. Additionally, vehicular ingress/egress is limited to two driveways on the perimeters of the Project Site, thereby emphasizing the pedestrian nature of Washington Boulevard and activating the streetscape near the Project Site. The addition of a traffic signal connecting the Project Site to Prospect Avenue will also provide enhanced and convenient pedestrian access to the northern side of Washington Boulevard.

Also, Policy LU-15.3: Architectural and visual interest in new development, encourages distinctive architecture and elements that add visual interest to buildings to enhance people's perceptions of Culver City as an interesting and inviting place. As shown in renderings of the future buildings, including Figure 15, *Conceptual Project Rendering,* and Figure 16*, Conceptual Project Rendering—Public Open Space,* and in Chapter 2, *Project Description*, of this document, the Project would change the character and quality of the existing commercial buildings and parking lot site with new, modern, high-quality architecturally designed buildings. The Project is proposing a contemporary architectural design defined by two buildings. As shown in Figure 15, the Project design includes varied facades and massing components within Buildings A and B along Washington Boulevard. At the ground level, the commercial components would include varied storefront designs and landscaping to provide additional visual interest. The design concept includes a blend of colors on the various building components with a boulevard-inspired aesthetic punctuated by lacy, lightweight balconies with an accent color. This scheme is consistent between the two buildings, while the use of warm colors and cool colors distinguish the buildings from each other, creating a sense of place for the users. As Building B continues down the long leg of the southern part of the Project Site, it steps down with the natural grade, as well as reducing to 4 stories. The façades of the buildings that face the single family homes along Charles Avenue and Milton Avenue are set back 30 - 35 feet, inset balconies are incorporated on certain levels, and taller landscaping along the existing site walls will be provided, all for the privacy for the adjacent community.

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.

As discussed in Section 3.10, *Land Use and Planning*, the Project would not conflict with the policies of the UFMP. The Project would provide 9,240 square feet of publicly accessible open space on the ground level between Buildings A and B. 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 and meet the UFMP's performance criteria.

CCMC Section 17.220.020, Table 2-8, Mixed-Use District Development Standards, provides development standards such as setback, open space, parking frontage, height and other development standards. The Project would be consistent the applicable development standards, with the exception of the incentives and waivers that the Project is requesting in connection with its Density and Other Bonus Incentives (DOBI) application. The Project is requesting a height increase of 5 feet beyond the maximum allowable height and relief from upper floor setback requirements as development incentives for providing affordable units. With these incentives, the Project would have maximum building heights of up to 61 feet to the top of the roof to accommodate grade changes. Even with this height increase and reduced upper floor setback, 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 roofs would be screened by fencing, the design of which would be coordinated with the buildings' 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 HVAC systems), as well as building appurtenances, to be integrated into the Project's architectural design (e.g., placed behind parapet walls) and to 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 15.06.100-180 (Art in Public Places) requires the inclusion of visual artwork, performing arts or 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 setbacks, public art, 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 and would be within the scope of impacts analyzed in the Certified PEIR.

Supplemental Shading Analysis

The analysis below provides an assessment of the Project's potential to create new shadows and shading of off-site routinely usable outdoor spaces for informational purposes only. Shadows cast by the Project are not considered a CEQA impact for purpose of analyzing the Project's aesthetics impacts.

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 structure. 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.[10] The Project would be up to 61 feet tall. As such, it could cast a maximum shadow of approximately 133 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 outdoor spaces associated with the residential uses located directly west and south of the Project Site.

Project shadows are illustrated in Appendix A of this document, 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. During the Winter Solstice, shadows would start to shade the residential uses to the south on the west side of Charles Avenue starting just before noon and would extend further eastward over the residential properties on the east side of Charles Avenue as the afternoon daytime hours progress. During the Summer Solstice, shadows would not reach the residential properties to the south, inclusive of those properties on the west side of Charles Avenue, until approximately 1:00 P.M., and would shade only a small portion of these residential properties for the remainder of the daytime hours. During the Spring/Fall Equinox, shadows would begin to reach residential properties to the south, inclusive of those properties on the west side of Charles Avenue, just before 1:00 P.M., and would shade a portion of these residential properties for the remainder of the daytime hours. Note that residential properties along Huron Avenue would not be shaded by the Project as the shadows generally move in a northwesterly to northeasterly direction throughout the day.

Based on the above, the Project would add shadows to the adjacent properties and their associated usable outdoor spaces to the south during the winter season in the afternoon hours, and would add limited shadows during the remainder of the year. As such, the Project's shading impact on surrounding sensitive uses would

[10] 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.

be considered minimal. Nonetheless, as noted above, shadows cast by the Project are not considered a CEQA impact for purpose of analyzing the Project's aesthetics impacts.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

d) Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impact Determination in the Certified PEIR

The Certified PEIR determined that impacts related to light and glare would be less than significant, as new development will primarily occur on parcels that already contain some development since the primary approach to accommodating growth is through infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. Future development will be required to comply with applicable lighting regulations and standards, which includes directing light to be oriented downward and to avoid any light spillover to adjacent properties; requiring that permanently installed lighting shall not blink, flash, or be of unusually high intensity or brightness; requiring landscaping and pedestrian walkway lights to be low profile; and limiting the height of freestanding light poles and luminaires.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to light and glare, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is located within an urbanized area, characterized by moderate ambient nighttime lighting levels due to the developed nature of the area, existing buildings and parking lots on-site, as well as from adjacent properties. Artificial light sources from the on-site uses and other surrounding properties include interior and exterior lighting for security, parking, architectural highlighting, incidental landscape lighting, and illuminated signage. Automobile headlights, streetlights and stoplights for visibility and safety purposes along the adjacent streets also contribute to overall ambient lighting levels.

Similar to the existing site and surrounding uses, the Project would include low to moderate levels of interior and exterior lighting for security, parking, wayfinding, 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. Additionally, the Project would be reviewed by the City for compliance with applicable requirements prior to Project

approval and issuance of a building permit. Compliance with these regulations would ensure that impacts regarding Project lighting are less than significant, consistent with the impact findings of the Certified PEIR.

Glare occurs from sunlight reflected from reflective materials utilized in existing buildings along the adjacent roadways and from vehicle windows and surfaces. Glare-sensitive receptors include the residential uses to the west, south, and east and motorists on the roadways surrounding the Project Site. As glare is a temporary phenomenon that changes with the movement of the sun, receptors other than motorists are generally less sensitive to glare impacts than to light impacts. Any glass fenestration incorporated into the Project's residential or retail components, in particular on the ground level, would be designed with low-reflectivity values (no mirror-like tints or films), minimizing off-site glare. To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets, it would be minimal and temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Additionally, the Project would comply with all applicable regulations in the CCMC. Based on the above, glare impacts would be less than significant and would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to aesthetics would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.2 Air Quality

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Air Quality: Would the project:				
(a) Conflict with or obstruct implementation of the applicable air quality plan?	Significant and Unavoidable	No	Less than Significant	Yes
(b) 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?	Significant and Unavoidable	No	Less than Significant	Yes
(c) Expose sensitive receptors to substantial pollutant concentrations?	Significant and Unavoidable	No	Less than Significant with Mitigation	Yes
(d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	Less than Significant	No	Less than Significant	N/A

a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Impact Determination in the Certified PEIR

The South Coast Air Basin (Basin) is designated nonattainment by the United States Environmental Project Agency (USEPA) and California Air Resources Board (CARB) for Ozone (O_3) and particulate matter that are 2.5 microns or less in diameter (PM2.5) under the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS), nonattainment for lead (Los Angeles County only) under the NAAQS, and nonattainment for PM10 under the CAAQS. Long-term growth associated with buildout under the General Plan 2045 and Zoning Code Update could result in the emissions of criteria pollutants that exceed South Coast Air Quality Management District (SCAQMD) thresholds for criteria pollutants. The Certified PEIR determined that impacts related to a conflict with or obstructing implementation of the applicable air quality plan would be significant and unavoidable due to population, housing, and employment growth that could exceed demographic assumptions for the City made by the Southern California Association of Governments (SCAG). Mitigation Measures PEIR MM AQ-1 through PEIR MM AQ-5 serve to reduce the severity of the impacts to emissions of criteria pollutants associated with future development and projected growth from future development. However, while implementation of Mitigation Measures PEIR MM AQ-1 through PEIR MM AQ-5 would serve to reduce the severity of the effects, impacts would nonetheless remain significant and unavoidable.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to conflicting or obstructing implementation of an air quality plan, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project's Nitrous Oxides (NO_X), Carbon Monoxide (CO), particulate matter that are 10 microns or less in diameter (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, PM2.5. Due to the Project's proximity to sensitive receptors, including adjacent residential uses to the south and west and a senior assisted living facility and La Ballona Elementary School approximately 100 feet and 85 feet, respectively, to the north of the Project Site, consistent with Mitigation Measure PEIR MM AQ-6, a localized Project construction-related air quality analysis was conducted for the Project in conformance with SCAQMD methodology for assessing localized significance thresholds (LST) air quality impacts. As shown in **Table 3**, *Estimated Maximum Unmitigated Localized Construction Emissions*, localized Project-related construction emissions would not exceed the SCAQMD localized significance thresholds.

TABLE 3
ESTIMATED MAXIMUM UNMITIGATED LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)

Source	NO_X	CO	PM10 [a]	PM2.5[a]
Demolition (Year 1)	9.3	12.4	0.8	0.4
Shoring and Excavation (Year 1)	18.1	19.4	3.6	2.1
Subterranean Work/Concrete Pouring (Year 1)	21.4	30.2	0.7	0.6
Subterranean Work/Building Construction (Year 1)	17.1	24.2	0.6	0.5
Building Construction (Year 1)	13.2	18.2	0.4	0.4
Building Construction (Year 2)	12.7	18.1	0.3	0.3
Building Construction (Year 3)	12.4	18.0	0.3	0.3
Mechanical Electrical Plumbing and Finishes (Year 3)	2.2	2.1	0.0	0.0
Site Work (Year 3)	3.2	5.0	0.1	0.1
Site Work (Year 4)	3.1	4.9	0.1	0.1
Maximum Daily Localized Emissions	**21.4**	**30.2**	**3.6**	**2.1**
SCAQMD Localized Significance Threshold	**221.0**	**1,531.0**	**13.0**	**6.0**
Exceed Threshold?	No	No	No	No

NOTE:

[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2025.

As shown in **Table 4**, *Estimated Maximum Unmitigated Localized Operational Emissions*, 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. Operational emissions are reduced based on the estimated operational emissions of the existing uses on the Project Site.

TABLE 4
ESTIMATED MAXIMUM UNMITIGATED LOCALIZED OPERATIONAL EMISSIONS (POUNDS PER DAY)[a]

Source	NO_X	CO	PM10	PM2.5
Existing				
Area (Consumer Products, Landscaping)	0.1	7.0	<0.1	<0.1
Energy	0.9	0.7	0.1	0.1
Total Existing Localized Emissions	**1.0**	**7.7**	**0.1**	**0.1**
Project				
Area (Consumer Products, Landscaping)	0.6	42.0	0.1	<0.1
Energy	1.8	1.0	0.1	0.1
Total Project Localized Emissions	**2.4**	**43.0**	**0.2**	**0.1**
Net Maximum Regional Emissions (Project – Existing)	**1.4**	**35.3**	**0.1**	**<0.1**
SCAQMD Localized Significance Threshold	**221.0**	**1,531.0**	**3.0**	**2.0**
Exceeds Thresholds?	**No**	**No**	**No**	**No**

NOTE:

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this document.

SOURCE: ESA, 2025.

As shown in Tables 3 and 4, above, the Project would have localized emissions below the applicable SCAQMD thresholds for both construction and operation. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for ozone. Impacts regarding the timely attainment of air quality standards or interim emission reductions specified in the SCAQMD 2022 Air Quality Management Plan (AQMP) and impacts would be less than significant.

The Project's construction and operations would not obstruct implementation of the 2022 AQMP as the Project would comply with CARB's requirements to minimize 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 volatile organic compounds (VOC) emissions from architectural coatings. Thus, the Project's 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 the CAAQS (e.g., ozone, PM10, and PM2.5), or to cause the Air Basin to deteriorate from its current attainment status with respect to any other criteria pollutant emissions.

The Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region. Therefore, the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2022 AQMP is based, 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).

The Project Site is located in Culver City and is currently zoned Mixed Use Medium and designated for Mixed Use Medium use in the General Plan 2045. The Project would be replacing the two existing

commercial buildings totaling 160,438 square feet, two connected surface parking lots with 439 parking spaces, and landscaping within an approximate 5.7 acre parcel that would be consistent with the Land Use and Community Design Element of the City's General Plan 2045 (see Section 3.10, *Land Use and Planning*, of this document). The Project is committed to providing pedestrian connections to nearby neighborhood uses and transit options. The Project's location, design, and land use planning aim to reduce vehicle trips by increasing the density of residential and commercial uses in proximity to public transit. Several public transit stops operated by Metro, LADOT, and Culver City Bus are located in close proximity to the Project Site. As such, the Project would not conflict with SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal 2020) policies for the concentration of growth in proximity to transit.

Furthermore, the Project's growth would be consistent with the growth projections contained in SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, which served as the basis for the 2022 AQMP. The Project would increase employees in the area but would comprise a negligible portion of the City's total employment, which was estimated at 59,300 jobs in 2016 and projected to reach 64,100 jobs in 2045.[11] Likewise, the Project would increase population in the area but would comprise a negligible portion of the City's total population, which was estimated at 40,100 persons in 2016 and projected to reach 41,600 persons in 2045.[12] As such, the Project would not generate growth beyond the range of development anticipated within the established SCAG regional forecast for Culver City, nor beyond the projected growth within the Certified PEIR. In addition, refer to Section 3.13, *Population and Housing*, of this document, which discusses the Project population increases as analyzed in the General Plan 2045. As discussed therein, the Project's population and housing impacts would be less than significant. Therefore, based on the above analysis, the Project would not spur additional growth other than that already anticipated for Culver City and captured within the Certified PEIR, nor would the Project eliminate impediments to growth. Consequently, the Project would not foster growth inducing impacts in conflict with the assumptions in the 2022 AQMP. Therefore, impacts would be less than significant, and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

Mitigation Measures PEIR MM AQ-1 to PEIR MM AQ-5 listed below are set forth in the Certified PEIR and the associated MMP to address air quality impacts under Threshold a) and are applicable to the General Plan 2045 Project. However, Mitigation Measures PEIR MM AQ-1 to PEIR MM AQ-5 are not applicable to the Project. Although not identified in the Certified PEIR for addressing impacts under Threshold a), Mitigation Measures PEIR MM AQ-6 (below under Threshold c) is relevant to addressing Project-specific air quality impacts for the Project. In accordance with Mitigation Measure PEIR MM AQ-6, a Project-specific air quality impact analysis was conducted for the Project to determine emissions of criteria pollutants, which are shown in Tables 3 and 4, above.

> **PEIR MM AQ-1**: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds during

[11] SCAG 2020-2045 RTP/SCS Technical Report: Demographics & Growth Forecast; https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

[12] SCAG 2020-2045 RTP/SCS Technical Report: Demographics & Growth Forecast; https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

construction for emissions of NO_X, CO, PM10 and/or PM2.5 shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (USEPA) and/or California Air Resources Board (CARB) Tier 4 Final or better Off-Road New Diesel Engine Emission Standards for construction equipment with more than 50 horsepower, unless it can be demonstrated to the Culver City Department of Building and Safety that such equipment is not available. Project sponsors should also consider including zero emissions (ZE) or zero net emissions (ZNE) technologies where appropriate and feasible or higher tier standard diesel equipment as it becomes developed and feasible. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.

Prior to construction, the project engineer shall ensure that all plans for construction phases (e.g., demolition, grading) that would exceed the SCAQMD significance thresholds clearly show the requirement for USEPA and/or CARB Tier 4 or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the Culver City Department of Building and Safety. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.

PEIR MM AQ-2: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds during construction for emissions of volatile organic compounds (VOCs) as a result of VOC off-gassing emissions from architectural coatings and industrial maintenance coatings shall require the construction contractor to use SCAQMD Low-VOC and/or Super Compliant VOC architectural coatings and industrial maintenance coatings such that daily volume of coatings applied would not result in emissions that exceed the SCAQMD significance threshold for VOC, unless it can be demonstrated to the City Department of Building and Safety that such coatings for a required application are not available. During construction, the construction contractor shall maintain a list of all architectural coatings and industrial maintenance coatings in use on the construction site and the daily volumes of coatings applied for verification by the Culver City Department of Building and Safety.

PEIR MM AQ-3: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, show on the building plans that all major appliances (dishwashers, refrigerators, clothes washers, and dryers) to be provided/installed are Energy Star–certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star or equivalent appliances shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.

PEIR MM AQ-4: Applicants for new residential development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, indicate on the building plans that the feature below has been incorporated into the design of the building(s). Proper installation of these features shall

be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.

- For multifamily dwellings, electric vehicle charging shall be provided as specified in Section A4.106.8.2 (Residential Voluntary Measures) of the CALGreen Code (or its successor code).

PEIR MM AQ-5: Applicants for new non-residential development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, indicate on the building plans that the features below have been incorporated into the design of the building(s). Proper installation of these features shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.

- Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code).
- Facilities shall be installed to support future electric vehicle charging at each nonresidential building with 30 or more parking spaces. Installation shall be consistent with Section A5.106.5.3 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code).

Mitigation Measures PEIR MM AQ-1 through AQ-5 are not applicable to the Project because, as noted above, the Project does not exceed the SCAQMD significance thresholds.

b) Would the Project 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 Determination in the Certified PEIR

The Certified PEIR determined that impacts related to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment during construction and operation would be significant and unavoidable due to regional emissions that could exceed the SCAQMD significance thresholds. While implementation of Mitigation Measures PEIR MM AQ-1 through PEIR MM AQ-5 serve to reduce the severity of the impacts, impacts remain significant and unavoidable.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment during construction and operation, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Project construction activities that would have the potential to create regional air quality impacts include use of heavy-duty off-road construction equipment, on-road vehicle trips generated by construction workers, vendor trucks, and haul trucks traveling to and from the Project Site, fugitive dust emissions from

material and soil handling, 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. Emissions from off-road equipment and on-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, and incorporates CARB's latest on-road vehicle EMissions FACtor (EMFAC) model, EMFAC2021. The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. When information was unknown, CalEEMod defaults were used. Project construction is assumed to start as early as the first quarter of 2027 and last up to approximately 37 months. If construction or operation commences at a later date, emissions would be lower than those estimated below due to the use of a more energy-efficient and cleaner burning vehicle fleet mix, pursuant to State regulations that require vehicle fleet operators to phase-in less polluting trucks. As shown in **Table 5**, *Estimated Maximum Unmitigated Regional Construction Emissions*, regional Project-related construction emissions would not exceed the SCAQMD significance thresholds during construction. Therefore, the Project would not result in new significant construction air quality impacts and would not result in a substantial increase in the severity of impacts compared to those identified in the Certified PEIR.

Project operational emissions were also estimated using CalEEMod Version 2022.1 to forecast the daily regional criteria pollutant emissions from on-site area and stationary sources and off-site mobile emissions that would occur during long-term Project operations. CalEEMod 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. Operational criteria pollutant emissions were calculated for area, energy, and mobile sources for the Project buildout operational year of 2030. Operational mobile trips and water usage factors were provided by the Project's Transportation Study and Water Supply Assessment.[13,14] Operational emissions are reduced based on the estimated operational emissions of the existing uses on the Project Site. Results of the criteria pollutant calculations are presented in **Table 6**, *Estimated Maximum Unmitigated Regional Operational Emissions*, along with the regional significance thresholds. The net increase in operational-related daily emissions (Project emissions minus existing emissions) for the criteria and precursor pollutants (VOC, NO_X, CO, sulfur dioxide (SO_2), PM10, and PM2.5) would be substantially below the SCAQMD thresholds of significance. Therefore, the Project would not result in new significant operational air quality impacts and would not result in a substantial increase in the severity of impacts compared to those identified in the Certified PEIR.

[13] Gibson Transportation Consulting, Inc., Transportation Study for 10950 Washington Boulevard, Culver City, California, April 2025 (Appendix L).

[14] EKI Environment & Water, Inc., Water Supply Assessment for the 10950 Washington Boulevard Project, 2024 (Appendix N).

TABLE 5
ESTIMATED MAXIMUM UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY)[a]

Source	VOC	NO_X	CO	SO_2	PM10[b]	PM2.5[b]
Demolition (Year 1)	1.0	10.5	14.0	<0.1	1.4	0.5
Shoring and Excavation (Year 1)	2.7	65.1	38.1	0.3	16.4	6.0
Subterranean Work/Concrete Pouring (Year 1)	5.2	40.4	66.6	0.2	11.4	3.5
Subterranean Work/Building Construction (Year 1)	4.4	22.8	55.3	<0.1	7.9	2.3
Building Construction (Year 1)	3.4	18.9	44.8	<0.1	7.7	2.1
Building Construction (Year 2)	3.3	18.0	47.3	<0.1	7.7	2.1
Building Construction (Year 3)	3.1	17.3	41.4	<0.1	7.6	2.1
Mechanical Electrical Plumbing and Finishes (Year 3)	22.6	6.5	19.1	<0.1	4.8	1.2
Site Work (Year 3)	0.4	3.3	5.3	<0.1	0.2	0.1
Site Work (Year 4)	0.3	3.2	5.3	<0.1	0.2	0.1
Maximum Daily Regional Emissions	**22.6**	**65.1**	**66.6**	**0.33**	**16.4**	**6.0**
SCAQMD Regional Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed 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 B of this document.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2025.

TABLE 6
ESTIMATED MAXIMUM UNMITIGATED REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)[a]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Existing						
Mobile	5.3	4.2	43.2	<0.1	8.9	2.3
Area (Consumer Products, Landscaping)	5.0	0.1	7.0	<0.1	<0.1	<0.1
Energy	<0.1	0.9	0.7	<0.1	0.1	0.1
Total Existing Regional Emissions	**10.3**	**5.1**	**50.9**	**0.1**	**8.9**	**2.4**
Project						
Mobile	8.4	6.1	67.9	0.2	17.1	4.4
Area (Consumer Products, Landscaping)	17.4	0.6	42.0	<0.1	0.1	<0.1
Energy	0.1	1.8	1.0	<0.1	0.1	0.1
Total Project Regional Emissions	**25.9**	**8.5**	**110.9**	**0.2**	**17.3**	**4.6**
Net Maximum Regional Emissions (Project – Existing)	**15.6**	**3.4**	**59.9**	**0.1**	**8.3**	**2.2**
SCAQMD Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

NOTE:

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this document.

SOURCE: ESA, 2025.

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted AQMP. As discussed above under Threshold a), the Project would not conflict with or obstruct implementation of AQMP and would be consistent with the growth projections in the AQMP and the Certified PEIR. In addition, the SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As shown in Table 5 and Table 6, all pollutants would be below the SCAQMD significance thresholds for regional emissions. Therefore, the Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable and, therefore, the cumulative impact of the Project would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

Mitigation Measures PEIR MM AQ-1 to PEIR MM AQ-5 (listed above) are set forth in the Certified PEIR and the associated MMP to address air quality impacts under Threshold b) and are applicable to the General Plan 2045 and Zoning Code Update Project. However, Mitigation Measures PEIR MM AQ-1 to PEIR MM AQ-5 are not applicable to the Project because, as explained above, the Project does not exceed the SCAQMD significance thresholds. Although not identified in the Certified PEIR for addressing impacts under Threshold b), Mitigation Measure PEIR MM AQ-6 (discussed below under Threshold c) is relevant to addressing Project-specific air quality impacts for the Project. In accordance with Mitigation Measure PEIR MM AQ-6, a Project-specific air quality impact analysis was conducted for the Project to determine regional emissions, which is shown in Tables 5 and 6, above.

c) Would the Project expose sensitive receptors to substantial pollutant concentrations?

Impact Determination in the Certified PEIR

Potential new development that would occur as a result of the General Plan 2045 and Zoning Code Update will likely occur close to existing sensitive receptors, and thus future development has the potential to expose sensitive receptors to substantial pollutant concentrations. The Certified PEIR determined that impacts related to exposure of sensitive receptors to substantial pollutant concentrations during construction and operation would be significant and unavoidable due to localized emissions and toxic air contaminant emissions that could exceed the applicable significance thresholds. Implementation of PEIR MM AQ-1, PEIR MM AQ-3, PEIR MM AQ-6, and PEIR MM AQ-7 serves to reduce the severity of the impacts to exposure of sensitive receptors to substantial pollutant concentrations. However, while the implementation of these measures would help to reduce the severity of the impacts, the impacts could nonetheless exceed the significance thresholds, and thus impacts would be significant and unavoidable.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to an exposure of sensitive receptors to substantial pollutant concentrations during construction and operation, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Localized Emissions

The nearest existing sensitive receptors include adjacent residential uses to the south and west and a senior assisted living facility and La Ballona Elementary School approximately 100 feet and 85 feet, respectively, to the north of the Project Site. Consistent with Mitigation Measure PEIR MM AQ-6, a localized Project construction-related air quality analysis was conducted for the Project in conformance with SCAQMD methodology for assessing localized significance thresholds (LST) air quality impacts. The maximum daily localized emissions for each of the construction phases and the localized significance thresholds are presented in Table 3 above. Localized Project-related construction emissions would not exceed the SCAQMD localized significance thresholds. Therefore, Project impacts would be significantly below the SCAQMD significance thresholds and would not result in a substantial increase in the severity of impacts and would be within the scope of impacts analyzed in the Certified PEIR.

The maximum daily operational localized emissions and the localized significance thresholds for Project operations are presented in Table 4 above. As presented in Table 4, the localized operation emission levels for the Project would not exceed the SCAQMD localized significance thresholds. The Project emissions would not result in a significant localized operation air quality impact and would be within the scope of impacts analyzed in the Certified PEIR.

Carbon Monoxide Hotspots

As stated in the Certified PEIR, 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 SCAQMD in support of their AQMPs and considering existing background CO concentrations. The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin. The SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions (i.e., excluding background concentrations) at these four intersections was 4.6 ppm (one-hour average) and 3.2 ppm (eight-hour average) at Wilshire Boulevard and Veteran Avenue. Therefore, projects that result in traffic at any intersection of less than 100,000 vehicles per day would be considered to be less than significant. Based on the Project's Transportation Study,[15] under the Future with Project Conditions (2030), the Project area would have a maximum traffic volume of approximately 26,280 vehicles per day under the Project buildout scenario at Venice Boulevard north of Midvale Avenue and Girard Avenue. As a result, CO concentrations would to be less than those estimated in the 2003 AQMP, which would not exceed the SCAQMD significance thresholds. Therefore, the Project would not contribute to the formation of CO hotspots nor result in a new CO hotspot impact and would be within the scope of impacts analyzed in the Certified PEIR.

[15] Gibson Transportation Consulting, Inc., Transportation Study for 10950 Washington Boulevard, Culver City, California, April 2025 (Appendix L).

Toxic Air Contaminants

The greatest potential for TAC emissions during Project construction would be related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment during construction activities. Construction activities associated with the Project would be sporadic, transitory, and short term in nature (approximately 37 months). Due to the Project's proximity to sensitive receptors, consistent with PEIR MM AQ-7, a construction-related air quality study was conducted for the Project in conformance with SCAQMD methodology for assessing potential health risk impacts. As noted by SCAQMD, the Office of Environmental Health Hazard Assessment (OEHHA) is responsible for developing and revising guidelines for performing health risk assessments (HRAs) under the State's 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 for the Project was performed in accordance with the revised OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidance). 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.

The maximum daily construction regional and localized emissions were estimated for each construction phase of the Project. However, these emissions would not represent the emissions that would occur for every day of construction. Therefore, to account for the average construction usage, the average daily equipment usage hours and average daily emissions of each construction phase were applied in the Project's construction HRA. Detailed assumptions, modeling and calculations can be found in Appendix B of this document.

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. Additionally, the Project will utilize electrified tower cranes (for at minimum the subterranean work, elevated concrete construction and building enclosure construction activities) and electrified air compressors and pumps for all construction activities in place of diesel-fueled equipment.

As shown in **Table 7**, *Maximum 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 shown in Table 7, the unmitigated cancer risk for school and commercial land uses does not exceed the SCAQMD significance threshold of 10 per million, and 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 7
MAXIMUM HEALTH RISK IMPACTS FOR OFF-SITE SENSITIVE AND COMMERCIAL RECEPTORS

	Without Certified PEIR MM AQ-1 and Project MM AQ-1		With Certified PEIR MM AQ-1 and Project MM AQ-1	
Sensitive Receptor	**Maximum Cancer Risk (# in one million)**	**Hazard Index**	**Maximum Cancer Risk (# in one million)**	**Hazard Index**
Residential Land Use	27.04	0.13	8.69	0.03
School Use	1.99	0.03	0.68	<0.01
Commercial (Worker)	2.10	0.21	0.69	0.05
Maximum Health Impact Thresholds	10	1.0	10	1.0
Exceeds Threshold?	Yes	No	No	No

SOURCE: ESA, 2025.

As Project unmitigated results of the HRA cancer risk for residential land use would exceed the SCAQMD significance threshold, the Project would implement Mitigation Measure PEIR MM AQ-1, as described below. In addition, the Project would implement Mitigation Measure Project MM AQ-1, which is based off Mitigation Measure PEIR MM AQ-1, and includes the use of off-road diesel-powered construction equipment that meets or exceeds the CARB USEPA Tier 4 Final off-road emissions standards or equivalent for construction equipment rated at 25 horsepower or greater during Project construction where available within the Air Basin (Mitigation Measure Project MM AQ-1 is listed below). Note that the primary difference between Mitigation Measure PEIR MM AQ-1 and Project MM AQ-1 is that the latter requires Tier 4 equipment on equipment over 24 horsepower, while the former only requires Tier 4 equipment on equipment over 50 horsepower. Therefore, the Project's impact related to health risks would be less than significant with implementation of Mitigation Measures PEIR MM AQ-1 and Project MM-AQ-1. The calculated cancer risk was 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 7, maximum cancer risk and hazard index for school commercial receptors would be below the SCAQMD significance thresholds without mitigation, but would be further reduced with the implementation of Mitigation Measures PEIR MM AQ-1 and Project MM AQ-1. As the mitigated maximum cancer risk and non-cancer impacts would be less than the SCAQMD significance thresholds, impacts would be less than significant with mitigation.

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 7, cancer risk and hazard index on nearby sensitive receptors would be below significance thresholds with the incorporation of Mitigation Measures PEIR MM AQ-1 and Project 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 residential, school, and commercial receptors to substantial toxic air contaminant concentrations, and construction-related health impacts would be mitigated to less than significant levels. Thus, construction activities would not expose sensitive receptors to substantial toxic air contaminant concentrations, and construction-related health impacts would be within the scope of impacts analyzed in the Certified PEIR.

The SCAQMD recommends that operational health risk assessments be conducted for substantial sources of operational diesel particulate matter (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. [16] Project operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance activities that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, Project trucks would be required to comply with the applicable provisions of the CARB 13 California Code of Regulations (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. Typical sources of hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). The Project's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. Based on this, operation of the Project is not expected to release substantial amounts of TACs. Documentation from CARB indicates that DPM exhaust consists of 92 percent PM2.5 and 100 percent PM10 (PM2.5 is a subset of PM10). Therefore, localized DPM emissions strongly correlate with localized PM10 emissions.[17] As presented in Table 4 above, localized PM10 operation emissions are less than significant. Although the localized analysis does not directly measure health risk impacts, it does provide data that can be used to evaluate the potential to cause health risk impacts. Thus, operation of the Project would not expose sensitive receptors to substantial toxic air contaminant concentrations, and operation-related health impacts would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

Mitigation Measures PEIR MM AQ-1, PEIR MM AQ-3, PEIR MM AQ-6, and PEIR MM AQ-7, are set forth in the Certified PEIR and the associated MMP to address air quality impacts under Threshold c) and are applicable to the General Plan 2045 and Zoning Code Update Project. As discussed above, PEIR MM AQ-1 and PEIR MM AQ-3 are not applicable to the Project because the Project does not exceed the SCAQMD significant thresholds. In contrast, Mitigation Measures PEIR MM AQ-6 and PEIR MM AQ-7 are applicable to the Project and will be implemented, as discussed above.

> **PEIR MM AQ-6**: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and are within one-quarter mile (1,320 feet) of a sensitive land use shall, prior to issuance of a building permit,

[16] 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.

[17] CARB. Speciation Profiles Used in ARB Modeling, PMSIZE – Particle size fraction data for source categories, PM Profile Number 425 (Diesel Vehicle Exhaust) [Excel data], 2024, https://www.arb.ca.gov/ei/speciate/speciate.htm.

submit a construction-related air quality study that evaluates potential localized project construction-related air quality impacts to the City Planning Department for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing localized significance thresholds (LST) air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the Planning Department.

PEIR MM AQ-7: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and are within one-quarter mile (1,320 feet) of a sensitive land use shall, prior to issuance of a building permit, submit a construction-related air quality study that evaluates potential health risk impacts to the City Planning Department for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing health risk impacts. If health risk impacts are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Department.

Mitigation Measures MM AQ-6 and MM AQ-7 are applicable to the Project. As discussed in the following section, a Project-specific air quality study was conducted in compliance with MM AQ-6 and MM AQ-7.

Project-Specific Mitigation Measures Addressing Impact

The Project-specific air quality analysis conducted per Mitigation Measures PEIR MM AQ-6 and PEIR MM AQ-7 has resulted in the below Project-specific mitigation measure.

Project MM-AQ-1: The Applicant shall implement the following requirements for construction equipment operating at the 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.

d) Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact Determination in the Certified PEIR

Impacts that would result in other emissions (such as those leading to odors) adversely affecting a substantial number of people were evaluated in the Initial Study prepared as part of the Certified PEIR. The Initial Study determined that impacts would be less than significant because development allowed under the General Plan 2045 and Zoning Code Update would comply with SCAQMD Rule 1113 (Architectural Coatings) and SCAQMD Rule 402 (Nuisance), meaning that the construction activities and materials and operational activities would not result in other emissions that create objectionable odors.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to other emissions (such as those leading to odors), nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Potential activities that may emit odors during construction activities include the use of architectural coatings and solvents, as well as the combustion of diesel fuel in on- and off-road equipment. SCAQMD Rule 1113 (Architectural Coatings) limits the amount of volatile organic compounds from architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. Through mandatory compliance with SCAQMD Rules and CARB's Air Toxics Control Measure regarding idling limitations for diesel trucks, no construction activities or materials are expected to create objectionable odors affecting a substantial number of people. Odors from the combustion of diesel fuel would be minimized by complying with the CARB Airborne Toxic Control Measures (ATCM) that limits diesel-fueled commercial vehicle idling to five minutes at any given location, which was adopted in 2004. The Project would also comply with SCAQMD Rule 402 (Nuisance), which prohibits the emissions of nuisance air contaminants or odorous compounds. Furthermore, as shown in Table 3 and Table 5, construction emissions would not exceed the SCAQMD significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2). Therefore, construction activities would result in less than significant impacts with respect to other emissions, including those leading to odors, and thus the Project would not result in new significant construction air quality impacts and would be within the scope of impacts analyzed in the Certified PEIR.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project includes residential and commercial uses and would not involve the types of uses typically associated with odor complaints. The Project would include various enclosed trash receptacles associated with the proposed development. On-site trash receptacles used by the Project would be covered and properly maintained to prevent adverse odors. With proper housekeeping practices, trash receptacles would be maintained in a manner that promotes odor control, and no adverse odor impacts are anticipated from the Project uses. Furthermore, as shown in Table 4 and Table 6, daily operational emissions would not exceed the SCAQMD significance

thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2). Therefore, operation of the Project would result in less than significant impacts with respect to other emissions, including those leading to odors, and thus the Project would not result in new significant odor impact and would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to air quality would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.3 Biological Resources

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Biological Resources: Would the project:				
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than Significant with Mitigation	No	No Impact	Yes
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No Impact	No	No Impact	N/A
(c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than Significant	No	No Impact	N/A
(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than Significant with Mitigation	No	Less than Significant with Mitigation	Yes
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than Significant	No	Less than Significant	N/A
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	No	No Impact	N/A

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

Impact Determination in the Certified PEIR

As discussed in the Certified PEIR, the vast majority of the Planning Area is heavily developed and contains minimal biological resources; however, fragmented, isolated swathes of coastal scrub and chaparral vegetation remain throughout portions of the Inglewood Oil Field (IOF) and Kenneth Hahn State Recreation Area. While the majority of special-status biological resources have a low potential to occur within the Planning Area as result of the largely developed nature of the Planning Area, new development projects have the potential to impact existing habitats and associated special-status species. The Certified PEIR determined that impacts related to candidate, sensitive, or special status species would be less than significant with implementation of PEIR MM BIO-1 and PEIR MM BIO-2.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to candidate, sensitive, or special status species, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is located in an urbanized area and is currently developed with two commercial buildings and associated surface parking. No suitable habitat for candidate, sensitive, or special status species exists, and for this reason and because of the density of development and high levels of human activity in the Project area, there is a negligible potential for the Project Site to support candidate, sensitive, or special status species. In the unlikely circumstance that a sensitive bird species nested on the Project Site, the Project would implement Mitigation Measure PEIR BIO-2 to ensure that potentially significant impacts to nesting birds are reduced to a less than significant level. With implementation of PEIR MM BIO-2, impacts would be less than significant, and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

Mitigation Measures PEIR MM BIO-1 and PEIR MM BIO-2 are set forth in the Certified PEIR and the associated MMP to address biological resources impacts under Threshold a) and are applicable to the General Plan 2045 and Zoning Code Update Project. As discussed below, Mitigation Measures PEIR MM BIO-1 is not applicable to the Project, whereas Mitigation Measure PEIR BIO-2 is applicable to the Project.

> **PEIR MM BIO-1: Baseline Biological Assessment.** The City shall require that applicants of proposed projects located within or adjacent to natural plant or wildlife habitat provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. The impact analysis will aid in determining any direct, indirect, and cumulative biological impacts from construction and operations, as well as specific mitigation or avoidance measures necessary to offset significant impacts associated with future projects. The Biological Assessment shall include the following information:
>
> a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [State CEQA Guidelines, § 15125(c)].
>
> b. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018);
>
> c. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al, 2008). Adjoining habitat areas shall be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;

d. A complete, recent assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & Game Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (State CEQA Guidelines, § 15380); and,

e. Identification of focused surveys for special-status plants and/or wildlife that could be directly or indirectly impacted by the project, which shall be conducted in the appropriate season prior to any habitat disturbance.

f. Identification of any aquatic habitats such as rivers, streams, and lakes and their associated natural plant communities/habitats. This includes any culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes.

g. Avoidance and minimization measures (such as preconstruction wildlife clearance surveys) to fully avoid and otherwise protect sensitive biological resources from Project- related construction and operational impacts shall be identified and implemented. If impacts cannot be avoided, appropriate mitigation measures to offset potential special-status species and habitat impacts shall be identified and implemented.

Since the Project Site is not located within or adjacent to a natural plant or wildlife habitat (see Figure 34, Vegetation, of the Conservation Element), PEIR MM BIO-1 is not applicable to the Project.

> **PEIR MM BIO-2: Nesting Bird Surveys**. Construction activity for individual projects occurring within the Planning Area shall take place outside of the nesting season, if feasible. If not feasible, for future development occurring between January 1 through September 15, a nesting bird and raptor survey shall be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any tree and/or vegetation removal within the Project site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. Pre-construction surveys shall be conducted by a qualified biologist no more than 7 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds. If construction activities are delayed or suspended for more than 7 days during the breeding season, the surveys shall be repeated. If nesting raptors and migratory songbirds are identified, the following minimum no disturbance buffers shall be implemented: 100 feet around active passerine (perching birds and songbirds) nests, 300 feet around active raptor nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

Mitigation Measure PEIR MM BIO-2 would be applicable to the Project if construction activities take place during nesting season. If that is the case, the Project will comply with PEIR MM BIO-2.

b) Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Impact Determination in the Certified PEIR

Given the lack of any riparian habitat or sensitive natural community within the Planning Area, the Certified PEIR determined that no impacts to riparian habitat or other sensitive natural community would occur with implementation of the General Plan 2045 and Zoning Code Update Project.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to riparian habitat or other sensitive natural community, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is located in an urbanized area and is currently developed with two commercial buildings and associated surface parking. No designated riparian habitat or natural communities exist on the Project Site or in the surrounding area. The Project Site currently supports a limited amount of ornamental landscaping. Thus, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community and no impact would occur, consistent with the impact findings of the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

c) Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact Determination in the Certified PEIR

Based on the habitats present within the Planning Area and review of the National Wetlands Inventory, there are no wetlands present within the Planning Area. Therefore, the General Plan 2045 and Zoning Code Update Project would have no impact on these resources. The Certified PEIR does recognize that the Ballona Creek Revitalization Project would enhance the restoration and use of Ballona Creek, which may require applicable future biological permitting within the Ballona Creek. However, the permit conditions would ensure that impacts to Ballona Creek are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to state or federally protected wetlands or waters, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is located in an urban area and is currently developed with two commercial buildings and associated surface parking. The Project Site does not contain any state or federally protected wetlands. Additionally, the Project Site is not located near Ballona Creek. As such, the Project would not have a substantial adverse effect on state or federally protected wetlands and no impact would occur, consistent with the impact findings in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

d) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact Determination in the Certified PEIR

The Certified PEIR determined that General Plan 2045 and Zoning Code Update Project would not substantially interfere with the movement of native resident or migratory fish or wildlife species or with established wildlife corridors due to the lack of wildlife movement corridors within the Planning Area. In addition, the General Plan 2045 and Zoning Code Update Project would not impede the use of wildlife nursery sites with implementation of PEIR MM BIO-2 for migratory birds. Therefore, impacts would be less than significant with mitigation incorporated.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to interfering with wildlife corridors or wildlife nursery sites, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is currently developed and located in an urbanized area. No wildlife corridors or native wildlife nursery sites are present on the Project Site or in the immediate surrounding area. Further, due to the urbanized nature of the Project area, the potential for native resident or migratory wildlife species movement through the Project Site is negligible. Washington Boulevard is a highly utilized roadway with moderate to high levels of ambient noise and human disturbance associated with pedestrian and vehicular traffic.

Nonetheless, the Project Site currently contains ornamental trees and landscaping, and there are adjacent street trees, all of which could support raptor and/or songbird nests for native species tolerant of human disturbance. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 Code of Federal Regulations [CFR] Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the Federal MBTA). As the Project would include the removal of existing trees on the Project Site and potentially the removal of adjacent street trees, the removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. However, Mitigation Measure PEIR MM-BIO-2 (as discussed above) would reduce potential impacts to protected nesting birds consistent with the Federal MBTA. Impacts would be less than significant with mitigation incorporated, and would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

Mitigation Measure PEIR MM-BIO-2, provided above, is set forth in the Certified PEIR and the associated MMRP to address biological resources impacts under Threshold b) and is applicable to the General Plan 2045 and Zoning Code Update Project. Mitigation Measure PEIR MM BIO-2 is also applicable to the Project and will be implemented if applicable.

e) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Determination in the Certified PEIR

The Certified PEIR determined that implementation of the General Plan 2045 and Zoning Code Update Project would not introduce any potential conflicts with the existing Culver City Tree Removal Ordinance No. 2013-007 (Tree Removal), Los Angeles County Oak Tree Protection Ordinance, or the Los Angeles County Oak Woodlands Conservation Management Plan. As such, impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to a conflict with any local policies or ordinances protecting biological resources, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

As contemplated in the Certified PEIR, the Project would be subject to, and would comply with, the City and County's tree preservation ordinances, and the County's oak woodland management policies, as applicable. As such, the Project will not create any conflicts with any local policies or ordinances protecting biological resources.

Specifically, the Project will comply with the applicable provisions pertaining to the removal and replacement of street trees in the CCMC, as applicable. An Arborist Report was prepared for the Project and is included in Appendix C of this document. No native or heritage/protected trees were observed during the tree survey. A total of 84 trees are located within or adjacent to the Project Site, including 11 street trees along Washington Boulevard. Existing tree species include Mexican fan palms, London plane tree, paperbark, and lemon scented gum trees.

For any street tree removed, the Project would comply with the applicable provisions pertaining to the removal and replacement of street trees in CCMC Section 9.08.215. 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 Washington Boulevard would be removed. This tree would either be re-planted or replaced in compliance with City street tree replacement requirements. Through compliance with the applicable street tree removal and replacement provisions of the CCMC, the Project's impacts on street trees would be less than significant.

Therefore, since the Project will comply will all applicable regulations, the Project's impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

f) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Impact Determination in the Certified PEIR

Impacts related to a conflict with adopted habitat conservation plans or natural community conservation plans were evaluated in the Initial Study prepared as part of the Certified PEIR, and it was determined that no impacts would occur because there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans in place for the Planning Area.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to a conflict with adopted habitat conservation plans or natural community conservation plans, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

As discussed under Threshold b), no designated riparian habitat or natural communities exist on the Project Site or in the surrounding area. Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place for the Project Site. The Project would thus have no impact with respect to these plans, consistent with the impact findings of the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to biological resources would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.4 Cultural Resources

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Cultural Resources: Would the project:				
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	Significant and Unavoidable	No	No Impact	Yes
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	Less than Significant with Mitigation	No	Less Than Significant With Mitigation	Yes
(c) Disturb any human remains, including those interred outside of formal cemeteries?	Less than Significant	No	Less than Significant	N/A

a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact Determination in the Certified PEIR

The Certified PEIR determined that future development facilitated under the General Plan 2045 and Zoning Code Update Project may include construction, demolition, or alteration of historic buildings/structures/objects/landscape features that have the potential to cause a substantial adverse change to historical resources as defined by CEQA Guidelines Section 15064.5, especially within the three designated historic districts of Culver City. Implementation of Mitigation Measure PEIR MM CUL-1 would help to reduce the severity of the impacts. However, even with implementation of this mitigation measure, impacts remain significant and unavoidable.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to historic resources, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Consistent with Mitigation Measure PEIR MM CUL-1 (discussed below), a historic resource memorandum was prepared by Architectural Resources Group (ARG) in December 2023 for the Project (provided in Appendix D of this document) to determine if the existing buildings on the Project Site qualify for listing in the National Register of Historic Places, California Register of Historical Resources, or locally in the City of Culver City, and would therefore be considered a historical resource under CEQA. The Project Site was not identified through Culver City's 1987 Historic Structures Field Survey, or any other historical resources survey, and it is not listed in the California Built Environment Resource Directory (BERD). It has not been formally designated under any federal, state, or local registration program. Per Section 15.05.020 of the CCMC, in order to be considered for local historic designation, a structure must be at least 50 years old or have special importance to the City. Unlike the National Register's and Culver City's 50-

year age requirement, there is no prescribed age limit for listing in the California Register. However, California Office of Historic Preservation guidelines state that sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with a resource[18]. The Project Site contains a one-story office and studio building built between 1958 and 1960 (10912 Washington Blvd.), a three-story office building and integrated parking garage constructed in 1974 (10950 Washington Blvd.), and two rear surface parking lots. The buildings do not have any historical associations with significant events or individuals that would render it of exceptional or special importance in Culver City, the greater Southern California region, or the nation. Based on the investigation included in Appendix D, the Project Site is not eligible for listing in the National Register of Historic Places or California Register of Historical Resources, or as a Culver City Cultural Resource under the "Landmark" or "Significant" levels. The buildings do appear to meet eligibility criteria as Culver City Cultural Resources at the "Recognized" level. However, this designation is honorific only and carries no protections or regulatory implications, and it does not meet the definition of a "historical resource" under CEQA. In addition, no historic resources are located in the Project vicinity that would be adversely affected indirectly by the Project. Therefore, no impacts under the Project would occur related to the significance of a historical resource and the Project's impacts would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The following mitigation measure is set forth in the Certified PEIR and the associated MMP to address historical resource impacts under Threshold a) and is applicable to the General Plan 2045 and Zoning Code Update Project. Mitigation Measure PEIR MM CUL-1 is also applicable to the Project.

> **PEIR MM CUL-1.** Prior to development of individual projects that are subject to CEQA within areas that contain properties more than 45 years old, the project proponent shall retain a qualified architectural historian, defined as meeting the Secretary of the Interior's Professional Qualification Standards for architectural history, to conduct a historic resources assessment including: a records search at the South Central Coastal Information Center or Built Environment Resources Directory (BERD) search; a review of pertinent archives, databases, and sources; a pedestrian field survey; recordation of all identified historic resources on California Department of Parks and Recreation 523 forms; and preparation of a technical report documenting the methods and results of the assessment. All identified potentially eligible historic resources will be assessed for the project's potential to result in direct and/or indirect effects on those resources and any historic resource that may be affected shall be fully evaluated for its potential significance under national and state criteria prior to the City's approval of project plans and publication of subsequent CEQA documents. The qualified architectural historian shall provide recommendations regarding additional work, treatment, or mitigation for affected historical resources to be implemented prior to their demolition or alteration. Impacts on historical resources shall be analyzed using CEQA thresholds to determine if a project would result in a substantial adverse change in the significance of a historical resource. If a potentially significant impact would occur, the City shall require appropriate mitigation to lessen the impact to the degree feasible.

Mitigation Measure PEIR MM CUL-1 is applicable to the Project, and the Project is in compliance with MM CUL-1 given that, as discussed above, the Project obtained a historic resource assessment for the Project Site.

[18] California Office of Historic Preservation, *Technical Assistance Series #6: California Register and National Register: A Comparison* (Sacramento, CA: California Department of Parks and Recreation, 2001), 3.

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact Determination in the Certified PEIR

The archival research conducted within the Certified PEIR indicates that 18 known archaeological resources have been previously identified within the City. Current or prior existence of development throughout the City does not preclude the presence of archaeological resources located underneath existing development. In addition, the City would have been a highly suitable area for the inhabitance of indigenous people in light of Ballona Creek flowing through the area. Individual project-related demolition, construction, maintenance, and/or improvement activities have the potential to cause a potentially significant impact to archaeological resources. However, implementation of PEIR MM CUL-2, along with the City's standard conditions of approval and applicable General Plan policies, will reduce impacts to previously unknown archaeological resources to a less than significant level.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to archeological resources, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Consistent with Mitigation Measure PEIR MM CUL-2 (see below), an archaeological resources assessment (including archival research and an archaeological sensitivity assessment) was prepared by ESA in January 2025 for the Project (provided in Appendix E of this document) to determine if the Project has the potential to encounter buried archaeological resources during construction. The archaeological sensitivity assessment indicates that the potential for encountering prehistoric archaeological resources is moderate to high based on the fact that five prehistoric archaeological resources (village/camp 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 (ranging between 1 and 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 development of the Project Site began in the 1920s with the construction of a commercial restaurant labeled as "Plantation Road House", a dance hall and a transformer within the northcentral portion. Sanborn maps from 1929, 1949, and 1950 show changes to the original restaurant and dance hall throughout the years but also exhibit a residential dwelling along the southern portion of the Project Site and a store along the western portion of the Project Site. Additionally, during construction activities for a Downtown Culver City project located approximately 1.6 miles northeast of the Project Site, a total of three isolated historic-period artifacts (consisting of whole glass bottle containers) were identified within the upper five feet of disturbed fill sediments at a property that had a similar land use history as the Project Site. Given the identification of historic-period archaeological resources in the vicinity and the potential for past and current land uses to have capped and sealed archaeological resources, the potential to encounter historic-period archaeological resources, especially in the central portion of the Project Site, is considered moderate to high.

Based on the above, Project excavations, which are anticipated to reach depths of 13 feet below ground surface (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. This impact finding is consistent with the impact findings of the Certified PEIR. Accordingly, the site-specific archeological resources assessment conducted per Mitigation Measure PEIR MM CUL-2 resulted in foreseeable supplemental site-specific mitigation included as Mitigation Measures Project MM CUL-1 to Project MM CUL-3. Implementation of Mitigation Measures Project MM CUL-1 to Project MM CUL-3 would reduce potentially significant impacts to a less than significant level, consistent with the impact findings of the Certified PEIR.

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. Project impacts would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The following mitigation measure is set forth in the Certified PEIR and the associated MMP to address archeological resources impacts under Threshold b) and is applicable to the General Plan 2045 and Zoning Code Update Project. Mitigation Measure PEIR MM CUL-2 is also applicable to the Project.

> **PEIR MM CUL-2:** Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a qualified archaeologist, defined as an individual meeting the Secretary of the Interior's Professional Qualification Standards for archaeology, to conduct an archaeological resources assessment. This assessment shall include a records search at the South Central Coastal Information Center; a Sacred Lands File search at the Native American Heritage Commission; and a pedestrian field survey of the project site. If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for eligibility in the California Register and local register. If a resource is determined to be eligible and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project's potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, archaeological construction monitoring shall be prescribed as a mitigation measure. The methods and results of the archaeological assessment shall be included in a technical report that is prepared prior to the city's approval of project plans and publication of subsequent CEQA documents.

Mitigation Measure PEIR MM CUL-2 is applicable to the Project, and the Project is in compliance with MM CUL-2 given that, as discussed above, the Project obtained an archaeological resources assessment. Based on the results of the assessment and in accordance with PEIR MM CUL-2, the Project will implement Project-specific mitigation measures, as discussed below.

Project-Specific Mitigation Measures Addressing Impact

The Project archeological resources analysis conducted per Mitigation Measure PEIR MM CUL-2 has resulted in the below listed Project-specific mitigation measures.

Project MM CUL-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 construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist). The frequency of monitoring shall be determined based on the factors presented above and 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.

Project MM CUL-2: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and a Gabrielino Tribe. If the resources are Native American in origin, the Gabrielino Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall incorporate the Gabrielino Tribe's treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material, and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

Project MM CUL-3: Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and

evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures

c) Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

Impact Determination in the Certified PEIR

Impacts to human remains were evaluated in the Initial Study prepared as part of the Certified PEIR, and it was determined that impacts would be less than significant. Various regulatory provisions address how to handle human remains that could be inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code (PRC) Section 5097.98, and State CEQA Guidelines Section 15064.5(e). Under these codes, if unrecorded human remains are discovered during construction within the Planning Area, excavation would be halted and the County Coroner would 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.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to human remains, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

As previously indicated, the Project Site is fully developed. Nevertheless, the Project would require excavation that could extend into native soils, with the potential to encounter previously unknown human remains. As noted above, 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 State 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 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. Since the Project would comply with these regulatory protocols, if applicable, the Project's impacts on human remains would be less than significant, and Project impacts would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to cultural resources would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.5 Energy

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Energy: Would the project:				
(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than Significant	No	Less than Significant	N/A
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than Significant	No	Less than Significant	N/A

a) Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Impact Determination in the Certified PEIR

The Certified PEIR found that implementation of the General Plan 2045 and Zoning Code Update would increase the demand for electricity, natural gas and transportation fuel consumption in the region during construction and operation, but that the extent of the projected increased consumption would not be considered inefficient or wasteful. As such, the General Plan 2045 and Zoning Code Update would result in a less-than-significant impact under CEQA for this category.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to wasteful, inefficient or unnecessary consumption of energy resources, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The amounts of construction fuel anticipated for Project construction are presented below in **Table 8**, *Project Construction Energy Usage*. 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 USEPA and National Highway Traffic Safety Administration fuel-efficiency standards for medium- and heavy-duty trucks and CARB's Pavley Phase I and II standards, 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. Therefore, the construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, and thus impacts associated with construction would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

TABLE 8
PROJECT CONSTRUCTION ENERGY USAGE[a]

Energy Type	Total Quantity	Annual Average Quantity During Construction
Electricity		
Temporary Construction Trailer	126 MWh	41 MWh
Electricity from Water (Dust Control)	18 MWh	6 MWh
Electric Construction Equipment	940 MWh	305 MWh
Total Electricity	**144 MWh**	**47 MWh**
Gasoline		
On-Road Construction Equipment	155,037 gallons	50,256 gallons
Total Gasoline	**155,037 gallons**	**50,256 gallons**
Diesel		
On-Road Construction Equipment	182,446 gallons	59,141 gallons
Off-Road Construction Equipment	136,099 gallons	44,117 gallons
Total Diesel	**318,545 gallons**	**103,259 gallons**

NOTES:

MWh = megawatt-hours

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this document.

SOURCE: ESA, 2025.

The Project includes residential and commercial uses. Operation of the Project would require energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs; as well as transportation-fuels, primarily gasoline, for vehicles traveling to and from the Project. Since the net new trip generation of the Project would increase, additional mobile emissions were based on the Transportation Study.[19] Operational water usage factors were provided by the Project's Water Supply Assessment.[20] **Table 9,** *Summary of Annual Net New Energy Use During Project Operation*, provides a summary of the annual electricity, natural gas, and transportation fuel usage required for Project operations. These usages are consistent with the scope of impacts analyzed in the Certified PEIR.

[19] Gibson Transportation Consulting, Inc., Transportation Study for 10950 Washington Boulevard, Culver City, California, April 2025 (Appendix L).

[20] EKI Environment & Water, Inc., Water Supply Assessment for the 10950 Washington Boulevard Project, 2024 (Appendix N).

TABLE 9
SUMMARY OF ANNUAL NET NEW ENERGY USE DURING PROJECT OPERATION

Energy Type[a]	Annual Quantity
Electricity	
Existing Site	2,564 MWh
Project – Total	3,972 MWh
Building	*3,617 MWh*
EV Charging	*116 MWh*
Water Conveyance	*240 MWh*
Total Net Electricity (Project – Existing)	**1,408 MWh**
Natural Gas	
Existing Site	3,587,663 cf
Project - Total	7,502,627 cf
Building	*6,853,111 cf*
Mobile Sources	*649,516 cf*
Total Net Natural Gas (Project – Existing)	**3,914,964 cf**
Transportation Fuel	
Existing Site	
Gasoline	162,565 gallons
Diesel	26,668 gallons
Project	
Gasoline	239,910 gallons
Diesel	43,420 gallons
Total Net Gasoline (Project – Existing)	**77,345 gallons**
Total Net Diesel (Project – Existing)	**16,752 gallons**

NOTES:
MWh = megawatt hours; cf = cubic feet.
[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.
SOURCE: ESA, 2025.

As shown in Table 9, the Project would result in a net total of 1,408 megawatt hours (MWh), which includes electricity usage for building lighting and equipment as well as electricity consumed for the conveyance and treatment of water and wastewater. The Project would install a solar electric photovoltaic (PV) system in accordance with City's Green Building Code Solar Ordinance as part of Project Design Feature GHG-PDF-1 (see Project Design Feature GHG-PDF-1).[21] Based on the CEC's 2023–2040 Energy Demand Forecast, Southern California Edison's (SCE) total system sales for 2030 are estimated to be 120,169,000 MWh of electricity.[22] As such, the Project-related net increase in annual electricity consumption of 1,408 MWh per year would represent approximately 0.001 percent of SCE's total energy

[21] The exact size of the Project's solar electric PV system has not yet been determined, so the analysis conservatively does not account for electricity reductions due to the Project's solar electric PV system.

[22] CEC, CED 2023 Baseline Forecast – SCE, California Energy Demand Forecast, 2023 - 2040 Baseline Forecast. https://efiling.energy.ca.gov/GetDocument.aspx?tn=254247&DocumentContentId=89615. Accessed December 2024.

sales. In addition, as shown in Table 9, net Project consumption of natural gas would total 3.9 million cubic feet (cf). The SoCal Gas 2024 California Gas Report estimates that natural gas supplies within SoCalGas's planning area will be 769,055 million cf in 2030.[23] Thus, the Project's annual net increase of 3.9 million cf of natural gas in year 2030 would account for <0.0001 percent of the 2030 forecasted annual consumption in SoCalGas's planning area. Therefore, the Project would fall within SoCalGas's projected consumption for the area and would be consistent with SoCalGas's anticipated regional demand from population or economic growth. Table 9 also provides the Project's total gasoline and diesel fuel usage per year during operation of the Project. Per Table 9, the Project's gasoline fuel usage is estimated to be 239,910 gallons per year and the Project diesel fuel usage is estimated to be 43,420 gallons per year. This would be approximately 0.008 percent and 0.010 percent of the Los Angeles County gasoline and diesel fuel usage in 2023 (the most recent year for which data is available). [24]

The Project would support statewide efforts, as well as local General Plan 2045 Land Use and Community Design Element Goals LU-1, LU-11, LU-13, LU-14, and LU-18, and Greenhouse Gas Reduction Element GHG-4, which include planning for growth around transit corridors; supporting multi-family housing development for short trips/around neighborhood amenities; and supporting zero emission vehicles and expanding vehicle charging stations to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The Project achieves this by locating residential and commercial uses at an infill location in close proximity to existing off-site commercial, residential, and retail destinations and by being accessible to and well served by public transit, including various public transit stops operated by Metro, LADOT, and Culver City Bus that are located in proximity to the Project Site.[25] Also, the Project would include 71 full EV charging stations (69 residential and 2 commercial). In addition, the Project would be consistent with SCAG's 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal 2024) strategies, and local General Plan 2045 Mobility Element Goals M-2, M-3, M-4, M-5, and M-8, to promote active transportation and support improvements in local bike networks as the Project would provide a total of 154 bicycle spaces, consisting of 20 short-term (7 commercial and 17 residential) and 130 long-term (3 commercial and 127 residential) bicycle parking spaces in compliance with CCMC requirements (see Project Design Feature GHG-PDF-1). The Project would therefore be consistent with the Connect SoCal 2024 and relevant General Plan 2045 goals and benefits intended to improve mobility and accessibility, provide more transportation choices, and reduce vehicular demand and associated emissions. Based on the above, operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure. Thus, as with the Certified PEIR, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and impacts associated with operations would be less than significant and within the scope of impacts analyzed in the Certified PEIR**.**

[23] California Gas and Electric Utilities, 2024 California Gas Report, https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf.

[24] CEC, 2023. California Retail Fuel Outlet Annual Reporting (CEC-A15) Results. Available at: https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed December 2024.

[25] Gibson Transportation Consulting, Inc., Transportation Study for 10950 Washington Boulevard, Culver City, California, April 2025 (Appendix L).

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Determination in the Certified PEIR

As discussed in the Certified PEIR, the future development facilitated under the General Plan 2045 and Zoning Code Update would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, including the City's plans to reduce energy consumption; therefore, impacts during construction and operation of future development under the General Plan 2045 and Zoning Code Update would be less than significant and no mitigation is required.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to a conflict with or obstruction of a state or local plan for renewable energy or energy efficiency, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

As discussed above, 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 USEPA and National Highway Traffic Safety Administration fuel-efficiency standards for medium- and heavy-duty trucks and CARB's Pavley Phase I and II standards, 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.

During Project operations, 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, and support local General Plan 2045 relevant goals, including Greenhouse Gas Reduction Element Goals GHG-2 and GHG-4, Land Use and Community Design Element Goal LU-16, Infrastructure Element Goal INF-2, Conservation Element Goal C-2, and Safety Element Goals S-2 and S-10, which are designed to encourage development that results in the efficient use of energy resources. The Project will incorporate Project Design Feature GHG-PDF-1, which includes sustainable design features equivalent to LEED Silver standards or better that provide opportunities for improved energy efficiency that would exceed the regulatory standards. 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. 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, as described above. 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. Overall, the Project's features would support and promote the use of renewable energy and energy efficiency and would not conflict with or obstruct any applicable renewable energy or energy efficiency plan. In addition, as described above, during Project operations, the Project would install a solar electric PV system in accordance with the City's Green Building Code Solar Ordinance as part of Project Design Feature GHG-PDF-1).

Furthermore, as discussed above, the Project would support statewide efforts, as well as local General Plan 2045 Land Use and Community Design Element Goals LU-1, LU-11, LU-13, LU-14, LU-18 and Greenhouse Gas Reduction Element GHG-4, which include planning for growth around transit corridors; supporting multi-family housing development for short trips/around neighborhood amenities; and supporting zero emission vehicles and expanding vehicle charging stations, to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The Project achieves this by locating residential and commercial uses at an infill location in close proximity to existing off-site commercial, residential, and retail destinations and in close proximity to many public transit options, including various public transit stops operated by Metro, LADOT, and Culver City Bus are located in proximity to the Project Site. In addition, the Project would include 71 full EV charging stations (69 residential and 2 commercial). Furthermore, the Project would be consistent with the Connect Socal 2024 strategies to promote active transportation and local General Plan Mobility Element Goals M-2, M-3, M-4, M-5, and M-8, which promote active transportation by improving bicycle and pedestrian infrastructure and support improvements in local bike networks, as the Project is located close to many Culver City bike paths, has a high bikeability score[26], and would meet the CMCC required number of bicycle parking spaces. All of these features have the potential to reduce the Project's fuel consumption and criteria pollutant and GHG emissions. Given that the Project Site is located in a transit-rich area such that vehicle trips and VMT would be minimized, the Project would be consistent with and support the applicable General Plan 2045 goals and the goals of Connect SoCal 2024, which has a core vision centered on a "future where transportation is efficient, multimodal and accessible to all. Integrated transit networks, including expanded rail systems, bus rapid transit and active transportation infrastructure, will provide seamless connections throughout the region and expand mobility options connecting to previously underserved areas." The density of housing, restaurants, shopping, and recreation amenities in the area, combined with the public transportation options surrounding the Project, supports the expectation that that projects located in the area would have a substantially greater level of transportation efficiency when compared to the Citywide and statewide averages.

Based on the discussion above, the construction and operations of the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would thus be less than significant and within the scope of impacts analyzed in the Certified PEIR.

[26] Bike Score for 10950 Washington Avenue, Available: https://www.walkscore.com/score/10950-washington-blvd-culver-city-ca-90232. Accessed December 2024.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to energy would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.6 Geology and Soils

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Geology and Soils: Would the project:				
(a) Directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	Less than Significant	No	Less than Significant	N/A
(ii) Strong seismic ground shaking?	Less than Significant	No	Less than Significant	N/A
(iii) Seismic-related ground failure, including liquefaction?	Less than Significant	No	Less than Significant	N/A
(iv) Landslides?	Less than Significant	No	Less than Significant	N/A
(b) Result in substantial soil erosion or the loss of topsoil?	Less than Significant	No	Less than Significant	N/A
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than Significant	No	Less than Significant	N/A
(d) 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?	Less than Significant	No	Less than Significant	N/A
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	No	No Impact	N/A
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than Significant with Mitigation	No	Less than Significant with Mitigation	Yes

a) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Impact Determination in the Certified PEIR

The Newport-Inglewood Fault and the corresponding Alquist-Priolo Earthquake Fault Zones run through the northeastern part of the City, including the Hayden Tract. There are no other known faults that traverse the City that have the potential to result in surface fault rupture. The Certified PEIR determined that new development under the General Plan 2045 and Zoning Code Update would comply with the California Building Code (CBC), the Los Angeles County Municipal Code, and the Culver City Municipal Code's

engineering design and construction requirements and standards to minimize potential impacts associated with surface fault rupture, including the Alquist-Priolo Earthquake Fault Zones, and thus impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to rupture of known earthquake faults, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The seismically active region of Southern California is crossed by numerous faults that are both active and inactive. Fault rupture is the displacement that occurs along the sides of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active if they have shown evidence of movement within the past 11,700 years (i.e., during the Holocene Epoch). The criteria for defining an active fault is based on standards developed by the CGS for the Alquist-Priolo Earthquake Fault Zoning Program.[27] Faults that have not moved in the last 11,700 years are not considered active.

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

As the Project Site is located in the seismically active Southern California region, it could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The Project's Geotechnical Investigation prepared by Geotechnologies Inc, dated November 17, 2023, revised March 3, 2025, included as Appendix F to this document, indicates that no currently known active or potentially active surface faults traverse the Project Site, and the Project Site is not located within a designated Alquist-Priolo Earthquake Fault overland Zone. According to the Geotechnical Investigation, the National Seismic Hazard Maps – Source Parameters database does not include the Overland Fault. However, a concealed trace of the Overland Avenue Fault is located approximately 0.25-mile to the east of the Project Site along Overland Avenue. Based on the location of the Overland Fault, its concealment under alluvium, and the age of its most recent replacement, the potential for surface rupture at the Project Site due to this fault is remote. It should be noted that no Special Studies Zones have been delineated by the State of California along any portion of the Overland Avenue Fault.

Per the Geotechnical Investigation, the nearest Earthquake Fault Zone is located approximately 1.75 miles to the east of the Project Site in connection with the Newport-Inglewood Fault. Given its distance from the Project Site, the Earthquake Fault Zone does not present a fault rupture hazard to the Project Site. Furthermore, Project buildings would be designed and constructed to resist the effects of seismic ground

[27] Bryant, W.A., and Hart, E.W., Fault-Rupture Hazard Zones in California – Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zones Maps: California Geological Survey Special Publication 42, page 42, 2017.

motions as provided in the Culver City Building Code and the CBC. Therefore, the Project would not directly or indirectly cause potential substantial adverse impacts associated with the rupture of a known earthquake fault. As such, impacts in this regard would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

ii) Strong seismic ground shaking?

Impact Determination in the Certified PEIR

The Certified PEIR determined that new development under the General Plan 2045 and Zoning Code Update could expose people and property to strong seismic ground shaking, but future development would comply with the CBC, the Los Angeles County Municipal Code, and the Culver City Municipal Code's engineering design and construction requirements and standards to minimize potential impacts associated with ground shaking, and thus impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to strong seismic ground shaking, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The City, as with all of Southern California, is subject to moderate to strong ground shaking. As such, the Project Site is located in a seismically active region. Earthquakes are unavoidable hazards, although the resultant damage can be minimized through appropriate seismic design and engineering.

As discussed in the Certified PEIR, the City requires that all new construction meet or exceed the Culver City Building Code and the latest standards of the CBC for construction, which requires structural design that can accommodate maximum ground accelerations expected from known faults. Furthermore, the Project would comply with the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provides guidance for evaluation and mitigation of earthquake-related hazards. As outlined in the Certified PEIR, 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 for foundations and retaining walls/shoring of the final design-level geotechnical report would further ensure that seismic-related ground shaking impacts would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. As such, impacts in this regard would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

iii) Seismic-related ground failure, including liquefaction?

Impact Determination in the Certified PEIR

The Certified PEIR determined new development under the General Plan 2045 and Zoning Code Update could expose people and property to liquefaction and other seismic-related ground failure, as the majority of the City is located within a liquefaction hazard area, but that future development would comply with the CBC, the Los Angeles County Municipal Code, and the Culver City Municipal Code's engineering design and construction requirements and standards to minimize potential impacts associated with liquefaction, and thus impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to liquefaction, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

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

According to the Geotechnical Investigation prepared for the Project, a very small portion of the southern area of the Project Site is located within a liquefaction hazard zone, and a site-specific liquefaction analysis was performed. Groundwater was encountered during exploration at a depth of 27 feet below the existing grade. The historically highest groundwater level for the Project Site is mapped at a depth of 20 feet below the ground surface. Based on the analysis provided in the Geotechnical Investigation, it was determined that the soils underlying the Project Site are not considered capable of liquefaction during ground motion associated with seismic movement. In addition, as outlined in the Certified PEIR, the Project would be required to comply with applicable seismic-related regulatory requirements of the Culver City Building Code and the CBC. Therefore, seismic-related ground failure impacts, including liquefaction, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. Thus, impacts in this regard would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

iv) Landslides?

Impact Determination in the Certified PEIR

The Certified PEIR determined that, while the Planning Area is relatively flat, the eastern portion of the City around Baldwin Hills is designated as a potential landslide zone. However, because future development would comply with the CBC, the Los Angeles County Municipal Code, and the Culver City Municipal Code's engineering design and construction requirements and standards to minimize potential impacts associated with landslides, impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to landslides, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is not located in or near Baldwin Hills and is relatively flat, having elevations that range from approximately 52 feet to 66 feet AMSL. According to the State of California Seismic Hazard Zone Map and the Geotechnical Investigation prepared for the Project, the Project Site is located outside the areas identified as susceptible to earthquake-induced landslides. Based on this information, impacts from landslides would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Would the Project result in substantial soil erosion or the loss of topsoil?

Impact Determination in the Certified PEIR

The Certified PEIR found that development under the General Plan 2045 and Zoning Code Update could expose soils to the effects of erosion or loss of topsoil. However, construction activities that disturb one or more acres of land surface are subject to the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ) adopted by the State Water Resources Control Board (SWRCB). Permit compliance includes implementation of a storm water pollution prevention plan (SWPPP). In addition, the General Plan 2045 includes goals and policies that require the use of best management practices (BMPs) to control soil erosion during and after ground-disturbing activities and geotechnical reports for projects

requiring grading permits. Therefore, compliance with applicable regulations would ensure that impacts related to soil erosion and topsoil loss are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to soil erosion or the loss of topsoil, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

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

The Project Site is located in a highly developed and urbanized area of Culver City. Negligible, if any, native topsoil is likely to occur on the Project Site as it is currently developed with two commercial buildings and associated surface parking. Project construction would result in ground surface disruption during site preparation, excavation, grading, and trenching, which would create the potential for erosion to occur. Wind erosion would be minimized through soil stabilization measures required by SCAQMD Rule 403 (Fugitive Dust), such as daily watering. Potential for water erosion would be reduced by implementation of standard erosion control measures imposed during site preparation and grading activities. As discussed in the Certified PEIR, construction activities would be carried out in accordance with applicable Culver City standard erosion control practices required pursuant to the CBC and the requirements of the NPDES General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. Consistent with these requirements, a SWPPP would be prepared that incorporates BMPs to control water erosion during the Project's construction period. Following Project construction, the Project Site would be covered completely by paving, structures, and landscaping, and would generate little, if any, soil erosion. Thus, impacts due to erosion of topsoil would be less than significant as the Project would comply with applicable regulatory requirements and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

c) Would the Project 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?

Impact Determination in the Certified PEIR

As determined in the Certified PEIR, certain geologic units present in the City have the potential for landslides, slope instability, liquefaction, and liquefaction-induced lateral spreading. Development allowed under the General Plan 2045 and Zoning Code Update could be located on geologic units or soils that are unstable, or that could become unstable, and result in geologic hazards if not addressed appropriately. The potential hazards of unstable soil or geologic units will be addressed largely through the integration of geotechnical information in the planning and design process for future development to determine the local soil suitability for specific projects in accordance with standard industry practices and state-provided requirements. In addition, future projects will comply with applicable requirements related to unstable geologic units or soils. As such, implementation of the General Plan 2045 and Zoning Code Update will result in a less than significant impact related to unstable geologic units or soils.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to unstable geologic units, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

As discussed in the Geotechnical Investigation, subsurface conditions on the Project Site consist of 1 to 3 feet of fill materials underlain by native soils. Based on soil boring tests, fill materials consist of a mixture of clayey silt, sandy silt, and silty sand. The fill is in turn underlain by native alluvial soils consisting of interlayered mixtures of sand, silt, and clay.

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

specifications to minimize the effects of liquefaction, which would in turn minimize any potential for lateral spreading.

Consistent with the Certified PEIR, the Project construction and design would be required to comply with the CBC, which is designed to assure safe construction, and implementation of the site-specific design measures including foundation design recommendations of the final design-level geotechnical report would further ensure that ground and soil stability hazards would not become unstable as a result of the Project. Thus, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

d) Would the Project 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?

Impact Determination in the Certified PEIR

The Certified PEIR determined that expansive soils within the City are generally located around Baldwin Hills due to the high clay content. Future development under the General Plan 2045 and Zoning Code Update will be required to comply with all appliable design, engineering, and construction standards and requirements of the CBC within the CCMC, including the Grading Ordinance. Therefore, future development under the General Plan 2045 and Zoning Code Update will not result in geologic hazards associated with expansive soils. As such, implementation of the General Plan 2045 and Zoning Code Update will result in a less than significant impact related to unstable expansive soils.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to expansive soils, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Soils with shrink-swell or expansive properties typically occur in fine-grained sediments and cause damage through volume changes as a result of a wetting and drying process. Structural damage may occur over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. As discussed in the Geotechnical Investigation (Appendix F), the Expansion Index was found to be 7 for representative bulk sample of the upper soils, meaning that onsite geologic materials are within the very low expansion range. Thus, with the incorporation of the recommendations provided in the final design-level geotechnical report, the Project would not create a substantial direct or indirect risk to life for property due to expansive soil. As such, impacts in this regard would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

e) Would the Project 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?

Impact Determination in the Certified PEIR

Impacts related to septic tanks and alternative waste water disposal systems were evaluated in the Initial Study prepared as part of the Certified PEIR, and it was determined that no impacts would occur given that future development under the General Plan 2045 and Zoning Code Update would connect to existing mainlines and services lines and thus would not use septic tanks or alternative wastewater disposal systems.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to septic tanks and alternative waste water disposal systems, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is located in an urbanized area where municipal wastewater infrastructure already exists. The Project would be required to connect to the existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur, consistent with the impact findings of the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

f) Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact Determination in the Certified PEIR

Based on the records search conducted in the Certified PEIR from the Natural History Museum of Los Angeles County (LACM), four fossil localities have been recorded within the City boundaries and eight other localities located outside the city but from the same sedimentary deposits (older Quaternary alluvium deposits and the San Pedro Sand) that occur within and throughout the city. The fossil localities have yielded multiple specimens of plants and animals including mammoth, mastodon, camel, human, horses, saber-toothed cat, duck, and multiple invertebrates (e.g., clam shells, gastropods, etc.) that have been recovered in previously undisturbed sediments between 6 and 55 feet bgs and unknown depths. Thus, future development implemented under the General Plan 2045 and Zoning Code Update that includes

construction-related ground disturbance (e.g., grubbing/clearing, grading, excavation, trenching, and boring/drilling) into previously undisturbed sediments are activities has the potential to directly or indirectly destroy paleontological resources. In addition, certain infrastructure and other improvements requiring ground disturbance into undisturbed sediments could result in damage to or destruction of paleontological resources buried below the ground surface. Therefore, impacts to paleontological resources are considered potentially significant. However, implementation of Mitigation Measure PEIR MM GEO-1 would reduce impacts to paleontological resources to a less than significant level.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to paleontological resources or unique geologic features, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Consistent with Mitigation Measure PEIR MM-GEO-1 (see below), a paleontological resources assessment was prepared by ESA in January 2025 for the Project (provided in Appendix G of this document) to determine if the Project has the potential to encounter buried paleontological resources during construction. As indicated previously, the Project Site is completely developed with surface parking and office buildings 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 Holocene-age alluvium (Qa), which have a low sensitivity for paleontological resources due to the young age of the deposits and are unlikely to preserve fossil resources. However, these sediments increase in age with depth, such that the deeper layers of this unit have a higher potential to preserve paleontological resources. Moreover, numerous paleontological resources have been recovered from deeper deposits during construction of development projects in the general vicinity of the Project Site in association with the Lakewood Formation—a geological unit which consists of a Pleistocene-age alluvium deposited in both marine and non-marine settings, which is considered to have high potential for encountering paleontological resources. In particular, these projects yielded the identification of more than 200 fossil specimens from these deposits. In addition, the paleontological records search conducted through the LACM also indicates that older (Pleistocene-age) geologic units in the vicinity of the Project Site have produced paleontological resources (including gastropods, elephant, uncatalogued invertebrates, American lion, rodent, ground sloth, and horse) situated within approximately 0.4 and 3.4 miles from the Project Site. Since excavations at the Project Site are estimated to reach depths of up to 13 feet bgs, which is likely deeper than previous excavations on the Project Site, they have the potential to impact older alluvium and possibly the Lakewood Formation, 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. This impact finding is consistent with the impact findings of the Certified PEIR. Accordingly, the site-specific paleontological resources assessment conducted per Mitigation Measure PEIR MM GEO-1 resulted in the foreseeable supplemental site-specific mitigation measures included below as Mitigation Measures Project MM GEO-1 to Project MM GEO-4. Implementation of Mitigation Measures Project MM GEO-1 to Project MM GEO-4 would reduce potentially significant impacts to a less than significant level, consistent with the impact findings of the Certified PEIR.

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.

Certified PEIR's Mitigation Measures Addressing Impact

The following mitigation measure is set forth in the Certified PEIR and the associated MMP to address paleontological resources impacts under Threshold f) and is applicable to the General Plan 2045 and Zoning Code Update Project. Mitigation Measure PEIR MM GEO-1 is also applicable to the Project.

> **PEIR MM-GEO-1.** Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a Qualified Paleontologist, defined as an individual meeting the Society of Vertebrate Paleontology (SVP) Standard, to conduct a site-specific paleontological resources assessment. This assessment shall include a records search at the Natural History Museum of Los Angeles County and/or other appropriate facilities, geologic map and scientific literature review, and a pedestrian field survey (if deemed appropriate by the Qualified Paleontologist). If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for significance pursuant to CEQA, SVP, and/or a local register. If a resource is determined to be significant and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project's potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, paleontological construction monitoring shall be prescribed as a mitigation measure. The methods and results of the paleontological assessment shall be included in a technical report that is prepared prior to the city's approval of project plans and publication of subsequent CEQA documents.

Mitigation Measure PEIR MM GEO-1 is applicable to the Project, and, as noted above, the Project has complied with PEIR MM-GEO-1 by preparing a paleontological resources assessment for the Project and by implementing the below Project-specific supplemental mitigation measures.

Project-Specific Mitigation Measures Addressing Impact

The Project paleontological resources analysis conducted per Mitigation Measure PEIR MM GEO-1 has resulted in the below listed Project-specific mitigation measures.

> **Project 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 Project progress meetings, and shall be responsible for monitoring and overseeing paleontological monitors (meeting SVP standards) that will observe grading and excavation activities as required in Project MM GEO-3.

> **Project MM GEO-2:** The Qualified Paleontologist shall prepare a Paleontological Resources Mitigation Plan (Plan) prior to the start of paleontological construction monitoring (see Project MM GEO-3). The Plan shall be prepared in accordance with guidelines of the Society of Vertebrate Paleontology (2010) and make provisions for the monitoring of excavations and a testing (e.g., wet screening) of sediment samples, particularly in the lower levels of the excavation. The Plan shall include a geological context discussion, methods for the construction monitoring, and describe the protocols when a paleontological discovery is made during construction.

Project MM GEO-3: Paleontological monitoring shall be conducted during construction excavations into undisturbed older alluvial sediments that exceed 10 feet in depth. 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, per SVP Guidelines (2010). The sample 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 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.

Project 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.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to geology and soils would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.7 Greenhouse Gas Emissions

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Greenhouse Gas Emissions: Would the project:				
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant	No	Less than Significant	N/A
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	No	Less than Significant	N/A

a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Determination in the Certified PEIR

The Certified PEIR presented a qualitative assessment of construction GHG emissions associated with development of the General Plan 2045 and Zoning Code Update, indicating that due to a lack of project-specific information, the effectiveness in estimating construction emissions could not be accurately quantified. The Certified PEIR described that operation of the development under the General Plan 2045 and Zoning Code Update would generate GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water usage and wastewater generation, and that GHG emissions would be approximately 406,023 MT CO_2e in year 2045. The Certified PEIR determined the net change in operational emissions from existing development (2019) to existing plus buildout at 2045 under General Plan 2045 would be negative compared to existing (2019) development primarily due to the focus of the proposed General Plan 2045 on infill development and development along transportation corridors to achieve an integrated land use mix that accommodates growth while reducing VMT and associated emissions, improvements in vehicle emissions standards and, to a lesser extent, improvements in building energy efficiency standards. The Certified PEIR determined that impacts related to the generation of greenhouse gas emissions, either directly or indirectly, would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to the generation of greenhouse gas emissions, either directly or indirectly, nor would it result in a substantial increase in a previously identified impact as analyzed in the Certified PEIR.

Impact Determination for Project

Construction

GHG quantification methods rely on guidance from State and regional agencies with scientific expertise in quantifying GHG emissions, including CARB and SCAQMD. As with the air quality emissions and as

detailed above under subsection 3.2, *Air Quality*, GHG emissions from construction were estimated using CalEEMod Version 2022.1 for off-road construction equipment and on-road vehicles. The Project's construction estimated GHG emissions are shown in **Table 10,** *Construction Greenhouse Gas Emissions*. The SCAQMD recommends that a project's construction-related GHG emissions be amortized over the project's 30-year lifetime in order to include these emissions as part of the project's annualized lifetime total emissions, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. As indicated in Table 10, Project construction emissions during the 37-month construction period would generate an estimated 5,724 $MTCO_2e$, or 191 $MTCO_2e$ amortized over a 30-year period. Thus, the amortized construction GHG emissions would only represent 12.8 percent of the Project's net annual operational GHG emissions, which, as discussed below, is well within the estimated total emissions of the Plan.

TABLE 10
CONSTRUCTION GREENHOUSE GAS EMISSIONS (TONS PER YEAR)[a]

Construction Year	$MTCO_2e$ (Metric Tons)[a]
2027	2,619
2028	2,006
2029	1,088
2030	11
Total GHG Emissions	**5,724**
Annual (Amortized over 30 years)	**191**

NOTES:
[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.

SOURCE: ESA, 2025.

Operation

Operation of the Project would generate GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water usage and wastewater generation. CalEEMod Version 2022.1 was used to estimate operational GHG emissions. Operational mobile trips and water usage factors were provided by the Project's Transportation Study and Water Supply Assessment.[28,29] Operational emissions are reduced based on the estimated operational emissions of the existing uses on the Project Site. Maximum annual net GHG emissions resulting from mobile, area, energy (i.e., electricity, natural gas), water conveyance, waste, EV charging stations sources, as well as amortized construction emissions, were calculated for the Project buildout year of 2030. The maximum first operating year GHG emissions from operation of the Project are shown in **Table 11**, *Estimated Annualized Project Greenhouse Gas Emissions*.

As demonstrated in Table 11, the net Project operations would be approximately 1,530 $MTCO_2e$, which would be well within the Certified PEIR estimated total annual emissions for implementation of the Plan

[28] EKI Environment & Water, Inc., Water Supply Assessment for the 10950 Washington Boulevard Project, 2024 (Appendix N).

[29] Gibson Transportation Consulting, Inc., Transportation Study for 10950 Washington Boulevard, Culver City, California, April 2025 (Appendix L).

of 406,023 $MTCO_2e$.[30] With the implementation of the Project's sustainable features, as discussed above, as well as providing the CMCC required number of bicycle parking spaces, and the Project infill design next to public transit where the Project locates residential and commercial uses in close proximity to existing off-site commercial, residential, and retail destinations and in close proximity to many public transit options, including various public transit stops operated by Metro, LADOT, and Culver City Bus, the Project would achieve GHG reductions for electricity, water and mobile emissions, as compared to a scenario without GHG reducing features and measures.

TABLE 11
ESTIMATED ANNUALIZED PROJECT GREENHOUSE GAS EMISSIONS

Emissions Sources	Operational Emissions CO_2e (Metric Tons per Year) [a]
	Project
Project	
Mobile	2,484
Area	23
Energy (Electricity)	431
Energy (Natural Gas)	377
Water	76
Waste	191
EV Charging	14
Construction - Amortized	191
Project Total GHG Emissions [b]	**3,787**
Existing GHG Emissions	**2,256**
Net Project GHG Emissions (Project – Existing)	**1,530**
General Plan 2045 GHG Emissions [b]	**406,023**

NOTES:

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.

[b] Note, PEIR General Plan 2045 GHG Emissions are reported for year 2045.

SOURCE: ESA, 2025.

In addition, Project operational-related GHG emissions would decline in future years as emissions reductions from the State's Cap-and-Trade program are fully realized. Emissions reductions from the Project's two highest GHG-emitting sources, mobile and electricity, would occur over the next decade, 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 Renewables Portfolio Standard obligations to provide 60 percent of their electricity from renewable electricity sources by 2030 consistent with 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 SCE 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

[30] PEIR General Plan 2045 GHG Emissions are reported for year 2045.

vehicle fleet meeting more stringent combustion emissions standards, such as CARB's Advanced Clean Cars II and Advanced Clean Truck Regulation, which aims to increase zero-emission truck sales annually. By 2035, all new passenger cars, trucks and SUVs sold in California will be zero-emissions.

Based on the above, the Project's construction and operational GHG impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Would the Project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Determination in the Certified PEIR

The Certified PEIR determined that the General Plan 2045 and Zoning Code Update was consistent with the applicable GHG emission reduction plans and policies within CARB's 2022 Scoping Plan, SCAG's 2020-2045 RTP/SCS and the City's Green Building Program. As such, the General Plan 2045 and Zoning Code Update would result in a less than significant impact related to conflicts with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to conflicts with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs, nor would it result in a substantial increase in a previously identified impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project would generate an incremental contribution to and a cumulative increase in GHG emissions. 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 Project would be consistent with the applicable GHG emission reduction plans and policies included within the Certified PEIR, including the 2022 Scoping Plan, SCAG's Connect SoCal 2024, the City of Culver City's Green Building Program and General Plan 2045, as discussed below.

Consistency with Climate Change Scoping Plan

At the State level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was adopted by the Legislature as the 2006 Global Warming Solutions Act (AB 32) and codified into law in Health and Safety Code (HSC) Division 25.5. Executive Order B-30-15's goal to reduce GHG emissions to 40 percent below 1990 levels by 2030 was adopted by the Legislature in SB 32 and also codified into law in HSC Division 25.5.

In support of HSC Division 25.5, the State has promulgated specific laws and strategies aimed at GHG reductions that are applicable to the Project. The primary focus of many of the Statewide and regional plans, policies, and regulations is to address worldwide climate change. 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."[31] It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone.

Table 12, *Project Compliance with the 2022 Climate Change Scoping Plan: Appendix D Local Actions,* contains a list of GHG-reducing strategies applicable to the Project. The analysis shows that the Project is consistent with these laws and strategies outlined in the State's Climate Change Scoping Plan to reduce GHG emissions. The Climate Change Scoping Plan outlines a framework that relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program. As discussed below, the Project would implement Sustainable Features and incorporate characteristics to reduce energy use, conserve water, reduce waste generation, and reduce vehicle travel consistent with Statewide strategies and regulations. As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

Consistency with Connect SoCal 2024

SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was applicable to the Certified PEIR at the time the analysis was conducted. Since then, SCAG's Connect SoCal 2024 (2024-2050) Regional Transportation Plan/Sustainable Communities Strategy was adopted, which is an update to the previous 2020-2045 RTP/SCS. Generally, projects are consistent SCAG's Connect SoCal 2024 if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As shown in Table 11, above, 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 the Connect SoCal 2024, which recognizes that the transportation sector is the largest contributor to the state's GHG emissions. At the regional level, the Connect SoCal 2024 is an applicable plan adopted for the purpose of reducing GHGs.

[31] California Air Pollution Control Officers Association, CEQA & Climate change: Evaluating and Addressing Greenhous Gas Emissions from Projects Subject to the California Environmental Quality Act, (2008).

TABLE 12
PROJECT COMPLIANCE WITH THE 2022 CLIMATE CHANGE SCOPING PLAN: APPENDIX D LOCAL ACTIONS

Priority Areas	Key Project Attribute	Compliance Analysis
Transportation Electrification	Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.	**No Conflict.** Consistent with the 2022 California Green Building Standards Code, the Project would include 71 full EV charging stations (69 residential and 2 commercial) (see Project Design Feature GHG-PDF-1). Therefore, the Project would not conflict with this key project attribute.
VMT Reduction	Is 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).	**No Conflict.** The Project would result in the infill development of residential and commercial uses that would be surrounded by similar residential and commercial uses. The Project is presently served by existing utilities and essential public services. In addition, the Project's location, design, and land use planning aim to reduce vehicle trips by increasing the density of residential and commercial uses in proximity to public transit. The Project Site is located near frequent and comprehensive public transit services. Consequently, both residential and employment growth resulting from the Project will be concentrated near transit stops. Several public transit stops operated by Metro, LADOT, and Culver City Bus are located in close proximity to the Project site. Furthermore, the Project is consistent with the CCMC since the Project would include Project Design Feature TRAF-PDF-2, where the Project would implement strategies and action plans as part of a comprehensive TDM program 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 further reducing Project VMT. Thus, the Project would not conflict with this key project attribute.
	Does not result in the loss or conversion of natural and working lands. [a]	**No Conflict.** The Project proposes to redevelop an approximately 5.761-acre site, which does not contain natural and working lands. The Project would not interfere, impede, or conflict with natural and working lands (NWL) strategies for all NWL actions under the 2022 Scoping Plan. Therefore, the Project would not conflict with this key project attribute.
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or is in proximity to existing transit stops (within a half mile), or satisfies more detailed and stringent criteria specified in the region's SCS.	**No Conflict.** The Project would result in a density increase from existing conditions. Under the General Plan 2045, Mixed-Use Medium land uses are allowed to develop 65 units per acre. Thus, with the Project Site being 5.761 acres, up to 375 units could be developed without a density bonus. The Project includes 79 units (22 percent of base density) as Low Income affordable units, meaning the Project qualifies for a 38.75 percent density increase under state density bonus law. At 508 units, the Project would be within the allowed number of units with the density bonus incentives included. The resulting density would be approximately 88.2 dwelling units per acre (508 units on 5.761 acres). Furthermore, as discussed above, the Project Site is well served by public transit, including various public transit stops operated by Metro, LADOT, and Culver City Bus that are located in proximity to the Project Site. Thus, the Project would be not conflict with this key project attribute.

TABLE 12
PROJECT COMPLIANCE WITH THE 2022 CLIMATE CHANGE SCOPING PLAN: APPENDIX D LOCAL ACTIONS

Priority Areas	Key Project Attribute	Compliance Analysis
	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.	**No Conflict.** The Project reduces parking requirements by providing as little residential parking as is operationally feasible. Additionally, residential parking will be unbundled from rent, meaning that parking spaces will be able to be efficiently dispersed amongst all tenants. Thus, the Project would not conflict with this key project attribute.
	Results in no net loss of existing affordable units.	**No Conflict.** There are no existing residential units on the Project Site, including affordable units. As such, the Project would result in a net gain of 79 affordable housing units. Thus, the Project would not conflict with this key project attribute.

NOTES:

[a] California's natural and working lands (NWL) cover approximately 90 percent of the state's 105 million acres, and include forests, grasslands, shrublands and chaparral, croplands, wetlands, sparsely vegetated lands, and the green spaces in urban and built environments (p. 241 – 2022 Scoping Plan).

SOURCE: CARB, 2022; ESA, 2025.

The purpose of Connect SoCal 2024 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. SCAG's Program EIR for Connect SoCal 2024, certified on April 4, 2024, "requires MPOs to include a SCS element as part of their RTP updates, with the purpose of identifying policies and strategies to reduce per capita automobile and light-duty truck GHG emissions." Connect SoCal 2024 seeks future growth in Priority Development Areas (PDAs) to help the region reach mobility and environmental goals. Development in PDAs would provide people with access to multiple modes of transportation or where trip origins and destinations are closer together allowing for shorter trips. Connect SoCal 2024 also seeks to protect Green Region Resource Areas (GRRAs), resource areas and farmland, which can reduce risks from climate change and promote future resilience. Furthermore, Connect SoCal 2024 includes transportation improvements to be integrated and coordinated with land use patterns that support reduced congestion, reduced VMT, and increased transit, walking, and biking options. Connect SoCal 2024 shows that SCAG would meet the GHG emissions reduction target of 19 percent below 2005 levels by 2035.

In order to assess the Project's potential to conflict with Connect SoCal 2024, this section analyzes the Project's consistency with the goals set forth in Connect SoCal 2024 to meet GHG emission-reduction targets set by CARB. Generally, projects are considered to not conflict with applicable County and regional land use plans and regulations, such as SCAG's Connect SoCal 2024, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project would not conflict with the Connect SoCal 2024 goals as detailed in **Table 13**, *Consistency with Applicable Connect SoCal 2024 Goals*.

As shown in Table 13, the Project would not conflict with SCAG's Connect SoCal 2024 and would be supportive of the actions and strategies contained therein. Therefore, GHG impacts would be less than significant with respect to Connect SoCal 2024 and within the scope of impacts analyzed in the Certified PEIR.

TABLE 13
CONSISTENCY WITH APPLICABLE CONNECT SOCAL 2024 GOALS

Goals	Responsible Party(ies)	Consistency Analysis
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	Local Jurisdictions, SCAG	**No Conflict**. The Project would not conflict with this goal. With the implementation of the Project's numerous sustainable features, as described above, as well as providing the CMCC required number of bicycle parking spaces, and the Project's infill design where the Project locates residential and commercial uses in close proximity to existing off-site commercial, residential, and retail destinations and in close proximity to many public transit options, including various public transit stops operated by Metro, LADOT, and Culver City Bus, the Project would achieve GHG reductions for electricity, water and mobile emissions.[32] As such, elements of the Project integrate the region's development pattern and transportation network in a way that is well-maintained and operated, coordinated, and resilient, which improves air quality and reduces GHG emissions. As such, the Project would be consistent with this Connect SoCal 2024 goal.
Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	Local Jurisdictions, SCAG	**No Conflict.** The Project would not conflict with this goal. The Project's land use characteristics, including its location near transit, housing, and bicycle/pedestrian facilities, would encourage non-automotive forms of transportation. The Project is located within a Transit-Oriented Community (TOC) because it is located within 0.5 miles of the Sepulveda Boulevard & Venice Boulevard intersection and is within one of the four Key TPAs identified in Culver City's July 13, 2020 Transportation Study Criteria and Guidelines. Specifically, various public transit stops operated by Metro, LADOT, and Culver City Bus are in close proximity to the Project Site. In addition, the Project promotes active transportation by improving bicycle and pedestrian infrastructure and supporting improvements in local bike networks since the Project is located close to many Culver City bike paths, has a high bikeability score, and would meet the CMCC required number of bicycle parking spaces.[33] Thus, the Project would be consistent with this Connect SoCal 2024 goal.
Support planning for people of all ages, abilities, and backgrounds.	Local Jurisdictions, SCAG	**No Conflict.** The Project would not conflict with this goal. Since the Project is adjacent to existing residential and commercial development, Project residents will have easy access to a wide variety of nearby uses, including an elementary school, a senior living facility, a Mosque, multiple local employment places, and retail shops, meaning the Project will attract residents of all ages, abilities, and backgrounds. Additionally, the Project will include 79 affordable units, as well as a variety of studio, one bedroom, and two bedroom units, meaning the Project will support the housing of persons of a variety of socioeconomic levels and backgrounds. Similarly, the Project's diversity of amenities will likewise provide resources for people of all ages, abilities, and backgrounds, such as the Project's provision of bicycle amenities, outdoor gathering spaces (including areas that are publicly accessible), an outdoor playground area, fitness rooms, and more. Therefore, the Project would be consistent with this Connect SoCal 2024 goal.
Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.	Local Jurisdictions, SCAG	**No Conflict.** The Project would not conflict with this goal. The Project would develop two new 5-story mixed-use buildings with residential and commercial uses adjacent to existing residential and commercial areas within the City's limits and would support human-centered communities by providing nearby employment via the operation of the Project and within the Project's commercial component. Furthermore, the Project Site is well served by public transit, including various public transit stops operated by Metro, LADOT, and Culver City Bus that are located in close

[32] As seen in Table 4 of the Project's Transportation Study for 10950 Washington Boulevard, provided in Appendix L of this document, the Project's infill design reduces Project trips, and associated mobile source emissions, by approximately 16% through transit/walk-in and pass-by trip reductions.

[33] Bike Score for 10950 Washington Avenue, Available: https://www.walkscore.com/score/10950-washington-blvd-culver-city-ca-90232. Accessed December 2024.

TABLE 13
CONSISTENCY WITH APPLICABLE CONNECT SOCAL 2024 GOALS

Goals	Responsible Party(ies)	Consistency Analysis
		proximity to the Project Site. The Project provides various common outdoor open spaces (including some space that is publicly accessible) and would not interfere with any improvements proposed as part of the *Culver City Bicycle & Pedestrian Action Plan.* In addition, the Project would support active modes of transportation by improving bicycle and pedestrian infrastructure and supporting improvements in local bike networks since the Project is located close to many Culver City bike paths, has a high bikeability score, and would meet the CMCC required number of bicycle parking spaces. Thus, the Project would be consistent with this Connect SoCal 2024 goal.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	Local Jurisdictions, SCAG	**No Conflict.** The Project would not conflict with this goal. The Project would develop two new 5-story mixed-use buildings with 508 residential units, including 79 units as Low Income affordable units. The Project also provides a mix of unit types, including studio, one bedroom, and two bedroom units. As such, the Project supports housing for persons of a variety of socioeconomic levels and backgrounds. Additionally, the Project includes accessibility and opportunity for the commuting needs for all households by providing EV parking spaces, bicycle parking and storage facilities, and access to various public transit stops operated by Metro, LADOT, and Culver City Bus located in close proximity to the Project Site. In addition, the Project would support active modes of transportation by improving bicycle and pedestrian infrastructure and supporting improvements in local bike networks since the Project is located close to many Culver City bike paths, has a high bikeability score, and would meet the CMCC required number of bicycle parking spaces. Thus, the Project would be consistent with this Connect SoCal 2024 goal.
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change.	Local Jurisdictions, SCAG	**No Conflict.** The Project would not conflict with this goal. The Project's infill location and its numerous sustainability features will help develop a resilient community that can adapt to climate change. The Project is located in a highly urban area in close proximity to other residential and commercial uses with major employers nearby. The Project will implement various sustainable features, such as the provision of EV and bicycle parking, the use of energy-saving features like LED lights and ENERGY STAR-rated appliances, and the emphasis on drought-tolerant landscaping and water-conscious irrigation. Moreover, the Project Site is in close proximity to many public transit options, including various public transit stops operated by Metro, LADOT, and Culver City Bus. With all of these factors, the Project would achieve GHG reductions for electricity, water and mobile emissions, as compared to a scenario without GHG reducing features and measures. Thus, the Project would be consistent with this Connect SoCal 2024 goal.
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	Local Jurisdictions, SCAG	**No Conflict.** The Project would not conflict with this goal. The Project would develop two new 5-story mixed-use buildings that would include Project Design Feature GHG-PDF-1 and comply with CALGreen and Title 24 requirements to reduce energy consumption by incorporating sustainable design features equivalent to LEED Silver standards and implementing energy efficient building designs, reducing indoor and outdoor water demand, and installing ENERGY STAR®-rated appliances and LED lighting throughout the Project Site (see Project Design Feature GHG-PDF-1). Further, the Project would install a solar electric PV system in accordance with the City's Green Building Code Solar Ordinance as part of Project Design Feature GHG-PDF-1. Additionally, the Project landscape plan calls for low maintenance, native, and drought tolerant landscaping and 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 provide 72 full EV charging stations (69 residential and 3 commercial) and would provide 154 bicycle parking spaces for residents, employees and visitors, including 20 short-term and 134 long-term

TABLE 13
CONSISTENCY WITH APPLICABLE CONNECT SOCAL 2024 GOALS

Goals	Responsible Party(ies)	Consistency Analysis
		spaces, in compliance with City codes. Furthermore, the Project's location, design, and land use planning aim to reduce vehicle trips by increasing the density of residential and commercial uses in proximity to public transit. The Project Site is located near frequent and comprehensive public transit services. Consequently, both residential and employment growth resulting from the Project will be concentrated near transit stops. Several public transit stops operated by Metro, LADOT, and Culver City Bus are located in close proximity to the Project site. The Project's design promotes a variety of transportation options, which helps the Project integrate into the region's development pattern and transportation network in a way that improves air quality, reduces GHG emissions, and enables a more sustainable use of energy and water. The Project Site is situated in an urban infill environment in close proximity to numerous compatible uses, including local employment places, retail shops, an elementary school, a senior living facility, and a Mosque. This, coupled with the provision of on-site commercial uses and the activation of the streetscape along Washington Boulevard, means that the Project will encourage walking as a mode of transportation. Additionally, the Project includes 353 EV-ready or EV-capable parking spaces and 154 bicycle parking spaces, which will help encourage more environmentally friendly modes of transportation. Lastly, the Project Site is located near frequent and comprehensive public transit stops, including those operated by Metro, LADOT, and Culver City Bus, which will enable residents to choose public transportation for their commuting needs. As such, all of these elements of the Project serve to integrate the region's development pattern and transportation network in a way that reduces VMT, which improves air quality and reduces GHG emissions, and enables sustainable use of energy and water. Thus, the Project would be consistent with this Connect SoCal 2024 goal.
Conserve the region's resources.	Local Jurisdictions, SCAG	**No Conflict.** The Project would not conflict with this goal. The Project would include strategies to conserve the region's resources through compliance of federal, state, and local regulations and the implementation of sustainable building practices that consume less energy, water, and, other non-renewable resources. The Project will incorporate Project Design Feature GHG-PDF-1 where the Project would include sustainable design and energy saving features, and the proposed buildings would comply with the applicable Title 24 California Code of Regulations. 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, as described above. As it relates to energy conservation, the Project would incorporate sustainable design features equivalent to LEED Silver standards and 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, as described above, during Project operations, the Project would install a solar electric PV system in accordance with the City's Green Building Code Solar Ordinance. Therefore, the operation of future development of the Project would be designed in a manner that is consistent with conserving the region's resources. As such, the Project would be consistent with this Connect SoCal 2024 goal.

TABLE 13
CONSISTENCY WITH APPLICABLE CONNECT SOCAL 2024 GOALS

Goals	Responsible Party(ies)	Consistency Analysis
Improve access to jobs and educational resources.	Local Jurisdictions	**No Conflict.** The Project would not conflict with this goal. The Project's infill location, its support of a wide range of transportation options (as discussed above), and its provision of neighborhood-serving commercial uses will improve access to jobs and educational resources. In fact, the Project Site is located across the street from an elementary school and in close proximity to a number of large employers and local shops. . Further, the development of the Project would generate approximately 51 employees on the Project Site. Therefore, the Project would be consistent with the strategies in Connect SoCal 2024.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	Local Jurisdictions	**No Conflict.** The Project would not conflict with this goal. The Project would enhance and improve infrastructure and circulation surrounding the Project Site to support commercial and residential uses. The Project is utilizing the goods movement systems of the existing commercial and residential area, as well as include site improvements that allow for vehicular access and circulation. Therefore, the Project would be consistent with the goods movements strategies in Connect SoCal 2024.

SOURCE: ESA, 2025.

Consistency with Culver City's General Plan 2045 Greenhouse Gas Reduction Element and Green Building Program

The significance of the Project's GHG emissions is also evaluated based on whether they would be generated in connection with a design that is consistent with relevant City of Culver City goals and actions designed to encourage development that results in a reduction of GHGs. The Project would support statewide efforts, as well as local General Plan 2045 Greenhouse Gas Reduction Element Goals GHG-1, GHG-2 and GHG-4. As described under subsections *Sustainability Features* and *Project Design Features* in this Environmental Checklist, the Project will incorporate Project Design Feature GHG-PDF-1 where the Project would include sustainable design features equivalent to LEED Silver standards or better that provide opportunities for improved energy efficiency that would exceed the regulatory standards. 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. 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, as described above, during Project operations, the Project would install a solar electric PV system, in accordance with the City's Green Building Code Solar Ordinance as part of Project Design Feature GHG-PDF-1.[34] Furthermore, the Project supports the transition to zero-emission vehicles by expanding vehicle charging stations, and the Project supports improving transportation efficiency and reducing transportation GHG emissions with respect to private automobiles by locating residential and commercial uses at an infill location in close proximity to existing off-site commercial, residential, and retail destinations as well as numerous public transit stops operated by Metro, LADOT, and Culver City Bus. The Project would include

[34] The exact size of the Project's solar electric PV system has not yet been determined, so the analyses conservatively do not account for electricity reductions due to the Project's solar electric PV system.

71 full EV charging stations (69 residential and 2 commercial), further supporting sustainable transportation practices. Therefore, the Project would achieve GHG reductions for electricity, water and mobile emissions, as compared to a scenario without GHG reducing features and measures.

Table 14, *Project Consistency with Applicable Culver City Green Building Program Requirements*, describes features the Project would implement to increase energy efficiency and reduce energy consumption, thus reducing Project GHG emissions. As discussed in Table 14, the Project would not conflict with the applicable requirements of the City's Green Building Program. Therefore, the Project's GHG emissions would be generated in connection with a development located and designed to be consistent with the applicable City goals and actions for GHG emission reductions.

TABLE 14
PROJECT CONSISTENCY WITH APPLICABLE CULVER CITY GREEN BUILDING PROGRAM REQUIREMENTS[a]

Source	Category / Description	Consistency Analysis
Culver City Green Building Program	Requires all new buildings of 10,000 or more of gross floor area to install 1kW of solar photovoltaic systems per 10,000 square feet of gross floor area	No Conflict. The Project would consist of approximately 502,331 sf of new floor area construction and would install a solar electric PV system in accordance with the City's Green Building Code Solar Ordinance as part of Project Design Feature GHG-PDF-1.35.
	Requires all new construction, additions, and major renovations of 50,000 square feet and greater of affected area to comply with Category 2 requirements, excluding single family and two family structures, where prior to the issuance of a construction permit, the permit applicant shall submit the following: 1. Evidence that a LEED-AP (Leadership in Energy and Environmental Design Accredited Professional) is one of the members of the project design team. 2. Evidence that the project has been registered with the appropriate USGBC (United States Green Building Council) LEED program. 3. A copy of the appropriate LEED checklist, which demonstrates that the project meets the appropriate LEED rating system at a "Certified" performance level or higher. 4. A signed declaration from the LEED-AP member of the project design team, stating that the plans and details have been reviewed for conformance with the appropriate LEED program and that the project meets the intent of the criteria for certification of the selected LEED program at the "Certified" performance level or higher. 5. Qualifying projects shall comply with a USGBC "3 point margin of error" for a minimum LEED "Certified" performance level. 6. The construction permit applicant shall submit to the Building Safety Division copies of all submissions and correspondence between the project team and the USGBC regarding the qualifying project.	No Conflict. The Project would provide evidence that a LEED-AP (Leadership in Energy and Environmental Design Accredited Professional) is one of the members of the Project design team. The Project would provide evidence that the project has been registered with the appropriate USGBC LEED program. The Project would be designed to meet criteria for the LEED Silver or equivalent certified level. The Project would provide a signed declaration from the LEED-AP member of the Project design team, stating that the plans and details have been reviewed for conformance with the appropriate LEED program and that the project meets the intent of the criteria LEED Silver or equivalent certified level. The Project applicant will submit to the Building Safety Division copies of all submissions and correspondence between the Project team and the USGBC.

NOTE:

[a] This table lists applicable City of Culver City requirements for Category 2 projects.

SOURCE: ESA, 2025.

[35] The exact size of the Project's solar electric PV system has not yet been determined, so the analyses conservatively do not /account for electricity reductions due to the Project's solar electric PV system.

Therefore, as shown in Tables 12, 13, and 14 above, the Project would not conflict with applicable GHG plans, policies and regulations adopted for the purpose of reducing GHG emissions, and as such, impacts regarding GHG emissions and reduction plans would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to greenhouse gas emissions would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.8 Hazards and Hazardous Materials

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Hazards and Hazardous Materials: Would the project:				
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	No	Less than Significant	N/A
(b) Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	Less than Significant	No	Less than Significant	N/A
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than Significant	No	Less than Significant	N/A
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than Significant	No	Less than Significant	N/A
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No	No Impact	N/A
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant	No	Less than Significant	N/A
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less than Significant	No	Less than Significant	N/A

a) Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact Determination in the Certified PEIR

The Certified PEIR determined that future development that will occur under the General Plan 2045 and Zoning Code Update could involve demolition of older buildings that contain asbestos containing materials and lead based paint. In addition, operation of future development could increase the amount of hazardous materials being transported, used, and stored in the city. However, the construction and operation of future development will comply with applicable regulations set forth by Culver City, USEPA, Occupational Safety and Health Administration (OSHA), Department of Toxic Substances Control (DTSC), Caltrans, SCQAMD, and other agencies. The City will review development applications for subsequent development under the Project for compliance with the applicable regulations, policies of the General Plan 2045, and the City's Municipal code. Therefore, the General Plan 2045 and Zoning Code Update will result in a less than significant impact related to the routine use, transport, or disposal of hazardous materials.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Construction of the Project would not involve the routine transport of hazardous materials to and from the Project Site. During demolition, excavation, on-site grading, and building construction, hazardous materials such as paint, petroleum, adhesives, surface coatings, solvents and other finishing materials, and cleaning agents, fuels, and oils could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. As such, construction of the Project would not involve the routine transport or disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, there are regulations aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would be in full compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act (RCRA), Hazardous Materials Transportation Act (HMTA), California Hazardous Waste Control Law, federal and state Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by the Culver City Building and Safety Division. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial and residential uses, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently occurring on the Project Site and other nearby developments. As a mixed-use commercial and residential development, the Project would not involve the routine transport, use, and disposal of large quantities of hazardous materials. The Project's limited use of common hazardous materials can typically be disposed of at Class II or III landfills, which accept most common waste materials, such as those identified above. In addition, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state, and local requirements.

Based on the above, with compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project's impact associated with the routine transport, use, or disposal of hazardous materials during construction and

operation of the Project would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact Determination in the Certified PEIR

Future development under the General Plan 2045 and Zoning Code Update will be required to comply with applicable regulations and General Plan 2045 policies during construction activities, which will ensure that future development will not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment. In addition, all new development will be required to comply with applicable regulations for hazardous materials adopted by USEPA, OSHA, DTSC, Caltrans, California Highway Patrol (CHP), SCAQMD, and other agencies. Therefore, the General Plan 2045 and Zoning Code Update will result in a less than significant impact related to accident and upset conditions.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

During Project construction, hazardous materials in the form paint, petroleum, adhesives, surface coatings, solvents and other finishing materials, could be used, and therefore, would require proper handling and management and, in some cases, disposal. The use, handling, storage, and disposal of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. However, as previously discussed in Threshold a), all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, as outlined in the Certified PEIR, the Project would comply with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials.

The Phase I Environmental Impact Assessment (ESA) prepared for the Project Site and included as Appendix H of this document details that a permit for the removal of a 10,000-gallon gasoline storage tank was provided for the Project Site in 1983. It is unknown whether the tank was an above-ground or an underground storage tank (UST). The Phase I ESA also indicates that the Project Site was permitted for a

280-gallon chlorinated and halogenated hydrocarbon storage tank and degreaser in 1982. According to the Phase I ESA, no historic or controlled Recognized Environmental Conditions (RECs) are known to occur at the site in consideration of the Project's Site former on-site uses, including the above referenced tanks. Nonetheless, as with most tanks, there is the potential for subsurface contamination to occur in and around the tank areas, although no known contamination has occurred. If an UST were to be encountered during construction activities, materials around the UST would be removed in accordance with applicable regulatory requirements, such as SCAQMD Rule 1166 as well as Culver City Fire Code requirements. For example, if USTs are encountered, applicable permits would be obtained from the Culver City Fire Department (CCFD) prior to removal and to ensure that handling and removal are carried out in accordance with applicable standards. Also, as part of standard construction practice, in the event that contaminated soils are suspected or encountered during construction, soils would be tested to determine the nature and extent of the contamination and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulations. Furthermore, as part of standard construction practices, soil is routinely tested for contaminants to ensure removed soils meet the disposal requirements of the receiving construction and demolition (C&D) facility or construction site. In addition, Project construction activities would occur in accordance with City grading permit regulations. Implementation of regulations such as SCAQMD 1166 and City grading permit regulations as well as CCFD oversight would ensure handling and removal in accordance with regulatory standards and, as such, USTs and/or contaminated soils would not pose a significant hazard to the public or the environment.

In addition, due to the age of the existing buildings, there is the potential for asbestos-containing material (ACM) and lead-based paint (LBP) to be encountered. State-level agencies, in conjunction with the USEPA and California Occupational Safety and Health Administration (Cal/OSHA), regulate removal, abatement, and transport procedures for ACM. ACM is regulated under state regulations including CCR, Title 8, Division 1, Chapter 4, Article 4, Sections 1529 and 5208. The Project would also comply with the requirements of SCAQMD Rule 1403 if ACM is found during the renovation and construction activities. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations and medical evaluation and monitoring is required for employees performing activities that could expose them to asbestos. Additionally, the regulations include warnings that must be heeded and practices that must be followed to reduce the risk for asbestos emissions and exposure. Finally, federal, state, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos.

The demolition of buildings containing LBPs is subject to a comprehensive set of California regulatory requirements[36] that are designed to ensure the safe handling and disposal of these materials. Cal/OSHA has established limits of exposure to lead contained in dusts and fumes, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, particularly since demolition workers are at greatest risk of adverse exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code. In the event that ACM and/or LBP is discovered during demolition, impacts would be less than significant through remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences. Therefore, based on

[36] See Title 17, California Code Of Regulations, Division 1, Chapter 8, Accreditation, Certification, and Work Practices, For Lead-Based Paint and Lead Hazards, Sections 35001 to 36100. See also California Code of Regulations, Title 8, Section 1532.1. Lead.

all of the above factors, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

c) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Determination in the Certified PEIR

The Certified PEIR determined that, while future development under the General Plan 2045 and Zoning Code Update may involve hazardous emissions or the handling of hazardous materials and wastes within one-quarter mile of an existing or future school, any such development will be required to comply with existing federal, State, and local regulations related to hazardous materials, which will ensure that hazardous materials requirements are met prior to construction and that hazardous materials would be properly stored, managed, and disposed of. Therefore, impacts would be less than significant related to emitting hazardous materials within one-quarter mile of a school.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts by emitting hazardous emissions or handling hazardous materials, substance or waste within a quarter mile of an existing or proposed school, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

La Ballona Elementary School is located north of the Project Site across Washington Boulevard, within 0.25 miles of the Project Site. Construction of the Project could involve the temporary use of hazardous substances such as paint, petroleum, adhesives, surface coatings, solvents and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions, as discussed in Threshold a). Similarly, the types and amounts of hazardous materials used during operation of the Project would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Furthermore, all 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 OSHA requirements. As such, the use of such materials would not create a significant hazard to any nearby existing or proposed schools. Thus, impacts would be less than significant in this regard and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

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

Impact Determination in the Certified PEIR

The Certified PEIR acknowledged that within the Planning Area there are known contaminated properties, some of which have been remediated and some that are undergoing remediation, and other properties could be added if contamination is discovered. Thus, future development allowed under the General Plan 2045 and Zoning Code Update could occur on a contaminated site. However, any development on a contaminated site will be required to comply with applicable mandatory regulations, which will ensure that the development does not create a significant hazard to the public or the environment. Therefore, impacts related to hazardous materials sites would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts due to hazardous materials sites, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

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

Neither the Project Site nor any adjacent sites are on the Cortese List or the Envirostar database. However, the Phase I ESA prepared for the Project Site obtained a database search report, which is included in Appendix B of the Phase I ESA (Appendix H of this document). The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases

of hazardous materials or petroleum hydrocarbons. According to the Phase I ESA, the Project Site is listed on Hazardous Waste Tracking System (HWTS), the Facility and Manifest Data (HAZNET), the Resource Conversation Recovery Act (RCRA) Small Quantity Generator (SQG) and the California Environmental Reporting System (CERS) regulatory agency databases related to the use, storage, or release of hazardous materials by onsite tenants. The Project Site is listed for the disposal of oxygenated and halogenated solvents in the mid to late 1980s; organic aqueous solutions and latex waste in the late 1990s; and unspecified solvents, polymeric resin waste, acid liquids, liquids with halogenated organic compounds, and photochemical and photo processing waste throughout the 1990s. However, while the Project Site is listed on these agency databases, the Phase I ESA did not identify any RECs, Historic RECs, or Controlled RECs associated with the Project Site. As detailed above in Threshold b), in the event that contaminated soils were to be suspected or encountered during construction, including those associated with USTs, soils would be tested as part of standard construction practices to determine the nature and extent of the contamination and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulations. Furthermore, as part of standard construction practices, soil is routinely tested for contaminants to ensure removed soils meet the disposal requirements of the receiving C&D facility or construction site. Project construction activities would occur in accordance with applicable SCAQMD (i.e., Rule 1166), Culver City Fire Code, and City grading permit regulations. Implementation and compliance with applicable regulations as well as CCFD oversight would ensure handling and removal of any contaminated soil do not pose a significant hazard to the public or the environment. This is consistent with the Certified PEIR which, as noted above, states that there are contaminated properties within the Planning Area. The Certified PEIR determined that impacts related to hazardous materials would be less than significant as any development on a contaminated site will be required to comply with applicable mandatory regulations.

The Phase I ESA regulatory agency database search also indicated the presence of 220 regulatory and other database listings for properties located within an approximate one-mile radius of the Project Site. As detailed within the Phase I ESA, all sites within a 0.25-mile upgradient of the Project Site, or otherwise judged to be of potential impact to soil, soil vapor, or groundwater quality at the Project Site, were determined to not likely represent a significant potential hazardous impact to the Project Site. Thus, impacts regarding this threshold would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact Determination in the Certified PEIR

Impacts related to airport safety hazards were evaluated in the Initial Study prepared as part of the Certified PEIR, and it was determined that no impacts would occur given that there are no airport land use plans or public airports within the Planning Area.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to airport safety hazards, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is not located within the vicinity of a private airstrip, heliport, or helistop or within an airport land use plan or within 2 miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately 2.2 miles northwest and 3.9 miles south of the Project Site, respectively. The Project Site is not located within the airport land use plan areas for either LAX or the Santa Monica Municipal Airport. Therefore, the Project is not located within an airport land use plan area and would not result in airport-related safety hazards or excessive noise for people residing or working in the Project area. Thus, the Project would have no impact in this regard, consistent with the impact findings of the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

f) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact Determination in the Certified PEIR

The Certified PEIR determined that continued growth and development associated with implementation of the General Plan 2045 and Zoning Code Update has the potential to strain the emergency response and recovery capabilities of federal, State, and local governments. However, the Los Angeles County Operational Area Emergency Response Plan provides the framework for responding to major emergencies or disasters. In addition, the City's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) provides a strategy for reducing the City's vulnerability to the impacts of natural hazard events such as earthquakes, flood, and wildfire. The General Plan 2045 contains policies that aim to continually strengthen emergency response and would not interfere with implementation of the MJHMP or of agencies that respond in the event of a disaster or major emergency in Culver City. Therefore, impacts related to impairment or interference with an emergency response plan would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts that would impair or interfere with an emergency response plan, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is located in an established urban area that is well served by a roadway network. While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would be maintained. In these instances, the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with Culver City requirements, the Project would develop a Construction Traffic Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access or impair the implementation of or physically interfere with the City's emergency response plan. As such, the Project's impact related to the implementation of the City's emergency response plan during construction would be less than significant.

Project operation would generate traffic in the Project vicinity and would result in some modifications to access (i.e., new curb cuts for project driveways) from the streets that surround the Project Site. However, emergency access to the Project Site and surrounding area would continue to be provided similar to existing conditions. Emergency vehicles and fire access for the Project Site would be provided at grade access from Washington Boulevard. Additionally, fire lanes are provided around most of the perimeter of the Project as well as via the central paseo, and a new fire access gate will be installed at the end of Milton Avenue. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons and employees. Subject to review and approval of Project Site access and circulation plans by the CCFD, the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. Since the Project would not cause significant impediments along any designated emergency evacuation routes, and the proposed mix of uses would not impair implementation of Culver City's emergency response plan, the Project would have a less than significant impact with respect to these issues, and the impacts would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

g) Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Impact Determination in the Certified PEIR

The Certified PEIR found that the majority of the Planning Area is not within a Very High Fire Hazard Severity Zone (VHFSZ) but that the eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods and areas within West Los Angeles College and the IOF are within a VHFHSZ. However, future development that will occur under the General Plan 2045 and Zoning Code Update will be required to adhere to building and fire codes and review by the CCFD to reduce fire hazards. Compliance with applicable requirements and review by CCFD will ensure that people or structures are not exposed,

either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, impacts would be less than significant related to wildland fire hazards.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to wildfire, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is not located in an area of moderate or very high fire hazard.[37] As stated in the Certified PEIR, the nearest VHFHSZ is located in Baldwin Hills, approximately 1.3 miles east of the Project Site. In addition, the Project Site is not located in or near a State Responsibility Area.[38,39] As the Project would involve redevelopment of an infill site within an urbanized area that is not proximate to wildlands or high fire hazard areas, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to hazards and hazardous materials would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

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

[38] California Board of Forestry and Fire Prevention, State Responsibility Area Viewer, https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1. Accessed December 23, 2024.

[39] The State Responsibility Area (SRA) is an area where the state has financial responsibility for wildland fire protection and prevention. All of the land within the State Responsibility Area is classified as being in a Moderate, High or Very High Fire Hazard Severity Zone. Information provided by CAL FIRE 2024 FAQ Page, dated December 18, 2024. Cal Fire, https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/2024-fhsz-faqs_english.pdf?rev=538374a27bb44bbab4c2786ff2eafb39&hash=AD4DB78. Accessed February 26, 2025.

3.9 Hydrology and Water Quality

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Hydrology and Water Quality: Would the project:				
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than Significant	No	Less than Significant	N/A
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than Significant	No	Less than Significant	N/A
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site;	Less than Significant	No	Less than Significant	N/A
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	Less than Significant	No	Less than Significant	N/A
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than Significant	No	Less than Significant	N/A
(iv) impede or redirect flood flows?	Less than Significant	No	Less than Significant	N/A
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant	No	Less than Significant	N/A
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant	No	Less than Significant	N/A

a) Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact Determination in the Certified PEIR

The Certified PEIR indicated that the City is generally a developed, urban environment with limited vacant parcels, where the sources and types of stormwater pollutants are typical of an urban setting. Under the General Plan 2045 and Zoning Code Update, an increase in impervious surfaces could occur, which could increase the amount of urban pollution in storm water runoff. In addition, other pollutant sources from past uses and disposal practices as well as chemicals and fertilizers applied to landscaping could result. Construction and operation of future development will comply with applicable laws, regulations, and standards related to water quality and waste discharge, including the General NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering Permit No. CAG994004, the Permit Order No. R4-2018-0125 issued by LARWQCB, and the Los Angeles MS4 Permit No. Order No. R4-2021-0105/ NPDES Permit No. CAS004004, as may be updated over time. In addition, future projects will comply with policies in the General Plan 2045 and requirements related to water quality of the CCMC. Therefore,

impacts related to violating water quality standards or waste discharge requirements are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to violating water quality standards or waste discharge requirements, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Surface Water Quality

Construction

In California, the NPDES stormwater permitting program is administered by the SWRCB through its nine Regional Water Quality Control Boards (RWQCBs). This NPDES permit, referred to as General Permit for Stormwater Discharges from Construction Activities by the SWRCB, establishes a risk-based approach to stormwater control requirements for construction projects.

The SWRCB adopted this General Permit for Stormwater Discharges from Construction Activities on September 2, 2009 (Order No. 2009-0009-DWQ, General NPDES Permit No. CAS000002) and amended the permit on July 17, 2012 (Order Nos. 2010-0014-DWQ and 2012-0006-DWQ). The Construction General Permit regulates construction activity, including clearing, grading, and excavation of areas one acre or more in size, and prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance, unless a separate NPDES permit has been issued for those discharges. For all construction activities disturbing one acre of land or more, California also mandates the development and implementation of SWPPP. The SWPPP documents the selection and implementation of BMPs to prevent discharges of water pollutants to surface or groundwater. The SWPPP also charges owners with stormwater quality management responsibilities. The developer or contractor for a construction site subject to the General Permit must prepare and implement a SWPPP that meets the requirements of the General Permit.

During construction of the Project, per the NPDES Construction General Permit, the Project would be required to implement a SWPPP that includes BMPs to reduce pollutants in stormwater runoff from the Project Site. The BMPs would adhere to the California Stormwater Quality Association BMP Handbook and would include, but not be limited to, use of sandbags, storm drain inlets protection, stabilized construction entrance, wind erosion control, and stockpile management to minimize the discharge of pollutants in stormwater during construction. All construction activities would occur in accordance with City grading permit regulations contained in the CCMC.

With the implementation of site-specific BMPs included as part of the SWPPP and implementation of standard construction practices, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements. Therefore, construction-related impacts on any surface water quality would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Operations

Stormwater discharge is generated by rainfall that runs off the land and impervious surfaces, such as paved streets, parking lots, and rooftops. If stormwater discharge includes pollutants of concern (which could be generated by the Project), stormwater quality can be affected. During Project operation, pollutants of concern within stormwater runoff may include, but are not limited to, pollutants such as sediment, nutrients, pesticides, metals, pathogens, oil and grease, and trash. This stormwater runoff can flow directly into storm drains and continue untreated. Untreated stormwater runoff degrades water quality in surface waters and groundwater and can affect drinking water, human health, plant and animal habitats, and the water quality in off-site drainages and surface water bodies such as Ballona Creek.

CCMC Section 5.05.040.A requires the implementation of Low impact Development (LID) and Standard Urban Stormwater Mitigation Plan (SUSMP) strategies outlining pollution prevention control requirements during operation for projects meeting specified size and/or redevelopment criteria to mimic predevelopment hydrology through infiltration, evapotranspiration and rainfall harvest and use.

The Project is also required to comply with County and City LID requirements, which require implementation of a stormwater treatment system that captures the 85th percentile runoff volume for treatment. The Hydrology Technical Memorandum prepared for the Project by KPFF, dated March 7, 2025 (included as Appendix I), concluded that impervious surfaces on the Project Site would be reduced from 91 percent impervious under existing conditions to 89 percent impervious under the Project. Due to the decrease in impervious area, the Project is anticipated to decrease runoff volumes, and thus the demand on the surrounding storm drain infrastructure would be reduced. It is preliminary proposed to use a capture and reuse system to treat and infiltrate the 85th percentile, 24-hour volume storm runoff. All site and building runoff will be captured and directed to the stormwater collection system, where the 85th percentile storm event runoff will be captured, treated and reused on-site for drip irrigation. Any overflow stormwater runoff beyond the required treated volume will be discharged into Milton Avenue, which is then ultimately routed to a catch basin along Harter Avenue. The final design and location of the rainwater capture and use system would be subject to review and approval by the City of Culver City Department of Public Works.

Source control measures per the City's LID requirements, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and proper use and storage of pesticides, would also reduce surface water quality impacts and would prevent pollutants from entering the surface water flow system, as well as to groundwater by percolation within landscaped areas. Any on-site use of hazardous materials to be used in association with operation of the Project, such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping, as well as fuel storage associated with maintenance and/or emergency equipment, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, such that no hazardous materials are exposed to or otherwise would adversely impact groundwater quality.

Due to the incorporation of the required LID system and BMPs, operation of the Project would not result in discharges that would cause (1) pollution which would alter the quality of the waters of the State (e.g., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree that creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health, affect an

entire community or neighborhood, or any considerable number of persons, and occurs during or as a result of the treatment or disposal of wastes.

Furthermore, the existing Project Site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance requirements. The existing Project Site currently does not implement BMPs and has no significant means for use or treatment of stormwater runoff. Therefore, with implementation of the LID BMPs, the Project would substantially improve the quality of stormwater runoff discharged from the Project Site. Accordingly, operation of the Project would not result in discharges that violate any water quality standards or waste discharge requirements. Therefore, impacts resulting from Project operation would be less than significant with respect to surface water quality and groundwater quality and within the scope of impacts analyzed in the Certified PEIR.

Groundwater Quality

Construction

As described above, excavation would occur to a depth of approximately 13 feet bgs for the lowest foundations. As described in the Geotechnical Investigation prepared for the Project (Appendix F), groundwater was encountered during exploration at a depth of 27 feet below the existing grade. The historically highest groundwater level for the Project Site is mapped at a depth of 20 feet below the ground surface. Based on historic groundwater levels in the Project Site vicinity and the depth of proposed construction, groundwater is not expected to be encountered during construction. However, in the unanticipated event that groundwater seepage were to occur within any of the deeper excavations, dewatering would be conducted in accordance with General NPDES Permit No. CAG994004, in which the developer must submit a Notice of Intent (NOI) to discharge groundwater generated from dewatering operations during construction in accordance with the requirements of the NPDES permit. Dewatering operations are practices that discharge groundwater that must be removed from a work location into the storm drain system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. Temporary pumps and filtration would be utilized in compliance with the NPDES permit. If dewatering is required, the treatment and disposal of the dewatered water would, therefore, occur in accordance with the requirements of LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

Although not anticipated, should grading and excavation encounter the presence contaminated soils, there could be a potential to impact groundwater quality. In the event that contaminated soils were to be encountered during construction, soils would be tested to determine the nature and extent of the contamination and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulations. In addition, Project construction activities would occur in accordance with City grading permit regulations. Furthermore, as part of standard construction practices, soil is routinely tested for contaminants to ensure removed soils meet the disposal requirements of the receiving C&D facility or construction site. With the removal of any potential contaminated soils and/or materials, grading and excavation activities would not pose a significant hazard to groundwater quality. Therefore, construction-related impacts on groundwater quality would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Operation

The Project does not include the installation or operation of water wells or any extraction or recharge system that is in the vicinity of the coast, within an area of known groundwater contamination or seawater intrusion, in proximity to a municipal supply well, or within a spreading ground facility.

Operational activities that typically affect groundwater quality include spills of hazardous materials and leaking USTs. Surface spills from the handling of hazardous materials at non-industrial sites most often involve small quantities that are removed in a timely manner, thereby resulting in little effect on groundwater, and, as mentioned above, the Project would comply with all applicable regulations regarding hazardous materials. Other types of risks such as leaking USTs have a greater potential to affect groundwater. However, no USTs would be installed as part of the Project. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirement. As such, operation-related impacts on groundwater quality would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Impact Determination in the Certified PEIR

The Certified PEIR determined that future development under the General Plan 2045 and Zoning Code Update would increase the demand for water, which in turn could lead to groundwater pumping. The City's water service is provided by the Los Angeles Department of Water and Power (LADWP) and the Golden State Water Company (GSWC). Since the groundwater supply used by the City's water providers is regulated, there are limits on the amount of groundwater each provider can pump for potable use, and for this reason, the potential for overdraft is limited. Additionally, neither of the water providers rely soley on groundwater to service the Planning Area and would be able to utlize other sources of potable water to supplement a decrease in the amount of available groundwater, if needed. Therefore, implementation of the General Plan 2045 is not aniticipated to substnatially deplete groundwater supplies.

In regard to groundwater recharge, a substantial increase in impervious surfaces would limit future groundwater recharge. The General Plan 2045 and Zoning Code Update establishes land use designations that would encourage mixed uses and infill development, while maintaining existing parks and open space resources and expanding these resources. Therefore, future development under the General Plan 2045 and Zoning Code Update would not result in substantial increases of impervious surfaces such that groundwater recharge would be substantially hindered. Furthermore, the CBC regulates any development that requires grading to submit an engineering geology report, which would include information about existing groundwater supplies and potential impacts to groundwater supplies. Therefore, any future development under the General Plan 2045 subject to the CBC would be required to account for its potential groundwater use and implement appropriate water conservation measures (or other mitigating actions) if the potential

demand is projected to exceed the available supply. For these reasons, impacts were determined to be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to groundwater supplies, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is located in an urbanized area of the City and is currently developed with two commercial buildings and associated surface parking. As stated in the Hydrology Technical Memorandum (Appendix I), 91 percent (5.2 acres) of the Project Site is currently impervious. As such, the Project Site does not currently provide a substantial opportunity for recharge of groundwater. In contrast, with development of the Project, the impervious area of the Project Site would decrease to 89 percent (5.14 acres), which would serve to promote groundwater recharge and improve existing conditions. Furthermore, the Project does not propose to use groundwater or to develop long-term groundwater production wells, which would lead to decreased groundwater supplies. Given the temporary nature of construction activities, while some dewatering could be necessary during construction activities (although unlikely), such dewatering activities would not be of an extent that would substantially alter groundwater supplies given the shallow depth of excavation and the lower groundwater levels, and the treatment and disposal of the dewatered water would occur in accordance with the requirements of LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles County. Based on the above, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Thus, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

c) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on or off site;

Impact Determination in the Certified PEIR

The Certified PEIR determined that future development under the General Plan 2045 and Zoning Code Update could impact existing drainage systems. However, the Certified PEIR notes that the majority of the City is currently developed and new housing would primarily consist of infill development. Furthermore, future development would be required to comply with all applicable construction and operational laws,

regulations, and permits related to hydromodification and discharging into the City's sewer system, such as the Los Angeles County MS4 Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004), Los Angeles County LID Ordinance, the CCMC (Sections 5.05.010 and 5.05.040), and the City's SUSMP and SWQMP. Therefore, compliance with applicable regulations would ensure that impacts are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to altering the drainage pattern that would result in substantial erosion or siltation on or off site, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

No streams or rivers occur on or near the Project Site. As discussed above, the Project would decrease the amount of impermeable surface area on the Project Site from 5.2 acres (91 percent) to 5 acres (87 percent). Under existing conditions, during a 50-year storm event, runoff is 12.79 cubic feet per second (cfs). With the Project's decrease in impervious area, runoff from the Project Site during the 50-year storm event would be reduced to 12.76 cfs (see Appendix I of this document). Due to the decrease in impervious area and stormwater capture and reuse system, the Project would decrease runoff volumes, and thus the demand on the surrounding storm drain infrastructure would be reduced. Thus, no increase in offsite runoff would occur under the proposed Project conditions, consistent with City LID and SUSMP requirements.

Under existing conditions, the existing site gradient and stormwater runoff generally flows either southwest towards Washington Boulevard or southeast to a low point at the southeast corner of the site towards Milton Avenue. Once runoff has left the Project Site and is in the public right-of-way, it is directed via concrete gutters either along Washington Boulevard or Milton Avenue (and ultimately to Harter Avenue) until it enters the Culver City storm drain system through a curb opening catch basin.

Under the Project conditions, stormwater runoff from the Project Site would be entirely captured and treated by a rainwater capture and reuse system, as described above. Any overflow stormwater runoff would be discharged into Milton Avenue. As discussed above, once within Milton Avenue, drainage flows via the gutter until it enters the City storm drain system through a catch basin along Harter Avenue. Because the overall amount of offsite stormwater runoff would be reduced compared to existing conditions, and stormwater would continue to flow into the City's municipal storm drain system which would accommodate the runoff, the Project would not negatively alter the existing drainage pattern of the Project Site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces. As such, the Project would not result in substantial erosion or siltation on- or off-site, and impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;

Impact Determination in the Certified PEIR

The Certified PEIR determined that future development under the General Plan 2045 and Zoning Code Update could impact existing drainage systems. However, the Certified PEIR notes that the majority of the City is currently developed, and new development would primarily consist of infill development. Furthermore, future development would be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the City's sewer system, such as the Los Angeles County MS4 Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004), Los Angeles County LID Ordinance, the CCMC (Sections 5.05.010 and 5.05.040), and the City's SUSMP and SWQMP. Therefore, compliance to applicable regulations would ensure that impacts are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to altering the drainage pattern that would substantially increase the rate or amount of surface runoff, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

As previously discussed, construction activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As discussed above in Threshold a), the Project would implement a SWPPP that specifies BMPs and erosion control measures used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES General Construction Permit requirements and compliance with applicable City grading permit regulations, construction activities for the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. As such, construction-related impacts to hydrology would be less than significant, consistent with the Certified PEIR.

With respect to operations, as discussed above in Threshold c.i), the Project would decrease the amount of impermeable surface area on the Project Site from 5.2 acres (91 percent) to 5.14 acres (89 percent). The Project would include a rainwater capture and reuse system that captures the 85th percentile, 24-hour runoff volume for treatment consistent with the City's SUSMP and LID preferred stormwater management system priorities. Under existing conditions, during a 50-year storm event, runoff is 12.79 cfs. With the Project's decrease in impervious area and stormwater system, runoff from the Project Site during the 50-year storm event would be reduced to 12.76 cfs (see Appendix I). Thus, no increase in offsite runoff would occur under the proposed Project conditions, consistent with City LID and SUSMP requirements. Flows would continue to be accommodated by the existing stormwater treatment and conveyance system. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in

flooding on- or off-site. Thus, Project impacts would be less than significant and would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Impact Determination in the Certified PEIR

The Certified PEIR determined that future development under the General Plan 2045 and Zoning Code Update could impact existing drainage systems. However, the Certified PEIR notes that the majority of the City is currently developed, and new development would primarily consist of infill development. Furthermore, future development would be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the City's sewer system, such as the Los Angeles County MS4 Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004), Los Angeles County LID Ordinance, the CCMC (Sections 5.05.010 and 5.05.040), and the City's SUSMP and SWQMP. Therefore, compliance to applicable regulations would ensure that impacts are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to altering the drainage pattern that would create or contribute runoff water that would exceed the capacity of stormwater drainage systems or provide substantial additional sources of polluted runoff, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

As discussed in Threshold c.i), the Project would reduce stormwater runoff compared to existing conditions from 12.79 cfs to 12.76 cfs during a 50-year storm event. Additionally, flows would be accommodated by the proposed rainwater capture and reuse system, which would capture the 85th percentile, 24-hour storm event consistent with the City's SUSMP and LID requirements. In addition, as discussed under Threshold a), the implementation of BMPs required by the City would target the pollutants that could potentially be carried in stormwater runoff. As such, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, with the incorporation of the proposed stormwater capture and reuse system and LID BMPs, operation of the Project would not create or contribute to runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Thus, Project impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

iv) impede or redirect flood flows?

Impact Determination in the Certified PEIR

The Certified PEIR determined that future development under the General Plan 2045 and Zoning Code Update could impact existing drainage systems. However, the Certified PEIR notes that the majority of the City is currently developed, and new development would primarily consist of infill development. Furthermore, future development would be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the City's sewer system, such as the Los Angeles County MS4 Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004), Los Angeles County LID Ordinance, the CCMC (Sections 5.05.010 and 5.05.040), and the City's SUSMP and SWQMP. Therefore, compliance to applicable regulations would ensure that impacts are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to impeding or redirecting flood flows, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is designated by the Federal Emergency Management Agency (FEMA) as an Area of Minimal Flood Hazard, and it is not located within a mapped flood zone, including the 100-year flood zone.[40] The Project Site is located in an urbanized area and there are no rivers, streams, or other water bodies (natural or urban) that could produce substantial flood flows on or through the Project Site. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or the area in a manner that would impede or redirect flood flows. As such, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

[40] Federal Emergency Management Agency, Flood Insurance Rate Map, Map Number 06037C1595G, Map Revised: December 2018. https://msc.fema.gov/portal/search?AddressQuery=10950%20washington%20boulevard%2C%20culver%20city%20CA. Accessed February 27, 2024.

d) In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to Project inundation?

Impact Determination in the Certified PEIR

The City, which is located approximately 1.5 miles inland from nearby coastal areas, is located outside of tsunami inundation zones. In addition, there are no enclosed large water bodies within the City with potential for seiche effects or waves generated by failure of retaining structures. Furthermore, the majority of the City is located outside of a flood hazard zone. Future development facilitated under the General Plan 2045 and Zoning Code Update will be required to comply with all applicable laws, regulations, and permits related to drainage and flooding hazards, which will reduce the risk of onsite flooding and release of pollutants. Therefore, compliance with existing regulations would ensure that impacts associated with release of pollutants from inundation by flood, tsunami, or seiche are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to risk of release of pollutants due to inundation from flood hazard, tsunami, or seiche, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

A seiche is a temporary disturbance or oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes.

As discussed in Threshold c.iv), the Project Site is mapped by FEMA as an Area of Minimal Flood Hazard. As such, the Project would have a less than significant impact related to risk of pollutants for a project within a flood hazard zone.

According to the County of Los Angeles Tsunami Hazards Area Map, the Project Site is not located within mapped tsunami inundation boundaries.[41] Therefore, the Project would not be subject to flooding hazards associated with tsunamis.

As provided in the Culver City Natural Hazards – Fire and Flooding Map, the Project Site (like other areas within the Planning Area studied in the Certified PEIR) is within the Stone Canyon Dam Inundation Zone.[42] However, a breach of the dam facilities is very unlikely. The Project Site is located approximately 6.8 miles away from the Stone Canyon Dam with a variety of development, hills, and terrain that would slow and limit any impacts of dam failures on the Project Site and surrounding area. In addition, the National Dam

[41] California Department of Conservation, CGS Information Warehouse: Tsunami Hazard Area Map, https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm_source=cgs+active&utm_content=losangeles. Accessed December 23, 2024.

[42] City Culver City, Natural Hazards – Fire and Flooding, February 1, 2007. https://www.culvercity.org/files/assets/public/v/1/documents/information-technology/maps/culver_city_natural_hazards_map.pdf. Accessed December 23, 2024.

Safety Act of 2006 authorized a program to reduce the risks to life and property from dam failure by establishing a safety and maintenance program. The program requires regular inspection of dams to reduce the risks associated with dam failures. Reservoir water, were it to reach the Project Site, would generally flow along roadways adjacent to or within the vicinity of the Project Site. Thus, during the unlikely failure of the dams, impacts regarding flooding hazards associated with seiches would be less than significant.

Based on the above, the Project would not result in the release pollutants due to inundation by flooding, tsunami, or seiche. Thus, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

e) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact Determination in the Certified PEIR

The Certified PEIR determined that future development under the General Plan 2045 and Zoning Code Update will not degrade water quality due to compliance with all applicable federal, state, regional and local water quality laws, regulations, and permits. The General Plan 2045 contains goals and policies that promote improved water quality and groundwater sustainability in the City, as well as continued compliance with state and local water quality regulations, which is intended to ensure that water quality and groundwater sustainability is managed to the maximum extent practicable. Future development will not interfere with or conflict with the Groundwater Sustainability Plan since the City is a member of the Santa Monica Basin Groundwater Sustainability Agency and the General Plan 2045 includes various implementation actions that support the Groundwater Sustainability Plan, including incentivizing and mandating stormwater infiltration where feasible and participating in regional coordination regarding aquifer recharge and sustainable groundwater supply. Thus, future development facilitated under the General Plan 2045 and Zoning Code Update will not conflict with the Santa Monica Subbasin Groundwater Sustainability Plan, and impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to a conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

As required by Section 303(d) of the Clean Water Act (CWA), the State and the Regional Water Boards assess water quality data for California's waters every two years to determine if they contain pollutants at levels that exceed protective water quality criteria and standards.[43] The LARWQCB most recently prepared a list of impaired waterbodies in the region as part of the 2024 assessment cycle. This list is referred to as the 303(d) list. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). The nearest water body to the Project Site that has been identified as an impaired water body is Ballona Creek, approximately 0.7 miles southeast of the Project Site. Impairment for Ballona Creek includes trash, toxic pollutants, bacteria, metals, and sediment.

As previously discussed, in terms of polluted runoff, the Project's proposed uses would be typical of residential and commercial uses and would not introduce substantial sources of polluted water that a use such as an industrial use would generate, for example. Moreover, the Project would also implement a rainwater capture and reuse system that would utilize stormwater for on-site drip irrigation, thus minimizing the potential for polluted runoff generated by the Project. With implementation of the rainwater capture and reuse system and LID BMPs, polluted runoff would be minimized under the Project Site. As such, the Project would not conflict with or obstruct any water quality control plans. No other water quality control plans or sustainable groundwater management plans would be affected by development of the Project. As such, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Construction

As discussed in the Certified PEIR, the Project Site falls under the jurisdiction of the LARWQCB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. The LARWQCB is also given authority to issue waste discharge requirements, enforce actions against stormwater discharge violators, and monitor water quality. In California, the NPDES stormwater permitting program is administered by the SWRCB and the local RWQCB, which in this area is the LARWQCB. In addition, the Project Site is located within the boundaries of Groundwater Basin 4-011.01, Coastal Plain of Los Angeles–Santa Monica.[44] The Sustainable Groundwater Management Act (SGMA) passed in 2014 requires local Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or to develop Alternatives to GSPs. GSPs provide a roadmap for how groundwater basins will reach long-term sustainability. The Coastal Plain of Los Angeles–Santa Monica, which is a medium-priority groundwater basin, requires the formation of a groundwater sustainability agency and GSP that includes objectives of maintaining groundwater quality.

As discussed in Threshold a), since the construction site would be greater than one acre, the Project would be required to obtain coverage under the NPDES Construction General Permit, which would be under the jurisdiction of the LARWQCB. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows, prevent pollution, and avoid on- or off-site flooding during construction. The NPDES Construction General Permit and SWPPP measures are designed to contain and treat, as necessary,

[43] State Water Resources Control Board, Impaired Water Bodies, https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html. Accessed December 23, 2024.

[44] California Department of Water Resources website, SGMA Basin Prioritization Dashboard. https://gis.water.ca.gov/app/bp-dashboard/final/, accessed February 27, 2024.

stormwater or construction watering on the Project Site, so runoff does not impact off-site drainage facilities or receiving waters with sediment or other pollutants. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion, control runoff from the construction site, and avoid on- and off-site flooding during the construction period. Compliance with the Construction General Permit and City grading permits during construction would prevent degradation of water quality, which would be consistent with the objectives of the Basin Plan and the GSP, resulting in a less than significant impact. As such, impacts would be within the scope of impacts analyzed in the Certified PEIR.

Operation

The County of Los Angeles and the City of Culver City are co-permittees under the Los Angeles County NPDES MS4 Permit and, as such, are required to implement development planning guidance and control measures regarding water quality impacts from new development.

The Los Angeles County MS4 Permit contains provisions for implementation and enforcement of stormwater management and includes a LID Plan that designates BMPs that must be used by projects to address water infiltration, filtering, treatment, and peak-flow discharge. The City of Culver City supports the requirements of the Los Angeles County MS4 Permit through the Culver City SUSMP and local regulations that provide guidance to developers of newly developed projects for compliance with regulatory standards. The Project is also within the jurisdiction of the Stormwater Quality Master Plan developed by Culver City, which includes descriptions of BMPs required by the City for stormwater quality management.

As discussed above, the Project would include a rainwater capture and reuse system, where runoff would be captured and utilized for on-site drip irrigation. This storm water capture system would be consistent with the LARWQCB's Basin Plan for the Coastal Waters of Los Angeles and Ventura Counties.

The Project's potential impacts regarding water quality are evaluated under Threshold a). As indicated in that analysis, since the existing Project Site currently does not implement BMPs and has no significant means for treatment of stormwater runoff, the Project would substantially improve the quality of stormwater runoff discharged from the Project Site. With the implementation of the Project's on-site storm water capture and use system, the Project would have less-than-significant impacts on both surface and groundwater quality during operation.

The Project's potential impacts regarding groundwater supplies and groundwater recharge are evaluated above under Threshold b).

Therefore, in conjunction with the implementation of necessary BMPs to support the applicable plans, the Project would not conflict with or obstruct implementation of a water quality control plan (e.g., the Basin Plan) or sustainable groundwater management plan (e.g., the GSP) during operation of the Project, resulting in a less than significant impact. As such, impacts would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to hydrology and water quality would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.10 Land Use and Planning

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Land Use and Planning: Would the project:				
(a) Physically divide an established community?	Less than Significant	No	Less than Significant	N/A
(b) 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?	Less than Significant	No	Less than Significant	N/A

a) Would the Project physically divide an established community?

Impact Determination in the Certified PEIR

The Certified PEIR determined that implementation of the General Plan 2045 and Zoning Code Update would improve connectivity and land use patterns within and between existing neighborhoods, thereby providing more linkages within the City and the region. Because the General Plan 2045 and Zoning Code Update provides strategies for thoughtful infill development and redevelopment and establishes a land use pattern that promotes a multi-modal network and pedestrian connectivity, the Certified PEIR determined that the General Plan 2045 and Zoning Code Update would not physically divide an established community. Therefore, impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to physically dividing an established community, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is currently developed with two commercial buildings, surface parking, and ornamental landscaping. The Project vicinity is urbanized and generally built out and is characterized by a mix of commercial, religious institution, educational, and residential uses and includes a fully developed roadway system. As such, the Project would represent redevelopment and infill development of an already fully developed site. Furthermore, the Project would not close any public streets or otherwise alter established infrastructure in the area. Rather, the Project would help improve the connectivity of the established community. The Project's street-facing landscaping, public plaza, and commercial uses will improve the walkability of the area and further activate Washington Boulevard. Moreover, the Project would encourage multiple modes of travel by providing EV parking spaces and bicycle parking spaces and by being located in close proximity to numerous public transportation stops. For all of these reasons, the Project would not physically divide an established community, and thus the impact would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Would the Project 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 Determination in the Certified PEIR

The Certified PEIR determined that the General Plan 2045 and Zoning Code Update will not conflict with California Government Code Section 65302, SCAG's 2020 RTP/SCS, the Complete Streets Act (AB 1358), the 2021-2029 Housing Element Update, Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan, the Culver City Bicycle & Pedestrian Action Plan, or the Culver City Urban Forest Master Plan. Thus, the General Plan 2045 and Zoning Code Update will not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to conflicts with a land use plan, policy, or regulation, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

As discussed below, the Project will not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect

State Planning Law

The Certified PEIR determined that the General Plan 2045 and Zoning Code Update would not conflict with California Government Code Section 65302. The Project is proposing the development of commercial and residential uses consistent with the types of uses envisioned for the Project Site under the General Plan 2045 and in furtherance of the goals and policies that were implemented to support the City's land use approach and vision. As such, no Project conflicts would occur with State Planning Law.

SCAG Connect SoCal 2024

As discussed in Section 3.7, *Greenhouse Gas Emissions*, the purpose of SCAG's 2020–2045 RTP/SCS per Connect SoCal 2024 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. Connect SoCal 2024 seeks future growth in Priority Development Areas (PDAs) to help the region reach mobility and environmental goals. Development in PDAs provides people with access to multiple modes of transportation and shorter trips since trip origins and destinations are closer together. As discussed Table 13, the Project Site is located within a TOC because it is located within 0.5 miles of the Sepulveda Boulevard & Venice Boulevard intersection and is within one of the four Key TPAs identified in Culver City's July 13, 2020 *Transportation*

Study Criteria and Guidelines. Additionally, various public transit stops operated by Metro, LADOT, and Culver City Bus are in proximity to the Project Site, which would provide convenient access to Project residents, employees and visitors. In addition, the Project would promote active transportation by improving bicycle and pedestrian infrastructure and supporting improvements in local bike networks given that the Project is located close to many Culver City bike paths, has a high bikeability score, and would meet the CMCC required number of bicycle parking spaces.[45] The Project would provide 154 bicycle parking spaces for residents, employees and visitors, including 24 short-term and 130 long-term spaces, in compliance with City codes. In addition, the Project would provide 10 commercial EV parking spaces (8 that are EV capable and 2 that have charging equipment) and 343 residential EV parking spaces (274 that are EV ready with receptacles and 69 that have EV chargers). The Project's EV parking would help support SCAG's GHG reduction goals and policies. Furthermore, the Project would implement strategies and action plans as part of a comprehensive TDM program (see TRAF-PDF-2) to reduce single occupancy vehicle trips while promoting the use of alternative transportation modes, thereby further reducing Project VMT. Overall, the integration of land uses on the Project Site and Project features discussed above would produce substantial reductions in automobile trips to and from the Project Site that would help the region accommodate growth and promote public transit ridership and alternative transportation modes that minimize GHG emission increases and reduce per capita emissions. Thus, the Project would not conflict with the goals/policies of the 2020-2045 RTP/SCS and would be within the scope of the Certified PEIR.

California Complete Streets Act Consistency

Assembly Bill (AB) 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), 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. The Certified PEIR determined that the General Plan 2045 and Zoning Code Update will not conflict with AB 1358 because the General Plan 2045 includes policies that support the City's efforts to implement the Complete Streets Act. The Project is not updating a local general plan, but is proposing the development of uses that would be consistent with the types of uses envisioned for the Project Site under the General Plan 2045. Additionally, the Project is aligned with the General Plan 2045's transportation-related goals and will not prevent the City from completing any of its Complete Streets projects. See Section 3.16, *Transportation*, for additional discussion. Thus, no Project conflicts would occur with the California Complete Streets Act.

Regional Housing Needs Assessment

The City recently adopted the 2021-2029 Housing Element Update, which is one of the State-mandated elements that must be included in the General Plan. State law stipulates that the Housing Element include certain items, such as a Housing Needs Assessment; goals, policies, and objectives regarding housing in City; and implementation programs to work toward achieving those goals. For the 6th Cycle Housing Element planning period of 2021 to 2029, the City received a RHNA allocation of 3,341 units. Per State mandate, the City must zone sufficient land for housing affordable to people at all income levels. The General Plan 2045 includes the land use and zoning amendments necessary to allow for the development of the residential units needed to meet the City's 6th cycle RHNA allocation. Here, the Project is consistent with the General Plan's land use designation, and the Project's inclusion of 508 residential units will help

[45] Bike Score for 10950 Washington Avenue, Available: https://www.walkscore.com/score/10950-washington-blvd-culver-city-ca-90232. Accessed December 2024.

the City meets its housing needs as included in the 6th cycle RHNA allocation. As such, no Project conflicts would occur with the City's Housing Element Update or the RHNA.

Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan

The Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) presents a strategy for reducing the City's and the Culver City Unified School District's (CCUSD) vulnerability to the impacts of natural hazard events such as earthquakes, flood, and wildfire. The MJHMP is a framework that guides the City in making decisions and developing policies to reduce or eliminate risk to life and property. The Certified PEIR determined that the General Plan 2045 and Zoning Code Update will not conflict with the MJHMP. The General Plan and the MJHMP are complementary planning documents that together achieve the goal of the reduction of risk exposure to residents within the Planning Area. No aspects of the Project would interfere with or conflict with implementing the emergency and evacuation planning policies included in the MJHMP.

Culver City Bicycle & Pedestrian Action Plan

The Culver City Bicycle & 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 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. 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 nonetheless support the Action Plan. Washington Boulevard is recommended to include a Class II Bike lane. The Project would not preclude the development of the contemplated bike lane along Washington Boulevard and rather would be compatible with such development given that the Project will include bicycle parking and storage places, both for project residents and the public. In addition to promoting bicycling as a mode of transportation, the Project will also encourage other modes of transportation by providing EV parking spaces and by being located in close proximity to numerous public transit options. The Project Site is also located in close proximity to various employment places, institutions, and local retail shops, which will allow residents to get to many places via a short walk or bicycle ride. Furthermore, the Project would support the Action Plan through the provision of an enhanced streetscape plan. The Project will incorporate ground floor landscaping, a public plaza with seating, and neighborhood-serving commercial uses that will all help enhance the pedestrian experience along Washington Boulevard. Those who live or work near the Project would also be able to take a short walk or bicycle ride to the Project to take advantage of these amenities rather than having to drive farther for similar options. The addition of a traffic signal connecting the Project Site to Prospect Avenue will also provide enhanced and convenient pedestrian access to the northern side of Washington Boulevard. Also, the Project's design would minimize the potential for collisions involving bicyclists and pedestrians along Washington Boulevard. To ensure maximum visibility, the Project's driveways would meet all of the City's access 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 driveways. Overall, the Project would not conflict with any of the applicable goals and actions of the Culver City Bicycle & Pedestrian Action Plan and thus would be within the scope of impacts analyzed in the Certified PEIR.

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 tree-lined 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, Washington Boulevard is recommended to include a Class II Bike lane. The UFMP recommends planting trees along bicycle routes 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, 11 street trees are located along Washington Boulevard and all other trees are located throughout 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 CCMC Section 9.08.215. Per the City's requirements, the Project is required to plant two new Street Right-of-Way trees or Parkway trees for each street 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 Washington Boulevard would be removed. This tree would either be re-planted or replaced along Washington Boulevard and an additional tree would be planted to comply with City street tree replacement requirements.

The Project's landscaping and trees would also enhance the pedestrian character along Washington Boulevard. Shade trees would be planted within the publicly accessible open space paseo accessed from Washington Boulevard. Because the Project would provide street trees in accordance with the UFMP palette and include a landscaped, publicly accessible, privately maintained open space area, it would not conflict with policies related to providing shade and wayfinding improvements within the designated (or proposed) bicycle routes shown in the UFMP along Washington Boulevard. Therefore, the Project would not conflict with UFMP policies adopted to avoid or mitigate an environmental effect and thus would be within the scope of impacts analyzed in the Certified PEIR.

City of Culver City Municipal Code

CCMC Section 17.220.015, Mixed Use District Land Uses and Permit Requirements, sets forth requirements of mixed use designated areas. The minimum site area for Mixed Use Medium Zoning is 20,000 sf or larger, which the Project Site exceeds at 250,932 gross sf. Per Section 17.220.020, no building or structure in the MU-MD 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 79 (21 percent of base density) of its residential units as 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 5 feet beyond the maximum allowable height as a development incentive for providing

affordable units. With this incentive, the Project would have maximum building heights of up to 61 feet to the top of the roof to accommodate grade changes.

With this height increase, no significant physical impact to the environment would occur. Refer to the Aesthetics section for a discussion of aesthetics impacts.

CCMC Section 17.220.020, Table 2-8, includes building setback requirements for the Mixed Use Medium zone. In addition to the Project's height and density incentives described above, the Project is requesting an incentive to provide relief from interior upper floor step backs requirement of the Mixed-Use Zoning District Development Standards where abutting an R1 or R2 parcel, which are 20 feet on rear yards if over 30 feet when adjacent to R1 or R2 zones. In addition, the Project is seeking waivers for relief from the minimum 15-foot non-residential ground floor height requirement, as the Project is proposing to provide ground floor commercial heights between 12' - 5" to 15' - 0". Also, the Project is seeking relief from the maximum 5-foot non-residential street facing setbacks requirement. That is, the Project is proposing varied setback along Washington Boulevard to provide increased public open space area and an active pedestrian streetscape. Aside from these incentives and waivers, the Project would follow the applicable development standards included in CCMC Section 17.220.020, Mixed-Use Zoning District Development Standards, which provides development standards such as those related to setbacks, open space, parking frontage, and other development standards. Approval of these project design features would not result in a significant effect on the environment, as analyzed throughout this CEQA document.

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. to 8:00 p.m. Mondays through Fridays; 9:00 a.m. to 7:00 p.m. Saturdays; and 10:00 a.m. to 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 excavation, hauling, and concrete phases of construction, which are expected to occur from approximately month 5 to month 11 of construction after the demolition activities are completed, as well as a 7:00 AM daily start on Sundays for the concrete-pouring portion of the concrete phase, which is expected to occur during approximately the first 40 days of the concrete activities during the 7th and 8th months of construction. The approximately four months of demolition activities prior to these phases and the remaining approximately 27 months after these 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 the Noise section below 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 document.

Based on the above, the Project will not conflict with the CCMC and thus is within the scope of the impacts analyzed in the Certified PEIR.

City of Culver City General Plan - Land Use and Community Design Element

Section 4.10, Land Use and Planning, in Certified PEIR did not specifically analyze impacts associated with future development projects consistency with applicable goals and policies of the Land Use and Community Design Element, however, such analysis is relevant to development of the Project. The General Plan's Land Use and Community Design Element (Element 4), designates the proposed distribution, location, and extent of different uses of land, and expresses community intentions regarding urban form and design. Goals and Policies within this Element seek to develop higher density/mixed uses near transit (Goals LU-1, Policy LU-1.1 to LU-1.3, Goal LU-8, Policy LU8.1); provide a diverse range of housing options (Goal LU-2, Policy LU-11.2); provide high quality, walkable development, with active street frontages and gathering spaces (Policy LU-2.6, Goal LU-3, Policy LU-8.2, Goal LU-15, Policy LU-15.1 to LU-15.5, Policy LU-15.7); provide attractive, pedestrian-oriented, human-scale and well-landscaped streets and civic spaces throughout the city for all ages and abilities (Goal LU-14, Policy LU-14.1 to Policy LU-14.9); and provide sustainable landscape design (Goal LU16, Policy LU-16.1 to LU16.6).

As described above, the Project includes 508 residential units, and 14,087 sf of commercial uses. These proposed uses would be consistent with the types of uses envisioned under the General Plan 2045, and would be within the projections analyzed therein. The Project would be consistent with the General Plan land use designation and zoning of the Project Site, which is Mixed Use Medium, and allows for 65 du/acre, a maximum nonresidential FAR of 3.0:1 and a broad range of mixed use, residential, and commercial uses. The Project would have a FAR of 2.0:1. The Project is proposing to include 79 units (21 percent of its allowed base density of 375 units based on 65 du/acre allowed by Mixed-Use Medium designation per City's Land Use Element) of its residential units as Low Income affordable units. By doing so, consistent with the CCMC, State Density Bonus Law (Gov't Code §65915) and AB 2345, the Project is entitled to receive development incentives including a height increase. The Project is requesting a height increase of 5 feet beyond the maximum allowable height as a development incentive for providing affordable units. With this incentive, the Project would have maximum building heights of up to 61 feet to the top of the roof to accommodate grade changes.

As summarized in Table 2-4, *General Plan 2045 Projections by Land Use*, in Section 2.0*, Project Description*, of the Certified PEIR, the General Plan 2045 allows for a net increase of 12,700 units for residential, 3,332,000 sf for commercial uses, 364,800 sf for industrial uses, and no net change for institutional uses. The total projected housing units included new infill, accessory dwelling units, housing on opportunity sites, pipeline projects, and existing residential units to remain. The Project would be considered an infill site and would be well within the City's growth projections.

Consistent with the applicable policies of the General Plan, the Project would provide a mix of uses at a density envisioned for the Project Site in the General Plan, which concentrates development within a TOC area that access to multiple alternative transportation options. The Project includes 79 units (21 percent of base density) as Low Income affordable units. The Project's housing units would range in size and would include studio, one-bedroom and two-bedroom units, thereby providing multiple housing opportunities for members of the community. The commercial uses would include retail, which would contribute to the economic diversity within the City. The Project would activate Washington Boulevard by providing ground floor retail uses, aesthetic treatments on building facades, landscaping, street trees, lighting, seating areas and a landscaped publicly accessible paseo creating a place for gathering and community along Washinton Boulevard. Finally, the Project is intending to incorporate sustainable design features equivalent to LEED

Silver standards or better. As it relates to landscaping and 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, as well through the use of drought tolerant plant species. All landscaping would be subject to review and approval by the City confirm compliance with applicable policies and regulations.

Overall, as demonstrated throughout this document and as discussed above, 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 and within the scope of impacts analyzed in the Certified PEIR.

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 Project's impact would be less than significant, consistent with the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to land use and planning would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.11 Mineral Resources

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Mineral Resources: Would the project:				
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	Less than Significant	No	No Impact	N/A
(b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	Less than Significant	No	No Impact	N/A

a) Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Impact Determination in the Certified PEIR

The Certified PEIR indicates that there are no aggregate or other mineral resource (shale, diatomite, clay or gypsum) mines within the Planning Area, and the Planning Area is not known to contain sand or gravel deposits of any economic importance. As such, the General Plan 2045 and Zoning Code Update would have no impact to aggregate mineral resources. Regarding oil and gas resources, the IOF is located within the City of Culver City and the unincorporated area of Los Angeles County known as Baldwin Hills. The current active IOF boundary is approximately 1,000 acres, of which 100 acres are located within the City of Culver City. While there is ongoing oil and gas production within the City's portion of the IOF, the City adopted the Oil Termination Ordinance, which requires the closure of the City's portion of the IOF. The General Plan 2045 and Zoning Code Update will not change the existing open space land use designation for the IOF that lies within the Planning Area. This designation, which allows open space, recreational, and/or park development, will ensure the presence and access to the existing oil and gas deposits will remain. Therefore, the General Plan 2045 and Zoning Code Update will not result in the loss of the regionally or locally important oil and gas resources. Thus, impacts to mineral resources would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to mineral resources, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The closest oil field to the Project Site is the IOF, which is located approximately 1.2 miles east of the Project Site. The Project Site is located in an urbanized area and is currently developed with two commercial

buildings and associated asphalt-paved surface parking lot and landscaping. As such, the potential of uncovering mineral resources during Project construction is considered low. The nearest oil well to the Project is an idle well located approximately 0.4 mile east of the Project Site.[46] Therefore, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents, nor would it result in the loss of a known mineral resource delineated on a local general plan, specific plan, or other land use plan, given that there are no known mineral resources or mineral resource recovery sites on or near the Project Site. Thus, no impact would occur, and the impacts would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to mineral resources would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

[46] California Department of Conservation, Geologic Energy Management Division's (CalGEM), Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.38745/34.02621/15. Accessed February 22, 2024.

3.12 Noise

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Noise: Would the project result in:				
(a) 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?	Significant and Unavoidable	No	Significant and Unavoidable	Yes
(b) Generation of excessive groundborne vibration or groundborne noise levels?	Significant and Unavoidable	No	Significant and Unavoidable	Yes
(c) 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?	No Impact	No	No Impact	N/A

a) Would the Project result in 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?

Impact Determination in the Certified PEIR

The Certified PEIR noted that construction activity noise levels will fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment. The exact locations of future projects and construction that will occur under the General Plan 2045 and Zoning Code Update is unknown, though it is assumed that some of the activities will take place in close proximity to sensitive receptors given that the City is generally built out. Even with mandatory compliance with Municipal Code requirements, it is possible that some future development projects could include construction in which multiple pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period noise levels could exceed the significance thresholds. Therefore, construction activities could result in a significant impact. Implementation of Mitigation Measure PEIR MM NOI-1 will help to reduce the potentially significant construction-related impacts resulting from a substantial temporary increase in ambient noise levels in the vicinity of future development projects in excess of the threshold. However, even with implementation of Mitigation Measure PEIR MM NOI-1, the Certified PIER determined that impacts could still be significant and unavoidable.

In contrast, the Certified PIER found that stationary noise, such as rooftop heating, ventilation, and air conditioning units, will be required to comply with applicable regulations. Therefore, the impact from stationary equipment will be less than significant.

With regard to operational noise, the Certified PIER found that permanent increases in noise would occur primarily as a result of increased traffic due to future development that would occur as a result of the General Plan 2045 and Zoning Code Update. Future traffic noise levels were evaluated along 62 roadway

segments within the City. As shown in the Certified PIER, there is no discernable difference for the majority of the segments when comparing existing noise levels with future project levels. However, since noise levels could exceed the threshold at the property line along one segment (Washington Boulevard between Inglewood Boulevard and S. Centinela Avenue), the General Plan 2045 and Zoning Code Update's impact on traffic noise was determined to be significant and unavoidable. The Certified PIER found that there are no feasible mitigation measures to reduce such traffic noise levels.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to generation of noise, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

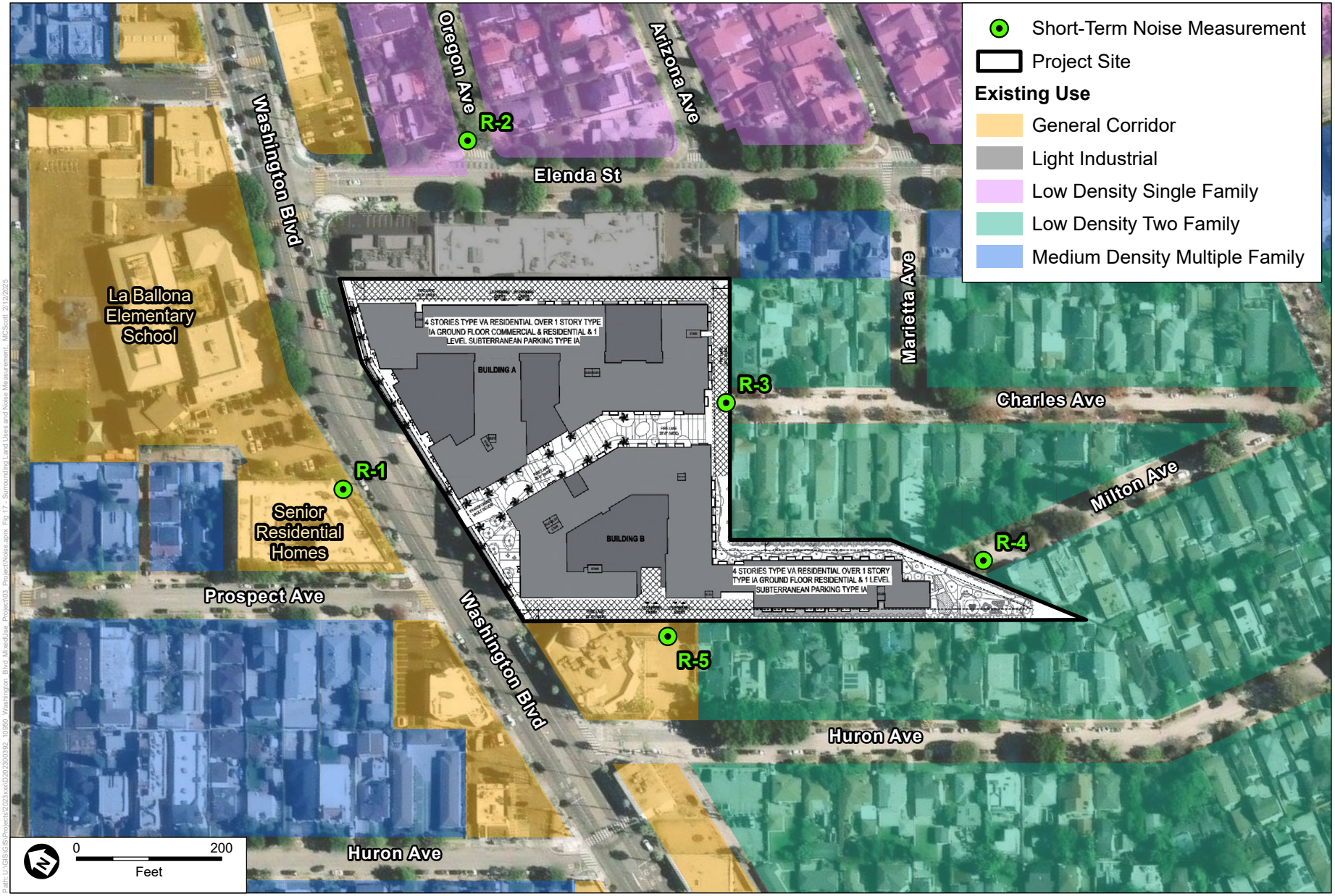
Impact Determination for Project

Existing Ambient Noise Levels

To quantify the existing noise environment, short-term (15-minute) measurements were conducted at five locations, representing the ambient noise levels at land uses identified as R1 through R5 in **Figure 17**, *Surrounding Land Uses and Noise Measurement Locations*. A 15-minute measurement is a standard 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, November 13, 2024 to characterize the existing noise environment in the Project vicinity at the nearest sensitive receptors analyzed in the section below. The measurements were taken in 15-minute intervals generally between 10:00 a.m. and 11:45 a.m. to capture ambient daytime noise levels. The measurement locations are described below:

- R1: Multi-family senior residential uses to the north/northwest of the Project Site, north of Washington Boulevard, approximately 100 feet from the Project boundary.
- R2: Single-family residential uses to the east of the Project Site, on the east side of Elenda Street, approximately 170 feet from the Project boundary.
- R3: Single-family residential uses the southeast of the Project Site, on the southeast side of Charles Avenue, adjacent to the Project boundary.
- R4: Single-family residential uses to the south of the Project Site, along Milton Avenue, approximately adjacent to the Project boundary.
- R5: Single-family residential uses and The King Fahad Mosque adjacent to the west of the Project boundary along Huron Avenue.

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}).



SOURCE: Culver City, 2024; ESA, 2024

10950 Washington Boulevard Project

Figure 17
Surrounding Land Uses and Noise Measurement

ESA

The results of the ambient sound measurements are summarized in **Table 15**, *Summary of Ambient Noise Measurements*.

TABLE 15
SUMMARY OF AMBIENT NOISE MEASUREMENTS

Location	Measured Ambient Daytime Noise Levels, dBA L_{eq}
R1	67.3
R2	54.8
R3	47.2
R4	43.6
R5	54.0

SOURCE: ESA, 2025.

Existing Roadway Noise Levels

To further characterize the Project area's ambient noise environment, Community Noise Equivalent Level (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,[47] and traffic data provided in the Project's Transportation Study[48] (see Appendix L of this document). 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 16 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 increase in traffic (and thus noise) from 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 existing ambient noise environment in the Project vicinity can be characterized by 24-hour CNEL levels attributable to existing traffic on local roadways. **Table 16**, *Predicted Existing (2025) Vehicular Traffic Noise Levels*, indicates the calculated CNEL from actual existing traffic volumes on the analyzed roadway segments.

[47] 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 are provided in Appendix L to this document. This methodology, considered an industry standard, allows for the definition of roadway configurations, barrier information (if any), and receiver locations.

[48] Gibson Transportation Consulting, Inc., Transportation Study for 10950 Washington, April 2025. Provided in Appendix L of this document.

TABLE 16
PREDICTED EXISTING (2025) VEHICULAR TRAFFIC NOISE LEVELS

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) Existing (2025)
Culver Boulevard		
North of Elenda Street	Residential/Commercial	71.6
South of Elenda Street	Residential/Commercial	71.8
Elenda Street		
Between Washington Boulevard and Culver Boulevard	Residential	64.6
East of Culver Boulevard	Residential	64.6
Midvale Avenue/Girard Avenue		
Between Venice Boulevard and Washington Boulevard	Residential	58.3
West of Venice Boulevard	Residential	65.5
Tilden Avenue - East Leg		
East of Washington Boulevard	Residential	54.9
Tilden Avenue – West Leg		
West of Washington Boulevard	Residential	59.1
Venice Boulevard		
North of Midvale Avenue/Girard Avenue	Residential/Commercial	72.9
South of Midvale Avenue/Girard Avenue	Residential/Commercial	72.7
Washington Boulevard		
Between Elenda Street and Tilden Avenue-East Leg	Residential/Commercial	70.1
Between Girard Avenue and Elenda Street	Residential/Commercial	70.3
Between Tilden Avenue-East Leg and Tilden Avenue-West Leg	Residential/Commercial	68.5
North of Girard Avenue	Residential/Commercial	70.3
South of Washington Place	Residential/Commercial	67.2
Washington Place		
West of Washington Boulevard	Commercial	64.0

SOURCE: ESA 2025. Appendix J of this document.

On-Site Construction Noise

Consistent with Mitigation Measure PEIR MM NOI-1 (see below), a project-specific construction noise analysis was conducted to determine if the Project has the potential to generate significant noise impacts during construction. Noise modeling data is included in Appendix J of this document.

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.

Construction sequencing would include demolition; shoring and excavation; subterranean work/building construction/concrete pour; subterranean work/building construction; building construction/elevated

concrete construction and building enclosure; site work; and mechanical, electrical, plumbing, and finishes. Project construction would require the use of mobile heavy-duty equipment with high noise-level characteristics. Individual pieces of construction equipment expected to be used during Project construction could produce maximum noise levels of 74 dBA to 85 dBA L_{max} at a reference distance of 50 feet from the noise source, as shown in **Table 17**, *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 Table 17. The usage factors are based on the FHWA's Roadway Construction Noise Model User's Guide.[49]

TABLE 17
CONSTRUCTION EQUIPMENT NOISE LEVELS

Equipment	Estimated Usage Factor, %	Maximum Noise Level at 50 feet from Equipment, dBA (Lmax)
Aerial Lift (Man 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
Off Highway Truck (Dump Truck)	40	76
Other Equipment	50	85
Paver	50	77
Paving Equipment (Pavement Scarafier)	20	90
Pumps	50	81
Rough Terrain Forklift	10	75
Rubber Tired Dozer	40	82
Rubber Tired Loader	40	79
Skid Steer Loader	40	78
Sweepers/Scrubbers	10	82
Tractor/Loader/Backhoe	40	78

SOURCE: FHWA Roadway Construction Noise Model User's Guide, 2017.

A summary of construction noise impacts at existing nearby sensitive receptors for different scenarios is provided in **Table 18,** *Estimated Construction Noise Levels at Existing Off-Site Sensitive Receptors*, with supporting calculations provided in Appendix J of this document.

[49] Federal Highway Administration, Roadway Construction Noise Model User's Guide, 2017. https://www.gsweventcenter.com/Draft_SEIR_References/2006_01_Roadway_Construction_Noise_Model_User_Guide_FHWA.pdf

TABLE 18
ESTIMATED CONSTRUCTION NOISE LEVELS AT EXISTING OFF-SITE SENSITIVE RECEPTORS

Noise Sensitive Receptor	Daytime Noise Threshold (Ambient + 5 dBA)	Maximum Unmitigated Construction Noise Levels, [a, b, c] (Exterior/Interior with windows open/Interior with windows closed) Hourly L_{eq} (dBA)	Exceeds Threshold? (Exterior/Interior with Windows Open/Interior with Windows Closed)	Maximum Mitigated Construction Noise Levels, [a, b, c] (Exterior/Interior with windows open/Interior with windows closed) Hourly L_{eq} (dBA)	Exceeds Threshold? (Exterior/Interior with Windows Open/Interior with Windows Closed)
R1	72.3	**77.5 /** 64.5 / 52.5	**Yes** / No / No	62.5 **/** 49.5 / 37.5	No / No / No
R2[d]	59.8	58.6 / 45.6 / 33.6	No / No / No	58.6 / 45.6 / 33.6	No / No / No
R3	52.2	**87.7** / **74.7** / **62.7**	**Yes** / **Yes** / **Yes**	**72.7** / **59.7** / 47.7	**Yes** / **Yes** / No
R4	48.6	**87.5** / **74.5** / **62.5**	**Yes** / **Yes** / **Yes**	**72.5** / **59.5** / 47.5	**Yes** / **Yes** / No
R5	58.0	**87.7** / **74.7** / **62.7**	**Yes** / **Yes** / **Yes**	**72.7** / **59.7** / 47.7	**Yes** / **Yes** / No

NOTES:

[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.

[d] A 15 dB reduction is included due to intervening commercial buildings to the east of the Project boundary.

SOURCE: ESA, 2025.

As shown in Table 18, projected construction noise levels would exceed daytime noise thresholds (ambient plus 5 dBA) at R1 and R3 through R5, and impacts would be potentially significant before implementation of mitigation measures. 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; and 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 excavation, hauling, and concrete phases of construction, which are expected to occur from approximately month 5 to month 11 of construction after the demolition activities are completed, as well as a 7:00 AM daily start on Sundays for the concrete-pouring portion of the concrete phase, which is expected during approximately the first 40 days of the concrete activities during the 7th and 8th months of construction. The approximately four months of demolition activities prior to these phases and the remaining approximately 27 months after these phases would occur per the allowable standard CCMC permitted construction hours.

As Project construction would result in temporary increases of 5 dBA or more in ambient noise, it would exceed the thresholds of significance at nearby noise sensitive receptors. Therefore, construction noise impacts would be potentially significant, and mitigation measures would be required.

As a result of implementing Mitigation Measure PEIR NOI-1 (see below), the Project-specific noise analysis has resulted in two foreseeable supplemental mitigation measures listed out below as Mitigation Measures Project MM NOI-1 and Project MM NOI-2. Mitigation Measure Project MM NOI-1 includes the use of temporary noise barriers and Mitigation Measure Project MM NOI-2 includes various construction

equipment features to minimize construction noise levels. As shown in Table 18, with the implementation of Mitigation Measures Project MM-NOI-1 and MM-NOI-2, construction noise would be reduced by 15 dBA at the surrounding sensitive receptors. However, the mitigated construction levels would still be 5 dB over ambient at sensitive receptors R3, R4, and R5. Therefore, similar to the findings of the Certified PEIR, even with the implementation of Mitigation Measures Project MM-NOI-1 and MM-NOI-2, impacts would remain significant and unavoidable given that off-site construction noise cannot be feasibly mitigated to below a 5 dB increase over ambient noise levels.

Off-Site Construction Noise

Delivery and haul truck trips would occur throughout the construction period, including during the allowable construction hours of 8:00 a.m. to 8:00 p.m. Mondays through Fridays; 9:00 a.m. to 7:00 p.m. Saturdays; and 10:00 a.m. to 7:00 p.m. Sundays (or potentially starting at 7:00 a.m. for certain phases of construction upon approval of Applicant's Extended Hours of Construction permit, as discussed above).

As shown in **Table 19**, *Estimate of Off-Site Construction Traffic Noise Levels*, Project construction would yield an addition of 366 haul truck trips, 2 vendor truck trips, and 24 worker trips per day (46 truck trips per peak hour across the work day, 2 vendor trips, and 24 worker trips would occur at the same peak hour (i.e., assuming all vehicles would arrive in the morning and depart in the afternoon). This would result in noise level increases above the 5 dBA threshold for 3 of the 16 studied roadway segments in the Project vicinity. There are no feasible mitigation measures to reduce off-site construction traffic noise levels. While General Plan 2045 policies would serve to limit traffic noise exposure to sensitive receptors, these policies cannot ensure that noise levels would be reduced to levels within the City's noise standards at all sensitive receptors. The ability to reduce impacts along roadways with measures such as sound walls or berms are not always feasible. The installation of traffic noise barriers along the roadway segments, which are characterized by a mix of residential uses, is not possible as such barriers would prohibit the ability for pedestrians, visitors, and occupants to access buildings. Additionally, barriers with breaks or gaps for standards and emergency access would negate intended noise reduction benefits. Therefore, consistent with the findings of the Certified PEIR, these construction-related impacts would be significant and unavoidable.

Operational Noise

In this section, the Project's various on-site operational noise sources are first evaluated and analyzed individually, and subsequently the composite impact of all on-site operational noise sources is reviewed. As explained below in more detail, none of the individual noise sources nor the combined impact of all of the sources exceed the applicable noise threshold.

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. However, the equipment 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 20**, *Mechanical Equipment Noise Levels at Noise Sensitive Receptors*, presents the estimated Project on-site mechanical equipment noise levels at the off-site receptor locations.

TABLE 19
ESTIMATE OF OFF-SITE CONSTRUCTION TRAFFIC NOISE LEVELS

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			
		Existing (2025) (A)	Existing (2025) with Project Construction (B)	Project Increment (B–A)	Exceed Threshold?
Culver Boulevard					
North of Elenda Street	Residential/Commercial	71.6	72.6	1.0	No
South of Elenda Street	Residential/Commercial	71.8	72.7	0.9	No
Elenda Street					
Between Washington Boulevard and Culver Boulevard	Residential	64.6	67.9	3.3	No
East of Culver Boulevard	Residential	64.6	67.7	3.1	No
Midvale Avenue/Girard Avenue					
Between Venice Boulevard and Washington Boulevard	Residential	58.3	65.5	7.2	**Yes**
West of Venice Boulevard	Residential	65.5	68.0	2.5	No
Tilden Avenue - East Leg					
East of Washington Boulevard	Residential	54.9	65.2	10.3	**Yes**
Tilden Avenue – West Leg					
West of Washington Boulevard	Residential	59.1	65.7	6.6	**Yes**
Venice Boulevard					
North of Midvale Avenue/Girard Avenue	Residential/Commercial	72.9	73.7	0.8	No
South of Midvale Avenue/Girard Avenue	Residential/Commercial	72.7	73.5	0.8	No
Washington Boulevard					
Between Elenda Street and Tilden Avenue-East Leg	Residential/Commercial	70.1	71.2	1.1	No
Between Girard Avenue and Elenda Street	Residential/Commercial	70.3	71.4	1.1	No
Between Tilden Avenue-East Leg and Tilden Avenue-West Leg	Residential/Commercial	68.5	70.0	1.5	No
North of Girard Avenue	Residential/Commercial	70.3	71.4	1.1	No
South of Washington Place	Residential/Commercial	67.2	69.2	2.0	No
Washington Place					
West of Washington Boulevard	Commercial	64.0	67.6	3.6	No

SOURCE: ESA 2025. Appendix J of this document.

TABLE 20
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	67.3	41.3 / 28.3 / 16.3	67.3 / 54.3 / 42.3	72.3	0.0	No
R2	54.8	42.3 / 29.3 / 17.3	55.0 / 42.0 / 30.0	59.8	0.0	No
R3	47.2	44.9 / 31.9 / 19.9	49.2 / 36.2 / 24.2	52.2	0.0	No
R4	43.6	44.9 / 31.9 / 19.9	47.3 / 34.3 / 22.3	48.6	0.0	No
R5	54.0	44.9 / 31.9 / 19.9	54.5 / 41.5 / 29.5	58.0	0.0	No

NOTES:

[a] The ambient noise level is based on the measured daytime noise levels shown in Table 15.

[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 ambient noise levels, plus 5 dBA.

SOURCE: ESA 2025.

The pieces of mechanical equipment were assumed to be placed in the center of the proposed buildings and are assumed to have a 6 dB reduction to offsite receptors on account of interference from the proposed buildings and the equipment being enclosed. As shown in Table 20, the estimated noise levels from the mechanical equipment 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. As such, impacts from mechanical equipment noise would be less than significant and within the scope of the Certified PEIR.

Parking Structure Noise

Ingress/egress driveways to the internal parking garage would be located on the P1/L1 Level from Washington Boulevard. Based on the Project's Transportation Study, the afternoon peak hour traffic volume would be 129 vehicles entering and exiting the parking structure to/from Washington Boulevard.[50] To provide a worst-case analysis, all 129 vehicles were assumed to enter the parking structure from Washington Boulevard within the same hour. Guidance from the FTA's *Transit Noise and Vibration Impact Assessment Manual* was used to calculate noise levels resulting from vehicles entering the parking structure.[51] The entering vehicles would create noise levels up to 48 dBA.

[50] Gibson Transportation Consulting, Inc., Transportation Study for 10950 Washington, April 2025. Provided in Appendix L of this document.

[51] FTA, Transit Noise and Vibration Impact Assessment. September, 2018, Tables 4-13 and 4-14.

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 given that the parking structure is primarily subterranean and is fully enclosed on all sides and oriented in the center of the Project's buildings at the ground floor level. 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 21,** *On-Site Parking Noise Levels at Noise Sensitive Receptors*, presents the Project's estimated noise levels from the parking garage at the off-site receptor locations. As indicated in Table 21, 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 in the vicinity of the Project in excess of standards established by the City. Thus, impacts from parking facilities would be less than significant and would be within the scope of the impacts analyzed in the Certified PIER.

TABLE 21
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	67.3	35.5 / 22.5 / 10.5	67.3 / 54.3 / 42.3	72.3	0.0	No
R2	54.8	21.9 / 8.9 / 0.0	54.8 / 41.8 / 29.8	59.8	0.0	No
R3	47.2	31.2 / 18.2 / 6.2	47.3 / 34.3 / 22.3	52.2	0.0	No
R4	43.6	31.9 / 18.9 / 6.9	43.9 / 30.9 / 18.9	48.6	0.0	No
R5	54.0	49.4 / 36.4 / 24.4	55.3 / 42.3 / 30.3	58.0	0.0	No

NOTES:

[a] The ambient noise level is based on the measured daytime and morning noise levels shown in Table 15 and 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 ambient noise levels, plus 5 dBA.

SOURCE: ESA 2025.

Loading Areas and Refuse Collection

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.[52] Delivery truck idling is restricted to no more than five consecutive minutes in the loading area pursuant to State regulation (Title 13 CCR, Section 2485). Pursuant to Title 13 California Code of Regulations (CCR),

[52] 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.

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 22,** *Loading Areas and Refuse Collection Noise Levels*, loading activity and trash compaction associated with the Project would be below the significance thresholds of each sensitive receptor identified. 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. Thus, impacts would be less than significant and within the scope of the impacts analyzed in the Certified PEIR.

TABLE 22
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	67.3	38.2 / 25.2 / 13.2	67.3 / 54.3 / 42.3	72.3	0.0	No
R2	54.8	23.6 / 10.6 / 0.0	54.8 / 41.8 / 29.8	59.8	0.0	No
R3	47.2	44.2 / 31.2 / 19.2	49.0 / 36.0 / 24.0	52.2	0.0	No
R4	43.6	34.7 / 21.7 / 9.7	44.2 / 31.1 / 29.2	48.6	0.0	No
R5	54.0	52.2 / 39.2 / 27.2	56.2 / 43.2 / 31.2	58.0	0.0	No

NOTES:

[a] The ambient noise level is based on the measured daytime noise levels shown in Table 15.

[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 ambient noise levels, plus 5 dBA.

SOURCE: ESA 2025.

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. As discussed above, principal on-site noise sources associated with the Project would include mechanical equipment, traffic, and parking and loading facilities. **Table 23**, *On-Site Composite Noise Impacts*, presents the estimated noise from Project-related noise sources in terms of CNEL. As indicated in Table 23, 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. Thus, the Project's operational composite noise would be less than significant and within the scope of the impacts analyzed in the Certified PEIR.

TABLE 23
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						
R1	41.3 / 28.3 / 16.3	41.0 / 28.0 / 16.0	38.2 / 25.2 / 13.2	45.1 / 32.1 / 20.2	67.3	67.3 / 67.3 / 67.3	0.0	72.3	No
R2	42.3 / 29.3 / 17.3	30.0 / 17.0 / 5.0	31.3 / 18.3 / 6.3	42.9 / 29.9 / 17.9	54.8	55.1 / 54.8 / 54.8	0.3	59.8	No
R3	44.9 / 31.9 / 19.9	31.2 / 18.2 / 6.2	44.2 / 31.2 / 19.2	47.7 / 34.7 / 22.7	47.2	50.5 / 47.4 / 47.2	3.3	52.2	No
R4	44.9 / 31.9 / 19.9	31.9 / 18.9 / 6.9	34.7 / 21.7 / 9.7	45.5 / 32.5 / 20.5	43.6	47.7 / 43.9 / 43.6	4.1	48.6	No
R5	44.9 / 31.9 / 19.9	49.4 / 36.4 / 24.4	52.2 / 39.2 / 27.2	54.5 / 41.5 / 29.5	54.0	57.3 / 54.2 / 54.0	0.0	58.0	No

NOTES:

[a] The ambient noise level is based on the measured daytime noise levels shown in Table 15, and the lower value (daytime or morning) is used for the purposes of impact determination.

SOURCE: ESA, 2025.

Off-Site Operational Traffic Noise

Impacts Under Existing Traffic Baseline Conditions

Existing roadway noise levels were calculated along various roadway segments near 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 24**, *Off-Site Traffic Noise Impacts – Existing (2025) Plus Project Conditions,* with supporting calculation files provided in Appendix J of this document.

TABLE 24
OFFSITE TRAFFIC NOISE IMPACTS – EXISTING (2025) PLUS PROJECT CONDITIONS

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			
		Existing (2025) (A)	Existing (2025) with Project Construction (B)	Project Increment (B–A)	Exceed Threshold?
Culver Boulevard					
North of Elenda Street	Residential/Commercial	71.6	71.6	-	No
South of Elenda Street	Residential/Commercial	71.8	71.8	-	No
Elenda Street					
Between Washington Boulevard and Culver Boulevard	Residential	64.6	64.7	0.1	No
East of Culver Boulevard	Residential	64.6	64.6	-	No
Midvale Avenue/Girard Avenue					
Between Venice Boulevard and Washington Boulevard	Residential	58.3	58.4	0.1	No
West of Venice Boulevard	Residential	65.5	65.5	-	No
Tilden Avenue - East Leg					
East of Washington Boulevard	Residential	54.9	54.9	-	No
Tilden Avenue – West Leg					
West of Washington Boulevard	Residential	59.1	59.1	-	No
Venice Boulevard					
North of Midvale Avenue/Girard Avenue	Residential/Commercial	72.9	72.9	-	No
South of Midvale Avenue/Girard Avenue	Residential/Commercial	72.7	72.7	-	No
Washington Boulevard					
Between Elenda Street and Tilden Avenue-East Leg	Residential/Commercial	70.1	70.4	0.3	No
Between Girard Avenue and Elenda Street	Residential/Commercial	70.3	70.4	0.1	No
Between Tilden Avenue-East Leg and Tilden Avenue-West Leg	Residential/Commercial	68.5	68.5	-	No
North of Girard Avenue	Residential/Commercial	70.3	70.3	-	No
South of Washington Place	Residential/Commercial	67.2	67.2	-	No
Washington Place					
West of Washington Boulevard	Commercial	64.0	64.2	0.2	No

SOURCE: ESA 2025. Appendix J of this document.

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 Washington Boulevard between Elenda Street and Tilden Avenue-East Leg. This increase in noise level would be below a "clearly noticeable" increase of 5 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 within the scope of the impacts analyzed in the Certified PEIR.

Impacts Under Future plus Project Conditions Traffic Noise

Future off-site traffic-generated noise impacts were assessed based on a comparison of the future base traffic volumes with the Project to the future year (2030) base traffic volumes without the Project. The results of that comparison are provided in **Table 25**, *Off-Site Traffic Noise Impacts – Future Plus Project Conditions (2030)*. Table 25 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 Washington Boulevard between Elenda Street and Tilden Avenue-East Leg. This increase in sound level would not exceed the significance thresholds of an increase of 5 dBA CNEL. As a result, future off-site traffic-related noise impacts would be less than significant and within the scope of the impacts analyzed in the Certified PEIR.

TABLE 25
OFFSITE TRAFFIC NOISE IMPACTS – FUTURE PLUS PROJECT CONDITIONS (2030)

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			
		Future (2030) (A)	Future (2030) with Project Construction (B)	Project Increment (B–A)	Exceed Threshold?
Culver Boulevard					
North of Elenda Street	Residential/Commercial	71.9	71.9	-	No
South of Elenda Street	Residential/Commercial	72.1	72.1	-	No
Elenda Street					
Between Washington Boulevard and Culver Boulevard	Residential	64.9	64.9	-	No
East of Culver Boulevard	Residential	64.8	64.8	-	No
Midvale Avenue/Girard Avenue					
Between Venice Boulevard and Washington Boulevard	Residential	58.6	58.7	0.1	No
West of Venice Boulevard	Residential	65.5	65.5	-	No
Tilden Avenue - East Leg					
East of Washington Boulevard	Residential	55.1	55.1	-	No
Tilden Avenue – West Leg					
West of Washington Boulevard	Residential	59.1	59.1	-	No
Venice Boulevard					
North of Midvale Avenue/Girard Avenue	Residential/Commercial	73.2	73.2	-	No
South of Midvale Avenue/Girard Avenue	Residential/Commercial	73.0	73.0	-	No
Washington Boulevard					
Between Elenda Street and Tilden Avenue-East Leg	Residential/Commercial	70.4	70.7	0.3	No

TABLE 25
OFFSITE TRAFFIC NOISE IMPACTS – FUTURE PLUS PROJECT CONDITIONS (2030)

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			
		Future (2030) (A)	Future (2030) with Project Construction (B)	Project Increment (B–A)	Exceed Threshold?
Between Girard Avenue and Elenda Street	Residential/Commercial	70.6	70.7	0.1	No
Between Tilden Avenue-East Leg and Tilden Avenue-West Leg	Residential/Commercial	68.9	68.9	-	No
North of Girard Avenue	Residential/Commercial	70.6	70.6	-	No
South of Washington Place	Residential/Commercial	67.5	67.6	0.1	No
Washington Place					
West of Washington Boulevard	Commercial	64.1	64.3	0.2	No

SOURCE: ESA 2025. Appendix J of this document.

Certified PEIR's Mitigation Measures Addressing Impact

The following mitigation measure is set forth in the Certified PEIR and the associated MMP to address noise impacts under Threshold a) and is applicable to the General Plan 2045 and Zoning Code Update Project. Mitigation Measure PEIR MM NOI-1 is also applicable to the Project.

> **PEIR MM NOI-1: Construction Noise.** Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 500 feet of noise-sensitive receptors (e.g., residences, hospitals, schools) shall submit a noise study to the City Planning Department for review and approval prior to issuance of a grading or building permit. The study shall include noise-reduction measures, if necessary, to ensure project construction noise will be in compliance with the City's Noise Ordinance standards as applicable to construction (i.e., CCMC Chapter 9.07). All noise-reduction measures approved by City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during construction activities. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:
>
> - Install temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive receptors.
> - Equip construction equipment with effective mufflers, sound-insulating hoods or enclosures, vibration dampers, and other Best Available Control Technology (BACT).
> - Limit non-essential idling of construction equipment to no more than five minutes per hour.

This mitigation measure shall not apply and is superseded once a Citywide noise ordinance goes into effect that establishes construction noise standards for noise-reduction measures that ensures project construction noise compliance with the Culver City Noise Ordinance standards for development projects within the City.

Mitigation Measure PEIR MM NOI-1 is applicable to the Project, and in connection therewith a noise study was conducted for the Project and, as discussed below, project-specific noise-reduction measures will be

implemented. As of the time this document was prepared, there has not been a Citywide noise ordinance that has superseded PEIR MM NOI-1.

Project-Specific Mitigation Measures Addressing Impact

The Project specific noise analysis conducted per Mitigation Measure PEIR MM NOI-1 has resulted in the below Project-specific mitigation measures.

Project MM-NOI-1: Temporary noise barriers shall be installed along the northern, western, southern and southeastern Project boundary to shield the sensitive receptors from construction noise. The barrier shall have a minimum height of 15 feet (with the top of the barrier at least 15 feet above the ground surface of the residences along Huron Avenue, Charles Avenue, Elenda Street, and Washington Boulevard) and be made of sound blanket, plywood or other solid material capable of reducing on-site construction noise levels by 15 dBA. A noise barrier is not required along the eastern and northeastern boundary, as the adjacent buildings to the Project effectively shield sensitive receptors to the east/northeast (R2) from construction noise.

Project 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.
- Equip internal combustion engines with properly operating mufflers that are free from rust, holes, and leaks.
- For construction equipment that utilizes internal combustion engines, ensure the engine's housing doors are kept closed, and mount noise-insulating material on the engine housing consistent with manufacturers' guidelines, if possible.

b) Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact Determination in the Certified PEIR

As indicated above, the locations of future projects and construction methods for the future projects are not known at this time. However, it is assumed that some of the activities will take place in close proximity to sensitive receptors given that the City is generally built out. With regard to structural damage and human annoyance during construction, activities could generate excessive ground vibration and potentially exceed damage criteria for surrounding existing structures. In addition, multiple pieces of equipment or other sources of groundborne vibration and/or groundborne noise could cause levels to exceed the threshold. Therefore, future development projects that will occur under the General Plan 2045 and Zoning Code Update could result in a significant impact. Implementation of Mitigation Measure PEIR MM NOI-2 will reduce the severity of impacts related to excessive groundborne vibration or groundborne noise during construction. However, even with implementation of Mitigation Measure PEIR MM NOI-2, vibration impacts during construction could exceed the significance thresholds, and therefore construction vibration impacts are significant and unavoidable.

During operation, future projects could generate groundborne vibration and groundborne noise from vehicle and truck traffic on roadways and from stationary mechanical equipment such as pumps and compressors. However, groundborne vibration from traffic and the operation of mechanical equipment is not expected to generate excessive vibration or noise. Therefore, impacts during operation relative to groundborne vibration and groundborne are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to groundborne vibration, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Structural Damage

Consistent with Mitigation Measure PEIR MM NOI-2 (see below), a project-specific construction vibration analysis was conducted to determine if the Project has the potential to generate significant vibration impacts that could cause structural damage. Vibration data is included in Appendix J of this document.

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 imperceptible 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 26**, *Vibration Source Levels for Construction Equipment*.

Because vibration level in root mean square (RMS) is best for characterizing human response to building vibration, and vibration level in peak particle velocity (PPV) is best used to characterize potential for damage, this construction vibration impact analysis assessed the potential for building damage using vibration levels in PPV (in/sec). Potential human annoyance is assessed in the next subsection using vibration levels in VdB.

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. As shown in Table 26, large bulldozers generate approximately 0.089 in/sec PPV when measured at 25 feet. 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. The stricter 0.2 inch/sec PPV threshold will be used for this analysis.[53]

TABLE 26
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

	Approximate PPV (in/sec)						Approximate RMS (VdB)					
Equipment	10 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	10 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.352	0.089	0.031	0.024	0.017	0.011	95	87	78	76	73	69
Loaded Trucks	0.300	0.076	0.027	0.020	0.015	0.010	94	86	77	75	72	68
Wheel Loader	0.300	0.076	0.027	0.020	0.015	0.010	94	86	77	75	72	68
Fork Lift	0.186	0.047	0.016	0.013	0.009	0.006	89	81	72	70	67	63
Jackhammer	0.138	0.035	0.012	0.009	0.007	0.004	87	79	70	68	65	61
Earth Mover	0.043	0.011	0.004	0.003	0.002	0.001	77	69	60	58	55	51
Small Bulldozer	0.0119	0.003	0.001	0.0008	0.0006	0.0004	66	58	49	47	44	40

SOURCE: FTA, Transit Noise and Vibration Impact Assessment, September 2018; ESA, 2025.

Based on the vibration data provided in Table 26, 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 residential buildings approximately 10 feet away to the south and to the west and the commercial/office buildings to the east as measured from the Project Site boundary. At 10 feet, vibration levels would exceed the 0.2 PPV in/sec threshold, as shown in Table 26. However, pile driving would not be used at the Project Site boundary and other vibration-generating equipment would normally operate at least 10 feet or more from the nearest off-site buildings. Thus, based on the vibration data provided in Table 26, the nearest off-site buildings could be exposed to vibration levels that would cause structural damage, and impacts would be potentially significant prior to mitigation.

As a result of implementing Mitigation Measure PEIR NOI-2, the Project-specific vibration analysis has resulted in one foreseeable supplemental mitigation measure listed below as Mitigation Measure Project MM NOI-3. As shown in **Table 27**, *Mitigated Vibration Source Levels for Construction Equipment,* with the implementation of Mitigation Measure Project MM-NOI-3, the vibration reduction would result in vibration levels below the 0.2 in/sec threshold for structural damage. Therefore, structural damage vibration impacts would be less than significant with mitigation and within the scope of impacts analyzed in the Certified PEIR.

[53] Federal Transit Administration, Noise and Vibration Manual, 2018, Page 218,

TABLE 27
MITIGATED VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Approximate PPV (in/sec)			Approximate RMS (VdB)		
	15 Feet	23 Feet	43 Feet	15 Feet	23 Feet	43 Feet
Large Bulldozer	--	--	0.039	--	--	82
Loaded Trucks	--	--	0.034	--	--	81
Wheel Loader	--	--	0.034	--	--	81
Fork Lift	-	0.053	0.016	--	82	76
Jackhammer	--	0.040	0.012	--	79	74
Earth Mover	0.024	0.012	0.004	73	70	64
Small Bulldozer	0.007	0.003	0.001	62	59	53

SOURCE: FTA, Transit Noise and Vibration Impact Assessment, September 2018; ESA, 2024.

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 could 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.[54] Thus, 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 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 and within the scope of the impacts analyzed in the Certified PIER.

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.[55] For typical buildings, groundborne vibration results in groundborne noise levels approximately 25 to 40 decibels lower than the velocity level.[56] According the FTA *Noise and Vibration Manual*, most of the studies of groundborne vibration in this country have focused on 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. Any vibrations created by Project construction would be intermittent and temporary and thus

[54] This vibration estimate is based on data presented in the USDOT Federal Transit Administration, 2018; which is included in Appendix J of this document.

[55] Federal Transit Administration, Noise and Vibration Manual, 2018, Page 112.

[56] Federal Transit Administration, Noise and Vibration Manual, 2018, Page 119.

would not create any on-going and continuous groundborne vibration and noise similar to that of an urban rail transit system. As such, groundborne noise impacts would be less than significant.

Nearby vibration-sensitive uses for potential human annoyance in the Project vicinity include residences approximately 10 feet away to the south and west of the Project Site boundary, with other residential structures at greater distances. Thus, Project construction would exceed the FTA's 75 VdB threshold at distances less than 25 feet away for occasional events at the nearest noise-sensitive receiver locations during daytime hours. Therefore, impacts would be potentially significant prior to mitigation.

As a result of implementing Mitigation Measure PEIR NOI-2, the Project-specific vibration analysis has resulted in one foreseeable supplemental mitigation measure listed below as Mitigation Measure Project MM NOI-3. As shown in Table 27, with the implementation of Mitigation Measure Project MM-NOI-3, construction equipment would still exceed the human annoyance threshold of 75 VdB for some equipment operating within 43 feet of a sensitive receptor. Potential mitigation measures to reduce vibration impacts from construction activities with respect to human annoyance could include the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered feasible for temporary applications, such as Project construction.[57] Per the Caltrans Transportation and Construction Vibration Guidance Manual, the wave barrier would need to be at least two-thirds of the seismic wavelength and the length of the barrier must be at least one wavelength (typical wavelength can be up to 500 feet). In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate groundborne vibration from the excavation equipment. Thus, it is concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from construction associated with human annoyance to a less than significant level. Therefore, similar to the impact findings of the Certified PEIR, even with the implementation of mitigation, impacts would be significant and unavoidable for human annoyance and within the scope of impacts analyzed in the Certified PEIR.

Operation

Post-construction on-site activities would be limited to residential uses, commercial retail uses, and associated mechanical equipment such as HVAC units, none of which would 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 and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The following mitigation measure is set forth in the Certified PEIR and the associated MMP to address vibration impacts under Threshold b) and is applicable to the General Plan 2045 and Zoning Code Update Project. Mitigation Measure PEIR MM NOI-2 is also applicable to the Project.

[57] Caltrans, *Transportation and Construction Vibration Guidance Manual*, p. 41. September 2020.

PEIR MM NOI-2: Construction Vibration. Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 300 feet of groundborne vibration receptors and that utilize vibration-intensive construction equipment (e.g., pile drivers, jack hammers, large dozer, or vibratory rollers) shall submit a vibration impact evaluation to the City Planning Department for review and approval prior to issuance of a grading or building permit. The evaluation shall include a list of project construction equipment and the associated vibration levels and a predictive analysis of potential project vibration impacts. If construction-related vibration is determined to exceed applicable standards, project-specific measures shall be required to ensure project compliance with vibration standards. All project-specific measures approved by the City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during project construction. Examples of equipment vibration source-to-receptor distances at which impact evaluation should occur vary with equipment type (based on FTA reference vibration information) and are as follows:

- Jackhammer: 23 feet.
- Dozer, hoe-ram, drill rig, front-end loader, tractor, or backhoe: 43 feet.
- Roller (for site ground compaction or paving): 75 feet.
- Impact pile-driving: 280 feet.

This mitigation measure shall not apply and is superseded once a Citywide groundborne vibration ordinance goes into effect that establishes construction groundborne vibration standards for vibration-reduction measures that ensures project construction groundborne vibration compliance with applicable standards for development projects within the City Planning Area.

Mitigation Measure PEIR MM NOI-2 is applicable to the Project and in connection therewith a noise study was conducted for the Project and, as discussed below, project-specific noise-reduction measures will be implemented. As of the time this document was prepared, there has not been a Citywide noise ordinance that has superseded PEIR MM NOI-2.

Project-Specific Mitigation Measures Addressing Impact

The Project specific vibration analysis conducted per Mitigation Measure PEIR MM NOI-2 has resulted in the below listed Project-specific mitigation measure.

PROJECT MM-NOI-3: In order to limit structural damage and human annoyance caused by the operation of construction equipment, the Project shall implement setback distances pursuant to PEIR MM-NOI-2. The setback distances for various types of equipment are as follows:

- Jackhammer and/or forklift: 23 feet.
- Large bulldozer, hoe-ram, drill rig, front-end loader, tractor, backhoe, or loaded trucks: 43 feet.
- Earth mover and small bulldozer: 15 feet.

c) 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?

Impact Determination in the Certified PEIR

Impacts related to airport land use plans were evaluated in the Initial Study prepared as part of the Certified PEIR, and it was determined that no impacts would occur since are no airport land use plans or public airports within the Planning Area.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to airport land use plans, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

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 2.2 miles to the northwest, and Los Angeles International Airport, approximately 3.9 miles to the south. Therefore, the Project would not expose people to excessive noise levels from such uses and no impact would occur, consistent with the impact findings of the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to noise would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.13 Population and Housing

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Population and Housing: Would the project:				
(a) 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)?	Less than Significant	No	Less than Significant	N/A
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than Significant	No	No Impact	N/A

a) Would the Project 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 Determination in the Certified PEIR

The Certified PEIR determined that the projected growth that would occur as a result of the General Plan 2045 and Zoning Code Update both in housing and employment is considered planned growth. The Project will accommodate the 6th cycle Regional Housing Needs Assessment (RHNA) allocation of 3,341 new units as well as future cycles through 2045. The General Plan 2045 is intended to accommodate planned regional growth requirements for the next 25 years with the densities allowed for various land uses and with the provision of infrastructure and public services to accommodate such growth. New residential opportunities will be a result of targeted residential and mixed-use development in activity centers and along commercial corridors to provide housing near jobs, neighborhood amenities, and health care facilities. This type of infill development focuses on redevelopment and revitalization of areas already served by infrastructure and will not require extensions of roads or other infrastructure. While an increase in employment opportunities within the City is expected during the 2045 planning horizon, the General Plan 2045 will ensure that housing needs, including future housing needs for the projected increase in employment, will be met. Therefore, the General Plan 2045 and Zoning Code Update will not induce substantial unplanned population growth, either directly or indirectly, and impacts are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to unplanned population growth, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project would involve demolition of two vacant commercial/office buildings on the Project Site to support a mixed-use development with residential and commercial uses. As shown in **Table 28,** *Projected*

Increases in Population, Housing, and Employment, the Project would increase the residential population of Culver City by introducing 508 residential units that would generate an estimated population of 1,270 residents at the Project Site.[58] In addition, the Project would include approximately 14,087 sf of commercial space, which would generate an estimated increase of approximately 51 employees on the Project Site.[59] When taking into account the demolition of 160,438 sf of existing commercial 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 716 employees, as shown in Table 28.

TABLE 28
PROJECTED INCREASES IN POPULATION, HOUSING, AND EMPLOYMENT

Housing Units and Population			
Use	**Amount**	**Average Household Size[a]**	**Total Population**
Residential	508 units	2.5	1,270
Existing Employees			
Use	**Amount**	**Employment Generation Factor (per 1,000 square feet)[b,c]**	**Existing Number of Employees**
Commercial Office	160,438 square feet	4.78	767
		Total Existing Employees	767
Projected Employees			
Use	**Amount**	**Employment Generation Factor (per 1,000 square feet)[b,d]**	**Number of Employees**
Commercial	14,087 square feet	3.62	51
		Total Projected Employees	51
		Net Employees	-716

NOTES:

[a] The Certified PEIR assumed 2.5 persons/household for new development in population projections.

[b] Culver City Unified School District, Developer Fee Justification Study, March 2020, page 12.

[c] Commercial Office Category employee generation factor, Table 4 of Developer Fee Justification Study.

[d] Neighborhood Shopping Center Category employee generation factor, Table 4 of Developer Fee Justification Study.

SOURCE: ESA, 2025.

As shown in **Table 29**, *General Plan 2045 Population, Household, and Job Growth Projections*, it is predicted that by 2045 the existing population in Culver City would increase from 40,800 to 62,400, the existing housing units would increase from 17,000 to 28,310, and the existing jobs would increase from 68,040 to 84,300.

[58] As described in Table 28, the total population is estimated based on the number of units multiplied by the average household size for Culver City based on new development projections used in the Certified PEIR.

[59] As described in Table 28, 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.

TABLE 29
GENERAL PLAN 2045 POPULATION, HOUSEHOLD, AND JOB GROWTH PROJECTIONS

	Existing	General Plan 2045 Projections	Net Change (General Plan 2045 – Existing)
Population	40,800 (2020)	62,400	21,600
Households	17,000 (2019)	28,310	11,310
Jobs	68,040 (2019)	84,300	16,260

SOURCE: City of Culver City General Plan 2045 and Zoning Code Update Project PEIR, March 2024

The population, housing, and employment projections assumed for the General Plan 2045 and Zoning Code Update are higher than SCAG's Connect Socal 2020-2045 and 2024-2050 estimates since the General Plan 2045 and Zoning Code Update provides for additional population, housing, and employment capacity not anticipated by SCAG. However, since SCAG projections are based on the General Plan land uses, future SCAG planning documents would be updated to reflect the General Plan 2045 projections.

The Project's 508 units would comprise approximately 4.5 percent of the General Plan 2045 projected housing increase for the City from 2019 to 2045. Compared to existing uses, the Project would result in a decrease of 716 employees, approximately -4.4 percent of General Plan 2045 projected employment increase for the City from 2019 to 2045. The Project's increases in population and housing would be within the General Plan 2045 projections for the City. The Project would support and not conflict with relevant goals, objectives, and policies in the General Plan 2045. While the Project would result in an overall decrease of jobs, the Project would provide high-quality infill housing through the provision of 508 residential units with a diverse mix of dwelling types, containing both market-rate and 79 Very Low Income units, which will accommodate 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 commercial uses would promote the General Plan's policy for mixed-use development that would be sensitive to adjacent residential uses.

The Project would link with and tie into existing infrastructure in the Project area. As described below under Section 3.18, *Utilities and Service Systems*, 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 slightly modify access from streets that surround the Project Site by shifting the location of the two existing driveways on Washington Boulevard. However, these minor modifications represent improvements, since it will help activate the streetscape in front of the Project, and they would not induce substantial population growth indirectly through the extension of roads or other infrastructure into undeveloped areas. Additionally, 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 and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact Determination in the Certified PEIR

The Certified PEIR determined that the General Plan 2045 and Zoning Code will provide infill development opportunities in vacant and underutilized areas in the City, while seeking to preserve existing neighborhoods. The General Plan 2045 and Zoning Code Update will increase the overall number of dwelling units in the City as well as include policies that seek to ensure equity and protect diversity in the City's communities. Therefore, the General Plan 2045 and Zoning Code Update will not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and impacts are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to displacement of people or housing, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is currently developed with two commercial buildings and no residential uses exist on-site. As such, Project implementation would not displace existing people or housing. Therefore, no impact would occur to local populations or existing housing such that the construction of replacement housing would be necessary. Impacts would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to population and housing would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.14 Public Services

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Public Services:				
(a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
(i) Fire protection?	Less than Significant	No	Less than Significant	N/A
(ii) Police protection?	Less than Significant	No	Less than Significant	N/A
(iii) Schools?	Less than Significant	No	Less than Significant	N/A
(iv) Parks?	Less than Significant	No	Less than Significant	N/A
(v) Other public facilities?	Less than Significant	No	Less than Significant	N/A

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

i) Fire protection?

Impact Determination in the Certified PEIR

As discussed within the Certified PEIR, implementation of the General Plan 2045 and Zoning Code Update will add an estimated 12,700 housing units, 21,612 residents, 3.7 million square feet of nonresidential uses, and 16,804 employees to the City, which will increase the demand for fire protection services. However, these increases would occur incrementally over the next 25 years. While the CCFD is not currently meeting their emergency response time goals, CCFD has plans to augment their existing staff by seven staff members, add new fire equipment and implement procedural improvements. Furthermore, additional staff may be needed to serve future development and the resulting population growth in order to meet their emergency response time goals.

The 2019 Standards of Cover and Community Risk Assessment and the CCFD Strategic Plan outline recommendations to increase CCFD performance regarding deployment, response time, data collection, and mutual aid. While no additional fire stations are currently proposed, the Standards of Cover and Community Risk Assessment will be updated by CCFD during implementation of the General Plan 2045

and Zoning Code Update to identify what new and/or expanded fire stations may be needed through the 2045 planning horizon. If a new station were to be needed in the future, the necessary environmental review would be conducted at that time.

Public safety in Culver City, including fire protection and emergency services provided by CCFD, is funded from the City's general fund. Revenue sources that contribute to the general fund, including property and sales taxes, are anticipated to grow in rough proportion to the projected growth that will occur as a result of the General Plan 2045. In addition, future development that occurs as a result of the General Plan 2045 and Zoning Code Update will be reviewed by the City and CCFD and will be required to comply with applicable requirements in effect at the time building permits are issued.

Due to the minimal effects that the development of new facilities could have on the environment with compliance with applicable regulations and proposed General Plan policies, the concentration of new development in areas already well-served by fire protection services, and the addition of policies to reduce fire hazards in the city, the impact of the Project with respect to fire protection is considered less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to fire protection, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

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. According to the Certified PEIR, the Project Site is located within the service area of CCFD Fire Station 2, which is located 0.5 miles southwest of the Project Site. CCFD Fire Station 2 includes an engine company, paramedic rescue, and an ambulance equipped with EMTs. 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. 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 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, temporarily encroach into the public rights-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on Washington Boulevard. 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.

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 and within the scope of impacts analyzed in the Certified PEIR.

Operation

Fire Protection Facilities and Services

As discussed in Section 3.13, *Population and Housing*, the elimination of the existing on-site office uses would result in an estimated net decrease in employees on the Project Site of 716 employees. The development of the Project's 508 residential units would result in a total residential population of approximately 1,270 people. While there would be a decrease in employees on the Project Site, fire incidents are based on population or employees. 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 0.5 miles from CCFD Fire Station 2. CCFD Fire Stations 1 and 3 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; 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. Additionally, the Project is designed in a way to facilitate the ease of emergency response. Fire lanes are provided around most of the perimeter of the Project and down the center via the paseo. Additionally, a new fire access gate will be installed at the end of Milton Avenue.

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 the 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. Additionally, any increase in demand on fire services generated by the Project is part of the planned growth that was captured by the Certified PEIR. As such, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Response Distance and Emergency Access

CCFD does not have a required response distance, but does have response time goals. CCFD emergency response time goals were met 54.9 percent of the time by Station 2.[60] While precise response times cannot be predicted, the proximity of Station 2 to the Project Site (0.5 miles on Washington Boulevard) can assume that the 7 minute response time would be met.

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, which reduces the risk of death or injury from a fire because the sprinklers dramatically reduce heat, flames, and smoke, allowing building occupants time to evacuate before the fire protection services arrive. Additionally, as discussed above, there are fire access lanes around most of the perimeter of the Project and between Buildings A and B and a new fire access gate will be installed at the end of Milton Avenue, as shown in Figure 3, Conceptual Site Plan. Additionally, as part of the City's plan review process, 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.

Moreover, 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.

Based on the considerations above, the Project would not significantly impair CCFD from responding to emergencies at the Project Site or the surrounding area. As such, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

[60] CCFD Performance Management Dashboard, Monthly Station Benchmark Reports. https://dashboards.mysidewalk.com/culver-city-ca-fire-performance-dashboard/station-2. Accessed December 20, 2024.

Water Infrastructures/Fire Flow for Firefighting Purposes

Fire flow requirements are based on building size and construction type. The Project proposes to connect to an existing 8-inch water main in Washington Boulevard for domestic and fire water services (see Appendix K, Water Infrastructure Analysis Technical Memorandum, of this document). There is an existing fire hydrant located along the Project's frontage on Washington Boulevard, and three additional hydrants within 300 feet of the Project Site. As provided within the Water Infrastructure Analysis prepared for the Project by KPFF, dated March 7, 2025 (included as Appendix K), the Project would have a minimum fire flow requirement of 4000 gpm at 20 pounds per square inch (psi) residual for a duration of 4 hours, in compliance with the CCMC Section 9.02. The existing fire hydrant located along the Project's frontage on Washington Boulevard can provide 3,770 gpm at 20 psi for a duration of 2 hours. Therefore, it is understood that the difference of 230 GPM between the required and tested flow is met by the three additional hydrants within 300 feet of the Project Site and that an additional fire flow test is not required by the CCFD (see Appendix K). Based on conversation with CCFD, the difference between the flow for "4 hours" written in the required fire flow and the flow for "2 hours" written in the tested fire flow availability is irrelevant to this analysis (see Appendix K). Based on these results, the Project fire hydrant flow needs can be supplied by the existing infrastructure. Therefore, operational impacts to the City's fire water service facilities and infrastructure would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

ii) Police protection?

Impact Determination in the Certified PEIR

As discussed within the Certified PEIR, growth anticipated as a result of the General Plan 2045 and Zoning Code Update will increase the number of police responses in the City, which could increase the need for equipment and personnel. To maintain existing ratios of officers to residents (as discussed further below), implementation of the General Plan 2045 and Zoning Code Update would require hiring a minimum of 58 new officers for the nighttime ratio and 18 new officers for the daytime ratio. In addition, the redistribution and increase of population and traffic density into areas proposed for growth could necessitate the reassignment of certain resources pertaining to police services. However, while the projected growth could result in a need for additional personnel, the growth would occur incrementally over the next 25 years. Additionally, if a new police station were to be needed in the future, the necessary environmental review would be conducted at that time. The revenues and fees generated by future development are anticipated to offset the costs of additional personnel and materials. In addition, future development that occurs as a result of the General Plan 2045 and Zoning Code Update will be reviewed by the City and CCPD and will be required to comply with applicable requirements in effect at the time building permits are issued.

Due to the minimal effects that the development of new facilities could have on the environment with compliance with existing regulations and proposed General Plan policies, impacts on police services related to implementation of the General Plan 2045 would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to police protection, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Construction

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 the Culver City Police Department (CCPD) in order to avoid potential theft. Security measures would ensure that valuable materials (e.g., building supplies and metals, such as copper wiring) and 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.

Additionally, 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, the Project would adhere to CCMC Section 9.08.385, which requires 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.

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 and within the scope of impacts analyzed in the Certified PEIR.

Operation

Operational activities associated with the Project would increase demand for police protection services. As discussed in Section 3.13, *Population and Housing*, the Project's 508 residential units and 14,087 sf of commercial use is anticipated to result in 1,270 residents and 51 employees, or 1,321 total persons. The existing uses on the Project Site employed approximately 767 people, and the overall anticipated net increase of 554 people would represent an approximately 0.18 percent increase[61] in the existing daytime population of the City (approximately 300,000, according to the Certified PEIR), while the anticipated added nighttime population of 1,270 residents would be an approximately 3.2 percent increase[62] in the existing nighttime population (approximately 40,000, according to the Certified PEIR) of the City. However, these minor increases in daytime and nighttime population have been accounted for within the Certified PEIR as part of the planned growth under the General Plan 2045 and Zoning Code Update.

The Project Site would be served by CCPD, which has 109 sworn officers serving the daytime and nighttime populations. According to the Certified PEIR, 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 554 people would increase the existing officer to daytime population ratio of 1:2,752 to 1:2,757[63], and would increase the existing officer to nighttime population ratio of 1:367 to 1:379.[64] The potential for an increase in officer to daytime and nighttime population ratios would represent increases of 0.2 and 2.7 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 0.2 additional CCPD sworn officers for the daytime population and three additional CCPD sworn officers for the nighttime population.[65,66] As discussed above, this increase was accounted for within the Certified PEIR.

While staffing changes of up to three officers may be required as a result of the Project, the minor increase could be accommodated in existing facilities and thus no new or expanded police facilities would be needed as a result of Project implementation. In addition, the Project would contribute revenue to the General Fund for the City, which could be used to 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. Moreover, any additional

61 554 new population/existing daytime population 300,000 = 0.0018, or 0.18 percent increase in daytime population.

62 1,270 new residential population/existing nighttime population 40,000 = 0.0317, or 3.2 percent increase in nighttime population.

63 300,000 existing daytime population + 554 new population = 300,554 new daytime population. The new 300,554 population/109 existing officers = one officer per 2,757 population.

64 40,000 existing nighttime population + 1,270 new population = 41,270 new nighttime population. The new 41,270 population/109 existing officers = one officer per 379 population.

65 554 new population X (one officer per 2,757 population) = 0.2 additional officers. (0.2 additional officers / 109 existing officers) X 100 = 0.2 percent increase in sworn officers.

66 1,270 new population X (one officer per 379 population) = 3 additional officers. (3 additional officers / 109 existing officers) X 100 = 2.7 percent increase in sworn officers.

increased demands on the CCPD would be funded via existing mechanisms (e.g., property taxes and government funding), to which the Project would contribute.

Lastly, given the limited increases in demand for police services expected to be generated by the Project and existing 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. 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, 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. Additionally, 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 objectives for police protection. Therefore, impacts to police protection during Project operation would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

iii) Schools?

Impact Determination in the Certified PEIR

The Certified PEIR determined that the General Plan 2045 and Zoning Code Update will generate an increase in enrollment in Culver City public schools by approximately 3,556 elementary school students, 1,016 middle school students, and 2,032 high school students. The projected 2045 enrollment will exceed the current elementary, middle, and high school capacities. However, the General Plan 2045 contains policies related to schools, including continued coordination with the Culver City Unified School District (CCUSD) to inform the CCUSD on impacts of major developments and population growth trends that may impact school enrollment. Additionally, CCUSD will collect development impact fees for future development prior to issuance of building permits, which will incrementally pay for any needed facility upgrades and expansions. The payment of statutory fees fully mitigates the impacts of development on school facilities for purposes of CEQA under Senate Bill 50. Therefore, impacts related to school facilities are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to schools, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

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.

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, consistent with the Certified PEIR.

Operation

The Project would develop a mixed-use development with residential and commercial uses. As detailed within Section 3.13, *Population and Housing*, the Project would increase the residential population of Culver City by introducing 508 residential units that would generate an estimated population of 1,270 residents at the Project Site. According to 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 30**, *Estimated Number of Students Generated by the Project*. As shown, the Project could generate an estimated 142 elementary school students, 41 middle school students, and 81 high school students, for a total net increase of approximately 264 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 commercial use (14,087 sf) and corresponding number of employees (51), the Project's employees' contribution to the estimated growth, if any, would be negligible. Furthermore, it can be expected that the Project's commercial 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 employees student generation; thus, the analysis of students generated by the Project is conservative in this regard.

TABLE 30
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	508 units	Elm: 0.28/unit MS: 0.08/unit HS: 0.16/unit	142	41	81	264

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 Fees Study for Culver City School District, March 2020, 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, 2025.

The projected 264 students generated by the Project would be within the growth anticipated as a result of the General Plan 2045, which accounted for an increase of 3,556 elementary school students, 1,016 middle school students, and 2,032 high school students. The Project's projected 264 students would comprise approximately four (4) percent of the General Plan 2045 projected increase in students for the City through 2045. However, consistent with the Certified PEIR impact findings, Project-generated students could exceed the available school capacities serving the Project Site, which could result in new or expanded school facilities.

However, 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 sections 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.

Based on the above, 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 and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as determined above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

iv) Parks?

Impact Determination in the Certified PEIR

The Certified PEIR analyzed impacts related to parks and recreational facilities in Section 4.15, *Recreation*. Thus, refer to analysis below in Section 3.15, *Recreation*, below for an analysis of the Project's impacts to park facilities.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed in Section 3.15, *Recreation*, the Project would not create any new significant impacts to parks, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Certified PEIR analyzed impacts related to parks and recreational facilities in Section 4.15, *Recreation*. Thus, refer to Section 3.15, *Recreation*, below for an analysis of the Project's impacts to park facilities

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed below in Section 3.15, *Recreation*, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

v) Other public facilities?

Impact Determination in the Certified PEIR

The Certified PEIR determined that as demand for other public facilities increases as a result of anticipated growth as a result of the General Plan 2045 and Zoning Code Update, there may be a need to increase staffing and facilities (e.g., libraries) to maintain acceptable service ratios and other performance objectives. However, no expansions are proposed at this time. If the expansion of an existing facility or a new facility were to be needed in the future, the necessary environmental review would be conducted at that time. The City will review future development project plans for consistency with the General Plan 2045. Due to the minimal effects that the development of new facilities would have on the environment with compliance with existing regulations and proposed General Plan policies, the impact of the Project with respect to public facilities is considered less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to other public facilities, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

As discussed above, instead of the 716 employees that currently utilize the Project Site, the Project will result in an approximate density of 1,321 persons (1,270 residents and 51 employees). These residents and employees, plus any visitors, would to some extent impact the maintenance of public facilities, such as libraries and roads, as discussed below.

The Los Angeles County Public Library (LACPL) provides library services to the City of Culver City. The Project Site is served by the LACPL Culver City Julian Dixon Branch Library, which is located at 4975 Overland Avenue, Culver City, approximately 1.2 miles southeast of the Project Site. Other nearby Los Angeles Public Library branches are the Palms-Rancho Park Library, Playa Vista Branch Library, and Baldwin Hills Branch Library. The Palms-Rancho Park Library is located at 2920 Overland Avenue, Los Angeles, approximately 1.8 miles northwest of the Project Site. The Playa Vista Branch Library is located at 6400 Playa Vista Drive, Los Angeles, approximately 4.1 miles southwest of the Project Site. The Baldwin Hills Library is located at 2906 South La Brea Avenue, Los Angeles, approximately 4.1 miles northeast of the Project Site. Since the Project would directly increase the residential population of Culver City, it could increase demand for library facilities and services. To address potential impacts to libraries, the Project applicant would pay the required fees per the Developer Fee Program for the LACPL as provided in Los Angeles County, Code of Ordinances, Title 22: Planning and Zoning, Division 2: Additional Regulations, Chapter 22.72: Library Facilities Mitigation Fee. Compliance would offset any incremental need for funding of capital improvements to maintain adequate library facilities and services resulting from the Project by payment of development fees per the Los Angeles County Code. As such, impacts regarding library services would be less than significant.

Additionally, the Project's residents, employees, and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. However, any potential impact of the Project would be offset by the existing employees that are currently/have historically accessed the Project Site. Moreover, the increase of overall site density compared to existing conditions is a small fraction of the City's overall population and its planned growth. Construction activities may result in a temporary increase in usage of the surrounding roads (although, the usage may overall be less given the number of existing daily employee trips). However, any such increase would be temporary and would not require maintenance beyond normal requirements. Additionally, any construction-related transportation would comply with all applicable City regulations, and the Applicant would pay all applicable impact fees to the City. Therefore, development and operation of the Project would not significantly increase the use of roadways and other public facilities beyond current levels. As such, impacts regarding road usage would be less than significant.

Overall, any incremental increased demand the Project would have on public facilities is captured by the planned development and population growth within the Certified PEIR. As such, impacts to other public facilities would be less than significant and the within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to public services would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.15 Recreation

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Recreation:				
(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than Significant	No	Less than Significant	N/A
(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than Significant	No	Less than Significant	N/A

a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Impact Determination in the Certified PEIR

As discussed in the Certified PEIR, implementation of the General Plan 2045 and Zoning Code Update would result in 12,700 additional housing units and 21,600 new residents at full buildout, which could result in a greater use of the City's existing parks and recreational facilities. The current park service ratio for the City is 8.9 acres of parkland per 1,000 residents, inclusive of regional parks and joint use facilities. However, the current service ratio for City-parkland is 2.2 acres per 1,000 residents, which does not meet the standard of 3 acres per 1,000 residents. The City has identified locations for planned or proposed trails and recreational facilities throughout Culver City, including joint-use facilities proposed throughout the City.

Additionally, while no new parks are currently proposed within the City, approximately 90 percent of Culver City residences are within one half-mile walking distance of an existing park, trail, or open space, including facilities just outside City limits. The service ratio provides an understanding of population relative to park acreage, and therefore a measure of the availability of park space to serve residents, but this ratio alone does not determine the quality of park service available to residents. In addition to improving the amount of park space and access to parks, enhancement of park amenities that improve park usability will allow for a greater variety of uses and programming. Accessibility and the quality of the pedestrian environment leading to/from a green space is also an important factor. Policies in the General Plan 2045 will reduce the likelihood that any existing neighborhood, community, or regional parks, or other recreational facilities would experience overuse resulting in the physical deterioration of those facilities. Therefore, future development under the General Plan 2045 and Zoning Code Update will not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated. Thus, impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to existing neighborhood and regional parks, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Construction

The nearest Culver City Parks, Recreation and Community Services (PRCS) Department parks to the Project Site are Tellefson Park, located approximately 0.2 miles west of the Project Site, and the Veterans Memorial Park, located approximately 0.3 miles east of the Project Site. A small number of construction workers may visit these parks 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 park or recreational facilities that might have an adverse physical effect on the environment. Thus, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Operation

This analysis evaluates the Project's proposed provision of open space and demand for parks and recreational amenities associated with new residents. Per CCMC Section 15.06.300, the public interest requires 3 acres of community park or recreational facilities for each 1,000 persons within the City. To meet this goal, CCMC Section 15.06.310 requires that private developers dedicate land for neighborhood and community park or recreational facilities or pay corresponding in-lieu fees. Based on the Project's residential population of 1,270 residents, the Project would need to provide approximately 3.8 acres of parkland and/or pay in-lieu fees to meet this requirement. Additionally, per CCMC 17.220.020, the Project would be required to provide at least 50,800 sf of open space. As discussed above, the Project will provide a total of 114,169 sf (or 2.86 acres) of open space, consisting of 20,450 sf of private open space and 93,719 sf of common open space (of which 9,240 sf will be open to the public). The open space includes a public plaza with built-in seating, multiple landscaped courtyards, and a playground. While this open space is roughly an acre short of the parkland dedication requirements, it nonetheless constitutes double the minimum amount of open space that is required, and Applicant will also contribute its required share of in-lieu fees.

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 9,240 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. Thus, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Impact Determination in the Certified PEIR

The General Plan 2045 encourages the development of future recreational facilities in order to meet demand associated with anticipated population growth. General Plan 2045 policies are designed to minimize environmental impacts associated with the construction of new parks or expanded recreational facilities. The precise amount, type, and location of future parks and recreational facilities would be determined during the planning process for individual development projects. Future development would be consistent with the proposed land use designations and policies. Environmental impacts associated with construction of new and expanded of parks and recreational facilities that are proposed as part of the General Plan 2045 and Zoning Code Update would be subject to additional environmental review under CEQA, as needed. Implementation of applicable goals and policies in the General Plan 2045 would minimize environmental impacts associated with the construction of new parks or expanded recreational facilities. As such, impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to recreational facilities, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Construction

As discussed within Threshold a), 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 of

this document. Therefore, with implementation of mitigation measures detailed throughout this document (where applicable), impacts during construction of these open space and recreational features would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Operation

As discussed above under Threshold a), the Project's provision of open space and recreational amenities would help offset demand for City 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 decks, 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, the construction of such facilities and the potential for associated adverse effects on the physical environment would be subject to additional environmental review under CEQA, as needed. 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. Thus, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to recreation would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.16 Transportation

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Transportation: Would the project:				
(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant	No	Less than Significant	N/A
(b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Significant and Unavoidable	No	Less than Significant	N/A
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant	No	Less than Significant	N/A
(d) Result in inadequate emergency access?	Less than Significant	No	Less than Significant	N/A

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

Impact Determination in the Certified PEIR

The Certified PEIR found that the General Plan 2045 and Zoning Code Update would not conflict with any applicable program, plan, or ordinance on the circulation system, including transit, roadway, bicycle, and pedestrian facilities, given the availability of nonvehicular transportation options and the Mobility goals and policies included in the General Plan 2045. First, implementation of the General Plan 2045 and Zoning Code Update would improve connections to local and regional transit services, encourage the use of alternative modes of transportation (including walking and biking) through supportive land use development, support of the expansion of a multi-modal network, and improve bike lanes and public transportation services. Additionally, implementation of the General Plan 2045 and Zoning Code Update will not preclude the implementation of the Culver City Short Range Mobility Plan and rather would provide complimentary goals, policies, and implementation actions that address transit improvements. In addition, the Mobility Element supports and complements the measures, objectives, and policies in the City's Bicycle and Pedestrian Action Plan. Further, the Mobility Element places an emphasis on Complete Streets and a layered transportation network consistent with the City's Complete Streets Policy. The Mobility Element establishes the goal of providing a transportation network that is safe and accessible for all travel modes consistent with the City's Local Road Safety Plan. The General Plan 2045 will enable the City to improve bicycling programs and infrastructure throughout the City, providing connections to the existing and proposed bicycle network. The goals and policies in the Mobility Element will be consistent with the applicable plans and therefore, the General Plan 2045 will not conflict with any applicable program, plan, or ordinance on the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As such, impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to a conflict with any applicable program, plan, or ordinance on the circulation system, including transit, roadway, bicycle, and pedestrian facilities, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Transportation Study prepared for the Project by Gibson Transportation Consulting, Inc., dated April 2025 (included as Appendix L), compiled a table of City programs, plans, ordinances, and policies relevant in determining whether the Project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As discussed below, the Project would not conflict with the City's' adopted programs, plans, ordinances, and policies addressing the circulation system. As determined in the Transportation Study, the following City programs, plans, ordinances, and policies would not apply to the Project: Gateway Neighborhood Design Guidelines, Gateway Adjacent Neighborhood Design Guidelines, Residential Parkway Guidelines, and Upper Culver Crest Hillside Design Guidelines. The below sections provide an overview of the Project's consistency with the applicable plans and policies addressing the circulation system.

Traffic Code, Chapter 7.05: Motor Vehicle Air Quality Management

Chapter 7.05 of the CCMC establishes transportation demand and trip reduction measures to reduce vehicular emissions of new developments in excess of 25,000 sf. Since the Project is greater than 25,000 sf, it will implement a comprehensive TDM program that adheres to the TDM requirements of the CCMC. The Project's TDM program will be subject to monitoring by the Planning Division and Transportation Department to ensure compliance.

Mobility Element

The purpose of the Mobility Element is to establish a policy framework that envisions a 2045 citywide network for all transportation modes by encouraging the use of active and shared modes getting to, from, and within Culver City by providing more reliable, safe, affordable, convenient, clean, and connected mobility options for people of all ages and abilities. By enhancing safe and reliable access to schools, parks, community services, neighborhood serving retail, and jobs, the Mobility Element aids in creating a community that is more equitable, inclusive, innovative, and sustainable. The Mobility Element identifies existing community mobility-related concerns and opportunities and establishes goals, policies, and guidance to address these concerns for the future improvement of the transportation network. The Project does not propose to modify or make any modifications to the street classifications or Special Designations, nor would it preclude the City from making improvements to the transportation network as envisioned in the Mobility Element. Consistent with Mobility Element Goal M-1 to provide a safe and accessible transportation network, the Project's driveways would meet all of the City's access requirements and 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. Consistent with Goal M-2 (Complete Streets) and Policy M-2.4, the Project's street frontage along Washington Boulevard would be improved to provide ground floor retail uses, aesthetic treatments on building facades, landscaping, street trees, lighting, seating areas, and a landscaped publicly accessible plaza, thereby creating spaces for gathering and community

along Washington Boulevard (in furtherance of Goal M-8 and Policies M-8.3 and M-8.4). Additionally, bicycle parking would be provided for Project residents, employees and visitors (in furtherance of Policy M-4.4). These features would enhance the street space and pedestrian experience, as well as provide placemaking features, that would foster local business activity and support a safe, convenient transportation systems that is accessible by multiple modes of transportation. The Project's transportation and design features would all meet applicable Americans with Disability Act (ADA) requirements (in furtherance of Policy M-4.6). As discussed above, the Project would implement a TDM Program per Project Design Feature TRAF-PDF-2, where the Project would implement strategies and action plans 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 further reducing Project VMT (in furtherance of Policies M-5.3 and M-5.4). Overall, the Project would not conflict with any goals or policies in the Mobility Element that would result in an adverse physical impact on the environment. As such, the Project's impacts would be less than significant and within the scope of the impacts analyzed by the Certified PEIR.

General Plan 2045 Land Use and Community Design Element

The purpose of the City's General Plan Land Use and Community Design Element (effective October 9, 2024) (Land Use Element) is to define the pattern, scale, organization, and character of development for the City's various land uses, including residential, mixed use, office, retail, light industrial, and civic and public spaces. The Project is located within a TOC because it is located within 0.5 miles of the Sepulveda Boulevard & Venice Boulevard intersection (i.e., within the Sepulveda/Venice Intersection Transit Priority Area). The Project is also located along Washington Boulevard, a designated Mixed-Use Corridor, defined as a residential, non-residential, and commercial corridor along which the Land Use Element seeks to intensify and mix land uses and to improve pedestrian experiences through parking management strategies, active street frontages, and public realm improvements. The Project proposes a desirable new mixed-use residential and commercial development that would activate the street frontage along Washington Boulevard, as discussed above. Thus, the mixed-use residential and commercial uses of the Project would not conflict with the goals and policies for development along Mixed-Use Corridors designated by the Land Use Element. See Section 3.10, *Land Use and Planning*, for further discussion of the Project's consistency with applicable policies of the Land Use and Community Design Element. As such, the Project's impacts would be less than significant and within the scope of the impacts analyzed by the Certified PEIR.

Neighborhood Traffic Management Program

The City adopted a series of procedures for the implementation of NTMPs, as defined in the City's *Neighborhood Traffic Management Program (NTMP) Procedures Manual* (November 22, 2004). Although the Project is projected to directly add trips to a Minor Collector street (Girard Avenue), the Project is not projected to lead to trip diversion along residential Local Streets because the fronting and nearby Arterials provide sufficient capacity to accommodate Project traffic. Additionally, the Project is not projected to add a substantial amount of automobile traffic to congested Arterial Streets that could potentially cause a shift to residential Local Streets because Project traffic would not increase volumes enough to create diversion of existing Arterial trips to nearby Local streets. Therefore, the Project would not be required to propose an NTMP for the surrounding residential neighborhoods. As such, the Project's impacts would be less than significant and within the scope of the impacts analyzed by the Certified PEIR.

Short-Range Mobility Plan

Short-Range Mobility Plan (Culver CityBus, FY 2022-2026) 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. As discussed above, the Project's TDM measures and its design features, such as the provision of bicycle and EV parking spaces, the activation of the Washington Boulevard streetscape, the Project's infill location and proximity to public transit, and the payment of development fees, will all support the City's efforts to improve mobility. As such, the Project would not conflict with any of the proposed changes in *Short-Range Transit Plan*, and improvements made in the plan would likely enhance transit alternatives for employees and visitors to the Project Site. Thus, the Project's impacts would be less than significant and within the scope of the impacts analyzed by the Certified PEIR.

Bicycle and Pedestrian Action Plan

The *Culver City Bicycle & Pedestrian Action Plan* seeks to promote a long-term vision for the City that would "ensure comfortable, safe, and attractive places to bike and walk so that these forms of active transportation become first choices for travelling around our city." Adjacent to the Project Site, Washington Boulevard has been identified for bicycle lane improvements. The Project would not interfere with any improvements proposed as part of the *Culver City Bicycle & Pedestrian Action Plan.* Rather, the Project would support active modes of transportation by providing bicycle parking and improving the pedestrian facilities adjacent to the Project frontage. As such, the Project's impacts would be less than significant and within the scope of the impacts analyzed by the Certified PEIR.

Complete Streets Policy

The City's *City of Culver City Complete Streets Policy* (Adopted January 13, 2020) intends to "promote healthy and sustainable mobility for Culver City residents and visitors by providing safe, convenient, and comfortable access to destinations throughout the City by walking, bicycling, transit, and autos." The Complete Streets Policy sets forth 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 Project would incorporate the complete streets principles into the Project design to encourage multi-modal transportation options within the community.

Specifically, the Complete Streets policies seek to: provide a connected network of streets and facilities that accommodate all modes of travel (Policy 5.a.i); enhance bicycle and pedestrian connectivity to public transit services, as well as to schools, parks, service retail, public facilities, regional connections, and business districts (Policy 5.a.ii); require developments to maintain or enhance connectivity, such as through interconnected street networks with small blocks, walkways and bikeways (Policy 5.a.iii); promote streetscape plans, including street trees, pedestrian-scale lighting, street furniture, and other streetscape elements (Policy 5.b.viii); provide accommodations for pedestrians and bicyclists during construction (Policy 5.b.xi.); and coordinate street improvements with business owners along retail and commercial corridors to develop or enhance vibrant business districts (Policy 5.d.ii).

The Project supports these policies 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 an enhanced streetscape, landscape and street trees, as well as open space along Washington Boulevard. Existing transit options within close proximity to the Project Site would further allow for pedestrian and bicycle access to public transit. Also, the Project will implement a 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 during construction. Any temporary closure of sidewalks closure or traffic lanes would be minimized.

Based on the above, the Project's impacts would be less than significant and within the scope of the impacts analyzed by the Certified PEIR.

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 to identify high-risk corridors and the intersections with the highest collision frequency and severity. Washington Boulevard was identified as a road with a high number of collisions. However, construction of the Project would not preclude the City from implementing improvements to eliminate fatal and severe injury collisions as part of the LRSP. Rather, the Project could help improve the existing conditions along Washington Boulevard. As discussed above, vehicular access to the Project would be provided by two driveways off Washington Boulevard that flank the perimeters of the Project Site, meaning that vehicular ingress/egress would not divide the Project's street-facing amenities, such as the retail spaces and the public plaza. Additionally, the Project's provision of bicycle amenities, its proximity to public transit, and its improvements of the pedestrian environment will all encourage alternative modes of transportation, which could help minimize vehicular collisions in the area. As such, the Project's impacts would be less than significant and within the scope of the impacts analyzed by the Certified PEIR.

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*, which is discussed above. The Project Site is located adjacent to Washington Boulevard, which is identified in the City's High Injury Network (HIN). However, as discussed above, the Project would not preclude any Vision Zero improvements on this corridor, and the Project's location and design could improve the circulation and transportation around the Project Site. Thus, the Project does not conflict with Vision Zero. As such, the Project's impacts would be less than significant and within the scope of the impacts analyzed by the Certified PEIR.

Conclusion

Based on the above, the Project would not conflict with any of the City's adopted programs, plans, ordinances, and policies. As such, impacts would be less than significant, consistent with the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact Determination in the Certified PEIR

As part of the Certified PEIR, a VMT assessment was conducted for the entirety of Culver City, using the Culver City Citywide Travel Demand Forecasting Model to obtain daily vehicle trips, daily VMT, and VMT per capita metrics. At buildout, the General Plan 2045 and Zoning Code Update will result in a 0.95 percent decrease in residential VMT per capita compared to the existing conditions, a 7.26 percent decrease in work VMT per employee compared to existing conditions, and a 3.60 percent increase in total daily VMT per service population. While there would be a resulting reduction in VMT compared with existing conditions, the General Plan 2045 and Zoning Code Update will result in an average daily VMT per capita, VMT per employee, and total VMT per service population above the 15 percent reduction threshold. Even with implementation of all goals and policies contained in the Mobility Element that promote transit priority lanes, multimodal connectivity, integrated public transportation services, and prioritize public transit and mobility service, the General Plan 2045 and Zoning Code Update will not meet the 15 percent VMT reduction threshold. Thus, the Certified PEIR found that the General Plan 2045 and Zoning Code Update will result in significant and unavoidable VMT impacts and that there are no feasible mitigation measures to reduce the severity of this impact.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to a conflict or inconsistency with CEQA Guidelines section 15064.3(b), nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Per the City VMT Guidelines, a "no impact" determination can be made for a project if any of the following screening criteria are met:

1. Small projects that result in less than 250 daily or 25 peak hour trips
2. Projects within 0.50 miles from the key TPAs of Metro E Line Culver City Station, Metro E Line La Cienega Station, Westfield-Culver City Transit Center, or the Sepulveda Boulevard & Venice Boulevard intersection may be screened
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 with less than 50,000 sf in size at a single store

If none of the above screening criteria are met, the Guidelines provide guidance for the further analysis of VMT, as discussed in the following section.

As analyzed in the Transportation Study prepared for the Project (Appendix L), the Project Site is located within 0.5 miles of the Sepulveda/Venice Intersection, a designated TPA, and more than 15% of the on-site residential units are affordable. Thus, based on the City's screening criteria, the Project is presumed to result in a less than significant VMT impact and no further analysis is required. Nonetheless, the Project would implement strategies and action plans as part of a comprehensive TDM program 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 further reducing Project VMT. As such, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no feasible mitigation measures are available to reduce the General Plan 2045 and Zoning Code Update's impacts to VMT. However, unlike the General Plan 2045 and Zoning Code Update, the Project would have a less than significant impact and thus no mitigation measures are required.

c) Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Determination in the Certified PEIR

The land use diagram and policies contained in the General Plan 2045 emphasize transition areas and buffers between land uses of varying intensity, which will serve to reduce potential conflicts between users of the transportation system connected with each land use, including commercial and industrial truck traffic, commute traffic, pedestrians, and cyclists. Access locations for development allowed under the General Plan 2045 will be designed to the City's standards and will provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to meet the City's requirements to protect pedestrian safety. The various goals and policies contained within the Mobility Element are designed to address transportation safety, improve circulation, implement transportation projects, and advance current City plans, policies, programs, and ordinances. The transportation projects included in the Mobility Element are envisioned to improve mobility, safety, and access, and thus will be designed to applicable federal, state, and City Engineering Design Standards or other applicable roadway standards. As a result, the Certified PEIR found that development under the General Plan 2045 and Zoning Code Update will not substantially increase hazards due to a geometric design feature or incompatible use, and impacts are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to an increase in hazards due to a geometric feature or incompatible use, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Transportation Study prepared for the Project (Appendix L) analyzed existing vehicle-vehicle, vehicle-bicycle, and vehicle-pedestrian interactions on transportation infrastructure adjacent to the Project Site and the potential impacts and hazards of the Project on those interactions, which are summarized below.

Driveway Design Features

Under current conditions, there are two vehicular driveways to the Project Site along Washington Boulevard, which will be modified/relocated in connection with the Project. Vehicular access to the Project Site would be provided by two separate driveways along Washington Boulevard that are restricted to RIRO movements. The north driveway (Driveway A) would provide commercial, guest, and residential access to Building A from a fire lane along the northeast side of the property, and the south driveway (Driveway B) would provide residential access to Building B. As shown on Figure 3, a new traffic signal would be installed at Driveway B that aligns with Prospect Avenue, which will better facilitate streamlined vehicular ingress/egress as well as safe pedestrian and bicycle crossing.

The parking garage is intended to serve tenants and retail visitors in Building A and Building B. Level 1 of Building A would provide secure, gated residential parking adjacent to commercial parking on the same level. Level 1 of Building B would provide secure residential parking. Both buildings would provide ramps that lead to Level P1, a subterranean parking garage spanning both Building A and Building B that would provide additional residential spaces. The entire parking area for both buildings would be physically secured for safety.

Retail loading would be accessed from a fire lane along the northeast side of the property at Building A. A 12’ x 40’ loading area that is open to the sky is provided along the north fire lane, in compliance with CCMC requirements. Trucks would access the loading area by traveling from west to east and then reversing into this loading zone. They would then exit to the west, back to Washington Boulevard. Materials would be transported directly from the loading area and through a corridor to the retail spaces. An additional 10’ x 30’ loading area that is open to the sky is provided along the south fire lane. Trucks would access the loading area by traveling from west to east, and then they would exit to the west, back to Washington Boulevard.

Pedestrian access to the Project would be provided separate from vehicular access via lobby entrances and a public paseo accessed along Washington Boulevard.

The section of Washington Boulevard along which the Project driveways are situated provides four travel lanes, two in each direction, a center turn lane, a northbound right turn lane, and limited unmetered parking on both sides of the street. Sidewalks are provided on Washington Boulevard adjacent to the Project Site. No existing bicycle facilities are provided adjacent to the Project Site; however, the City has proposed a Class II bike lane along Washington Boulevard in connection with the *Culver City Bicycle and Pedestrian Master Plan* and the *Culver City Bicycle & Pedestrian Action Plan*. However, the Project would generate fewer than 5 vehicles per minute across the two driveways on Washington Boulevard. Thus, pedestrians and cyclists would have adequate gaps in vehicular traffic at the driveways to safely cross, and the Project is unlikely to result in an increase in driveway conflicts. Furthermore, the new traffic signal to be installed at the Project’s southern driveway would provide for added safe pedestrian crossing at this driveway location. No exceptional horizontal or vertical curvatures exist along this section of roadway that would

create sight distance issues for Project traffic utilizing the proposed driveways. Additionally, as discussed above, the proposed driveways are located on the perimeters of the Project Site, meaning that all of the Project's street-facing amenities along Washington Boulevard (such as the retail spaces and the public plaza) will be situated in one central location.

As shown above, no unusual or new obstacles are presented in the Project's driveway design that would be considered hazardous to pedestrians, bicyclists, or motorists. Additionally, all driveways would be subject to review and approval by the City.

Pedestrian, Bicycle, and Transit Activity

Adequate sight distance would be provided at the Project driveways to ensure safety for all road users, including pedestrians, bicyclists, and motorists. The Project driveways would be designed to remain clear of hardscapes, vegetation, or signage that would impede sight lines.

Based on the trip generation estimates detailed in Appendix L, the Project would generate fewer than 5 vehicles per minute across the two driveways. 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 or vehicle-bicycle conflicts. The Washington Boulevard / Prospect Avenue bus stop is adjacent to the Project Site; however, it is on the opposite side of Washington Boulevard from the Project, so the sidewalk and bus stop would not be affected by construction. Therefore, the Project would not affect transit activity or access.

Physical Terrain

The Project Site is located on a relatively flat parcel with little to no change 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 the Project driveways. The driveways are designed to permit RIRO movements only and to intersect the public right-of-way at 90-degree angles to the extent possible, with adequate building setback to allow pedestrians and bicyclists to observe vehicles within the driveway.

Incompatible Uses

The Project would be compatible with the surrounding uses. The Project will incorporate both residential and commercial uses, which is consistent with the area surrounding the Project Site. The adjacent neighborhood consists of a mix of uses, including residential uses, commercial/retail uses, and various institutional uses. Thus, the mixed-use Project is not out of place for the neighborhood. Additionally, the Project will incorporate a significant amount of open space, some of which is open to the public, which is cohesive with the other open space areas in the nearby area, such as Tellefson Park to the east and Veterans Memorial Park to the west. The Project also includes bicycle parking and storage, which is compatible given that the Culver City Bike and Walking Path is located just 0.2 miles from the Project Site and given the City's plans to add a bike lane to Washington Boulevard. Overall, the Project would be complimentary to the existing and planned characteristics of the neighborhood.

Summary

Based on the site plan review and design, the Project does not present any geometric design features that would substantially increase hazards related to traffic movement, mobility, or pedestrian accessibility. Thus, Project impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

d) Would the Project result in inadequate emergency access?

Impact Determination in the Certified PEIR

As discussed in the Certified PEIR, the General Plan 2045 and Zoning Code Update applies programmatically Citywide, whereas project-level review will be conducted by the City to evaluate the site access for emergency vehicles and traffic control plans for individual projects. This development review process will ensure that future development under the General Plan 2045 and Zoning Code Update will be consistent with applicable policies and will not hinder emergency access for individual sites. Therefore, the General Plan 2045 and Zoning Code Update will not result in inadequate emergency access, and impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to inadequate emergency access, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is located within an urbanized area with a fully developed roadway system. Direct emergency access is provided by Washington Boulevard. Construction of the Project is not anticipated to require road closures in public right-of-way, and construction staging will primarily take place 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 CCPD and 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. Thus, the Project would not result in inadequate emergency access during construction, and impacts would be less than significant.

Regarding Project operation, the Project incorporates multiple features to ensure adequate emergency access. There are fire lanes around most of the perimeter of the Project Site and via the central paseo, and a new fire access gate will be installed at the end of Milton Avenue. Additionally, 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 and would be within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to transportation would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.17 Tribal Cultural Resources

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Tribal Cultural Resources:				
(a) Would the project 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.	Less than Significant	No	Less than Significant	NA

a) Would the Project 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)?

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 Determination in the Certified PEIR

The Certified PEIR determined that the City was a highly suitable area for the inhabitance of indigenous people. There are 12 known prehistoric archaeological resources that have been previously identified within the Planning Area, and while the City is mostly built out, this does not preclude the presence of tribal cultural resources from being located underneath existing development. Thus, potential for encountering tribal cultural resources in the City is considered high, and implementation of the General Plan 2045 and Zoning Code Update could cause a substantial adverse change to tribal cultural resources. However, future projects would be required to comply with the provisions of SB 18 and AB 52, as necessary, to incorporate tribal consultation into the review process to ensure that tribal cultural resources are properly identified and

that mitigation measures are identified to reduce impacts on these resources. Furthermore, the City would continue to implement standard conditions of approval that require and specify the steps to be taken to avoid damage and to promote preservation if tribal cultural resources are uncovered during construction in support of the City's goals for protection of cultural resources. Adherence to these regulations and implementation of proposed General Plan policies and implementation actions would ensure that the Project's impact with respect to tribal cultural resources would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to tribal cultural resources, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Consistent with the Certified PEIR analysis, the City conducted tribal consultation per the provisions of AB 52 in an effort to ensure that tribal cultural resources are properly identified and that measures are identified to reduce impacts on these resources. The City submitted notification and request to consult letters to the individuals and organizations listed below on March 13, 2025:

- Sandonne Goad and Samuel Dunlap, Gabrielino/Tongva Nation
- Charles Alvarez, Gabrielino-Tongva Tribe
- Andrew Salas and Christina Swindall Martinez, 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 requests for consultation from the Gabrieleño Band of Mission Indians—Kizh Nation (Kizh Nation) and the Gabrielino Tongva Indians of California Tribal Council (Gabrielino Tongva Indians). Consultation with the Kizh Nation was conducted on April 7, 2025, and May 22, 2025. Consultation with the Gabrielino Tongva Indians was conducted on April 24, 2025. During the consultation meetings, both tribes provided background information and indicated that the area around the Project Site is located within their traditional homeland and that resources have been previously found at other construction sites within the city. However, the tribes did not provide documentation on tribal cultural resources that are specific to the Project Site. On April 24, 2025, the City received a correspondence from the Gabrielino Tongva Indians indicating that the tribal chair was the most likely descendant and providing their monitoring mitigation language.

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 five prehistoric archaeological resources have been recorded outside of the 0.50-mile radius records search, adjacent to Ballona Creek. 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 alluvial soils (consisting of interlayered mixtures of sand, silt and clay).

Based on the above, it was determined that 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 known Native American villages 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, per the City's standard conditions of approval, as shown below, the City has determined that the Project would be subject to Native American monitoring by both the Kizh Nation and the Gabrielino Tongva Indians. Monitoring would be conducted per the City's standard conditions of approval, which would ensure that the Project's impact with respect to tribal cultural resources would be less than significant. As noted above, the Certified PEIR contemplated that projects would be subject to and would comply with the City's standard conditions of approval, as is the case here.

Standard City Conditions of Approval (COA) – Tribal Cultural Resources (TCR)

TCR COA-1: Prior to the issuance of demolition permits and if determined necessary by the City and potentially with consultation from Native American tribes, when applicable, based on sensitivity for encountering tribal cultural resources, the applicant shall retain a Native American Monitor from a Gabrieleño Tribe or Tribes. The Native American Monitor(s) 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. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor(s). The Native American Monitor(s) shall provide a written daily report for each day they are on site that shall be submitted to the applicant on a regular basis. This daily report shall include observations relating to soil or sediment types and disturbances, the location and description of ground-disturbing activities that were monitored, and the location and descriptions of cultural resource materials that were discovered.

TCR COA-2: Prior to commencement of 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(s) 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.

TCR COA-3: In the event of a discovery of potential tribal cultural resources, a qualified archaeologist (after consultation with the Native American Monitor[s]) 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(s) 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.

TCR COA-4: A meeting shall be convened between the applicant, the qualified archaeologist, the Tribe(s), and the City's Planning and Development Director to discuss the significance of the find. At the meeting, the significance of the discoveries shall be discussed and, after consultation with the Tribe(s) and the qualified archaeologist, a decision shall be made, with the concurrence of the City's Planning and Development Director, as to the appropriate mitigation or treatment (documentation, recovery, avoidance, etc.) for the cultural resources. If the applicant, qualified archaeologist, and the Tribe(s) cannot agree on the significance or the treatment for the archaeological or tribal cultural resources, these issues will be presented to the City Planning and Development Director for decision. The City's Planning and Development Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist, and shall take into account the cultural and religious principles and practices of the Tribe(s).

TCR COA-5: The treatment measures for the resource shall be included in a treatment plan that is prepared by the qualified archaeologist with input from the Tribe(s) as necessary, and with the concurrence of the City's Planning and Development Director. The treatment plan shall also include measures regarding the curation of the recovered resources. Once the treatment measures have been implemented, construction excavations can proceed in the vicinity of the discovery.

TCR COA-6: The recovered Native American resources may be placed in the custody of the Tribe(s), 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 more than one Tribe is involved with the project and they cannot come to an agreement between themselves as to the final disposition of precontact archaeological resources or tribal cultural resources, the applicant shall contact the City's Planning and Development Director regarding this matter and then proceed with the resources being curated at a public, non-profit curation repository in Los Angeles County that meets federal curation standards pursuant to 36 CFR Part 79.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to tribal cultural resources would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.18 Utilities and Service Systems

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Utilities and Service Systems: Would the project:				
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than Significant	No	Less than Significant	N/A
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than Significant	No	Less than Significant	N/A
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	No	Less than Significant	N/A
(d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than Significant	No	Less than Significant	N/A
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than Significant	No	Less than Significant	N/A

a) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact Determination in the Certified PEIR

Future development that will occur under the General Plan 2045 and Zoning Code Update will result in an increased demand for water, wastewater treatment, storm drainage, electric power, natural gas, and telecommunication services and facilities.

With regard to water facilities, each individual project would be required to demonstrate the availability of water to service the development, as required and applicable, in the form of will-serve letters and, for larger projects, preparation of a Water Supply Assessment (WSA) per SB 610. If additional facilities were to be constructed, separate environmental analysis would be required. The City currently complies with the applicable water-related statutory requirements, and the General Plan 2045 ensures that the City would continue to comply with the state and federal regulatory requirements. Overall, the General Plan 2045 policies contain various methods of water conservation and water planning, such as expanding and enhancing existing water conservation measures, mandates, and strategies to optimize wise use of water (Policy INF-2.1); restricting and eliminating potable water use for primarily non-edible irrigated landscapes where alternative water sources are available (Policy INF-2.6); providing dual plumbing for all new public parks and landscape projects in anticipation of future water recycling or on-site water capture, treatment, and re-use infrastructure to be used for irrigation (Goal INF-4 and associated policies; Policy INF-2.8); and

providing resources and guidance for conventional lawn conversion to drought tolerant landscaping (Policy INF-2.5), which would improve water management in the Planning Area.

Most new development is expected to be infill and would rely on the existing distribution network that has sufficient capacity to convey available water supplies. Moreover, it is anticipated that the City's overall water infrastructure system would be improved over the next 25 years, particularly as redevelopment occurs and the system services additional residences and businesses. If future development under the General Plan 2045 and Zoning Code Update would require the construction and operation of new or expanded water supply facilities, construction or expansion of such facilities would be subject to project-level environmental review in accordance with CEQA at the time it is proposed. This project-level review would identify any significant environmental impacts that could result from the construction and operation of such facilities and would identify project-specific mitigation measures to lessen or avoid any significant impacts as feasible. Furthermore, beyond construction and installation of new transmission and distribution infrastructure, new or expanded water supply facilities undertaken by the City (e.g., water treatment plants, water reclamation/recycling facilities, pump stations) would be the responsibility of Metropolitan Water District of Southern California (Metropolitan), LADWP and GSWC and would also be subject to individual CEQA review and clearance to determine whether any would have significant environmental impacts. Therefore, impacts on water associated with implementation of the General Plan 2045 and Zoning Code Update would be less than significant.

With regard to wastewater, the General Plan 2045 includes policies and actions that would reduce the demand for wastewater treatment. New development allowed under the General Plan 2045 and Zoning Code Update will be subject to the latest adopted edition of the California Plumbing Code and CALGreen Code, which will reduce the amount of effluent entering the wastewater system. In addition, as discussed within the Certified PEIR, there is sufficient capacity at the Hyperion Water Reclamation Plant (HWRP) and Joint Water Pollution Control Plant (JWPCP) to accommodate wastewater collection and treatment generated by the growth that will occur under the General Plan 2045 and Zoning Code Update. Future development would be located within urban areas of the Planning Area and near existing wastewater infrastructure. In addition, the City would comply with applicable current and future statutory requirements. Therefore, the Project would not result in insufficient wastewater collection and treatment, and no new or expanded wastewater treatment facilities would be needed. Thus, impacts would be less than significant.

With regard to stormwater drainage, future development will be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the City's system. Compliance with applicable City requirements and policies will ensure that runoff generated by new development associated with the implementation of the General Plan 2045 and Zoning Code Update will not inundate existing storm drainage facilities such that new or expanded facilities will be required. As such, the General Plan 2045 and Zoning Code Update's impacts on stormwater drainage would be less than significant.

With regard to electric power, it is possible that future development allowed under the General Plan 2045 and Zoning Code Update could result in the provision of new electrical power facilities, including new or upgraded substations and/or transmission lines. However, all new development would be subject to the latest adopted edition of the CALGreen Code, which establishes mandatory energy efficiency measures for new residential and non-residential buildings. Compliance with current CALGreen requirements and

proposed General Plan policies that promote renewable energy generation and energy efficiency would ensure that new development associated with the implementation of the General Plan 2045 and Zoning Code Update would be energy efficient, thus reducing the need for new electrical power infrastructure. Should upgrades to new facilities be required, construction of those facilities could result in adverse environmental effects. However, future facilities would be subject to environmental review under CEQA and would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Therefore, electricity demand from projects associated with the implementation of the General Plan 2045 and Zoning Code Update would not result in additional impacts related to the provision of electrical power infrastructure. Thus, the General Plan 2045 and Zoning Code's impact on electric power would be less than significant.

Regarding natural gas, it is possible that future development allowed under the General Plan 2045 and Zoning Code Update could result in the provision of new natural gas facilities, including new and/or upgraded pipelines. SoCalGas estimates that the total gas demand in its service area would decline at an annual rate of 1 percent from 2020 to 2035 due to modest economic growth and CPUC-mandated energy efficiency standards and projects.[67] Additionally, all new development would be subject to energy efficiency standards contained in the latest adopted edition of the CALGreen Code, thus reducing the need for new natural gas infrastructure. Should upgrades be required, construction of those facilities could result in adverse environmental effects. However, future facilities would be subject to environmental review under CEQA and would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Therefore, natural gas demand from projects associated with the implementation of the General Plan 2045 and Zoning Code Update would not result in additional impacts related to the provision of natural gas infrastructure. Thus, the General Plan 2045 and Zoning Code's impact on natural gas would be less than significant.

Regarding telecommunications facilities, it is possible that future development allowed under the General Plan 2045 and Zoning Code Update could result in the provision of new telecommunication facilities. Should upgrades to telecommunication infrastructure be required, construction of those facilities could result in adverse environmental effects. However, future facilities would be subject to environmental review under CEQA and would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Therefore, demand for new telecommunications services from projects associated with the implementation of the General Plan 2045 and Zoning Code Update would not result in additional impacts related to the provision of telecommunication infrastructure. Thus, the General Plan 2045 and Zoning Code Update's impact on telecommunications facilities would be less than significant.

In summary, the Certified PEIR found that the General Plan 2045 and Zoning Code Update would result in less-than-significant impacts related to new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities.

[67] California Gas and Electric Utilities, 2020. 2020 California Gas Report. https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf. Accessed April 2023.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Water

Construction

Water would be required during construction for various purposes. Water for construction would be required for activities such as dust control, cleaning of equipment, excavation/export, removal and re-compaction, masonry, painting, and clean-up. 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 the non-potable water is trucked to the construction site. Project construction activities would also create a demand for some potable water, such as for drinking, cleaning of brushes and other items, and lavatories, which would also be trucked to the construction site.

According to the Water Infrastructure Analysis prepared for the Project by KPFF, dated March 7, 2025, (included as Appendix K of this document), the Project would connect to an existing 8-inch water main in Washington Boulevard for both domestic and fire water services. 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. 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 and within the scope of impacts analyzed in the Certified PEIR.

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 Infrastructure Analysis (Appendix K of this document), the Project would have a minimum fire flow requirement of 4,000 gpm at 20 psi residual for a duration of 4 hours, which complies with CCMC Section 9.02. There is an existing fire hydrant located along the Project's frontage on Washington Boulevard, and there are three additional hydrants within 300 feet of the Project Site. The existing fire hydrant located along the Project's frontage on Washington Boulevard can provide 3770 gpm at 20 psi for a duration of 2 hours. Therefore, it is understood that the difference of 230 GPM between the

required and tested flow would be met by the three additional hydrants within 300 feet of the Project Site, and as such an additional fire flow test is not required by the CCFD (Appendix K). Based on conversations with the CCFD, the difference between the flow for "4 hours" written in the required fire flow and the flow for "2 hours" written in the tested fire flow availability is irrelevant to this analysis (see Appendix K). 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. Thus, Project operational impacts related to water infrastructure would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Wastewater

The City's wastewater is treated at the HWRP or the JWPCP. The HWRP treats an average daily flow of approximately 275 million gallons per day (mgd), with the capacity to treat up to 450 mgd. Therefore, the HWRP has a remaining treatment capacity of approximately 175 mgd.[68] The JWPCP currently treats 260 mgd and has a capacity of 400 mgd, meaning there is a remaining capacity of 140 mgd.

During construction of the Project, a negligible amount of wastewater would be generated by construction workers. However, any such wastewater generation would be temporary, only lasting as long as Project construction activities occur (approximately 37 months). It is anticipated that portable toilets would be provided by a licensed private vendor that would dispose of the wastewater off-site. Such wastewater generation is therefore expected to result in either no or negligible discharges to the City's wastewater treatment conveyance systems or treatment facilities, and the wastewater would not be discharged through any service connections at or near the Project Site. Any off-site wastewater flows would be minimal in comparison to the meaning treatment capacities of the HWRP and the JWPCP. Additionally, construction-related impacts would be on a temporary, intermittent basis. As such, the minimal wastewater generation during construction would not require the construction of new or expansion of existing facilities, and, given its small amount, is not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems.

A Wastewater Infrastructure and Generation Analysis Memorandum was prepared for the Project by KPFF, dated March 7, 2025, and is included in Appendix M of this document. The technical memorandum evaluates the existing wastewater infrastructure to determine whether there is available capacity in the sewer lines serving the Project Site to accommodate the Project. As shown in **Table 31,** *Estimated Operational Wastewater Generation,* operation of the Project would generate approximately 209,708 gpd [approximately 0.32 cubic feet per second (cfs)] of wastewater. The Project's wastewater generation would represent a fraction of one percent of the daily capacity available at the HWRP or JWPCP. Therefore, Project impacts on wastewater treatment facilities would be less than significant, consistent with the Certified PEIR.

[68] City of Los Angeles Sanitation. Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=2hxygimk0_5&_afrLoop=1342937646848223#!. Accessed February 27, 2024.

TABLE 31
ESTIMATED OPERATIONAL WASTEWATER GENERATION

Project Land Uses	Units	Wastewater Generation Rate (gpd)[a]	Peak Wastewater Factor	Total Wastewater Generation (gpd)	Sewage Flow Rate (cfs)
Residential	508 units	156 gpd/unit	2.6	206,045	0.319
Commercial	14,087 sf	0.1 gpd/sf	2.6	3,663	0.006
Total Gross Proposed Wastewater Generation				***209,708 gpd***	***0.32 cfs***

NOTE:

[a] Sewer generated rates are per LACSD Sewage Generation Factors.

SOURCE: KPFF, 2025, Wastewater Infrastructure and Generation Analysis Memorandum (Appendix M of this document)

As discussed in the Sewer Area Study, the Project proposes a total of six sewer connections, including three sewer connections to the main at the northeast edge of the Project Site, one sewer connection to the main at the southeast corner of the site, and two sewer connections to the main at the southwest edge of the site.

The sewer area study is broken into two sewersheds: Sewershed A and Sewershed B. Sewershed A includes three of six proposed sewer connections by the Project, which is assumed to account for 50 percent of the wastewater flow from the Project, and all existing developments bounded by the Project Site, Washington Boulevard, Elenda Street, Aletta Avenue, and Charles Avenue. Sewershed B includes three of six proposed sewer connections by the Project, which is assumed to account for 50 percent of the wastewater flow from the Project, and all existing developments bounded by the Project Site, Charles Avenue, Aletta Avenue, Huron Avenue, and Washington Boulevard. See Appendix M for an exhibit of the Project Site and sewershed delineation.

Table 32, *Sewer Capacity*, shows the pipe capacity of the mains in Sewershed A and Sewershed B in the existing condition and the proposed condition as a result of the Project. The most downstream end of the main corresponding to each sewershed was studied in this analysis (see the Sewer Area Study for additional details and capacity calculations). Based on this analysis, the Project would not cause the wastewater flow in the existing sewer mains to exceed 50 percent of their full flow capacity. Therefore, the existing infrastructure is expected to be sufficient to accept flow from the proposed development.

TABLE 32
SEWER CAPACITY

Sewershed	Existing Flow (cfs)	Proposed Flow with Project (cfs)	50% Full Flow Capacity (cfs)	Existing Percent Full (%)	Proposed Percent Full (ft/s)
Sewershed A	0.062	0.225	0.47	17.4	33.3
Sewershed B	0.059	0.222	0.31	21.0	41.0

SOURCE: KPFF, 2025, Wastewater Infrastructure and Generation Analysis (Appendix M of this document).

Further, construction of the Project would include all necessary on and off-site sewer pipe improvements and connections to adequately link the Project to the existing City sewer system based on the City

requirements. The necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the City.

Therefore, based on the above, the Project would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects. Thus, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Stormwater Drainage

The grade of the Project Site descends gently to the south, with a site grade range of approximately 66 feet ABSL near the northern portion of the site to an approximate elevation of 52 feet AMSL at the southern portion of the site. The existing site gradient and stormwater runoff generally flows either southwest towards Washington Boulevard or southeast to a low point at the southeast corner of the site towards Milton Avenue.

As discussed in Section 3.9, *Hydrology and Water Quality*, the preliminary concept for the site drainage and stormwater treatment implements a rainwater capture and reuse system that would utilize stormwater from the Project Site for on-site drip irrigation. The Project would include appropriate on-site drainage improvements to convey anticipated stormwater flows into the City's municipal storm drain system. Due to the decrease in impervious area, the Project is anticipated to decrease runoff volumes, and thus the demand on the surrounding storm drain infrastructure would be reduced. Moreover, final plan check by the City would ensure that adequate capacity is available in the storm drain system in surrounding streets prior to Project approval. The Applicant would be responsible for providing the necessary on-site storm drain infrastructure to serve the Project Site, as well as any connections to the existing system in the area. It is also acknowledged that there are no known deficiencies in the existing storm drain system.

Therefore, based on the above, the Project would not require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. Thus, impacts associated with on-site stormwater drainage facilities would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Electric Power

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 likely be powered with diesel fuel. Additionally, the temporary 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. Additionally, 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. Thus, 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 a fraction of the Project's net annual operational electricity consumption, which would be within the supply and infrastructure capabilities of SCE. 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. Likewise, 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.

Regarding Project operations, as reported above in Table 9, *Summary of Annual Net New Energy Use During Project Operation*, the Project's annual net increase in operational electricity usage would be approximately 1,408 MWh for the Project. The Project-related increase in annual electricity consumption would represent 0.001 percent of SCE's total energy sales. Given the miniscule increase in electrical demand to SCE's distribution network, SCE's facilities would be able to meet the Project's demand. As such, the Project's operational electricity services and supply and infrastructure impacts would be less than significant and would not require the construction of new electric facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects, consistent with the scope of impacts analyzed in the Certified PEIR.

Natural Gas

Construction activities, including the construction of new buildings and hardscape, typically do not involve the consumption of natural gas. Accordingly, as discussed in Section 3.5, *Energy*, natural gas is not expected to be supplied to support Project construction activities; thus, there would be no expected demand generated by construction.

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 to 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 it would not result in the construction of new energy facilities or expansion of existing facilities. As discussed in Section 3.5, *Energy*, natural gas is not expected to be needed during construction of the Project.

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. Thus, construction impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

As reported in Table 9, operation of the Project would result in a net increase of approximately 3,914,964 cf of natural gas per year. The SoCal Gas 2024 California Gas Report estimates that natural gas supplies within SoCalGas' planning area will be 769,055 million cf in 2030.[69] Thus, the Project's annual net increase

[69] California Gas and Electric Utilities, 2024 California Gas Report, https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf.

of 3.9 million cf of natural gas in year 2030 would account for <0.0001 percent of the 2030 forecasted annual consumption in SoCalGas' planning area. Therefore, the Project would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth. Given the incremental increase in natural gas demand to SoCal Gas's distribution network, SoCal Gas's facilities would be able to meet the Project's demand, and the Project's operational natural gas services and supply and infrastructure impacts would be less than significant and would not require the construction of new natural gas facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects, consistent with the scope of impacts analyzed in the Certified PEIR.

Telecommunications

The Project Site is located in a developed and urbanized area that is served by existing telecommunication services. The Project would include the installation of new underground telecommunication lines (for internet, telephone, and other services), as needed, to serve the residential and commercial uses proposed on the Project Site. Construction impacts associated with the installation of new telecommunication infrastructure would primarily involve trenching in order to place the lines below ground surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure if needed is expected to be limited to on-site telecommunications distribution and minor off-site work associated with connections to the broader infrastructure system. As telecommunication providers already deliver their services to the Project Site and to homes and businesses in the vicinity of the Project Site, it is anticipated that existing telecommunications facilities would be sufficient to support the Project's needs for telecommunication services. As such, no substantial upgrades to off-site telecommunications facilities are anticipated. Therefore, the Project would not require or result in the relocation or construction of new or expanded telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Thus, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Impact Determination in the Certified PEIR

As discussed in the Certified PEIR, the General Plan 2045 and Zoning Code Update's projected increase in development will result in an increased demand for potable water. Culver City is served by two water service providers: GSWC and LADWP. GSWC and LADWP will account for the General Plan 2045 and Zoning Code Update growth during the next UWMP update cycle in 2025 and thus will account for future development in the City prior to the General Plan Update's horizon year of 2045. Individual development proposals that meet the definition of a project under CEQA will be required to address water supply as part of the CEQA process, and for qualifying projects, a WSA will be required pursuant to SB 610 as part of the

project's CEQA analysis. Furthermore, all new development would be subject to water conservation standards contained in the CALGreen Code. Compliance with current CALGreen requirements would ensure that future development allowed under the General Plan 2045 and Zoning Code Update would establish water conservation features. In addition, future development will be required to comply with Chapter 5.03 of the City's Municipal Code, the City's Water Conservation Plan, and General Plan 2045 policies aimed at reducing water demand over time. In the event of a water shortage, GSWC and LADWP will rely on their Water Shortage Contingency Plans (WSCPs), which are to be engaged in the case of a water shortage event, such as a drought or supply interruption.

Therefore, given that (1) Metropolitan, who supplies much of the GSWC and LADWP water, will continue to improve regional water supplies though its Integrated Water Resources Plan (IRP) planning process and its 26-member agencies will continue to improve local water supplies; (2) the GSWC and LADWP have the ability to implement a WSCP in the case of supply shortages, which had demonstrated 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 within the region, including by GSWC and LADWP, to meet all future demands within the Culver City service area. Based on the above, there would be sufficient water supplies available to serve the reasonably foreseeable future development associated with the General Plan 2045 and Zoning Code Update during normal, dry and multiple dry years. Thus, impacts regarding water supply are less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to water supply, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Construction

As stated under Threshold a), some 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. However, construction activities would be intermittent, and the demand for water consumption during construction would be temporary and limited to just the duration of construction (approximately 37 months). It is therefore expected that Project construction activities would generate minimal potable water demand , which could 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. Given that Project construction would require a nominal amount of water compared to Project operation, the Project's intermittent construction-related water demand would also be able to 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, and impacts on water supply during construction would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Operation

Project Water Demand

Estimated domestic water demand for the Project is shown in **Table 33**, *Project's Estimated Annual Water Consumption,* which shows the net increase in potable water that would be required for the Project. As shown in Table 33, the net annual water demand for the Project would be 104 AFY (see Appendix N, Water Supply Assessment, of this document). As discussed in the following section, existing water supplies are sufficient to handle this net increase.

TABLE 33
PROJECT'S ESTIMATED ANNUAL WATER CONSUMPTION

Proposed Use	Units	Water Demand Rate	Total Water Demand (AFY) [b]
Residential	508 du	173 gpd/du	99
Food Services	14,087 sf	0.11 gpd/sf	1.8
Covered Parking	269,421 sf	0.020 gal/sf/cleaning	0.2
Community Pools and Spa	0.030 acres	[a]	0.11
Irrigated Landscaping	0.92 acres	[a]	1.8
Distribution System Losses	--	[a]	5.2
		Total Proposed Water Demand	**108**
Existing Site Demand		[a]	-3.8
		Total Net Water Demand	**104**

NOTES: gpd = gallons per day; sf = square feet; AFY = acre-feet per year; du = dwelling unit.

[a] See Appendix N of this document for details

[b] Totals may not sum due to rounding.

SOURCE: EKI, Water Supply Assessment, 2024 (Appendix N of this document), Table 1.

Golden State Water Company Water Supplies

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. As indicated in the WSA, the Project's commercial and landscaping demands and associated water distribution losses are within the projected water demand growth that forms the basis of GSWC's demand projections in the adopted GSWC Culver City 2020 UWMP, while the multi-family residential and corresponding distributional loss demands are additive to the 2020 UWMP projections.

The WBMWD 2020 UWMP states that it will be able to serve 100% 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 included in the GSWC 2020 UWMP. Additionally, GSWC has confirmed that is has the ability to purchase additional water from WBMWD to meet the additive demands of the Project associated with the multi-family residential use and corresponding distributional water loss. Therefore, the available supplies to the GSWC Culver City service

area are considered to be equal to GSWC 2020 UWMP demands plus the additive demands of the Project under all conditions (i.e., current and projected, and for normal, single dry, and multiple dry years, including a five-year drought period). The total projected potable supplies, inclusive of the Project, for the GSWC Culver City service area for normal, single dry, and multiple dry years are presented in **Table 34**, *Projected Normal Year Water Supply and Demand for Culver City Service Area*, **Table 35**, *Single Dry Year Water Supply and Demand for Culver City Service Area*, and **Table 36**, *Multiple (Five) Consecutive Dry Years Water Supply and Demand through 2045 for Culver City Service Area*, respectively.

TABLE 34
PROJECTED NORMAL YEAR WATER SUPPLY AND DEMAND FOR CULVER CITY SERVICE AREA

	2025	2030	2035	2040	2045
Normal Year Supply	5,002	5,288	5,410	5,504	5,605
Normal Year Demand (inclusive of Project)	5,002	5,288	5,410	5,504	5,605
Difference	0	0	0	0	0

NOTE: All values in acre-feet.
SOURCE: EKI, Water Supply Assessment, 2024 (Appendix N of this document), Table 6.

TABLE 35
SINGLE DRY YEAR WATER SUPPLY AND DEMAND FOR CULVER CITY SERVICE AREA

	2025	2030	2035	2040	2045
Single Dry Year Supply	5,502	5,796	5,927	6,031	6,142
Single Dry Year Demand (inclusive of Project)	5,502	5,796	5,927	6,031	6,142
Difference	0	0	0	0	0

NOTE: All values in acre-feet.
SOURCE: EKI, Water Supply Assessment, 2024 (Appendix N of this document), Table 6.

TABLE 36
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	5,796	5,927	6,031	6,142
	Dry Year Demand	5,502	5,796	5,927	6,031	6,142
	Difference	0	0	0	0	0
2	Dry Year Supply	5,520	5,815	5,947	6,052	6,142
	Dry Year Demand	5,520	5,815	5,947	6,052	
	Difference	0	0	0	0	0
3	Dry Year Supply	5,538	5,835	5,968	6,074	6,142
	Dry Year Demand	5,538	5,835	5,968	6,074	6,142
	Difference	0	0	0	0	0
4	Dry Year Supply	5,557	5,854	5,989	6,097	6,142

Year		2025	2030	2035	2040	2045
	Dry Year Demand	5,557	5,854	5,989	6,097	6,142
	Difference	0	0	0	0	0
5	Dry Year Supply	5,575	5,874	6,010	6,119	6,142
	Dry Year Demand	5,575	5,874	6,010	6,119	6,142
	Difference	0	0	0	0	0

NOTE:

[1] All values in acre-feet.
[2] All Dry Demands are inclusive of the Project.

SOURCE: EKI, Water Supply Assessment, 2024 (Appendix N of this document), Table 6.

In addition, GSWC, due to new requirements by the State, is currently required to continue to increase water efficiency in its service area into the future. GSWC has demonstrated effectiveness in reducing demand during recent water shortage conditions through implementation of its WSCP and would be expected to rely on its WSCP to meet any potential water shortages or regulatory-required cutbacks.

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.
- 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.

Based on the above, given that (1) the projections inclusive of the Project do not identify supply shortfalls under any hydrologic conditions evaluated; (2) GSWC has the ability to implement a WSCP in the case of supply shortages and has demonstrated its effectiveness during recent droughts; and (3) the recent 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 GSWC Culver City service area and those associated with the Project.

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. Thus, water supply impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

c) Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

Impact Determination in the Certified PEIR

As discussed in the Certified PEIR, future development under the General Plan 2045 and Zoning Code Update would result in an increase in the generation of wastewater and demand for wastewater treatment capacity. As the demand for wastewater treatment capacity increases, there may be a need to increase wastewater conveyance and treatment facilities, the construction of which could cause environmental impacts. However, no new major sewer upgrades are anticipated or proposed as part of the General Plan 2045. The Certified PEIR determined that the all new development in the City will be subject to sewer capacity considerations as part of the City review process. Improvements and upgrades to sewer lines are prioritized based on need. Development fees are collected from each project and used to fund the highest priority improvements. Additionally, the projected increase in wastewater flows associated with the anticipated growth will not exceed the treatment capacity at the HWRP or the JWPCP. Therefore, impacts related to wastewater would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to wastewater, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

As indicated in the wastewater treatment capacity analysis in Threshold a), implementation of the Project would generate approximately 209,708 gpd (approximately 0.21 mgd) of wastewater. The HWRP and JWPCP have a remaining treatment capacity of approximately 175 mgd and 140 mgd, respectively. Given the current capacity of the HWRP and JWPCP, Project wastewater generation would account for a fraction of one percent increase in demand at the HWRP or JWPCP, and there would be ample capacity to treat this increase. As such, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

d) Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Impact Determination in the Certified PEIR

The Certified PEIR determined that the generation of solid waste (both construction and operation waste) will increase with future development that will occur under the General Plan 2045 and Zoning Code Update. Construction waste will be required to be diverted from landfills in accordance with CCMC Section 15.02.1140. As required, a minimum of 75 percent of the nonhazardous construction and demolition debris from new development or redevelopment will be recycled and/or salvaged for reuse. Additionally, the Certified PEIR found that there is adequate capacity in the serving inert landfills to accommodate the projected volume of waste that could occur.

For the solid waste that would be disposed of at landfills, the 10 Class III landfills in the county have a combined remaining capacity of approximately 142.67 million tons. The annual solid waste generated by future development (37,084 tons) would represent approximately 0.03 percent of the remaining capacity of these landfills. Over the life of the General Plan 2045, it is anticipated that 741,680 tons would be generated, which is 0.5 percent of the remaining capacity. Therefore, the remaining capacity would be sufficient to accommodate the solid waste generated by future development that would occur from the implementation of the General Plan 2045 and Zoning Code Update. In addition, all future development projects proposed in the City will be required to comply with applicable federal, state, and local statutes and regulations related to solid waste that are intended to reduce the disposal of waste in landfills.

Therefore, the Certified PIER determined that the General Plan 2045 and Zoning Code Update will not generate solid waste in excess of state or local standards, or generate waste in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Thus, impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts to waste generation, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Culver City's Public Works Environmental Programs and Operations Division collects municipal solid waste, which includes trash, recycling, organics, and construction and demolition debris from both the commercial and residential sectors. The City of Culver City does not own or operate any landfill facilities and the majority of its solid waste is disposed of at in-County landfills.

Construction of the Project would result in generation of approximately 4,480 cubic yards of construction and demolition debris such as metal scrap, lumber, and concrete, which will be collected and diverted to a construction and demolition debris facility for materials to be recycled and/or discarded. It is anticipated that a large amount of the construction debris would be recycled. Residual wastes, such as trash packing materials, and plastics could require disposal at landfills. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations.

The remaining disposal capacity for the County's Class III landfills was estimated at approximately 142.67 million tons.[70] In addition to in-County landfills, out-of-County disposal facilities may also be available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and, based on the Los Angeles County Integrated Waste Management Plan (ColWMP), the County anticipates that future Class III disposal needs can be met through 2034 through a number of strategies that would be carried out in coming years. Such strategies include the following: (1) maximize waste reduction and recycling; (2) expand existing landfills; (3) study, promote, and develop alternative technologies; (4) expand transfer and processing infrastructure; and (5) promote out-of-county disposal (including waste-by-rail). It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

As illustrated in **Table 37**, *Projected Solid Waste Generated During Operation,* and based on solid waste generation factors from the California Department of Resources and Recycling and Recovery (CalRecycle), the Project could generate a total of approximately 2,384 lbs/day of solid waste, or 438 tons per year (tpy). The annual amount of solid waste generated by the Project would represent an incremental fraction of a percent of the estimated 142.67 million tons of remaining disposal capacity for the County's Class III landfills. The Sunshine Canyon Landfill is the primary recipient of the City's waste disposal. The maximum daily capacity for this landfill is 12,100 tons per day (tpd), and the 2020 disposal rate was 7,907 tpd, indicating an unused daily capacity of 4,193 tpd. If all the Project's waste were taken to Sunshine Canyon Landfill, the Project's additions to the daily disposal of 12,100 tons would be approximately 0.03 percent of the unused daily capacity of 4,193 tons per day. Based on the above, the solid waste generated by the Project could be accommodated by the County's available regional landfills.

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

Based on the above, the Project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste during construction or operation. Thus, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

[70] County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2020 Annual Report, October 2021, page 35.

TABLE 37
PROJECTED SOLID WASTE GENERATED DURING OPERATION

Land Uses	Quantity	Factor[a]	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Residential	508 du	4 lbs/du/day	2,032	1.02	372
Commercial	14,087 sf	2.5 lbs/100 sf/day	352	0.18	65.7
		Total	**2,384**	**1.2**	**438**

NOTES:
sf = square feet; lbs. = pounds
[a] Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed December 23, 2024.
SOURCE: ESA, 2025.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required.

e) Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact Determination in the Certified PEIR

As indicated above, development and growth in the City will increase the generation of solid waste. In accordance with City requirements, future development allowed under the General Plan 2045 will be served with solid waste and recycling services provided by the City or its authorized agents (Municipal Code Section 5.01.01). Future development allowed under the General Plan 2045 will be required to comply with statewide and local requirements, including AB 341, AB 939, SB 1016, and SB 1383, which require waste reduction, recycling, and diversion. In addition, projects will be required to be consistent with policies in the General Plan 2045 and applicable requirements in the Zoning Code Update related to solid waste. Therefore, future development allowed under the General Plan 2045 will comply with federal, state, and local management and reduction statutes and regulations related to solid waste, and impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

All local governments, including the City of Culver City, are required under AB 939, the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the local jurisdiction's solid waste exceeds the target, the local jurisdiction

would be required to pay fines or penalties from the State for not complying with AB 939. The waste generated by the Project would be incorporated into the waste stream of City of Culver City, and diversion rates would not be substantially altered. The Project does not include any component that would conflict with state laws governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. Impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to utilities and service systems would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.19 Wildfire

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
Wildfire: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less than Significant	No	Less than Significant	N/A
(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less than Significant	No	Less than Significant	N/A
(c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Less than Significant	No	Less than Significant	N/A
(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Less than Significant	No	Less than Significant	N/A

a) Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact Determination in the Certified PEIR

The Certified PEIR determined that continued growth and development associated with implementation of the General Plan 2045 and Zoning Code Update could have the potential to interfere with an adopted emergency response or evacuation plan if the emergency response services and/or evacuation routes were to become overburdened by the increase in residents or intensity of new development. However, evacuation routes in the City have been designed to accommodate future development through the General Plan's horizon year (2045). In the event of an evacuation, major freeways including I-10 and I-405 will be used as the main evacuation routes outside of the City. The City's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) also provides a strategy for reducing the City's vulnerability to the impacts of natural hazard events such as earthquakes, flood, and wildfire. In addition to the City's emergency response systems, the Los Angeles County Operational Area Emergency Response Plan provides the framework for responding to major emergencies or disasters. New development associated with implementation of the General Plan 2045 will be reviewed and approved by CCFD for compliance with applicable Fire Code requirements that pertain to emergency access during the development review process. Therefore, compliance with local and regional emergency response, evacuation plans, building regulations and requirements established in the CMCC, as well as consistency with applicable General Plan policies, will ensure that the General Plan 2045 and Zoning Code Update will not impede an adopted emergency or evacuation plan. Thus, impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to an emergency response plan or emergency evacuation plan, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is not located in an area of moderate or very high fire hazard.[71] The Project Site is an infill development site and the area around the Project Site is entirely built out. The Project will replace two existing commercial buildings, which will offset the Project's density of residents and employees. Additionally, during construction, access to the surrounding streets would be maintained and any temporary lane closures or encroachments into the right-of-way would be approved by the City. Refer also to Sections 3.14, *Public Services*, and 3.16, *Transportation*, for additional analysis showing that the Project will not have a significant impact on the provision of fire or police services or traffic around the Project Site, which further shows that the Project will not hinder the implementation of an emergency response plan or an emergency evacuation plan. As such, impacts are less than significant and within the scope of the impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?

Impact Determination in the Certified PEIR

The Certified PEIR determined that future development associated with implementation of the General Plan 2045 and Zoning Code Update will primarily occur as redevelopment on parcels that already contain some existing residences or businesses, which are less susceptible to wildland fires than open areas containing vegetation. Additionally, the City is generally built-out and existing structures have been built in accordance with fire prevention and protection measures required by the California Fire Code (CFC) and CBC. Compliance with CFC, CBC, and consistency with General Plan 2045 policies, as well as review by CCFD of all new structures and private and public improvements, will ensure that fire risks are not exacerbated. Therefore, the Certified PEIR determined that the General Plan 2045 and Zoning Code Update would result in a less than significant impact related to exacerbating wildfire risk.

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

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to exacerbating wildfire risk, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project Site is not located in an area of moderate or very high fire hazard.[72] The nearest very high fire hazard severity zone is located in Baldwin Hills, approximately 1.3 miles east of the Project Site. In addition, the Project Site is not located in or near a State Responsibility Area.[73] The Project would include the redevelopment of an infill site within an urbanized area. As such, the Project would not require the installation or maintenance of associated infrastructure that could exacerbate fire risk and would not result in impacts related to emergency response or emergency evacuation plans. Therefore, impacts related to wildfires would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

c) Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Impact Determination in the Certified PEIR

The Certified PEIR determined that the City is generally built-out and existing structures have been built in accordance with fire prevention and protection measures required by the CFC and CBC. Future development allowed under the General Plan 2045, including private and public improvements throughout the City, will generally occur in urban and developed areas that contain existing defensible space, roadways, fuel breaks, water sources, power lines, and other utilities. Additionally, the City will review future development applications for compliance with the relevant policies in the General Plan 2045. Furthermore, CCFD or Los Angeles County Fire Department (LACFD) will review the development plans for any City utilities or fire prevention and protection equipment, such as the installation and maintenance of fire access roadways, access walkways to and around buildings, and hydrant quantity and placement, to ensure compliance with the CFC and CBC. Therefore, the General Plan 2045 and Zoning Code Update results in a less than significant impact related to the installation or maintenance of associated infrastructure that could exacerbate fire risk or result in temporary or ongoing impacts to the environment.

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

[73] California Board of Forestry and Fire Prevention, State Responsibility Area Viewer, https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1. Accessed February 27, 2024.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to the installation or maintenance of associated infrastructure that could exacerbate fire risk or result in temporary or ongoing impacts to the environment, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project will not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The Project is a mixed-use residential and commercial development on an infill site in a built-out area, and it will not involve any uses that would be considered particularly hazardous (like an industrial or energy use). Additionally, as discussed above, the Project Site is well served by existing roadways and utilities, and no significant changes to the existing infrastructure are anticipated to be needed on account of the Project. As such, the Project's impacts are less than significant and within the scope of those analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

d) Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact Determination in the Certified PEIR

The eastern portion of the City, including the Culver Crest and Blair Hills neighborhoods and areas within the IOF, is designated as a VHFHSZ and is adjacent to land designated as a VHFHSZ outside of the Planning Area. The Blair Hills (located near the Baldwin Hills) and Culver Crest neighborhoods contain sloping hillsides that are susceptible to landslides and flooding after fire has removed protective vegetative cover. Future development allowed under the General Plan 2045 and Zoning Code Update will be required to comply with all applicable requirements related to soil instability and water quality, including the regulations of the CCMC and policies in the General Plan 2045 regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. The General Plan 2045 contains specific policies related to the prevention of flooding, landslides, and drainage changes, including policies that require ensuring prudent development and redevelopment within areas with high landslide potential during environmental and development review processes. Combined with the continued implementation of the City's MJHMP, as well as review of development plans by CCFD, these policies provide additional proactive measures to refine and enhance the resiliency of the area, as well as strengthening the City's review of new applications for development to ensure that the General Plan 2045 and Zoning Code Update will not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. As such, impacts would be less than significant.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to exposing people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes, nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

The Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. As discussed above under Thresholds a) and b), the Project Site is not located in an area of moderate or very high fire hazard or within a State Responsibility Area. Additionally, the Project Site and the surrounding area is largely flat. See also Section 3.9, *Hydrology and Water Quality*, for the determination that the Project will improve on-site groundwater recharge and will reduce offsite runoff. As such, impacts would be less than significant and within the scope of impacts analyzed in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

The Certified PEIR determined that no mitigation measures would be required. Since, as discussed above, the Project does not involve new significant impacts or substantially more severe impacts, no new or additional mitigation measures are needed.

Conclusion

Based on the above, the Project's potential environmental impacts with regard to wildfire would be within the scope of the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.20 Cumulative Impacts

Impact Determination in the Certified PEIR

The Certified PEIR determined that the following cumulative impacts would be significant and unavoidable: air quality (project-specific impacts), cultural resources (historical resources), noise (construction noise, traffic noise, and construction vibration), and utilities and service systems (water supply). Mitigation measures identified in the Certified PEIR would reduce some of these impacts, but not to less than significant levels.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant cumulative impacts, nor would it result in a substantial increase in a previously identified significant cumulative impact as analyzed in the Certified PEIR.

Impact Determination for Project

As defined in Section 15355 of the CEQA Guidelines, cumulative impacts refer to two or more individual effects, which, when considered together, are considerable or which compound or increase other environmental impacts.

As evaluated above, all of the Project's potential environmental impacts would be less than significant except for noise and vibration generated during construction of the Project, which would be significant and unavoidable, consistent with the impact conclusions set forth in the Certified PEIR. As these impacts would be significant and unavoidable, construction activities within the Project Site could combine with other construction in the vicinity of the Project Site to also result in a significant and unavoidable cumulative impact, as concluded in the Certified PEIR.

The Project would not contribute to cumulative impacts with regard to air quality, cultural resources, and transportation as the Project's impacts regarding these environmental topics would be less than significant or less than significant with incorporation of the mitigation measures included in the Certified PEIR.

Additionally, the General Plan 2045 guides development within the Planning Area through the year 2045. Through the General Plan 2045, the City monitors growth and evaluates proposed development within the Planning Area. Through this review process, the City ensures that development within the Planning Area is consistent with the permitted uses and anticipated growth in this area. As analyzed above in Section 3.13, *Population and Housing*, the Project would be within the growth projections established by the City's General Plan 2045, which, in combination with impacts from projected growth throughout the whole of Los Angeles County and the surrounding region, as forecasted in the adopted SCAG regional projections, is the basis for the Certified PEIR's cumulative analyses.

Overall, in each of the analyses provided above, impacts associated with the Project would be within the scope of impacts evaluated in the Certified PEIR, and as such, the Project's contribution to potential cumulative impacts would remain unchanged from those previously evaluated. Accordingly, the Project

would not result in any new significant cumulative impacts, nor would it substantially increase the severity of any significant cumulative impacts previously identified in the Certified PEIR.

Certified PEIR's Mitigation Measures Addressing Impact

As indicated above, the General Plan 2045 and Zoning Code Update would implement the mitigation measures set forth in the Certified PEIR, as applicable. As discussed above, the Project will implement the applicable Certified PEIR mitigation measures and it will implement additional Project-specific mitigation measures. This will ensure that the Project's impacts would be reduced to the maximum extent possible, thus reducing the Project's contribution to cumulative impacts.

Conclusion

Based on the above, the Project is within the scope of the impacts analyzed in the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.21 Mandatory Findings of Significance

Thresholds (and Supporting Information Sources):	Impact Determination in the Certified PEIR	Does the Project Involve New Significant Impacts or Substantially More Severe Impacts?	Impact Determination for the Project	Certified PEIR's Mitigation Measures Addressing Impact
(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Less than Significant	No	Less than Significant	N/A
(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	Less than Significant	No	Less than Significant	N/A
(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Less than Significant	No	Less than Significant	N/A

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

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

Impact Determination in the Certified PEIR

The environmental issues addressed in the Mandatory Findings of Significance were analyzed in a combination of the Initial Study and the Draft EIR of the Certified PEIR. As summarized above, the Certified PEIR determined that implementation of the General Plan 2045 and Zoning Code Update would result in significant and unavoidable impacts with respect to air quality, cultural resources (historical resources), noise, transportation (conflict with CEQA Guideline Section 15064.3, Subdivision (b)), and utilities and service systems (water supply). Mitigation measures identified in the Certified PEIR would reduce some of these impacts, but not to less than significant levels. As such, the significant impacts of the General Plan 2045 and Zoning Code Update would have the potential to degrade the quality of the environment, cause cumulatively considerable impacts, and result in environmental effects which would cause substantial adverse effects on human beings. However, despite these significant and unavoidable

impacts, the General Plan 2045 and Zoning Code Update was still proposed so that the City would have a comprehensive General Plan that focuses on particular issues and provides strategies for sustainable future growth, and because it would foster harmony between people and the environment through continued sustainability efforts in compliance with state requirements. The Certified PEIR also identified a number of benefits that the General Plan 2045 and Zoning Code Update would provide, including establishing a long-range vision, preserving environmental resources, and achieving compliance with state and regional policies.

Does the Project involve new significant impacts or substantially more severe impacts?

As discussed below, the Project would not create any new significant impacts related to the mandatory findings of significance nor would it result in a substantial increase in a previously identified significant impact as analyzed in the Certified PEIR.

Impact Determination for Project

Regarding Threshold a), as described in Section 3.3, *Biological Resources*, pursuant to Certified PEIR Mitigation Measure PEIR MM-BIO-2, a bird survey would be conducted for the Project Site. As determined above, with implementation of the prescribed mitigation measure, the Project would have a less than significant impact on biological resources and is within the scope of impacts analyzed in the Certified PEIR.

Regarding Threshold b), see Section 3.20, *Cumulative Impacts*. As detailed therein in each section, impacts associated with the Project would be within the scope of impacts evaluated in the Certified PEIR. Accordingly, the Project would not result in any new significant cumulative impacts, nor would it substantially increase the severity of any significant cumulative impacts previously identified in the Certified PEIR.

Regarding Threshold c), Project's impacts would be less than significant in all resource areas analyzed above, with the exception of short-term, temporary construction noise and vibration impacts. However, these impacts were previously disclosed and within the scope of impacts analyzed in the Certified PEIR

Certified PEIR's Mitigation Measures Addressing Impact

As described above, the Project would implement the previously adopted mitigation measures set forth in the Certified PEIR, as applicable.

Project-Specific Mitigation Measures Addressing Impact

The Project would implement Project-specific supplemental mitigation measures related to air quality, archeological resources, paleontological resources, and construction noise and vibration, prescribed a result of conducting site-specific analyses as required by the applicable Certified PEIR mitigation measures.

Conclusion

Based on the above, the Project is within the scope of the impacts analyzed in the Certified PEIR and would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

CHAPTER 4
PRC Section 21080.66 - Consistency Analysis

On June 30, 2025, California Governor Gavin Newsom signed into law AB 130, effective immediately, which added Section 21080.66 to the PRC to create a new statutory CEQA exemption for qualifying housing development projects. The qualifying criteria for the Section 21080.66 exemption are set forth above in relevant part in Subsection 1.1.2 of this document. Section 21080.66 is an absolute "statutory" exemption, meaning it excludes a project from CEQA consideration regardless of the potential for environmental impacts. Furthermore, the exceptions found in CEQA Guidelines Section 15300.2 that are applicable to certain categorical exemptions are not applicable to the Section 21080.66 statutory exemption.

To qualify for the Section 21080.66 exemption, projects must meet all of the following criteria:

Is/Does/Has/Will the Project:

1. Project Type: A "housing development project" as defined in Government Code Section 65905.5(b), which includes single-family residences, multi-family communities, mixed-use developments where at least two-thirds of the square footage is designated for residential use, transitional housing, and farmworker housing. Yes ☒ or No ☐ The Project is a housing development project because it is a mixed-use multifamily residential project that is more than two-thirds residential (approximately 488,244 sf of the Project's total 502,331 sf are residential, or roughly 97 percent).

2. Size. On a site less than 20 acres in size, or 5 acres if the project is a builder's remedy project (as defined in Government Code Section 65589.5(h)(11))? Yes ☒ or No ☐ The Project is not a builder's remedy project and it is located on approximately 5.8 acres (i.e., less than 20 acres).

3. Location. Located within an incorporated municipality or Census-defined urban area? Yes ☒ or No ☐ The Project is located within Culver City, an incorporated municipality, and also within the Los Angeles-Long Beach-Anaheim Urban Area.[74]

4. Urban Infill. Located on a site that has previously been developed with an "urban use" or substantially surrounded by "urban uses"? "Urban use" means any current or previous residential or commercial development, public institution, or public park that is surrounded by other urban uses, parking lot or structure, transit or transportation passenger facility, retail use, or any combination of those uses. Yes ☒ or No ☐ The Project Site is currently developed with an urban use (two commercial/office buildings and associated parking), and the Project Site is also

[74] United States Census Bureau, 2020 Census Urban Areas Wall Map.

surrounded on all sides by other urban uses, including commercial, residential, and institutional uses.

5. General Plan and Zoning Consistency. Consistent with the applicable general plan and zoning ordinance, as well as any applicable local coastal program, excepting any density bonuses, incentives, concessions, waivers, reductions of development standards, or reduced parking ratios pursuant to Government Code Section 65915? Yes ☒ or No ☐ The Project is consistent with the City's general plan and zoning ordinance, as discussed in depth above in Section 3.10, Land Use and Planning, of this document. The Project Site is not located within the coastal zone, so there is no applicable local coastal program.[75]

6. Minimum Density. Meet minimum residential density requirements of 7.5 units per acre in incorporated cities within nonmetropolitan counties or nonmetropolitan counties with a micropolitan area, five units per acre in unincorporated areas in nonmetropolitan counties, 10 units per acre in suburban jurisdictions, or 15 units per acre in metropolitan counties? Yes ☒ or No ☐ The Project's density would be approximately 88.2 dwelling units per acre (508 units on 5.761 acres), which exceeds all of the possible minimums.

7. On-Site Characteristics. Satisfy the requirements in Government Code Section 65913.4(a)(6), as further outlined below? Yes ☒ or No ☐ The Project Site satisfies all of the requirements because it:

    a. Is not located within the coastal zone per the California Coastal Commission's Los Angeles County Coastal Zone Boundary Map.[76]

    b. Does not consist of prime farmland or farmland of statewide importance or land zoned or designated for agricultural protection or preservation. As noted above, the Project Site is currently fully developed with office buildings and surface parking and is completely surrounded by similar urban uses. It does not have any specially designated farmland. It is zoned Mixed Use Medium, which primarily allows commercial, residential, and mixed uses.

    c. Does not contain wetlands. As noted above, the Project Site is currently fully developed with office buildings and surface parking and is completely surrounded by similar urban uses. Moreover, there are no wetlands or other water resources on or near the Project Site per the U.S. Fish and Wildlife Service's National Wetlands Inventory.[77]

    d. Is not located within a very high fire hazard severity zone or in a state responsibility area, as discussed above in Section 3.19, Wildfire.

    e. Is not a hazardous waste site listed pursuant to Government Code Section 65962.5 or a hazardous waste site designated by the Department of Toxic Substances Control pursuant

[75] California Coastal Commission, Los Angeles County Coastal Zone Boundary Map, https://www.coastal.ca.gov/maps/czb/.

[76] California Coastal Commission, Los Angeles County Coastal Zone Boundary Map, https://www.coastal.ca.gov/maps/czb/.

[77] U.S. Fish and Wildlife Service, National Wetlands Inventory, https://www.fws.gov/program/national-wetlands-inventory.

to Health and Safety Code Section 25356. As discussed above in Section 3.8, Hazards and Hazardous Materials, neither the Project Site nor any adjacent sites are on the Cortese List or the Envirostar database.

f. Is not located within a delineated earthquake fault zone. As discussed above in Section 3.6, Geology and Soils, and in the Geotechnical Report attached to this document as Appendix F, the Project Site is not located within a designated Alquist-Priolo Earthquake Fault overland Zone.

g. Is not located within a special flood hazard area. As discussed above in Section 3.9, Hydrology and Water Quality, the Project Site is not located within a mapped flood zone.

h. Is not located within a regulatory floodway. As discussed above in Section 3.9, Hydrology and Water Quality, the Project Site is not located within a mapped flood zone.

i. Does not consist of lands identified for conservation in an adopted natural community conservation plan. As discussed above in Section 3.3, Biological Resources, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place for the Project Site.

j. Does not consist of habitat for protected species identified as candidate, sensitive, or species of special status. As discussed above in Section 3.3, Biological Resources, the Project Site does not include suitable habitat for candidate, sensitive, or special status species.

k. Does not consist of lands under conservation easement. There are no records on title indicating that the Project Site is subject to a conservation easement.

8. Historic Resources. Not require the demolition of a historic structure? Yes ☒ or No ☐ The Project Site does not contain any historic structures, as discussed in the Historic Resources Memorandum attached to this document as Appendix D.

9. Uses. Exclude hotel, motel, bed and breakfast inn, or other transient lodging uses, unless the project application was deemed complete prior to January 1, 2025. Yes ☒ or No ☐ The Project does not include hotel, motel, bed and breakfast inn, or other transient lodging uses.

10. Tribal Cultural Resources. Provided formal notification to each California Native American tribe that is traditionally and culturally affiliated with the project site within the specified timeframes and requirements of Section 21080.66(b) of the PRC? Yes ☒ or No ☐ The City conducted the required tribal consultation within the specified timeframe. Results of the tribal consultation process are included above in Section 3.17, Tribal Cultural Resources, of this document.

11. Hazardous Materials. Completed a Phase I Environmental Site Assessment? And, if recognized environmental conditions (RECs) or hazardous substance releases are found, have remedial actions been identified to ensure that hazardous materials or health impacts to the public or environment are mitigated to a level of insignificance in compliance with current state and federal requirements?

Yes ☒ or No ☐ A Phase I Environmental Site Assessment was conducted for the Project, which is attached to this document as Appendix H. Results of the Phase I Environmental Site Assessment are included above in Section 3.8, Hazards and Hazardous Materials, of this document. As discussed therein, hazardous materials impacts would be less than significant.

12. Air Quality. Located further than 500 feet from a freeway, or if not, includes protective air filtration media as required by Section 21080.66(c)(2) of the PRC and does not have any balconies facing the freeway? Yes ☒ or No ☐ The Project is located more than 500 feet from the nearest freeway. The nearest freeway is the 405 Freeway, which is located approximately 1,900 feet from the Project Site.

13. Prevailing Wages. Pay the applicable general prevailing wage and comply with applicable labor standards if the project consists of 100 percent lower income affordable units, is over 85 feet tall, or is a certain specific type of project in the City or County of San Francisco? Yes ☒ or No ☐ The Project does not consist of 100 percent lower income affordable units, is approximately 61 feet tall (i.e., not more than 85 feet tall), and is not located in San Francisco City or County. Thus, the Project is not required to pay prevailing wages or comply with the specified labor standards.

Overall, as can be seen above, the Project would meet all applicable criteria to qualify for the PRC Section 21080.66 statutory exemption. Thus, no further CEQA review is necessary beyond that included in this document.

While no additional CEQA review is necessary with the exemption, the City has nonetheless conducted environmental review set forth in this document which shows that the Project is also "within the scope" of the Certified PEIR pursuant to CEQA Guidelines Section 15168(c)(2), which also shows that no further environmental analysis is required.

CHAPTER 5
Conclusion

5.1 CEQA Guidelines Section 15168(C)

There is no basis to find the criteria in CEQA Guidelines Section 15162 have been met such that a major revision to the General Plan 2045 and Zoning Code Update Program Certified PEIR is required. The analysis above in Section 3, *Comparative Analysis of Project Impacts*, shows the Project would not result in any new significant impacts or more severe significant impacts than those identified in the Certified PEIR given that the Project is within the scope of and is consistent with the forecasted development of the City's General Plan 2045 and Zoning Code Update. Additionally, there have been no changes to the City's General Plan 2045 or Zoning Code Update since its adoption that resulted in or will foreseeably result in new significant impacts or more severe significant impacts. Based on the handful of projects that have been approved so far, the number of residential dwelling units, residential floor area, and non-residential floor area anticipated for the City have not met the previously-assessed buildout assumptions in the Certified PEIR.

Moreover, there is no basis to find there has been a change to the development associated under the General Plan 2045 and Zoning Code Update analyzed in the Certified PEIR such that there will be new or more severe significant impacts. Additionally, there have been no changes to the circumstances that would be expected to result in new or more severe significant impacts. Finally, there is no new information of substantial importance that was not known or could not have been known when the Certified PEIR was certified and the General Plan 2045 and Zoning Code Update Project was adopted.

As analyzed herein and demonstrated above, the Project is "within the scope" of the Certified PEIR pursuant to CEQA Guidelines Section 15168(c)(2), and no further environmental analysis is required.

5.2 PRC Section 21080.66

Additionally, the Project meets all applicable criteria and thus qualifies for the PRC Section 21080.66 statutory exemption. Thus, no further CEQA review is necessary beyond that included in this document. While no additional CEQA review is necessary with the exemption, the City has nonetheless conducted environmental review set forth in this document which shows that the Project is also "within the scope" of the Certified PEIR pursuant to CEQA Guidelines Section 15168(c)(2), as discussed above.

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LINK TO CEQA CHECKLIST APPENDICES

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