Culver CITY

(310) 253-5710
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PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

PROPOSED MITIGATED NEGATIVE DECLARATION

Project Title and File No.: Culver Place - Assisted Living and Single Family Development Project
Comprehensive Plan (CP) - P2015054
Planned Development (PD 14) Zoning Code Map Amendment (ZCMA) - P2015055
General Plan Map Amendment (GPMA) – 2015056
Tentative Tract Map (TTM) - 2015057
Mitigated Negative Declaration (MND) – P2015058

Project Location: 3814 Lenawee Avenue, Culver City, CA 90232

Project Sponsor: David Boyd & Rob Schultz R and D Development LLC

Project Description: Comprehensive Plan, Planned Development/Zoning Code Map Amendment, General Plan Map Amendment, and Tentative Tract Map for the development on a current 4.35 acre R1 Zoned lot, into ten (10) new land lots, 9 of which will be R1 style single family parcels and the tenth lot which will be a 98,108 square foot parcel containing a 90 unit/110 bed senior citizen residential care facility for assisted living and memory care. The single family parcels will have 2 to 3 car garages and the residential care facility will have a 52 space surface parking area. The project will include an 18,265 square foot public right-of-way dedication for a new 225 foot long Cul de Sac and a 15 foot widening of Lenawee Avenue.

Environmental Determination:

This is to advise that the City of Culver City, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environment and is proposing this MITIGATED NEGATIVE DECLARATION based on the following finding:

☐ The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

☒ The Initial Study identified potentially significant effects, but:

1. Revisions in the project plans or proposals made by, or agreed to by the applicant before this proposed MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY was released for public review would avoid the effects or mitigate the effects or mitigate the effects to a point where clearly no significant effects would occur, and

2. There is no substantial evidence before the agency that the project as revised may have a significant effect on the environment.

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

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

The public is invited to comment on the proposed MITIGATED NEGATIVE DECLARATION during the review period, which ends **May 25, 2016.**

Jose Mendivil, Associate Planner May 4, 2016

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INITIAL STUDY

ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title/Case Nos.	Culver Place - Assisted Living and Single Family Development Project Comprehensive Plan (CP) - P2015054 Planned Development (PD 14) Zoning Code Map Amendment (ZCMA) - P2015055 General Plan Map Amendment (GPMA) – 2015056 Tentative Tract Map (TTM) - 2015057 Mitigated Negative Declaration (MND) – P2015058		
Lead Agency Name & Address:	City of Culver City, Planning Division 9770 Culver Blvd., Culver City, CA 90232		
Contact Person & Phone No.:	Jose Mendivil, Associate Planner (310) 253-5757		
Project Location/Address:	3814 Lenawee Avenue Culver City, CA 90232		
Nearest Cross Street:	Vicstone Ct.	**APNs:**	4204-010-010; 4204-010-011
Project Sponsor's Name & Address:	David Boyd & Rob Schultz R and D Development LLC 4819 Falcon Avenue Long Beach, CA 90807 (310) 980-5333		
General Plan Designation:	Low Density Singe Family	**Zoning:**	Residential Single Family (R1)
Former Redevelopment Project Area:	N/A		
Overlay Zone/Special District:	N/A		

Project Description and Requested Action: *(Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary)*

The Project consists of 10 new land lots, 9 of which will be planned as single family parcels and ranging in area from 5,138 square feet to 9,847 square feet. One oversized lot of 20,869 square feet will contain an existing single family dwelling that is proposed to remain. Single family parcels will have at minimum 2 covered parking spaces. The tenth lot will be 98,108 square feet and will contain a 90 unit/110 bed residential care facility. It will operate as an assisted living and memory care center for senior citizens 65 years and older and for wounded veterans. There will be 52 surface parking spaces on site. The project site is currently 189,439 square feet and will include an 18,265 square foot public right-of-way dedication for a new 15,146 square foot Cul de Sac and a 15 foot widening of Lenawee Avenue.

The assisted living facility will be approximately 75,394 square feet and will consist of 90 units in three levels. The 90 units will be divided into 22 memory care units, 41 studios, 25 one-bedroom units, and 2 two-bedroom units. There will be a kitchen and common dining area, activity areas, a theatre, gym, classroom/computer room, library, offices and nursing stations, and outside open space and courtyard areas. The architecture will be Spanish style with white stucco finish walls.

Entry to the facility will be only from La Cienega Boulevard and exiting will only be onto the new cul-de-sac which intersects with Lenawee Avenue. There will be no exiting onto La Cienega Boulevard and entry from the cul-de-sac.

The existing house will be located on the one oversized single family lot and the remaining 8 single family lots will each contain a two-story house with attached garage at the front of the house. The single family homes will range in size from 3,000 to 3,535 square feet while the existing single family house will remain at 3,949 square feet. Generally the homes will be 4-bedroom/4bath and will vary in architectural style. Some homes will contain a mix of stucco and wood, stone veneer bases, and shingle roofs; some will be Spanish style with smooth stucco and tile roofs; others will have mainly wood finishes with shingle roofs.

Five of the new homes and the existing house will front along the approximate 225 foot long cul-de-sac street and the remaining three new homes will front along Lenawee Avenue. The side of one the Lenawee Avenue fronting homes will face the cul-de-sac. A portion of the project site facing Lenawee will be dedicated to the City in order to widen Lenawee Avenue. A fault line exists at the east end of the project and a 50 foot no build zone on either side of the fault will be required. Portions of the Assisted Living facility surface parking lot and landscaping will be installed in the no build zone. The project requires a comprehensive plan and planned development zoning in order construct what is proposed. As an oversized R1 lot, an assisted living facility could not be built. The CP and PD will facilitate a greater land use intensification as opposed to only several single family lots.

Existing Conditions of the Project Site:
The site is 189,439 square feet or 4.35 acres and contains one residential structure, a barn, and an outbuilding. Most of the site is covered with vegetation or open fields and was historically used as a small farm. It ranges in elevation from about 125 feet to 138 feet above mean sea level and gently slopes downward to the northeast, toward La Cienega Boulevard. The average on-site grade change is 13 feet (138 – 125 = 13). Further, the project is covered by various amounts of artificial fill that cover Late Pleistocene (about 126,000 to 5,000 years ago) to Early Holocene (beginning about 13,700 years ago) colluvial and alluvial deposits. The thickness of the artificial fill ranges from about 4 to 6 feet below the ground surface with some localized fill exceeding 11 feet where past trenching occurred in connection with fault investigation. At the northeast end of the site lies a portion of the Newport-Inglewood fault; there no structures over the fault line.

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

Location	Zoning	Land Use
West:	CC R1	One & two--story single family residential
East:	L.A. R1-1; L.A. OS-1XL	La Cienega Boulevard, parkland/hillside/open space and one & two-story single family residential
North:	L.A. RD2-1; LA RD1.5-1	Three-story townhomes, two-story condominiums & apartments
South:	CC R1	One & two--story single family residential

CC = City of Culver City; L.A. = City of Los Angeles

Other public agencies whose approval is required: *(e.g., permits, financing approval, or participation agreement)*
Culver City has discretionary review over the proposed project.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a 'Potentially Significant Impact' as indicated by the checklist on the following pages:

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

ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

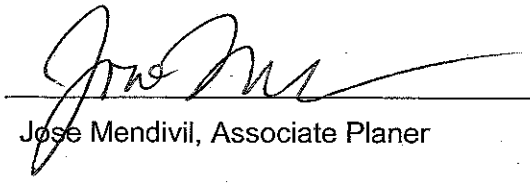
☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

☐ I find that the proposed project **MAY** have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPO**RT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



5/4/16

Jose Mendivil, Associate Planer — Date

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Responses:

a) *Less than Significant Impact*. The project is located in an urbanized area, with commercial and residential buildings in the immediate vicinity. The topography of the surrounding site is hillside with a gentle uphill climb from north to south. Residences further south of the project have a view of the downhill with vistas of Los Angeles beyond; however vegetation and trees planted by residents downhill (to the north) tend to obscure the Los Angeles vista beyond. Residences to the west and on Vicstone Court immediately south of the project site currently have a direct view of the existing single family house, the barn and small farm, and several tall trees planted in the interior and around the project site. The tall trees and 2 and 3 story multi-family housing developments in Los Angeles immediately to the north and northwest of the project site obscure vistas beyond (Los Angeles and Baldwin Hills). When the project is complete the highest structure on the project site – the Assisted Living Facility – will lower than the tallest existing trees. Residents immediately south of the project site – the north side of Vicstone Court – will be an elevation roughly equal to the elevation of the 3 story Assisted Living Facility. This is due to the increase in grade from north to south; Vicstone Court is at a higher elevation than the project site and this will not change with re-grading of the site. The south side of Vicstone Court is still higher than the north side and the project beyond. Given these conditions and the built out nature of the surrounding area there is no expected substantial adverse effect on a scenic vistas.

No mitigation measures are necessary.

b) *Less than Significant Impact*. There are no identified rock outcroppings or historic buildings within a state scenic highway on the site. The Project Site is not bordered by or within the view shed of any designated scenic highway. The project site was used as a small farm and includes a single family house, a barn, outbuildings, and several bushes and non-native trees. It has been somewhat leveled with fill and contains open graded areas including a horse run area. The project will replace the current trees and bushes with new trees and bushes for both the residential lots and the Assisted Living lot. New street will be planted along La Cienega Boulevard, Lenawee Avenue, and the new cul-de-sac. The installation of new public right of way landscaping and on-site landscaping will reduce any potential impact that may occur from the loss of the existing trees and bushes, to a level that is less than significant. Therefore, the project would not damage and/or remove any scenic resources within a State or City designated scenic highway, and no impact would occur.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

No mitigation measures are necessary.

c) *Less than Significant Impact*. There is no defining visual character or quality on or in the project site. It has been used as a small farm and includes a single family house, a barn, outbuildings, and several bushes and non-native trees. It has been somewhat leveled with artificial fill ranging from about 4 to 6 feet above the natural grade. Vistas of the site itself are obscured by the several trees located in and around the site and the area surrounding it is urban in nature and is developed with single family and multi-family housing. Development of the project site with eight new single family homes on eight separate land lots, each fronting either Lenawee Avenue or the new cul-de-sac will make the site more consistent with the surrounding single family homes. The new Assisted Living facility facing La Cienega Boulevard will be more consistent with multi-family housing located along La Cienega Boulevard directly north of the site.

The project will replace the current trees and bushes with new trees and bushes for both the residential lots and the Assisted Living lot. New street will be planted along La Cienega Boulevard, Lenawee Avenue, and the new cul-de-sac. Currently there are no street trees on the public right-of-ways fronting the project site. The installation of new public right of way landscaping and on-site landscaping will reduce any potential impact that may occur and over development will result in a land use pattern that is more consistent with the surrounding area.

No mitigation measures are necessary.

d) *Less than Significant Impact*. The proposed project will bring new sources of light at nighttime from exterior lighting of the Assisted Living facility and to a lesser degree from the single family homes and the new street lights. However, the project is required to be built to City of Culver City codes and all on-site lighting is required to be shielded or recessed so that direct glare and reflections are confined to the boundaries of the site and do not shine or glare directly onto adjacent public and private properties. Street lights will be consistent in design, spread, and intensity with existing street lights and will follow code standards for street lights. With implementation of applicable code requirements and Culver City street light standards, potential impacts are reduced to a level that is less than significant.

No mitigation measures are necessary.

Mitigation Measure(s): None required

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE RESOURCES AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Responses:

a)- e) *No Impact*. The project site is not located on land identified, utilized, or zoned for agricultural purposes, and there is no known Williamson Act contract in effect on the project site. The site is located in an urban area and there is no forestland in the vicinity of the project site.

No mitigation measures are necessary.

Mitigation Measure(s): None required

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

Responses:

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

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

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

Implementation of the AQMP is based on a series of control measures that vary by source type, such as stationary or mobile, as well as by the pollutant targeted. Since the 2012 AQMP is based on growth projections reflected in local general plans, only new or amended general plans or projects that exceed the level of development contemplated in the general plan have the potential to conflict with the AQMP. For the City of Culver City, the proposed project will require an amendment to the Culver City General Plan land use designation of Low Density Single Family to Planned Residential Development. However this designation will be for 9 single family lots consistent with the surrounding R1 zoned area and for a multi-unit assisted living facility consistent with multi-family units north of the project site. The added dwellings and assisted living units are within expected growth patterns and housing increases based on the Regional Housing Needs Assessment (RHNA).

Development of the project will increase the on-site population from two existing residents to approximately 36 total residents for the single family residential development (assuming 4 persons per home), 110 people for the assisted living facility given the 110 beds, and approximately 16 permanent staff members of the assisted living facility. According to the Southern California Association of Governments (SCAG), the state mandated metropolitan planning organization for southern California which is charged with development of the region's Regional Transportation Plan (RTP) and RHNA, Culver City's projected population by 2020 is expected to be 39,300. The project's expected population represents about 0.41% of this forecasted population for 2020. According to the 2016-2040 RTP, the expected population in 2040 is 40,700; the project population will be approximately 0.40% of the expected population. The single family residents will represent about 2.25% of the expected growth between 2012 (population – 39,100) and 2014 (population – 40,700). Impacts normally associated with multi-family dwellings such as greater number of trips per day when compared to single family homes are not expected for assisted living units whose residents normally do not drive themselves but are instead driven in vans and in paratransit vehicles. Further these residents usually eat in group settings on-site further lessening the need for individual vehicles.

These percentages represent a minor percentage of the overall expected growth for the City. Accordingly the project will result in population and vehicle trips that are consistent with SCAG's growth populations anticipated in both the 2016-2040 RTP and the 2012 AQMP. The project is not expected to conflict with or obstruct implementation of applicable air quality plans because the project is consistent with the anticipated population growth for Culver City and associate vehicle trips which have been factored into the underlying growth projections for the AQMP and RTP.

No mitigation measures are necessary.

b)-c) *Less Than Significant Impact*. Future new development in Culver City and in the vicinity of the Project may contribute both at the project level and cumulatively to pollutant emissions over existing non-attainment conditions due to both construction and operation of individual projects. This project involves construction of 8 new single family homes and a 75,394 square foot, 110 bed assisted living facility. Construction will occur in 3 phases. Phase 1 will consist of grading the site for the single family homes, construction of 3 homes, walls, surface parking and street/utility improvements. The remaining 5 homes will be built in Phase 2 and Phase 3 will complete the project with construction of the assisted living facility. Approximately 5,500 cubic yards of soil will be excavated and balanced on the assisted living facility site.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

During construction, air contaminant emissions would result from the use of construction equipment such as trucks, loaders, graders, as well as construction workers that will be traveling to and from the project. Project related construction traffic would have a temporary effect on air quality in the vicinity of the project. Construction worker traffic and diesel powered equipment would emit nitrogen oxides, carbon monoxide, sulfur oxides, hydrocarbons, and particulates.

These emissions would increase local concentrations temporarily but would not be expected to increase the frequency of violations of air quality standards. An Air Quality Technical Report and Green House Gas Emissions Analysis (AQT/GHG Study) prepared by Dudek (October, 2015) estimated that for each construction phase, maximum daily construction emissions (of nitrogen oxides, carbon monoxide, sulfur oxides, hydrocarbons, and particulates) measured in pounds per day unmitigated, would be several pounds below SCAQMD daily pound thresholds for these types of construction emissions. The project will be subject to SCAQMD Rule 403 to control for fugitive dust emissions. Standard construction practices to control for emissions include watering active sites 3 times daily. Further the project will be subject to limits on the construction hours contained in the City of Culver City Municipal Code's and standard conditions that will reduce construction related pollutant emissions and dust emissions. Overall, construction emissions would be short-term and limited only to the time period when construction activity is taking place. Therefore, construction emissions would not add to long-term air quality degradation. Further the proposed project will implement standard SCAGMD-approved construction procedures and will comply with applicable provisions of SCAQMD Rule 403.

Operationally the project is also not expected to create significant air quality impacts. Based on Allan Engineering's March 30, 2016 Traffic Impact Analysis, the project is expected to generate approximately 21 trips in the AM peak hour and 32 trips in the PM peak hour. The traffic study concluded that the additional trips created by the project will not significantly impact study intersections and roadway segments. The amount of added trips, taking into account the cumulative trips from surrounding projects is expected to be below City adopted thresholds of significance. Overall, emissions resulting from the construction and number of vehicles related to the proposed project are not expected to be significant.

No mitigation measures are necessary.

d) *Less Than Significant Impact*. In the immediate vicinity of the project site there are single family homes and multi-family residential dwellings. The site will generate carbon emissions from residents, patrons, customers, and delivery vehicles once it is operational. These emissions are not expected to significantly affect these surrounding uses because the project will be residential in nature and consistent with surrounding land use patterns. Carbon emissions in close proximity to sensitive receptors are not expected to be significantly above the normal emissions from any existing single family and multi-family uses within the project vicinity. The AQT/GHG Study determined that the net new operational emissions will not exceed the AQMD operational thresholds for various pollutants.

During construction, there will be periods of construction related emissions; however construction activities will be subject to standard construction conditions such as hours of construction, routine maintenance of construction vehicles, and SCAQMD Rule 403. Further according to the AQT/GHG Study, for all 3 phases, construction related emissions are not anticipated to result in an exceedance of the AQMD Localized

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

Significance Threshold for various pollutants. Localized ambient air quality impacts will be less than significant.

No mitigation measures are necessary.

e) *Less Than Significant Impact*. Diesel-powered equipment used for construction could cause odors and emissions that may be offensive to sensitive persons. This would be a temporary impact and would be mitigated by existing SCAQMD regulations and project standard conditions requiring proper maintenance of vehicle engines and exhaust systems, and by standard construction conditions. Operationally single family homes and assisted living facilities do not normally generate noxious odors; these uses are not industrial in nature and are consistent with existing residential lands use patterns in the project vicinity. Therefore, impacts are not expected to be significant.

No mitigation measures are necessary.

Mitigation Measure(s): None required

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

	EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

Responses:

a-b) *Less Than Significant Impact*. The project site is on disturbed developed land that has been deposited with non-natural fill, reducing its suitability for naïve species conservation and is too small to support open country wildlife species. Disturbed and developed urban land surrounds the site and includes both single family and multi-family residential uses. A Biological Assessment and Nesting Bird Survey (Coper Ecological Monitoring – March 9, 2015) observed that were no special status plant or animals on the site. No sensitive native plants or wildlife are known to inhabit the site or surrounding areas. There is no riparian habitat or other sensitive natural community on the site. The project site does not support federally-protected wetlands or waters of the United States as defined by Section 404 of the Clean Water Act. The project site is completely surrounded by development and within an urbanized area and has not been identified as part of a resident migratory wildlife corridor or wildlife nursery site. However the survey did note that due to the present number of trees on the site nesting birds could be affected during tree removal if initiated in late winter. In order to ensure compliance with the Federal Migratory Bird Treaty ACT (MBTA) of 1918, a project condition will require that beginning 30 days prior to the initiation of project activities, a qualified biologist with experience in conducting breeding bird surveys will conduct a weekly bird survey to detect protected native birds. The survey shall continue on a weekly basis with the last survey occurring no more than 3 days prior to initiation of project activities. The biologist shall ensure compliance with the MBTA which could result in a buffer area around trees with active nests.

No mitigation measures are necessary.

c) *Less Than Significant Impact*. The project site is on disturbed developed land that has been deposited with non-natural fill, reducing its suitability for naïve species conservation and is too small to support open country wildlife species. Disturbed and developed urban land surrounds the site and includes both single family and multi-family residential uses. As stated above a biological survey determined that there no special status plants or animals. No sensitive native plants or wildlife are known to inhabit the site or surrounding areas. There is no riparian habitat or other sensitive natural community on the site. The project site does not support federally-protected wetlands or waters of the United States as defined by Section 404 of the Clean Water Act. The project site is completely surrounded by development and within an urbanized area and has not been identified as part of a resident migratory wildlife corridor or wildlife nursery site.

No mitigation measures are necessary.

d) *Less Than Significant Impact*. The project site is on disturbed developed land that has been deposited with non-natural fill, reducing its suitability for naïve species conservation and is too small to support open country wildlife species. Disturbed and developed urban land surrounds the site and includes both single

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

family and multi-family residential uses. As stated above a biological survey determined that there no special status plants or animals. No sensitive native plants or wildlife are known to inhabit the site or surrounding areas. There is no riparian habitat or other sensitive natural community on the site. The project site does not support federally-protected wetlands or waters of the United States as defined by Section 404 of the Clean Water Act. The project site is completely surrounded by development and within an urbanized area and has not been identified as part of a resident migratory wildlife corridor or wildlife nursery site. As noted above the survey did note that due to the present number of trees on the site nesting birds could be affected during tree removal if initiated in late winter. In order to ensure compliance with the Federal Migratory Bird Treaty ACT (MBTA) of 1918, a project condition will require that beginning 30 days prior to the initiation of project activities, a qualified biologist with experience in conducting breeding bird surveys will conduct a weekly bird survey to detect protected native birds. The survey shall continue on a weekly basis with the last survey occurring no more than 3 days prior to initiation of project activities. The biologist shall ensure compliance with the MBTA which could result in a buffer area around trees with active nests.

No mitigation measures are necessary.

e) *Less Than Significant Impact*. The project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. There are not street bordering the site and all trees to be removed are on private property. Project conditions will require on-site landscaping including drought tolerant trees and bushes and street trees along Lenawee Avenue, the new cul-de-sac, and La Cienega Boulevard.

No mitigation measures are necessary.

f) *Less Than Significant Impact*. The project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As noted above a Biological survey did note that due to the present number of trees on the site nesting birds could be affected during tree removal if initiated in late winter. In order to ensure compliance with the Federal Migratory Bird Treaty ACT (MBTA) of 1918, a project condition will require that beginning 30 days prior to the initiation of project activities, a qualified biologist with experience in conducting breeding bird surveys will conduct a weekly bird survey to detect protected native birds. The survey shall continue on a weekly basis with the last survey occurring no more than 3 days prior to initiation of project activities. The biologist shall ensure compliance with the MBTA which could result in a buffer area around trees with active nests. Development of the proposed project would result in impacts that are less than significant.

No mitigation measures are necessary.

Mitigation Measure(s): None required

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Responses:

a) *Less than Significant Impact.* Information on existing conditions of the project site per City of Culver City project application materials indicates that no identified historical resources exist on the site and no significant adverse impacts relative to historic resources are associated with the project. The proposed project site includes disturbed developed land that has been deposited with non-natural fill, a barn, some outbuildings, a single family home, and open fields and vegetation. Disturbed and developed urban land surrounds the site and including both single family and multi-family residential uses. None of the buildings on the site have been identified as historic resources.

No mitigation measures are necessary.

Mitigation Measure(s): None required

b-d) *Potentially Significant Impact Unless Mitigated.* Culver City is located in a region of the western Los Angeles basin known to contain paleontological/archaeological resources and upon significant excavation for projects that involve substantial re-grading such resources could surface[1]. The project site is developed as a small farm with a single family house, a barn, and some outbuildings. It contains significant fill and has open areas as well as several trees and bushes. It is located in an urbanized area surrounded by existing disturbed land and development. There will be significant excavation at levels not to exceed 4 feet below ground surface (bgs). The thickness of the fill ranges from about 4 to 6 feet bgs with some localized fill exceeding 11 feet where past trenching occurred in connection with fault investigation. Excavations on the order of 6 to 15 feet bgs in vertical height may be required during grading operations.

Archeological Resources

A Phase I Archaeological and Paleontological Survey was required as part of the application materials (by Dudek - May 6, 2014). In addition city staff transmitted an AB 52 Consultation Request to interested Native

[1] Culver City General Plan Program EIR, November 1995, page 226

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

American Tribes on April 19, 2016. Andrew Sala, Chairman of the Gabrieleno Band of Mission Indians – Kizh Nation, provided a response on April 19, 2016. Both the Survey and the Kizh Nation letter helped to inform staff on potential significant impacts to both archeological and paleontological resources which with mitigations can be reduced to less than significant. The May 6, 2014 Survey indicated that no archaeological resources were identified during an intensive level survey of the site. Ground visibility was poor due to the numerous large trees which have formed dense piles of duff over a majority of the ground surface, addition of top soil and mulch, modern refuse, and the presence of asphalt in some areas.

Dudek contacted the California Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File and the NAHC indicated the presence of Native American cultural resources within or near the project site. Dudek sent letters to several Native American tribal representatives asking if they were aware of any Native American cultural resources and no one responded to their inquiry. The Survey reported that based in previous recorded resources Native American village sites have been identified within 0.5 miles or less from the project site. Part of the paleontological survey reported fossils of 2 humans (indicating Native American ancestry) found along Rodeo Road. The Survey recommends that given the site's proximity to past identified Native American sites (such resources unearthed along Ballona Creek), the area's sacred identification for Native tribes, and the lack of subsurface testing for archeological resources at the project site, a mitigation be required that an archeologist and Native American monitor be present during initial ground disturbances of native soils.

The Kizh Nation April 19 response to the AB 52 Consultation Request indicated that the project lies in an area where the Ancestral territories of the Kizh (Kitc) Gabrieleño's villages such as" **Guaspet"** adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods. The homeland of the Kizh Gabrieleño was centered in the Los Angeles Basin, and reached as far east as the San Bernardino-Riverside area. During their seasonal rounds to exploit plant resources, small groups would migrate within their traditional territory in search of specific plants and animals. Their gathering strategies left behind signs of special use sites, usually grinding slicks on bedrock boulders, at the resource locations. The response further stated that when NAHC states there are "no records of sacred sites in the project area" they will always refer lead agencies to the respective Native American Tribe because the NAHC is only aware of general information and are not the experts on each California Tribe. While the property may be located in an area that has been previously developed, numerous examples can be shared to show that there still is a possibility that unknown, yet significant, cultural resources will be encountered during ground disturbance activities. Finally the response stated that per AB 52 lead agencies must consult with Native American Tribes who can prove and document traditional and cultural affiliation within the area of said project in order to protect cultural resources. The Kizh Nation, connected ancestrally to the project area and vicinity, wishes to avoid unnecessary destruction of cultural resources and protect what resources may exist at the project site. The Kizh Nation requests that due to the project location and the high sensitivity of the area, one of their certified Native American Monitors as well as an archeological monitor be on site during any and all ground disturbances.

Paleontological Resources

The Survey reported that because of the site's 4 to 6 feet of artificial fill, there is little to no fossil-yielding potential within such material. Therefor no active monitoring is recommended for surface disturbances of 4

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

feet bgs or less. A mitigation will be required that describes proper handling of fossils should they be discovered (archeological and paleontological mitigations are listed below). Excavations of 6 to 15 feet may be required during grading operations; these are at depths below the fill. A paleontological resource survey indicated that several fossils have been discovered along Rodeo Drive north of the project site and in other surrounding nearby sites; these include mastodons, sabretooth cats, horses, and camels. The survey recommends and a mitigation will be required that requires a Paleontological Resources Mitigation and Monitoring Program (PRMMMP) and a monitor for excavations below 4 feet bgs, given that the surrounding areas has yielded fossils in the past, the potential depth of excavations, and uncertainty regarding paleontological potential below the fill level.

Human Remains

There is always a possibility for human remains and a mitigation will be required that follows standard California Health and Safety Code law regarding treatment of human remains.

Due to both archeological and paleontological potential impacts the following mitigations will be required including the requirement for on-site monitoring during all excavations. With these mitigations potential impacts will be reduced to less than significant.

Mitigation Measure(s):.

CR-1: The Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor and a certified Native American Monitor from the Gabrieleno Band of Mission Indian – Kizh Nation. Both the archaeological monitor and the certified Native American Monitor shall be present during all ground disturbances and construction excavations such as demolition, pavement removal, clearing/grubbing, post holing, auguring, boring, 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. Monitoring may be adjusted, or ceased entirely, as determined appropriate by the archaeological monitor.

CR-2: In the event that archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by a qualified archaeologist and certified Native American Monitor (the monitors). The Applicant shall coordinate with the monitors to develop an appropriate treatment plan for the resources. 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 shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

CR-3: The archaeological monitor 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. The report and the Site Forms shall be submitted by the Applicant to Culver City, the City of Los Angeles, 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.

CR-4: A qualified Paleontologist shall be retained to develop and implement a paleontological resources mitigation and monitoring program (PRMMP) for construction excavations exceed 4 feet bgs. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations below 4 feet bgs. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the paleontological monitor.

CR-5: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and evaluation. If preservation in place is not feasible, the paleontologist shall implement a paleontological salvage program to remove the resources form the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

CR-6: The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

CR-7 For excavation activity at or above 4 feet bgs, if potential fossils are discovered by construction crews, all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately until a qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the fine, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

If treatment and salvage is required, recommendations shall be consistent with SVP 1995 guidelines and currently accepted scientific practice, and shall be subject to review and approval by the City. Work in the affected area may resume once the fossil has been assessed and/or salvaged and the City in consultation with the professional paleontologist has provided written approval to resume work

CR-8: If human remains are encountered unexpectedly during implementation of the project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment. Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS -- Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☒	☐	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

Responses:

Geocon West Inc. produced two studies for this project site: an Updated Geotechnical Investigation (April 28, 2015 – Geo Report) and a Fault Rupture Hazard Investigation (December 29, 2010 - Fault Report)

a) (i) *Potentially Significant Impact Unless Mitigated.* Based on the Fault Report the site is within a State designated Alquist-Priolo Earthquake Fault Zone because the active Newport-Inglewood Fault Zone (NIFZ) runs through the eastern end of the project site. This fault is seismically active and the March 11, 1933 Long Beach Earthquake (M 6.3) occurred along this fault approximately 3.5 miles offshore from Newport Beach. No surface rupture was reported however considerable ground failure in the form of liquefaction, seismic settlement, and lateral spread were reported from Long Beach to Newport Beach to Garden Grove. In addition a number of moderate earthquakes have occurred northwest of the epicenter – June 18, 1920 Inglewood M4.9, October 2, 1933 east of Reservoir Hill M5.4, June 19, 1944 Dominguez Hills M 4.5 and 4.4. A field investigation was preformed between October 4, 2010 and November 5, 2010 and consisted of excavation and detailed logging of 3 exploratory trenches. Based on these investigations fault strands do exist and pose a potential for surface fault within a portion of the project site – the eastern portion. Further

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

the study stated that based on the estimated age of soil tested for this rupture investigation – 15,000 to 20,000 years near the late Pleistocene and early Holocene – the faulting observed should be considered active. The empirical record of recent earthquakes in the early to mid-20th century noted above supports this conclusion.

To mitigate this hazard the study recommended and a mitigation will require that a building setback of 50 from both sides of the Newport-Inglewood Fault Zone (NIFZ) located within the eastern section of the project site be established thereby creating a 100 foot wide No-Build area along the NIFZ and surrounding area. Surface parking, driveways, landscaping, a trash enclosure area, fences, and a non-habitable portico will be allowed within this 100 foot wide No-Build zone. The study recommends that structures designed for human occupancy be limited to areas that lie outside this No Build area. The 50 foot distance on either side of the fault line is considered adequate.

a) (ii) *Less Than Significant Impact*. The site is subject to ground shaking during the event of an earthquake. The Geo Report stated that this hazard, common in seismically active California, and be mitigated if proposed structures on the project site are designed and constructed with current building codes and engineering practices. Standard code requirements for Culver City requires the submittal of a detailed comprehensive geotechnical report prior to building permit issuance, to ensure adequate seismic safety and soils stability of all proposed development improvements for the project. In addition, the project grading plan and building plans shall conform to the recommendations in the Geo Report in a manner consistent with Culver City building code regulations. Compliance with the recommendations in the geotechnical report and standard building code requirements will reduce this impact to a level that is less than significant.

No mitigation measures are necessary.

a)(iii) *Less Than Significant Impact*. Based on the City of Culver City's Seismic Hazard Map and the Geo Report the site is not within a liquefaction area and liquefaction potential associated with ground deformations is low. Standard building code requirements and recommendations in the Geo Report will reduce hazards from seismic-related ground failure to less than significant. In addition, as a project condition the project grading plan and building plans shall conform to the recommendations in the geotechnical report in a manner meeting the approval of Culver City Building Safety. Compliance with recommendations in the geotechnical report and standard building code requirements will reduce this impact to a level that is less than significant

No mitigation measures are necessary.

a) (iv) *Less Than Significant Impact*. Based on the City of Culver City's Seismic Hazard Map and the Geo Report the site is not within an earthquake induced landslide area. Additionally according to the Geo Report the site is not within an area identified as having potential seismic slope instability and such hazards are considered low. Further compliance with recommendations in the geotechnical report and standard building code requirements will further reduce this impact to a level that is less than significant

No mitigation measures are necessary.

b) *Less Than Significant Impact.* The project site is on a semi developed urban lot with 4 to 6 feet of artificial fill and is surrounded by urban development. After leveling out of the site most of the excavated dirt

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

will have come from the fill level. The site has historically been used as a small farm but with no significant land intensive farming or crop rotation that could have created agriculturally healthy top soil. Re-grading of the site, new landscaping, and paving for vehicles and building foundations will ensure site stability and the proposed project will not result in substantial soil erosion or the loss of topsoil where none exists now or where none is needed.

No mitigation measures are necessary.

c) *Less Than Significant Impact.* The Geo Report concluded that subsidence commonly occurs in such small magnitudes and over such large areas that is generally imperceptible at an individual local such as the project site. According it affects only regionally extensive structures sensitive to slight elevation changes such as canals and pipelines. The rate of vertical displacement (subsidence) is usually uniform over a large enough area that it does not result in differential settlements that could damage buildings. Further as stated in the Geo Report and as noted in City hazard maps, the site is not within a landslide or liquefaction area and is on stable land. The required geotechnical report will determine what if any construction requirements will be needed to ensure use of the site does not result in an unstable or lateral spreading conditions.

No mitigation measures are necessary.

d) *Less Than Significant Impact.* Nothing in the application materials indicate the soils at the project site are identified as expansive. Nevertheless, standard code requirements and conditions of approval requires the preparation of erosion/sediment control plans such as the Local Storm Water Pollution Prevention Plan (LSWPPP) and Standard Urban Storm Water Mitigation Plan (SUSMP), to regulate and control pollutant run-off by using Best Management Practices (BMPs) in accordance with National Pollutant Discharge Elimination System (NPDES). These plans shall show all temporary and permanent erosion control devices, effective planting of graded slopes, practical accessibility for maintenance purposes and proper precautions and fences to prevent public trespass on to certain areas where impounded water may create hazardous conditions. Compliance with LSWPPP, SUSMP, and NPDES BMPs, as well as compliance with the Culver City building and safety codes and the Geotechnical Report prepared for the project site would reduce this impact to a level that is less than significant.

No mitigation measures are necessary.

e) *No Impact*. The project would not involve the use of septic tanks. All wastewater is proposed to be conveyed off-site via connections to the public sanitary sewer system.

No mitigation measures are necessary.

Mitigation Measure(s):

GS-1: A building setback of 50 from both sides of the Newport-Inglewood Fault Zone (NIFZ) located within the eastern section of the project site shall be established thereby creating a 100 foot wide No-Build area along the NIFZ and surrounding area. Surface parking, driveways, landscaping, a trash enclosure area, fences, and a non-habitable portico will be allowed within this 100 foot wide No-Build zone. Structures designed for human occupancy shall be limited to areas that lie outside this No-Build area.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS –Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Responses:

a) *Less Than Significant Impact.* An Air Quality Technical Report and Green House Gas Emissions Analysis (AQT/GHG Study) was prepared by Dudek (October, 2015). The purpose of the Analysis was to evaluate potential stationary and mobile Green House Gas (GHG) emissions and impacts resulting from implementation of the project. GHG emissions have been identified as the key reason for climate change within the last several decades. Many scientists believe and increasing climate data supports the theory that this "Green House" effect, resulting from the increase of GHG emissions, has led to abnormal weather conditions. To address the impacts of climate change, legislation at the Federal and State levels have been enacted with the goal of reducing stationary and mobile source GHG emissions thereby reducing the potential for further climate change. State GHG legislation has established a goal for reduction of GHG emissions over time. The study reviewed the project's construction and operational GHG emissions to determine if there will be potentially significant impacts from such emissions.

The project's "business as usual" GHG emissions were calculated for the project. "Business as usual" refers to emissions that would be expected to occur in the absence of GHG reduction measures. The proposed "business as usual" GHG emissions include operation of the proposed project and forecast trip generation, as well as the GHG emissions from project construction. The California Emissions Estimator Model (CalEEMod) computer model and outputs contained within the Modeling Data were used to calculate direct and indirect project-related GHG emissions.

Direct Project-Related Sources of Greenhouse Gases

Construction

Construction of the project will result in GHG emissions that are primarily associated with off-road construction equipment and on-road construction and worker vehicles. Project construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operation emissions. Construction GHG emissions have been amortized, and would result in 800 Metric Tons of Carbon Dioxide Equivalents ($MTCO_2eq$)/yr, which are added to the total operational GHG emissions.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

Mobile Source

The CalEEMod model relies upon project specific land use and traffic data derived from the Institute of Transportation Engineers' Trip Generation Manuel, 9th Edition, to calculate mobile source emissions. The project would directly result in 410.97 $MTCO_2eq/yr$ of mobile source-generated GHG emissions.

Indirect Project Related Sources of Greenhouse Gases

Energy Consumption.

Energy Consumption emissions were calculated using the CalEEMode model and project specific land use data. Electricity would be provided to the project site via Southern California Edison. The project would indirectly result in 128.22 $MTCO_2eq/yr$ due to energy consumption.

Water Demand.

The project's water supply would be provided by groundwater and imported sources. Emissions from indirect energy impacts due to water supply would result in 34.56 $MTCO_2eq/yr$.

Solid Waste.

Solid waste associated with operations of the proposed project would result in 37.36 $MTCO_2eq/yr$.

Total Project-Related Sources of Greenhouse Gases.

The report concluded that the total amount of project-related "business as usual" GHG emissions from direct and indirect sources combined would total 646 $MTCO_2eq/yr$. Vehicles traveling to and from the site would be the primary source of project related GHG emissions

Consistency With the Culver City's Green Building Ordinance

The project will be subject to Culver City's Green Building Ordinance, which will require that energy efficient features be incorporated into the building improvements. The increased perimeter landscaping and the applicable Green Building features will further reduce the project's GHG emissions (beyond the Business as Usual data provided).

Conclusion

The total amount of project related "business as usual" GHG emissions from direct and indirect sources combined would total 646 $MTCO_2eq/yr$, which are below the SCAQM 3,500 $MTCO_2eq/yr$ GHG significance threshold for residential projects. Additionally, project design features that are consistent with and required of the Culver City's Green Building Ordinance will further reduce GHG emission. Therefore, a less than significant impact would occur with regards to GHG emissions.
No mitigation measures are required.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

b.) Culver City adopted the Mandatory Green Building Program as an ordinance (the "ordinance') in June 2009. The ordinance applies to all new construction and major renovations and the project will be required to comply with the ordinance. The ordinance requires implementation of several sustainability measures adopted for the purpose of reducing GHG emissions. Sustainability measured in the ordinance relate to energy efficiency, water conservation, recycling, and landscaping. In addition to the Culver City's Green Building Ordinance the project will be subject to the 2013 California Green Building Standard Code (CalGreen). Similar to the ordinance CalGreen requires implantation of several GHG emission reduction measures. Following implementation of the required GHG emission reduction measures pursuant to the ordinance and CalGreen, the project will not conflict with applicable plans, policies, or regulations adopted for the purposes of reducing GHG emissions.

No mitigation measures are required.

Mitigation Measure(s): None Required.

VIII. HAZARDS AND HAZARDOUS MATERIALS --Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

Responses:

a) *Less Than Significant Impact.* The proposed project involves the construction of 8 single family homes, preservation of one existing single family home, and construction of an Assisted Living/Memory Care facility with surface parking for the Assisted Living facility. Such residential uses would not result in the routine transport, use, or disposal of hazardous materials. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the site, and use of these substances would comply with State Health Codes and Regulations. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and a less than significant impact would occur.

No mitigation measures are necessary.

b) *Potentially Significant Impact Unless Mitigated.* The proposed project involves the construction of 8 single family homes, preservation of one existing single family home, and construction of an Assisted Living/Memory Care facility with surface parking for the Assisted Living facility. Based on the November 12, 2010 Phase I Environmental Assessment and the February 16, 2011 Phase II Environmental Assessment, a limited subsurface soils investigation was conducted to analyze potential hazardous materials and substances that over the years may have leached into the ground. Several vehicles have been stored at the site over the years and there was visual evidence that hazardous materials had been handled and spilled on the project site. Additionally the site may contain asbestos containing building materials, possible lead-based paint applied to various existing buildings, and arsenic in pressure treated wood (applied in the past to prevent insect infestations).

The Phase II Study reported on eleven soil samples that were collected as well as the lead paint, asbestos, and arsenic analysis as recommended in the Phase I Study. Various hazardous materials such as volatile organic compounds, semi-volatile organic compounds, petroleum hydrocarbons-gasoline, petroleum hydrocarbons-oil, polychlorinated biphenyls, perchlorate, were detected in the soil samples at levels below significance. Several metals – arsenic, barium, cadmium, cobalt, chromium, copper, mercury, molybdenum, nickel, lead, vanadium and zinc were detected in at least one of two soil samples collected from an on-site soil stockpile.

None of these detected metal concentrations exceed their respective California Human Health Screening Level for residential soils (CHHSLr) with the exception of arsenic. The detected concentrations of arsenic in the soil stockpile was 8.4 mg/kg and 3.6 mg/kg and in the surficial soils it was 7.9 mg/kg and 8.3 mg/lg. The 95% upper confidence level (UCL) for arsenic was calculated using ProUCL 4.00.04 (USEPA 2010). The 95UCL for arsenic in soils was calculated at 5.6 mg/kg which is less than 6.0 mg/kg, the threshold used by the Department of Toxic Substance Control (DTSC) as a background concentration of potential school sites. Asbestos was not detected a significant levels in three building material samples while lead was detected in five paint samples collected from the site. Lead concentrations exceeded the 5,000 parts per million (ppm) threshold with concentrations, varying depending on location within various existing structures,

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

of 5,300 ppm to 49,000 ppm. The Phase II concluded that existing stockpile dirt on-site can be used as fill due to soil samples yielding below significant thresholds. Lead paint did exceed regulatory thresholds and the study recommended (which will be a mitigation) that lead on existing buildings be abated by a State of California licensed abatement contractor and appropriately disposed prior to demolition of structures. With this mitigation potential significant hazards to the public or the environment through reasonably foreseeable upset and accident involving the release of hazardous materials into the environment will be reduced to less than significant.

The Updated Geotechnical Investigation (Gecon West, Inc. – April 28, 2015) reported that the site is located within the Inglewood Oil Field based on review of the California Division of Oil, Gas and Geothermal Resources (DOGGR) Gas Well Location Map W1-5, Sheet 118. The nearest oil well to the site is the 57 Petroleum Corp Moynier Well No. 1 that is a plugged and abandoned dry hole; it is about 500 feet south of the site. Due to the voluntary nature of record reporting by the oil well drilling companies, wells may be improperly located or not shown on DOGGR maps. Undocumented wells could be encountered during construction and any such wells will need to be abandoned in accordance with current DOGGR requirements. Also given that the site is within the Inglewood Oil Field there could be a potential for methane and other volatile gases to occur at the site which could require a permanent methane gas control system beneath the proposed buildings. A mitigation will be added that requires a methane study be drafted by a qualified methane consultant; the study shall provide mitigations as necessary to lessen hazards due to methane. Such mitigations may require a permanent methane gas control system for the site. With these mitigations potential significant hazards to the public or the environment through reasonably foreseeable upset and accident involving the release of hazardous materials into the environment will be reduced to less than significant.

Operationally as a single family development and assisted living facility no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the site, and use of these substances would comply with State Health Codes and Regulations. During demolition and construction there will be potentially hazardous materials on-site or transported to or from the site. The mitigations noted above will reduce this impact to less than significant. Additionally standard Building Safety requirements will be required during demolition that includes removal of asbestos.

c) *Potentially Significant Impact Unless Mitigated.* There is a private schools within 0.25 miles from the project - Kinetic Theory Theatre Circus School - Classes and Training. As noted above hazardous materials, substances, or waste such as lead paint, substances associated with improperly abandoned oil wells, and methane could potentially affect this school Hazardous Materials (HM) mitigations 1, 2, and 3 discussed above and stated below will reduce impacts to this school to less than significant. Additionally, standard Building Safety requirements during demolition and construction will reduce impacts to less than significant. Routine use of hazardous materials will not occur operationally since this is a residential and assisted living development.

d) *Less Than Significant Impact*. The Phase I report indicates that the site is not located on a site which is included on a list of hazardous materials sites complied pursuant to Government Code section 65962.5.

No mitigation measures are necessary.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

e)- f) *Less Than Significant Impact*. The proposed project is not located near a private airstrip; the nearest airport to the project site is Santa Monica Airport located approximately 4 miles west from the project site. The Los Angeles International Airport (LAX) is located approximately 4.75 miles south of the project site. Both airports exceed the two-mile radius discussed in the threshold. The project is not expected to result in a safety hazard from airports for people residing or working in the project area; a less than significant impact would occur.

No mitigation measures are necessary.

g) *Less Than Significant Impact.* The proposed project would have no long-term effect on any emergency response or emergency evacuation plan or procedures. Emergency evacuation routes could be affected during construction however, temporary street or lane closures will be required to meet standard City conditions to prepare and implement traffic control plans to ensure that construction does not obstruct emergency access.

No mitigation measures are necessary.

h) *Less Than Significant Impact*. The project site currently is surrounded by developed sites that includes residential and some commercial buildings. The project site is within a fire hazard zone and a project condition will require that the project comply with Building Code and Fire Code fire resistant requirements as deemed appropriate by the Building Official and Fire Marshal. The proposed project will not expose people or structures to a significant risk of loss, injury or death involving wildfires.

No mitigation measures are necessary.

Mitigation Measure(s):

HM-1: Lead on existing buildings shall be abated by a State of California licensed abatement contractor and appropriately disposed of prior to demolition of structures containing said lead.

HM-2: If undocumented oil wells are encountered during construction, then those wells shall be abandoned in accordance with current California Division of Oil, Gas and Geothermal Resources (DOGGR) requirements.

HM-3: A methane study shall be required and shall be drafted by a qualified methane consultant; the study shall provide mitigations as necessary to lessen hazards due to methane. Such mitigations may require a permanent methane gas control system for the site.

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

Responses:

a) *Less Than Significant Impact.* During construction and excavation, erosion and siltation could occur resulting in water pollution and a violation of Regional Water Quality Control Board standards if proper steps are not implemented. Standard code requirements and conditions of approval for the project requires the preparation of erosion/sediment control plans such as the Local Storm Water Pollution Prevention Plan

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

(LSWPPP) and Standard Urban Storm Water Mitigation Plan (SUSMP), to regulate and control pollutant run-off by using Best Management Practices (BMPs) in accordance with National Pollutant Discharge Elimination System (NPDES). These plans shall show all temporary and permanent erosion control devices, effective planting of graded slopes, practical accessibility for maintenance purposes and proper precautions and fences to prevent public trespass on to certain areas where impounded water may create hazardous conditions. City and State standard code requirements and site design elements would reduce this potential impact to a level that is less than significant.

No mitigation measures are necessary.

b) *Less Than Significant Impact.* Water service to the City of Culver City is provided by the Golden State Water Company which contracts with the Metropolitan Water District for its supply. There are no water wells within the City of Culver City and the project does not require the installation of wells for water service and will not affect any groundwater supplies in the area. Development of the project will require the installation of landscaped areas that will percolate and filter the first ¾ inch of rainfall for the Assisted Living facility. The nine new single family residential lots are not subject to this requirement. Grading leveling of the site will require excavation of 4 feet bgs and fills of 5 feet. At some points 6 to 11 feet of excavation may be required. The historic groundwater level is approximately 18 feet bgs and borings from then Updated Geotechnical Investigation indicate groundwater levels ranging from 18 feet to 26 feet below the surface. Groundwater will not be affected.

No mitigation measures are necessary.

c) *Less Than Significant Impact*. Grading in connection with the project will result in changes to existing drainage patterns since the site is currently heavily vegetated. However the new development will contain significant new vegetation and will be required to install new storm drains and curb and gutter to convey storm water as per City, County, and State standards. Grading and building plans will be reviewed by the City's Engineering Division to ensure that grading and drainage will be done in manner that does not cause substantial erosion, siltation or flooding. The Project Site is located in a highly urbanized area and no streams or river courses are located on or within the project vicinity. Implementation of the SWPPP as required will reduce the amount of surface water runoff after storm events, as the proposed project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event. Therefore, significant impacts will not occur and there will no alteration to the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site

No mitigation measures are necessary.

d) *Less Than Significant Impact.* Standard code requirements and conditions of approval for the project requires the preparation of erosion/sediment control plans such as the Local Storm Water Pollution Prevention Plan (LSWPPP) and Standard Urban Storm Water Mitigation Plan (SUSMP), to regulate and control pollutant run-off by using Best Management Practices (BMP's) in accordance with National Pollutant Discharge Elimination System (NPDES). The construction of the proposed development would not result in a significant increase in runoff during storm events. The Ballona Creek flood control channel is approximately 0.30 miles northwest of the site but standard City and State code requirements for stormwater runoff and drainage as described in this section will assure the project does not affect the channel.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

Impacts will be reduced to a level that is less than significant.

e)- f) *Less Than Significant Impact*. See Sections VIII. a)- d), above. The project is expected to result in an increase in runoff, which would be conveyed to public storm drains by required drainage improvements including new curbing and a storm drain in the cul-de-sac. Design of the storm drain system for the project whether conveyance to existing storm drains or new storm drain will be consistent with City, County, and State standards. With storm drain design as per City standards, the project is not expected to 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. Also, there are no other known impacts to water quality.

No mitigation measures are necessary.

g)-h) *No Impact*. The site is not within a 100-year flood hazard area.

No mitigation measures are necessary.

i) *Less Than Significant Impact*. The site is not within a Dam Inundation Zone.

No mitigation measures are necessary.

j) *No Impact*. Inundation by seiche, tsunami, or mudflow is highly unlikely as the site is not near any inland body of water and is located in an area where mudflows are not likely to occur.

No mitigation measures are necessary.

Mitigation Measure(s): None required

X. LAND USE AND PLANNING - Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

Responses:

a) *Less Than Significant Impact*. The project will not physically divide an established community because the project site is one contiguous site and within the development the single family residential portion will front existing single family homes creating a sense of continuity. The assisted living portion will be more compatible with multi-family housing and its commercial nature will be more conducive to La Cienega Boulevard – a high speed limited access road. The assisted living portion of the project is oriented towards La Cienega Boulevard. Further the project will not require that streets connecting existing residential or commercial areas be vacated or closed off but instead will create a new cul-de-sac street that will act as frontage for 6 of the 9 single family lots, lessening potential impacts to existing homes fronting Lenawee Avenue. The proposed project site is located within an urbanized area of Culver City and is consistent with the existing physical arrangement of the properties within the vicinity of the site. The proposed project will not require the separation of land uses or disruption of access between land use types other than the separation on-site between the new single family lots and the assisted living lot.

No mitigation measures are necessary.

b) *Less Than Significant Impact*. The Culver City General Plan Land Use Element designates the property as Low Density Single Family. The site is 189,439 square feet or 4.35 acres and contains one residential structure, a barn, and an outbuilding. Most of the site is covered with vegetation or open fields and was historically used as a small farm. As a single lot it can only be developed with on single family house and accessory buildings not exceeding 800 square feet total. For this reason the proposed development requires a General Plan Map Amendment to re-designate the site as Planned Development. The General Plan Land Use Designation of Planned Development states that it is established in recognition of existing or proposed large residential complexes which often consist of more than one building on a site of 1 acre or larger. The intent of the designation is to take advantage of the opportunity provided by large scale development parcels to develop residential complexes that integrate aesthetic and functional design both within the complex and the larger community.

At 4.35 acres the site is consistent with 1 acre or more criteria. Further the eight new single family land lots along with the ninth single family lot that will contain the existing house will function as if they were each designated Low Density Single Family, thereby maintaining consistency with the surrounding R1 zoned lots that are designated Low Density Single Family. The nine new lots will each have their own street frontage along Lenawee Avenue or a new cul-de-sac street consistent with other surrounding single family lots. Thus the single family complex will have an aesthetic and functional design that is integrated within the development and with the larger community. The Planned Development Land Use Designation also acknowledges the high intensity multi-family and senior housing that currently exists in certain portion of the City and which exceed multi-family maximum densities of 29 dwelling units per acre. The assisted living portion of the project will be a commercial use but will act as assisted housing for senior citizens, memory care patients, and veterans. The 110 bed assisted living facility will be consistent with the Planned Development's

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

allowance of densities that are more than the 29 du/acre maximum found in multi-family designated areas. Also the Planned Development designation for this site will allow a separation of uses between the single family and assisted living portions with the assisted living section closer in function with multi-family housing to the north, some of which fronts La Cienega Boulevard (like the assisted living will).

Zoning Development standards unique to this Planned Development will be adopted that assure integration within the neighborhood. Generally the single family portion will follow R1 development standards requiring setbacks, height, and covered parking consistent with surrounding R1 zoned areas. The assisted living portion will have more unique setbacks given the size of the assisted living lot and its adjacency to a high speed boulevard. Consistent with R1 it will be set back at least 10 feet from single family lots, 18 to 28 feet from other single family and multi-family lots that are adjacent to the exit driveway (thus creating a larger setback), and 15 feet for only one portion of the building fronting La Cienega Boulevard. Most of the building will be substantially setback from La Cienega Boulevard due to a 100 foot No Build Zone along a fault line. Height for the Assisted Living at 42 feet will be more consistent with commercial uses; although it will be a group quarter residential type use for senior citizens in need of assisted living the use is considered and not residential. As noted the project's unique zoning standards under Planned Development or PD zone will allow the project as proposed with goal of respecting the single family, multi-family, and nearby commercial uses.

The single family portion of the project will be consistent with: General Plan Land Use Objective 1 – Neighborhood Character – because the single family lots will be consistent with surrounding single family lots thus protecting the low to medium density character of Culver City's residential areas; General Plan Land Use Objective 2 – Housing Supply – because the project will result in 8 new homes; General Plan Land Use Objective 5 – Economic Activity – because the assisted living will encourage a new business opportunity that will help to serve local and regional communities in need of assisted living; and General Plan Land Use Goal of providing clear and balanced growth because the single family lots will be closer to existing single family lots while the assisted living will be closer to a high speed commercial boulevard and nearby multi-family housing.

With regard to regional planning the added dwellings and assisted living units are within expected growth patterns and housing increases based on the Regional Housing Needs Assessment (RHNA). Development of the project will increase the on-site population from two existing residents to approximately 36 total residents for the single family residential development (assuming 4 persons per home), 110 people for the assisted living facility given the 110 beds, and approximately 16 permanent staff members of the assisted living facility. According to the Southern California Association of Governments (SCAG), the state mandated metropolitan planning organization for southern California which is charged with development of the region's Regional Transportation Plan (RTP) and RHNA, Culver City's projected population by 2020 is expected to be 39,300. The project's expected population represents about 0.41% of this forecasted population for 2020. According to the 2016-2040 RTP, the expected population in 2040 is 40,700; the project population will be approximately 0.40% of the expected population. The single family residents will represent about 2.25% of the expected growth between 2012 (population – 39,100) and 2014 (population – 40,700). Impacts normally associated with multi-family dwellings such as greater number of trips per day

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

when compared to single family homes are not expected for assisted living units whose residents normally do not drive themselves but are instead driven in vans and in paratransit vehicles. Further these residents usually eat in group settings on-site further lessening the need for individual vehicles. These percentages represent a minor percentage of the overall expected growth for the City. Accordingly the project will result in population and vehicle trips that are consistent with SCAG's growth populations anticipated in both the 2016-2040 RTP.

The project is not expected to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.

No mitigation measures are required.

c) *No Impact*. The site is not located within a Natural Community Conservation Plan area or other habitat conservation plan area.

No mitigation measures are required.

Mitigation Measure(s): None required

XI. MINERAL RESOURCES – Would the project:

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

Responses:

a)- b) *No Impact*. The project site is surrounded by residentially and commercially developed urban uses. Current site conditions indicate that there are no mineral resources on or within the project site and no locally important mineral resource recovery areas located in the project area. Also that the site is within the Inglewood Oil Field however there are no known active wells on the site and any wells that may be on the site are most likely abandoned. Therefore, project implementation would not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state.

No mitigation measures are necessary.

Mitigation Measure(s): None required

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE –Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Responses:

a), b), d) *Less Than Significant Impact with Mitigation*. There are two potential sources of concern regarding noise: 1) noise generated on adjacent properties during construction and 2) noise impacts caused by the additional traffic generated by future occupants of the proposed project or operational related noise. A short-term noise increase during construction would be expected to occur from the use and transport of heavy constructed equipment and overall construction activity. Several noise related mitigations will be required during construction of the project.

With regard to construction hours, pursuant to Culver City's standard condition of approval, construction is limited to:
8:00 a.m. to 8:00 p.m. Monday through Friday,
9:00 a.m. to 7:00 p.m. on Saturday,
10:00 a.m. to 7:00 p.m. on Sundays and national holidays.
Dirt hauling and construction material deliveries or removal are prohibited during the peak traffic periods; morning (7:00 a.m. to 9:00 a.m.) and afternoon (4:00 p.m. to 6:00 p.m.).

This standard condition of approval limiting the hours on construction activity would reduce potential impact from construction noise. However to further reduce noise impacts construction hours will be further limited in order to ensure noise impacts are reduced to less than significant levels. A noise mitigation will require that construction hours be:

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

8:00 am to 7:00 pm Monday through Friday,
9:00 a.m. to 6:00 p.m. on Saturday,
No construction on Sundays or Holidays.
Dirt hauling and construction material deliveries or removal would stay the same as noted above.

A short-term increase in ground borne vibration and noise would be expected to occur during grading and construction. The size of the project and limitations on allowable hours of construction found in the Culver City's Municipal Code as well as standard conditions of approval addressing construction noise impacts for the project would reduce this impact. Some of these standard noise related conditions include: prohibition of construction equipment lacking exhaust mufflers; use of sound control devices like intake silencers and noise shrouds on equipment; proper maintenance of construction equipment to minimize noise emissions; on site servicing of construction vehicles at the greatest distance possible from the public right-of-way and from Noise Sensitive Receptors; minimization of noise from stationary sources like mechanical equipment, ventilators, and air conditioning units, by proper selection of equipment and the installation of acoustical shielding; and location of stationary source equipment like compressors, at the greatest distance possible from the public right-of-way and from Noise Sensitive Receptors.

Further mitigations will be required during demolition and construction activities that will require scheduling so as to avoid operating several pieces of equipment simultaneously, which can causes high noise levels. Further project contractor will be required to use power construction equipment with state-of-the-art noise shielding and muffling devices. With regard to noise from ground borne vibration, construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) will be required to be conducted as far as possible from the nearest noise- and vibration-sensitive land uses. Further natural and/or manmade barriers (e.g., intervening construction trailers) will be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible. Finally to further mitigate the temporary impacts from construction related noise, barriers such as, but not limited to, plywood structures or flexible sound control curtains extending eight feet in height will be required along the perimeter of the construction site to minimize the amount of noise during construction on the nearby noise-sensitive uses.

With the mitigation measures described below, all impacts will be reduced to a less than significant level.

c.) *Less Than Significant Impact.* The project will not create a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. It will be single family residential in the portion facing the single family lots along Lenawee Avenue consistent with existing land use patterns. The assisted living portion will be more consistent with existing multi-family housing to the north and it will front La Cienega Boulevard which is a high traffic volume commercial street. Noise levels associated with both these uses will be consistent with existing noise levels in the surrounding single family and multi-family areas and nearby commercial areas.

Operational noise levels would result from vehicles entering and exiting the single family homes with an average of about 2 cars a day (one in the morning and one in the evening) similar to vehicle trips in surrounding single family neighborhoods. The noise generated by vehicles associated with the single family portion of the project will be consistent with vehicle noise from surrounding single family uses. The assisted living associated noise from vehicle trips will be generated by employees (3 shifts of personnel spread out in one 24 hour period), para transit during the daytime (residents will not be driving themselves), truck

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

deliveries, and emergency vehicles. These noise levels are not similar to vehicle related commercial noise such as noise associated with shopping centers or offices and impacts from paratransit, employees arriving at three different times in one 24 hour period and truck deliveries will not be significant. Noise from vehicles will be spread out over the day.

Noise from emergency vehicles will occur but because emergencies do not follow a pattern and can happen on any given day, emergency vehicle related noise is not predictable (other than there may be a higher frequency of 911 calls to the assisted living than to the single family residents due to the geriatric nature of the population). Normally vehicles including emergency vehicles will approach the site from La Cienega Boulevard – away from surrounding residential uses. The noise from the sirens would not significantly affect nearby residents since the sirens would be turned off once entering the site. Upon exiting sirens may or may not be used depending on the status of the patient and the surrounding traffic conditions. Normally if a patient is not so critical so as to be in immediate need of a doctor and traffic conditions allow the ambulance to maneuver without using the sirens, sirens will not usually be deployed. The ambulance or paramedic driver will decide on a case by case basis whether or not to use the siren upon leaving. Also if more than one emergency vehicle arrives and only the ambulance or paramedic unit is needed the other vehicles may leave without using the siren. They would use the siren if they received a 911 call to another location. What cannot be conditioned is the prohibition of the siren. By state law and to ensure maximum safety, sirens must be deployed under an emergency situation that may be life threatening (such as a dying patient or a 911 call that requires a first responder to go through a red light). Generally noise from sirens is not expected to be significant; 911 calls will not follow a set pattern and intensity and there will not be a set time in the day when sirens are most uses.

No mitigation measures are necessary.

e)- f) *No Impact*. The proposed project is not located near a private airstrip; the nearest airport to the project site is Santa Monica Airport located approximately 4 miles west from the project site. The Los Angeles International Airport (LAX) is located approximately 4.75 miles south of the project site. Both airports exceed the two-mile radius discussed in the threshold. The project is not expected to result in noise impacts from airports for people residing or working in the project area; a less than significant impact would occur.

No mitigation measures are necessary.

Mitigation Measures:

N-1. Construction and demolition shall be restricted to 8:00 am to 7:00 pm Monday through Friday, 9:00 a.m. to 6:00 p.m. on Saturday, and no construction on Sundays or Holidays. Dirt hauling and construction material deliveries or removal are prohibited during the peak traffic periods; morning (7:00 a.m. to 9:00 a.m.) and afternoon (4:00 p.m. to 6:00 p.m.).

N-2. Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

N-3. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

N-4. Noise and ground borne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.

N-5. Barriers such as, but not limited to, plywood structures or flexible sound control curtains extending eight feet in height shall be erected around the perimeter of the construction site to minimize the amount of noise during construction on the nearby noise-sensitive uses.

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

Responses:

a) *Less Than Significant Impact.*

For the City of Culver City, the proposed project will require an amendment to the Culver City General Plan land use designation of Low Density Single Family to Planned Residential Development. However this designation will be for 9 single family lots consistent with the surrounding R1 zoned area and for a multi-unit assisted living facility consistent with multi-family units north of the project site. The added dwellings and assisted living units are within expected growth patterns and housing increases based on the Regional Housing Needs Assessment (RHNA).

Development of the project will increase the on-site population from two existing residents to approximately 36 total residents for the single family residential development (assuming 4 persons per home), 110 people for the assisted living facility given the 110 beds, and approximately 16 permanent staff members of the assisted living facility. According to the Southern California Association of Governments (SCAG), the state mandated metropolitan planning organization for southern California which is charged with development of the region's Regional Transportation Plan (RTP) and RHNA, Culver City's projected population by 2020 is expected to be 39,300. The project's expected population represents about 0.41% of this forecasted population for 2020. According to the 2016-2040 RTP, the expected population in 2040 is 40,700; the project population will be approximately 0.40% of the expected population. The single family residents will represent about 2.25% of the expected growth between 2012 (population – 39,100) and 2014 (population – 40,700). Impacts normally associated with multi-family dwellings such as greater number of trips per day when compared to single family homes are not expected for assisted living units whose residents normally do not

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

drive themselves but are instead driven in vans and in paratransit vehicles. Further these residents usually eat in group settings on-site and carry on with their daily lives on-site. The coming and going of a multi-unit apartment is not the likely pattern for assisted living facilities.

These percentages represent a minor percentage of the overall expected growth for the City. Accordingly the project will result in population increases that are consistent with SCAG's growth populations anticipated in both the 2016-2040 RTP and the 2012 AQMP and will also be consistent with RHNA projections. The individual lots will have ample on-site open space for private leisure or active use and the residential portion will be subject to Quimby fees. The assisted living portion will contain on-site open spaces for their residents. Additionally school fees will paid during the building permit process. The project has been reviewed for service utility and drainage capacity requirements and found to be serviceable without causing significant impacts in providing such services. The school district can absorb the children of eight new households and police and fire did not report any impacts that would not allow them to meet their response times because of the project (to either the project site or surrounding areas). The project is not expected create impacts due to the increase in population because it will result in a 4 acre single family lot being subdivided into 9 single family lots that meet code standards for both lot density and setbacks and height. This is expected for lot of this size. Further the large assisted living lot will be oriented towards La Cienega Boulevard and away from single family lots.

Overall the project is designed to be compatible with the scale and character of the adjacent neighborhood which is consistent with Objective 2 of the General Plan Housing Element to allow for a variety of housing while protecting the character of existing neighborhoods. The General Plan Land Use Element designation for the project will be Planned Development which provides flexibility in allowing the assisted living facility while creating single family lots that are consistent with the surrounding Low Density Single Family land use designation. Similarly the Planned Development zoning will allow the assisted living and will provide standards that are consistent with surrounding R1 zoned areas. Any population increase resulting from the project is no greater than what is anticipated for the surrounding is Low Density Single Family land use designation and R1 zoning. The assisted living lot will have standards that a similar to commercial zoning and will be oriented toward La Cienega Boulevard – a high speed commercial street. Furthermore, the project will provide 8 new residential units to Culver City's housing stock. This will further the intent of the 5th Cycle Regional Housing Needs Assessment (RHNA), 2014 to 2021, as prepared by the Southern California Association of Governments (SCAG) and the State of California Housing and Community Development Department (HCD), which call for an addition of 185 housing units in Culver City in the RHNA planning period ending in 2021. By addressing Culver City's share of new housing units as stipulated in the RHNA and the Housing Element, the new dwelling units are considered to be within the expected development threshold for the City during the current Housing Element cycle (2014 to 2021). Population increases due to the new units are also considered to be within this expected development threshold and impacts will be less than significant. Impacts related to housing would be less than significant.
No mitigation measures are necessary.

b)- c) *No Impact* The proposed project does not displace any existing housing supplies and does not displace any residents. There is only one home on the site and that will remain and displacement of population or housing associated with the project will not be significant and no mitigation measures are required. No mitigation measures are necessary.
Mitigation Measure(s): None required

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES				

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

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

Responses:

a) & b) Fire and Police protection

Less Than Significant Impact. The Culver City Fire Department (CCFD) maintains three stations and the closest station to the proposed site is Station No. 1 located approximately 1.11 miles northwest of the site 9about 2 miles to the Assisted Living using nearest streets and entering off of La Cienega Avenue and about 1.85 miles to the residential area entering off of Lenawee Avenue). The proposed project will be conducted and operated in accordance with the latest CCFD codes and guidelines for construction, access, water, fire flows and hydrants. Standard conditions regarding street improvements require the preparation and implementation of traffic control plans to ensure that construction does not obstruct emergency access. The Culver City Police Department (CCPD) is located approximately the same distance and northwest of the project site. According to the CCPD, the emergency response time anywhere in the City for a top priority emergency is three minutes or less.

Currently the project site contains a small farm and residence and it currently generates demand for Fire and Police services as needed. Implementation of standard Fire Department related requirements will address potential impacts and the inclusion of design features such as a deceleration lane off of La Cienega Boulevard, a fire department access lane along the entrance to the assisted living to ensure maneuverability and exiting onto La Cienega Boulevard if needed, a dedicated fire parking area next to the assisted living drop-off area, and an 18 to 24 foot wide exit lane from the assisted living onto Lenawee Avenue will ensure adequate fire department access. The single family portion will have a standard new, 38 foot wide cul-de-sac street and Lenawee Avenue will be widened by 15 feet to match the width of Lenawee Avenue just south of the site; these standard street improvements will assure adequate fire department access to the single family lots. The Fire Code was recently updated to require sprinkler systems in all residential and commercial buildings. As a result, even though the project site is within an adequate and urbanized response area, the proposed project will include automatic fire sprinkler systems and will further result in a less than significant impact to fire services.

Street lights along the streets for the single family portion and security gates and on-site security measures for the assisted living such as cameras, on-site security, and self-locking doors and exterior lighting for both the homes and the facility will assist in deterring potential criminal activity. These security measures will further lessen the need for police protection. Additionally the project is within the expected development

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

envelope for this area and Fire and Police comments did not indicate that this project was beyond their scope of services. Impacts to fire and police will be less than significant.

No mitigation measures are required.

c) Schools

Less Than Significant Impact. Culver City Unified School District (CCUSD) and the Los Angeles Unified School District (LAUSD), in accordance with California Government Code Section 53080 and 65995, collect statutory developer fees prior to the issuance of a building permit. CCUSD and LAUSD determine the use of these funds which can include construction or reconstruction of school facilities. The assisted living facility will not result in significant adverse impacts relative to schools because they are not expected to generate a school age population increase, and while additional housing will provide additional demand for schools, payment of the school fees by the applicant, in accordance with State law, would offset impacts to school services. Further the expected increase in people is about 36 total. Not all households will have school age children; nevertheless whatever increase the project as noted above will contribute school fees.

No mitigation measures are necessary.

d) Parks

Less Than Significant Impact. The use of the existing neighborhood and regional parks is not expected to substantially increase due to the project's proposed net 8 single family homes and assisted living facility. The assisted living facility's target population is senior citizens in need of basic daily assistance due to age and medical complications, memory care patients, and wounded veterans. The ability for this population to come and go as it pleases and visit local parks is compromised due to its physical and medical conditions. Further the facility will have ample open spaces for its residents. The single family homes will have large on-site open/play areas common for single family lots. The project will not require new construction or expansion of parks facilities and the residential portion will require a standard code required in-lieu parkland or Quimby fee which is used to maintain the City's park system. Impacts to parks and recreational facilities would be reduced to a less-than-significant level.

No mitigation measures are necessary.

e) Other Public Facilities *No Impact*. Other facilities have not been identified that could be impacted by the project. No mitigation measures are necessary.

Mitigation Measure(s): None required

XV. RECREATION –				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Responses:

a)-b) *Less Than Significant Impact*. As stated above in Section XIV- Parks, the use of the existing neighborhood and regional parks is not expected to substantially increase due to the project's proposed net 8 single family homes and assisted living facility. The assisted living facility's target population is senior citizens in need of basic daily assistance due to age and medical complications, memory care patients, and wounded veterans. The ability for this population to come and go as it pleases and visit local parks is compromised due to its physical and medical conditions. Further the facility will have ample open spaces for its residents. The single family homes will have large on-site open/play areas common for single family lots. The project will not require new construction or expansion of parks facilities and the residential portion will require a standard code required in-lieu parkland or Quimby fee which is used to maintain the City's park system. Overall, the project will not result in significant adverse impacts relative to recreation because it is not expected to generate a substantial population increase and on-site open spaces consisting of drought tolerant species of trees, bushes, and ground cover will not have adverse environmental impact.

No mitigation measures are necessary.

Mitigation Measure(s): None required

XVI. TRANSPORTATION/TRAFFIC – Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulating system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐

	EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e)	Result in inadequate emergency access?	☐	☐	☒	☐
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

Responses:

a),b,d) *Less Than Significant Impact.* Based on Allan Engineering's March 30, 2016 Traffic Impact Analysis, the project is expected to generate approximately 21 trips in the AM peak hour and 32 trips in the PM peak hour. The assisted living portion will generate 15 trips in the AM peak and 24 trips in the PM peak. The 110 bed unit facility's target population is senior citizens in need of basic daily assistance due to age and medical complications, memory care patients, and wounded veterans. The ability for this population to come and go as it pleases is difficult and residents are unable to drive themselves. Traffic will be generated by employees, visitors, caregivers, paratransit, and first responders. Employee traffic will occur mainly at the intersection of 2 shifts (with one leaving and one coming); there are 3 shifts in one 24 hour so there is no constant coming and going of employees. The other traffic generators have no set schedule and traffic is spread throughout the day. The low traffic counts for the assisted living noted above are below the 50 trip threshold for either AM or PM peaks and thus a traffic study would not be required for this use alone. The single family use has even less AM and PM peak traffic at 6 and 8 respectively. This is normal for residential uses where on average residents will leave in the morning for work and come home in the evening.

Taken together the project does not meet the threshold of 50 trips for requiring a traffic study. Nevertheless a traffic impact analysis was conducted (noted above) and three street segments were studied:

- Lenawee Avenue between Rodeo Road and Ivy Way
- Lenawee Avenue between Ivy Way and Wrightcrest Drive
- Wrightcrest Drive between La Cienega Boulevard and Lenawee Avenue.

The traffic analysis made the following conclusions:

- Culver City's Traffic Study Criteria indicates that a traffic study shall be required if a project is estimated to add 500 daily trips or 50 peak-hour trips. The project will generate 369 daily trips, 21 AM peak-hour trips and 32 PM peak-hour trips.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

- All of the assisted living trips will enter of off La Cienega Boulevard and exit onto the cul-de-sac and from there go either north on Lenawee Avenue to La Cienega Boulevard or south on Lenawee Avenue onto Rodeo Road. The facility is expected to generate 293 daily trips; the single family homes will generate 76 daily trips and will be added to the study street segments. The build-out year for the project is 2020.

- A detailed analysis of the three residential street segments was performed. The study found that for Future with Project scenario, using Culver City's level of significance criteria for residential impacts, none of the study segments will be significantly impacted by the project trips.

- The project has adequate parking and internal circulation. To accommodate right turning vehicles decelerating into the assisted living facility, a right turn decelerating lane on southbound La Cienega Avenue is recommended. This will be a project condition.

- As a traffic calming measure, it is recommended that the City of Los Angeles investigate the need for a three-way stop control and associated pedestrian crosswalks at each leg of the corner of Bowcroft Street and Lenawee Avenue. This will be a project condition.

- As a traffic calming measure, it is recommended that a three-way stop control and associated pedestrian crosswalks at each leg of the corner of Lenawee Avenue and the new cul-de-sac be installed. This will be a project condition.

Based on the traffic study and internal review by City staff the project will not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulating system. It will not conflict with an applicable congestion management program and it will not substantially increase hazards due to a design feature. As noted above and in other sections of the Initial Study, the project conditions will requires a stop sign, a deceleration lane, a Fire emergency land at the entrance to the entrance to the assisted living facility in case first responders need to exit onto La Cienega Boulevard, a new cul-de-sac to provide required street frontage to 6 of the 9 single family lots, widening of Lenawee Avenue to straighten out Lenawee Avenue and to provide new curb gutter and sidewalk, and the project will provide new street parking.

During construction, there will be standard project conditions regarding construction management (which will include traffic management during construction) and pedestrian protection. One project condition will require that construction related vehicles park on site or on commercial streets and not in the residential neighborhood. The project will be built in 3 phases allowing flexibility in on-site parking for construction related vehicles such as construction employees. Another project condition will require that construction employees access the site from La Cienega Boulevard and exit onto Lenawee Avenue (for safety purposes). Large trucks making deliveries will be allowed to exit onto La Cienega Boulevard only with flag people. Operationally there will be a condition that requires assisted living facility access to be from La Cienega Boulevard only and exiting to be only onto the cul-de-sac. Emergency vehicles will generally follow this

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

route however in emergency situations where they can exit only onto La Cienega Boulevard there will be a striped fire only lane at the entrance allowing the ability for emergency vehicles to exit (but not non-emergency vehicles that must exit onto the cul-de-sac). Overall there are no significant traffic impacts.

No mitigation measures are necessary.

c) *No Impact.* The project would have no effect on air traffic patterns.

e). *Less Than Significant Impact.* The design and construction of the project will be required to incorporate all applicable City standards related to emergency access to ensure that the emergency access would be adequate. Included within these standards will be a required lock box for emergency access and roadway improvements noted above. Therefore, implementation of the project will not result in any impacts.

No mitigation measures are necessary.

f). *No Impact.* The proposed project will not conflict with any adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. The proposed project is consistent with the City's bicycle and pedestrian master plan and will be required to install onsite bicycle parking. Traffic impacts will be less than significant and no mitigation measures are necessary.

Mitigation Measure(s): None required

XVII. UTILITIES AND SERVICE SYSTEMS –Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

	EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g)	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

Responses:

a),b),&e) *Less Than Significant Impact*. Culver City maintains its own sewage collection facilities within the City limits and contracts with the City of Los Angeles for treatment and disposal service. Treatment occurs at the Hyperion Treatment Plan, located southwest of Culver City, which has sufficient capacity to serve the needs of the proposed project. Expansion of the existing facilities is not necessary. The proposed project will have less than significant impact to the waste water system.

No mitigation measures are therefore required.

c) *Less Than Significant Impact.* The City of Culver City is primarily served by the Los Angeles County Storm Drainage System. The City currently maintains some of its own storm drains that connect to the County systems. In addition, the project will construct a new storm drain in the cul-de-sac. Existing storm drain systems and the new storm drain in the cul-de-sac are sufficient to service the property and there is no expected significant environmental effects.

No mitigation measures are therefore required.

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

No mitigation measures are required.

f) *Less Than Significant Impact.* Solid waste from Culver City is disposed of at BKK Sanitary Landfill located in the City of West Covina and Bradley West Landfill located in the City of Sun Valley. The Culver City Municipal Code requires provision of trash containers for recyclable materials and yard waste to reduce solid waste generation. The proposed project would follow all applicable solid waste policies and objectives that are required by local law, statute, or regulation. The Project's solid waste disposal needs would be directed to the local recycling facilities and landfills described above. The proposed project's impacts on solid waste during construction would be less than significant. The amount of solid waste generated by the proposed project is within the available capacities at area landfills. Therefore, the impacts would be less than significant.
No mitigation measures are necessary.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

g) *Less Than Significant Impact.* See Section XVI.f, above. The project could generate solid waste during construction. Standard conditions requiring the contractor to remove and dispose of waste in accordance with applicable statues and regulations would reduce this impact to a level that is less than significant. No mitigation measures are necessary.

Mitigation Measure(s): None required

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE –

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

Responses:

a) *Less Than Significant Impact.* The project site does not contain any threatened or endangered species or sensitive habitats. Therefore, the project will not degrade the quality of the environment or have any potential significant impacts to any plant or animal wildlife species. Mitigations regarding cultural resources are included and no significant impacts to examples of the major periods of California history or prehistory are expected.

b) *Less Than Significant Impact.* Any potential cumulative impacts will be substantially reduced to less than significant due to mitigations listed herein, standard City code requirements and conditions of approval.

c) *Less Than Significant Impact.* The project will not result in significant environmental impacts from construction and operation of the project. Mitigations listed herein, standard City code requirements, and conditions of approval will reduce any potential impacts to less than significant.

Mitigation Measure(s): None required

XVIII. EARLIER ANALYSES:
None

References Utilized:

- Allan Engineering's March 30, 2016 Traffic Impact Analysis
- November 12, 2010 Phase I Environmental Assessment and the February 16, 2011 Phase II Environmental Assessment (Mearns Consulting)
- Updated Geotechnical Investigation (April 28, 2015 – Geocon West) & Fault Rupture Hazard Investigation (December 29, 2010 – Geocon West)
- Air Quality Technical Report and Green House Gas Emissions Analysis (Dudek - October, 2015)
- Phase I Archaeological and Paleontological Survey (Dudek - May 6, 2014)
- Biological Assessment and Nesting Bird Survey (Cooper Ecological Monitoring – March 9, 2015)

MITIGATION MONITORING PROGRAM

The following environmental mitigation measures shall be incorporated into the project development as conditions of approval. The project applicant shall secure a signed verification for each of the mitigation measures which indicate that mitigation measures have been complied with and implemented, and fulfills the City environmental and other requirements (Public Resources Code Section 21081.6.). Final clearance shall require all applicable verification as included in the following table. The City of Culver City will have primary responsibility for monitoring and reporting the implementation of the mitigation measures unless otherwise indicated. The mitigation measures have been identified by impact category and numbered for ease of reference.

MITIGATION MONITORING PROGRAM
Culver Place – 3814 Lenawee Avenue
CP - P2015054; (PD 14) ZCMA - P2015055;
GPMA – 2015056; TTM) – 2015057; MND – P2015058
May 4, 2016

MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Cultural Resources **CR-1:** The Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor and a certified Native American Monitor from the Gabrieleno Band of Mission Indian – Kizh Nation. Both the archaeological monitor and the certified Native American Monitor shall be present during all ground disturbances and construction excavations such as demolition, pavement removal, clearing/grubbing, post holing, auguring, boring, 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. Monitoring may be adjusted, or ceased entirely, as determined appropriate by the archaeological monitor. **CR-2:** In the event that archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away	Condition of Approval for all Mitigations	Field Inspection and Reports	Prior to Building Permit Issuance and Prior to issuance of Certificate of Occupancy	Planning, Cultural Resources

from the vicinity of the find so that the find can be evaluated. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by a qualified archaeologist and certified Native American Monitor (the monitors). The Applicant shall coordinate with the monitors to develop an appropriate treatment plan for the resources. 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 shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes. **CR-3:** The archaeological monitor 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. The report and the Site Forms shall be submitted by the Applicant to Culver City, the City of Los Angeles, 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. **CR-4:** A qualified Paleontologist shall be retained to develop and implement a paleontological resources mitigation and monitoring program (PRMMP) for construction excavations exceed 4 feet bgs.				

The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations below 4 feet bgs. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the paleontological monitor. **CR-5:** If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and evaluation. If preservation in place is not feasible, the paleontologist shall implement a paleontological salvage program to remove the resources form the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials,				

such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. **CR-6:** The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. **CR-7** For excavation activity at or above 4 feet bgs, if potential fossils are discovered by construction crews, all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately until a qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the fine, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. If treatment and salvage is required, recommendations shall be consistent with SVP I 995 guidelines and currently accepted scientific practice, and shall be subject to review and approval by the City. Work in the affected area may resume once the fossil has been assessed and/or salvaged and the City in consultation with the professional paleontologist-has provided written approval to resume work **CR-8:** If human remains are encountered unexpectedly during implementation of the project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as				

to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment. Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human				

remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.				
Geology and Soils **GS-1:** A building setback of 50 from both sides of the Newport-Inglewood Fault Zone (NIFZ) located within the eastern section of the project site shall be established thereby creating a 100 foot wide No-Build area along the NIFZ and surrounding area. Surface parking, driveways, landscaping, a trash enclosure area, fences, and a non-habitable portico will be allowed within this 100 foot wide No-Build zone. Structures designed for human occupancy shall be limited to areas that lie outside this No-Build area.	Condition of Approval for all Mitigations	Field Inspections	Prior to issuance of Building Permit and prior to Certificate of Occupancy	Building Safety, Planning
Hazardous Materials **HM-1:** Lead on existing buildings shall be abated by a State of California licensed abatement contractor and appropriately disposed of prior to demolition of structures containing said lead. **HM-2:** If undocumented oil wells are encountered during construction, then those wells shall be abandoned in accordance with current California Division of Oil, Gas and Geothermal Resources (DOGGR) requirements. **HM-3:** A methane study shall be required and shall be drafted by a qualified methane consultant; the study shall provide mitigations as necessary to lessen hazards due to methane. Such mitigations may require a permanent methane gas control system for the site.	Condition of Approval for all Mitigations	Field Inspections and Reports	Prior to issuance of Building Permit and prior to Certificate of Occupancy	Building Safety, Planning
Noise **N-1**. Construction and demolition shall be restricted to 8:00 am to 7:00 pm Monday through Friday, 9:00 a.m. to 6:00 p.m. on Saturday, and no construction on Sundays or Holidays. Dirt hauling and construction	Condition of Approval for all Mitigations	Field Inspections	Prior to issuance of Building Permit	Building Safety, Planning

material deliveries or removal are prohibited during the peak traffic periods; morning (7:00 a.m. to 9:00 a.m.) and afternoon (4:00 p.m. to 6:00 p.m.). **N-2**. Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. **N-3**. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. **N-4**. Noise and ground borne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible. **N-5**. Barriers such as, but not limited to, plywood structures or flexible sound control curtains extending eight feet in height shall be erected around the perimeter of the construction site to minimize the amount of noise during construction on the nearby noise-sensitive uses.				