



Culver CITY

CURRENT PLANNING DIVISION

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9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

PROPOSED MITIGATED NEGATIVE DECLARATION

Project Title and File No.: Beyond Hello Cannabis Retailer-Storefront Business
Conditional Use Permit, P2021-0276-CUP

Project Location: 3800 Sepulveda Boulevard, Culver City, CA 90230

Project Sponsor: Tom Dougherty, C/O Jushi Holdings
301 Yamato Road, Boca Raton, FL 33431

Project Description: The proposed project consists of on-site improvements including construction of a 3,824-square foot retail building for a commercial cannabis retail-storefront business, surface parking, 2,080 square feet of on-site landscaping, installation of a storm drain system, and installation of a vapor barrier as part of a soil management plan required due to potential release of perchloroethylene and other hazardous materials. The project also includes right-of-way improvements including the demolition and replacement of existing sidewalk and street features along Sepulveda and Venice Boulevards and relocation of 2 bus stops. Project site access is planned via one driveway on Venice Boulevard and a two-way driveway on Sepulveda Boulevard. A Conditional Use Permit from the City of Culver City will be required for project implementation.

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:

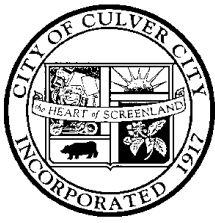
- ☐ The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- ☒ The Initial Study identified potentially significant effects, but:
1. Revisions in the project plans or proposals 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 is from June 22, 2022, through July 13, 2022.

Jose Mendivil, Associate Planner, June 22, 2022



Culver CITY

PLANNING DIVISION

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INITIAL STUDY

ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title/Case Nos.	<u>Beyond Hello Cannabis Retailer-Storefront Business</u> <u>Conditional Use Permit, P2021-0276-CUP</u>		
Public Comment Period	June 22, 2022, through July 13, 2022.		
Lead Agency Name & Address:	City of Culver City, Current Planning Division 9770 Culver Blvd., Culver City, CA 90232		
Contact Person & Phone No.:	Jose Mendivil, Associate Planner (310) 253-5757		
Project Location/Address:	3800 Sepulveda Boulevard Culver City, CA 90230		
Nearest Cross Street:	Venice Boulevard	APN:	4213-018-014
Project Sponsor's Name & Address:	Tom Dougherty, C/O Jushi Holdings 301 Yamato Road Boca Raton, FL 33431		
General Plan Designation:	General Corridor	Zoning:	Commercial General (CG)
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)*

SUMMARY

The proposed project consists of on-site improvements including construction of a 3,824-square foot retail building for a commercial cannabis retail-storefront business, surface parking, 2,080 square feet of on-site landscaping, installation of a storm drain system, and installation of a vapor barrier as part of a soil management plan required due to potential release of perchloroethylene and other hazardous materials. The project also includes right-of-way improvements including the demolition and replacement of existing sidewalk and street features along Sepulveda and Venice Boulevards and relocation of 2 bus stops. Project site access is planned via one driveway on Venice Boulevard and a two-way driveway on Sepulveda Boulevard. A Conditional Use Permit from the City of Culver City will be required for project implementation.

GENERAL DESCRIPTION

The Beyond Hello Cannabis Retailer-Storefront Business (the "project") is a commercial cannabis dispensary open to walk-in customers, located at the southeast corner of Venice and Sepulveda Boulevards on an approximately 0.3-acre site (13,001 square feet). The project includes a one-story, 32 foot-3-inch-tall building totaling 3,824 gross square feet. The table below provides a size breakdown of key elements within the proposed cannabis retail building but does not account for total square footage.

Key Elements	Net Square Footage (sf)
Lobby/Lounge	466
Express Sales Space	125
Sales Floor	1,166

Storage/Inventory Vault	569
Office	113
Security Vestibule	49
Delivery Space	239
Processing Space	72
Break Room	117
Storage Space	102
IT Room	75
Restroom 01	52
Restroom 02	54
Back of House Corridor 01	157
Back of House Corridor 02	173

PARKING

A total of 11 parking vehicle spaces (three compact, two accessible, two electric vehicle [EV] charging capable, one EV charging ready, one EV charging full, two standard, and one loading) and four short-term bicycle spaces will be provided for the project. All vehicle parking is provided within a paved, surface parking lot accessed by one driveway on Venice Boulevard and a two-way driveway on Sepulveda Boulevard. The four bicycle spaces will be located on the project's southern boundary.

RIGHT-OF-WAY IMPROVEMENTS

The project will include the demolition and replacement of existing sidewalk, curb and gutter, driveway, and ramp outside property boundaries along Sepulveda and Venice Boulevards. In addition, 2 trees on the existing Sepulveda Boulevard sidewalk will remain and 1 new tree will be planted on the improved Venice Boulevard sidewalk.

STORM DRAIN SYSTEM

The project includes the installation of a storm drain system on-site consisting of a trench drain with traffic rated grate, 12-inch x 12-inch grate and drain, six-inch area drain, four-inch planter drain, drywell, Curb-O-Let outlet, and 6-inch SDR-35 PVC pipe.

LANDSCAPING

The project would provide 2,080 square feet of on-site landscaping and would consist of species that require low to medium water use. Four existing trees, including one palm tree, along the boundary of the project site would be removed and nine trees, including the *Olea Europaea*, *Aloe Barbarae*, and *Platanus x Acerfolia* species, would be planted along the northern and western borders of the proposed dispensary building and within the parking lot. Project landscaping would also include succulents and grasses, vines, and a sculpture garden. In addition, two trees would be planted within the public right-of-way, with one tree on Sepulveda Boulevard and one tree on Venice Boulevard. A project condition will require zero scape and drought tolerant landscaping.

Existing Conditions of the Project Site:

The currently vacant site is approximately 0.3 acres and contains paving and landscaping from the former gas station use, including four planted trees and sparse, ornamental shrubs, which surrounds the project boundary. The site currently contains contaminated soil as a result of the former on-site Mobil gasoline service station operations or the adjacent Shell gasoline service station release and former adjacent release cases. See Section VIII, *Hazards and Hazardous Materials*, for further discussion regarding site contamination.

Surrounding Land Uses and Setting: Sepulveda Boulevard is considered to run in a North/South orientation *(Briefly describe the project's surrounding).*

Location	Zoning	Land Use
North:	Los Angeles C2-1	Venice Boulevard, with commercial uses beyond
East:	Culver City CG	Commercial uses including a car wash, with a church and residential uses beyond
South:	Culver City CG	Commercial uses including a fast-food restaurant, with a nursery beyond
West:	Culver City CG	Sepulveda Boulevard, with a Shell gasoline service station beyond

Other public agencies whose approval is required: *(e.g., permits, financing approval, or participation agreement)*
Culver City has discretionary review of 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 | ☐ Mineral Resources |
| ☐ Agriculture and Forestry Resources | ☐ Noise |
| ☐ Air Quality | ☐ Population / Housing |
| ☐ Biological Resources | ☐ Public Services |
| ☐ Cultural Resources | ☐ Recreation |
| ☐ Energy | ☐ Transportation/Traffic |
| ☐ Geology /Soils | ☐ Tribal Cultural Resources |
| ☐ Greenhouse Gas Emissions | ☐ Utilities / Service Systems |
| ☒ Hazards & Hazardous Materials | ☐ Wildfire |
| ☐ Hydrology / Water Quality | ☐ Mandatory Findings of Significance |
| ☐ Land Use / Planning | |

ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

- ☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

- ☐ I find that the proposed project **MAY** have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


 Jose Mendivil, Associate Planner
 June 22, 2022
 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) <u>No Impact</u>. The project is located in an urbanized area, with commercial and residential buildings in the immediate vicinity. The adjacent topography consists of the Baldwin Hills located to the southeast. The topography surrounding the site contains no substantial ocean or mountain views that can be considered scenic that will be affected by the project. The Project Site does not contain any scenic resources. The Project Site is approximately 0.3 acres and contains vacant paved lot and landscaping, including four planted trees and sparse, ornamental shrubs, which surrounds the project boundary. The project's vacant paved lot is not designated as a historic resource nor does it contain historic structures. There is no significant vegetation or unique geologic features on-site. The Project Site is not bordered by or within the view shed of any designated scenic highway. 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. No mitigation measures are necessary.				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) <u>Less than Significant Impact.</u> There are no identified rock outcroppings or historic buildings within a state scenic highway on the site. The project site is made up of approximately 0.3 acres and contains vacant paved lot and landscaping, including four planted trees and sparse, ornamental shrubs, which surrounds the project. Four existing trees, including one palm tree, along the boundary of the project site would be removed and nine trees would be planted along the northern and western borders of the dispensary building and within the parking lot. Project landscaping would also include succulents and grasses, vines, and a sculpture garden. The proposed on-site landscaping will reduce any potential impact to a level that is less than significant. The Project Site is not bordered by or within the view shed of any designated scenic highway. 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. No mitigation measures are necessary. c) <u>Less than Significant Impact.</u> There is minimal visual character or quality of the project site because it is made up of a vacant paved lot and landscape. The surrounding area is developed with commercial and residential uses. The proposed project is for the construction of a retail building for a commercial cannabis dispensary will improve the visual character for the surrounding residential and commercial areas which currently have a view of a vacant paved lot. The proposed project on the currently underutilized site will improve existing views with a new one-story building incorporating a modern design and substantial architectural features, related street improvements, and other improvements. The project would comply with the existing Culver City General Plan Land Use and Open Space Elements and the Culver City municipal Code to meet the community aesthetics requirements. No mitigation measures are necessary. d)) <u>Less than Significant Impact.</u> The project site is currently vacant therefore the proposed project will bring new sources of light at nighttime from exterior lighting of the building and to a smaller extent, interior lighting of the building. However, the project is required to be built pursuant to Culver City standards that require that all lighting 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. In accordance with these requirements, proposed project lighting will be directed onto driveways, walkways, and parking areas within the development and away from adjacent properties and public rights of way. Natural light will also be provided for spaces of human habitation through exterior glazed openings or would be provided with adequate artificial light. Emergency lighting facilities will be installed and arranged to provide initial illumination. In addition, uncovered parking areas, vehicle accessways, and walkways will also include lighting not exceeding a height of sixteen feet. A maximum to minimum illumination uniformity ratio of 40 to 1 will not be exceeded as required by the Building Code. Emergency lighting will comply with building codes as well. With adherence to applicable Culver City Code requirements proposed project lighting will not adversely affect daytime or nighttime views in the project area. Therefore, no lighting impacts would occur as a result of project implementation. <u>Mitigation Measure(s):</u> 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) <u>No Impact</u> . The project site is in an area of Culver City that is zoned for general commercial use and does not currently have any agricultural use, activity, or designation. There is no nearby Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance, according to the 2016 Los Angeles County Important Farmland Map provided by the Farmland Mapping and Monitoring Program (FMMP), ¹ the most recent year for which FMMP mapping is available. Furthermore, the City's General Plan does not identify the project site as an area designated for agriculture use. Therefore, the project would not convert Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance to non-agricultural uses. No impact would occur.					

¹ California Department of Conservation, 2016, California Important Farmland Finder, <https://maps.conservation.ca.gov/DLRP/CIFF/>, accessed September 2021.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) <u>No Impact</u>. The project would not be located in an area currently zoned for agricultural use or under a Williamson Act contract.² Therefore, no impact would occur as a result of the project. c) <u>No Impact</u>. The project site contains a vacant paved lot and landscaping. Neither the project site nor surrounding parcels are zoned for forest land, timberland, or timberland production.³ The project would not directly or indirectly result in loss or conversion of forest land or farmland. No impact would occur. d) <u>No Impact</u>. The project site is in an urbanized area of Culver City that is zoned for general commercial use.⁴ It would not result in the loss of forest land or conversion of forest land to non-forest land. No impact would occur. e) <u>No Impact</u>. The project site is in an urbanized area of Culver City that is zoned for general commercial use.⁵ As there are no agricultural or forest uses or related operations on or near the project site, the project would not involve the conversion of farmland or forest land to other uses, either indirectly or directly. As such, no impact would occur. Mitigation Measure(s): None required.				
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?	☐	☐	☒	☐

² Ibid.

³ Ibid.

⁴ City of Culver City, 2007, General Plan Land Use Element Map, <https://www.culvercity.org/files/assets/public/documents/information-technology/maps/general-plan-land-use-map.pdf>, accessed September 2021.

⁵ Ibid.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Responses: a) <u><i>Less Than Significant Impact</i></u> The City is located within the 6,745-square-mile South Coast Air Basin (SoCAB). Air quality planning for the SoCAB is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Project would be subject to the SCAQMD's Air Quality Management Plan (AQMP), which contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). Although it is anticipated that most commercial cannabis related activities authorized under the Project would locate within existing structures, the Project would authorize uses, which would result in some degree of future construction activities, which could result in short-term construction-related air emissions. However, the project would be required to comply with California Air Resources Board (CARS) and SCAQMD regulations and rules regarding fugitive dust control and minimizing exhaust emissions. These regulations and rules include using dust suppression techniques (e.g., watering disturbed areas), limiting heavy-duty truck idling to 5 minutes or less, and using construction contractors with construction equipment fleets that are in compliance with the State's heavy-duty equipment regulation to minimize ozone precursor and particulate matter emissions. Accordingly, it is not anticipated that construction of the proposed cannabis retail structure and related parking and landscape improvements would exceed SCAQMD screening criteria for new construction. During operation of the proposed commercial cannabis retail facility, emissions from vehicles used for retail deliveries, product transportation, employee trips, and customer/visitor traffic would occur. It is anticipated that the proposed commercial cannabis facilities would operate similar to a typical retail business as it would not include any cultivation, manufacturing or extraction activities. In terms of potential employment, it is anticipated that a maximum of 18 employees would be at the site over various shifts during the 9:00 AM to 10:00 PM daily business hours and as a result, the Project would not result in a substantial increase in employees within the City. The Project would not amend General Plan designations and therefore, would not change regional growth projections. The proposed Project would also be within both the City and SCAG projections. As such, the Project would not induce substantial population growth in the area either directly or indirectly beyond City and SCAG growth projections that are incorporated into the AQMP. The Project would be similar to other permitted retail uses that do not require discretionary review and replaces a former gas station that was on the project site. Based on the above analysis, Project impacts to air quality from construction and operational are considered negligible in relation to baseline conditions and are not expected to result in non-compliance with the adopted AQMP. Therefore, impacts would be less than significant and no mitigation measures are necessary b) <u><i>Less Than Significant Impact</i></u>. As indicated above, the City is located within the SoCAB, which is characterized by relatively poor air quality. Culver City is located in the Source Receptor Area (SRA) 2, Northwest Los Angeles County Coastal. State and federal air quality standards are often exceeded in many parts of the SoCAB, including monitoring stations within SRA 2 nearest to the City. The proposed cannabis retail building and related improvements could result in development that would contribute to local and regional short-term or temporary construction related air pollutant emissions. Operation of commercial cannabis activities would result in long-term occupancy and associated air emissions. However, the Project would be similar to other permitted retail uses that do not require discretionary review and replaces a former gas station that was on the project site. The proposed cannabis retail facility would not contribute substantially to air quality violations and impacts would be less than significant.				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c) <u><i>Less Than Significant Impact</i></u>. The SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the Federal Clean Air Act and California Clean Air Acts. The Federal and California Clean Air Acts establish the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) respectively. In order to meet the CAAQS and NAAQS in the basin, the SCAQMD has adopted a series of AQMPs. As discussed earlier, the SCAQMD has developed a comprehensive plan, the 2012 AQMP, which addresses the region's cumulative air quality condition. A significant impact may occur if a Project were to add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the SoCAB is currently in nonattainment for ozone, PM10 and PM2.s, related projects could cause ambient concentrations to exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated using thresholds for CEQA and the SCAQMD. In particular, CEQA Guidelines Sections 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that: "A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency ... " B-5 Culver City - Cannabis Ordinance Attachment B - Explanation of Checklist Determinations For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2012 AQMP. Projects which are consistent with the AQMP would also be consistent with the AQMD's goals for meeting ambient air quality standards. As discussed under Response II.a, the Project would not conflict with the 2012 AQMP. The Project would be similar to other permitted retail uses that do not require discretionary review and replaces a former gas station that was on the project site. The Project would not result in a cumulatively considerable net increase of criteria pollutants for which the region is non-attainment and impacts would be less than significant. d) <u><i>Less Than Significant Impact</i></u>. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools; (7) parks and playgrounds; (8) childcare centers; and (9) athletic fields. The Project would include construction of a cannabis retail facility which is 215 feet from the nearest residential uses and over 600 feet from the other sensitive uses listed above and is an allowable location for a commercial cannabis activity. While construction and operation, could result in generation of air emissions, such emissions are not anticipated to comprise a substantial new source of air emissions to which a sensitive population would be exposed. The Project would be similar to other permitted retail uses that do not require discretionary review and replaces a former gas station that was on the project site. Therefore, impacts concerning the exposure of sensitive land uses to air pollutant concentrations are considered to be less than significant.				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e) <u>Less Than Significant Impact</u> According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Although the Project does not fall specifically within these categories of uses, it could result in the generation of objectionable odors from storage of cannabis retail products. However, Culver City cannabis regulations require that odor control devices and techniques be incorporated in all commercial cannabis businesses to ensure that odors are not detectable outside of the facility, anywhere on adjacent property or public rights-of-way, on or about the exterior or interior common area walkways, hallways, breezeways, foyers, lobby areas, or any other common area or within any other unit located within the same building. The proposed project incorporates a HVAC system of sufficient size and capacity that will ensure that no odors are detected outside the building or property boundaries. The Project would be similar to other permitted retail uses that do not require discretionary review and replaces a former gas station that was on the project site. Therefore, the proposed project would not result in the generation of objectionable odors that would affect a substantial number of people. The Project would result in less than significant impacts with regards to odor. 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 state or federally protected wetlands (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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
<u>Responses:</u> a) <u>Less than Significant Impact</u>. Special status species are those plants and wildlife listed, proposed for listing, or candidates for listing as Threatened or Endangered by the U.S. Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act (FESA); those considered “Species of Concern” by the USFWS; those listed or candidates for listing as Rare, Threatened, or Endangered by the California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act (CESA); animals designated as “Fully Protected” by the California Fish and Game Code (CFGC); wildlife listed as Species of Special Concern by the CDFW; and plants with California Native Plant Society (CNPS) California Rare Plant Ranks (CRPR) of 1B, 2, 3, and 4. The project site is not located in any known regional wildlife movement corridors or any other sensitive biological areas as indicated by the USFWS Environmental Conservation Online System (ECOS) Critical Habitat portal, or CDFW Biogeographic Information and Observation System (BIOS).^{6,7} The project site is located in an urban area and is currently developed with a vacant paved lot and landscaping. Vegetation on-site is limited to four trees along the boundary of the site, including one palm tree, and three trees located within the public right-of-way surrounding the project site along Sepulveda and Venice Boulevards. The project would remove the four existing trees and would plant nine trees along the northern and western borders of the proposed dispensary building and within the parking lot. In addition, two trees would be planted within the public right-of-way, with one tree on Sepulveda Boulevard and one tree on Venice Boulevard. Given the developed nature of the project site in a predominantly urban area, the project site does not provide suitable habitat for special status species. As such, the project site is not expected to support any candidate, sensitive or special status species and none have a moderate or high potential to occur. Therefore, development of the proposed project would not have a substantial, adverse effect on such species. Impacts would be less than significant. b) <u>No Impact</u>. Plant communities are considered sensitive biological resources if they have limited distributions, have high wildlife value, including sensitive species, or are particularly susceptible to disturbance. CDFW ranks sensitive communities as “threatened” or “very threatened” and keeps records of their occurrences in the California Natural Diversity Database (CNDD). The project is in a developed urban area and is not located within a vegetated or open space area. The only vegetation present on-site is landscaping, consisting of sparse, ornamental shrubs and planted trees. These existing trees and shrubs do not constitute a sensitive natural community. Additionally, there is no riparian habitat on or near the project site.⁸ Therefore, the proposed project would not have a substantial adverse effect on riparian habitat or other sensitive natural communities as none exist on the site or in nearby areas. No impact would occur.				

⁶ United States Fish and Wildlife Service, 2021, Environmental Conservation Online System, Critical Habitat for Threatened & Endangered Species, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>, accessed September 2021.

⁷ California Department of Fish and Wildlife, 2021, Biogeographic Information and Observation System, <https://wildlife.ca.gov/Data/BIOS>, accessed September 2021.

⁸ United States Fish and Wildlife Service, 2021, National Wetlands Inventory Mapper, <https://www.fws.gov/wetlands/data/Mapper.html>, accessed September 2021.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c) <u>No Impact.</u> As examined under Responses IV.a and IV.b, the project site is in an urban area. No riparian habitats, wetlands, or other water features have been identified on or adjacent to the project site.⁹ According to the USFWS, the nearest riparian area is a 2.72-acre riverine, which consists of a concrete-lined channel located approximately 0.5 mile west of the project site.¹⁰ Therefore, the project would not have a substantial adverse effect on State or federally protected wetlands, and no impact would occur. d) <u>Less Than Significant Impact.</u> Wildlife corridors are generally defined as connections between habitat areas that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. As examined under Responses IV.a through IV.c of this section, the project site is developed with a vacant paved lot and landscaping in an urban area. The site is separated from open space areas by existing urban development and roadways. The nearest large open space, Culver City Tellefson Park, is separated from the Project site by approximately 1,275 feet of urban developed properties. The project site does not contain any natural communities or habitat areas that would be expected to support populations of native wildlife nurseries or movement. While the project site contains trees, these trees are not a part of larger habitat area; they are surrounded by development and do not form a natural community or constitute a habitat area. Due to the fully developed nature as described above, the project site and surrounding area do not contain any natural or physical features that connect habitat areas and impacts to the movement of native or resident species or on the use of native wildlife nursery sites resulting from the proposed project are not expected. Therefore, no impact would occur. e) <u>Less Than Significant Impact.</u> The project site is not located in or adjacent to areas with suitable habitat to support Environmental Sensitive Habitat Areas or special status species and thus, would not conflict with local policies or ordinances protecting biological resources. Vegetation on-site is limited to trees and other ornamental landscaping. The project would include removal of four existing trees and ornamental landscaping on-site. However, the project would also include 2,080 square feet of on-site landscaping, including nine trees, succulents and grasses, vines, and a sculpture garden. In 2015, the City adopted the Culver City Urban Forest Master Plan which aims to facilitate the preservation, management, and enhancement of the City's urban forest. Tree removal is required to comply with applicable provisions in Chapter 9.08 of the Culver City Municipal Code (CCMC), including Section 9.08.215 which requires a tree replacement ratio of 2:1 for each tree removed from the public right-of-way during project construction. The proposed project would include the removal of four existing trees; however, all four trees are located on-site and not within the public right-of-way. In addition, the project would include the planting of nine trees (seven trees on-site and two trees within the public right-of-way) and would retain the three existing trees within the public right-of-way that surround the project site. Therefore, the project would comply with applicable provisions of the CCMC, and impacts would be less than significant.				

⁹ United States Fish and Wildlife Service, 2021, National Wetlands Inventory Mapper, <https://www.fws.gov/wetlands/data/Mapper.html>, accessed September 2021.

¹⁰ Ibid.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
f) <u>No Impact</u>. There are no adopted Habitat Conservation or Natural Community Conservation Plans in the Culver City. Further, there are also no approved local, regional, or State habitat conservation plans in the City. Therefore, no impacts would occur. Mitigation Measure(s): None required.				
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) <u>Less Than Significant Impact</u> Information on existing conditions of the project site per City of Culver City and project application materials indicates that two nearby dry cleaner listings within the vicinity of the project site, listed as historical dry-cleaning facilities have been identified. These sites are identified as June's Cleaners located at 11127 Venice Blvd and The Cleaning Store located at 11277 Venice Boulevard. June's Cleaners is located approximately 300 feet north of the project site. The Cleaning store is located approximately 775 feet west of the project site. The proposed project site includes a vacant paved lot that is not identified as an historic resource, important event location, historical pattern location, or a location associated with significant historical persons. Therefore, construction and operation of the proposed cannabis facility would not adversely impact historic resources and impacts would be less than significant. Mitigation Measure(s): None required b-d) <u>Less than Significant Impact</u>. 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 subterranean parking areas or occupiable space such resources could surface¹¹. The project site is a vacant paved lot located in an urbanized area. This potential impact is considered significant without mitigation. A Phase I ESA Study was prepared for the proposed project site (Rincon Consultants, 2020). The Study indicated that no Archaeological or Paleontological resources exist within the project area. Therefore, no historic properties will be visually or physically affected by the project.				

¹¹ 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
As prescribed by state law, work will be halted if undetected fossil resources and/or human remains or other archaeological and/or paleontological resources are encountered during construction activities that require excavation such as the subterranean parking level. If human remains are encountered during excavation, all work will stop, the City of Culver City, the County Coroner, and an archaeologist and/or paleontologist will be contacted to evaluate the resources per Section 7050.5 of the California Health and Safety Code (CHSC). The Coroner will determine whether the remains are of forensic interest. If the remains are prehistoric or not of a forensic interest, the Coroner will contact the Native American Heritage Commission (NAHC) who will be responsible for designating the most likely descendant (MLD). The MLD will be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the Public Resources Code. Permission to commence work in that area will be granted only after the coroner or archaeologist and/or paleontologist has evaluated the resources or remains and has properly disposed of them as prescribed by law. This will be a project condition. Potential impacts will be less than significant. <u>Mitigation Measure(s):</u> None required.				
VI. ENERGY -- Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐
<u>Responses:</u> a) <u>Less Than Significant Impact</u>. During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. The project would require replacement of existing sidewalk and street features; site preparation; grading, including hauling material off-site; storm drain system installation; vapor barrier installation; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping. Construction equipment would be maintained to applicable standards, and construction activity and associated fuel consumption and energy use would be temporary and typical for construction sites. It is also reasonable to assume that contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant. Electricity service would be provided to the project by Southern California Edison (SCE) and the Southern California Gas Company (SoCalGas) would provide natural gas to the project. Operation of the project (a one-story, 3,802-square foot commercial cannabis dispensary) would increase energy demand from greater electricity, natural gas, and gasoline consumption at the project site. Natural gas and electricity would be used for heating and cooling systems, lighting, cannabis processing, water use, and the overall operation of the proposed dispensary. Gasoline consumption would be attributed to project-generated vehicle trips.				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
As shown on sheet M5.01 of the project site plans, the project's energy components would comply with current energy standards and would perform approximately 16.7 percent more efficiently than current standards. The project would also comply with all standards set in California Building Standards Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California's Green Building Standards Code (CALGreen; California Code of Regulations [CCR], Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the California Energy Commission (CEC). As the name implies, these standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. For example, according to the CEC, non-residential buildings would use about 30 percent less energy compared to 2016 standards.¹² Furthermore, the project would further reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase to comply with State requirements through Senate Bill (SB) 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. Therefore, project operation would not result in wasteful or unnecessary energy consumption. Operational impacts would be less than significant. b) <u><i>Less Than Significant Impact</i></u>. The City of Culver City has not adopted a renewable energy or energy efficiency plan. However, the City has a Bicycle and Pedestrian Action Plan that contains measures to reduce greenhouse gas (GHG) emissions in the city and which would also assist in reducing energy consumption.¹³ The project would be designed to comply with the performance levels of the latest version of CALGreen, which would reduce energy consumption compared to standard building practices. The proposed project would be required to comply with the nonresidential mandatory measures in the 2019 CALGreen, Title 24, Part 11. The proposed project would also be required to comply with the energy standards in the California Energy Code, Part 6 of the CBC (Title 24). Measures to meet these energy standards may include low-flow plumbing fixtures, water-efficient irrigation systems, high-efficiency heating, ventilation, and air conditioning (HVAC) equipment, and lighting conservation features. As described in Section VIII, <i>Greenhouse Gas Emissions</i>, the project would be consistent with all applicable measures, including those from the Bicycle and Pedestrian Action Plan. Therefore, the project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant. <u>Mitigation Measure(s):</u> None required.				

¹² California Energy Commission, 2018, Toward A Clean Energy Future, 2018 Integrated Energy Policy Report Update Volume II, <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2018-integrated-energy-policy-report-update>, accessed September 2021.

¹³ City of Culver City, 2020, Draft Bicycle and Pedestrian Action Plan, <https://www.culvercity.org/City-Hall/City-Projects/Bicycle-and-Pedestrian-Action-Plan>, accessed September 2021.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. 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?	☐	☐	☐	☒
<u>Responses:</u>				
a) (i-ii) <u>Less Than Significant Impact</u>. Based on a City maps for both the City of Culver City and the City of Los Angeles, both of which include an Alquist-Priolo Earthquake Fault Zoning Map, the site is not located in an Alquist-Priolo zone. Since no active faults cross the property, the surface rupture hazard at the site is very low. However, the site is subject to ground shaking during the event of an earthquake. Alquist-Priolo Earthquake Fault Zone Standard code requirements for both the Cities of Culver City and Los Angeles require the submittal of the detailed comprehensive geotechnical report to ensure adequate seismic safety and soils stability of all proposed development improvements for the project. 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.				
(iii-iv) <u>Less Than Significant Impact</u>. Based on the City of Culver City's Seismic Hazard Map, the project site is not within an area that has been identified to be susceptible to seismically induced liquefaction. Nor is it found within an area identified as having a potential for slope instability and there are no known landslides near the site nor is the site in the path of any potential landslides. Therefore, liquefaction impacts would not be significant.				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) <u><i>Less Than Significant Impact.</i></u> The project site is on a flat vacant paved lot surrounded by urban development. The project is part of the Santa Monica subbasin which underlies the northwestern part of the Coastal Plain of Los Angeles groundwater basin. Holocene age alluvium forms much of the surficial deposits for the central part of the subbasin and fills the Ballona gap, an erosional channel cutting into and across the Inglewood fault. Holocene age alluvium forms much of the surficial deposits for the central part of the subbasin and fills the Ballona gap, an erosional channel cutting into and across the Inglewood fault. The site is underlain by artificial fill and Holocene age alluvial deposits consisting primarily of sand, silt, and clay (CGS, 2012). The alluvial soils are characterized as slightly moist and loose to very dense or stiff. The project site is a vacant paved lot that is the site of a former gas station. The site would be excavated to a depth of not more than eight feet and all debris and incompatible soils would be removed and replaced with adequate soil and fill during project construction. Therefore, the proposed project will not result in substantial soil erosion or the loss of topsoil where no significant topsoil currently exists. c) <u><i>Less Than Significant Impact.</i></u> The project site is on a flat vacant paved lot surrounded by urban development. According to the California Geological Survey (CGS), California Geomorphic Provinces, the project site is located within the Transverse Ranges Geomorphic Province. The Transverse Ranges are an east-west trending series of steep mountain ranges and valleys. The east-west structure of the Transverse Ranges is oblique to the normal northwest trend of coastal California. The province extends offshore to include San Miguel, Santa Rosa, and Santa Cruz islands. Its eastern extension, the San Bernardino Mountains, has been displaced to the south along the San Andreas Fault. Intense north-south compression is squeezing the Transverse Ranges. As a result, this is one of the most rapidly rising regions on earth. Great thicknesses of Cenozoic petroleum-rich sedimentary rocks have been folded and faulted, making this one of the important oil-producing areas in the United States. According to the State of California Seismic Hazard Zone Map of the Beverly Hills Quadrangle, the Site is not within a liquefaction hazard zone. There is no indication of potential risk to persons or property related to geologic hazards, and all site preparation would be consistent with the building and safety codes of the City of Culver City and consistent with the recommendations in the Geotechnical Report prepared regarding the project site. d) <u><i>Less Than Significant Impact.</i></u> The geotechnical report indicates that no soils at the project site are identified as expansive. 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) will be required to regulate and control pollutant run-off by using Best Management Practices (BMPs) in accordance with National Pollutant Discharge Elimination System (NPDES). The proposed project plans indicate that erosion control measures would be incorporated during project construction and no impacts related to expansive soils or erosion would occur. e) <u><i>No Impact.</i></u> 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. <u>Mitigation Measure(s):</u> None required				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. 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?	☐	☐	☒	☐
<u>Responses:</u> a-b) <u>Less Than Significant Impact.</u> Construction of the proposed project would generate temporary GHG emissions primarily as a result of operation of construction equipment on-site as well as from vehicles transporting construction workers to and from the project site and heavy trucks to transport building materials and soil export. As discussed in Section VI, <i>Energy</i>, construction equipment would be maintained to applicable standards, and construction activity and associated GHG emissions would be temporary and typical for construction sites. Therefore, construction related GHG impacts would be less than significant. Operation of the proposed project would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, vehicle trips, and wastewater and solid waste generation. Project operational-related GHG emissions would decline in future years as emissions reductions from the State's Cap-and-Trade program are fully realized. Emissions reductions from the project's two highest GHG-emitting sources, mobile and electricity, would occur over the next decade, and beyond, ensuring that the project's total GHG emissions would be further reduced. Emissions from electricity would decline as utility providers, including SCE, meet their Renewables Portfolio Standard obligations to provide 60 percent of their electricity from renewable electricity sources by 2030 consistent with SB 100, which would achieve additional reductions in emissions from electricity demand. In addition, project emissions from mobile sources would decline in future years as older vehicles are replaced with newer, more fuel-efficient vehicles, which would result in a higher percentage of the state's vehicle fleet meeting more stringent combustion emissions standards. Therefore, operational impacts would be less than significant. Project Consistency with Plans, Policies, and Regulations Plans and policies have been adopted to reduce GHG emissions in the Southern California region, including the State's 2017 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and the City's Bicycle and Pedestrian Action Plan. The project's consistency with these plans is discussed in the following subsections. As discussed therein, the proposed project would not conflict with plans and policies aimed at reducing GHG emissions. <i>2017 Scoping Plan</i> The principal State plan and policy addressing GHG emissions is AB 32, the California Global Warming Solutions Act of 2006, and the follow up, SB 32. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020 and the goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. Pursuant to the SB 32 goal, the 2017 Scoping Plan was created to outline goals and measures for the state to achieve these reductions. The 2017 Scoping Plan's goals include reducing fossil fuel use and energy demand and maximizing recycling and diversion from landfills. The project would be consistent with these goals through project design, which includes complying with the latest Title 24 Green Building Code and Building Efficiency Energy Standards and installing energy-efficient LED lighting, water-efficient faucets				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
and toilets, and water efficient landscaping and irrigation. Therefore, the project would be consistent with the 2017 Scoping Plan. SCAG 2020-2045 RTP/SCS: SCAG's 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing per capita GHG emissions from passenger cars by eight percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. The 2020-2045 RTP/SCS includes ten goals with corresponding implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The project's consistency with the 2020-2045 RTP/SCS is discussed below. As shown therein, the proposed project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.				
Project Consistency with Applicable SCAG 2020-2045 RTP/SCS Strategies:				
Reduction Strategy		Project Consistency		
Focus Growth Near Destinations & Mobility Options Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)		Consistent. The proposed project would provide one EV charging ready, one EV charging full, and two EV charging capable parking spaces on-site. In addition, the project would include four short-term bicycle spaces.		
Leverage Technology Innovations Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space		Consistent. The proposed project would include EV charging outlets and a loading area.		
Support Implementation of Sustainability Policies Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions		Consistent. The project would be consistent with Title 24 and the latest CALGreen requirements.		
Promote a Green Region - Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards - Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration - Promote more resource efficient development focused on conservation, recycling and reclamation		Consistent. The project would be consistent with applicable sustainability policies in the Culver City Urban Forest Master Plan, Culver City Bicycle and Pedestrian Action Plan, Title 24, and CALGreen.		
Source: Southern California Association of Governments, 2020, 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy, https://scag.ca.gov/read-plan-adopted-final-plan , accessed September 2021.				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact								
Local Regulations The City's Bicycle and Pedestrian Action Plan contains goals and policies to help achieve a community where bicycling and walking provide affordable, safe, and healthy mobility options for all residents. As shown below, the proposed project would be consistent with the goal, objective, and policies relating to GHG emission reduction contained in the Bicycle and Pedestrian Action Plan. Consistency with Applicable Bicycle and Pedestrian Action Plan Goals, Objectives, and Policies <table border="1"> <thead> <tr> <th>Goal 2 – Health and Safety</th> <th>Project Consistency</th> </tr> </thead> <tbody> <tr> <td>Objective HS-4: Reduce air pollution, asthma rates, and greenhouse gas emissions.</td> <td></td> </tr> <tr> <td>Action HS-4.1. Build an active transportation network that encourages Culver City residents to use means of transportation other than driving by providing safer, more comfortable biking and walking facilities.</td> <td>Consistent. The proposed project would include four short-term bicycle spaces which would encourage City residents to use means of transportation other than driving.</td> </tr> <tr> <td>Action HS-4.2. To meet the goals of the City's Urban Forest Master Plan, install trees as part of sidewalk, shared-use path, and trail projects.</td> <td>Consistent. The proposed project would include the planting of two trees within the public right-of-way surrounding the project site.</td> </tr> </tbody> </table> Source: City of Culver City, 2020, Draft Bicycle and Pedestrian Action Plan, https://www.culvercity.org/City-Hall/City-Projects/Bicycle-and-Pedestrian-Action-Plan, accessed September 2021. Because the proposed project would not conflict with plans and policies aimed at reducing GHG emissions or generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, impacts would be less significant. Mitigation Measure(s): None required.					Goal 2 – Health and Safety	Project Consistency	Objective HS-4: Reduce air pollution, asthma rates, and greenhouse gas emissions.		Action HS-4.1. Build an active transportation network that encourages Culver City residents to use means of transportation other than driving by providing safer, more comfortable biking and walking facilities.	Consistent. The proposed project would include four short-term bicycle spaces which would encourage City residents to use means of transportation other than driving.	Action HS-4.2. To meet the goals of the City's Urban Forest Master Plan, install trees as part of sidewalk, shared-use path, and trail projects.	Consistent. The proposed project would include the planting of two trees within the public right-of-way surrounding the project site.
Goal 2 – Health and Safety	Project Consistency											
Objective HS-4: Reduce air pollution, asthma rates, and greenhouse gas emissions.												
Action HS-4.1. Build an active transportation network that encourages Culver City residents to use means of transportation other than driving by providing safer, more comfortable biking and walking facilities.	Consistent. The proposed project would include four short-term bicycle spaces which would encourage City residents to use means of transportation other than driving.											
Action HS-4.2. To meet the goals of the City's Urban Forest Master Plan, install trees as part of sidewalk, shared-use path, and trail projects.	Consistent. The proposed project would include the planting of two trees within the public right-of-way surrounding the project site.											
IX. 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?	☐	☒	☐	☐								

EVALUATION OF ENVIRONMENTAL IMPACTS:		Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Responses:

a) Less Than Significant Impact. The proposed project involves the construction and operation of a 3,802-square foot retail building for a commercial cannabis dispensary, surface parking lot, 2,080 square feet of on-site landscaping, installation of a storm drain system, and installation of a vapor barrier. The project would not result in the routine transport, use, or disposal of hazardous materials. 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.

b-c) Potentially Significant Impact Unless Mitigation Incorporated. A Phase I Site Assessment prepared for the project site (Rincon Consultants, Inc. 2020) concluded that the project site currently contains contaminated soil as a result of the former on-site Mobil gasoline service station operations as well as potential releases from the adjacent Shell gasoline service station. The project site is also located within the Charnock Well Field MTBE Investigation area. In 1996, the main well field was shut down after discovering contamination in the form of gasoline additives MTBE, TBA, and other volatile organic compounds (VOCs). The contaminants had leaked into the groundwater supply from USTs and product pipelines in the area surrounding the well field.

In addition, dry cleaner sites located approximately within 1,000 feet of the subject property are reported to have used perchloroethylene and other hazardous materials. These sites are identified as June's Cleaners located at 11127 Venice Blvd and The Cleaning Store located at 11277 Venice Boulevard. June's Cleaners is located approximately 300 feet north of the project site and the Cleaning Store is located approximately 775 feet west of the project site.

Due to the potential release of perchloroethylene or other hazardous materials, soil vapor impacts could extend beneath the project site, which also lies within the Charnock Well Field impact area. Therefore, prior

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
to issuance of grading and building plans a soil management plan would need to be prepared that includes a vapor barrier system to ensure that there are no soil contamination or vapor impacts to construction workers or users of the proposed facility. Implementation of the mitigation measure below requiring the preparation of a soil management plan and installation of vapor barrier system would reduce potential hazardous materials to a below a level of significance. Mitigation Required (please see below). e)- f) <u><i>Less Than Significant Impact.</i></u> The proposed project is not located near a private airstrip; the nearest airport to the project site is Santa Monica Airport located approximately 1.8 miles northwest from the project site. The Los Angeles International Airport (LAX) is located approximately 4.92 miles south of the project site. LAX exceeds the two-mile radius discussed in the threshold. The project is not expected to result in a safety hazard for people residing or working in the project area due to the 2-mile proximity to the Santa Monica Airport which is a small regional airport that serves private aircraft owners as opposed to large carrier airlines. As a result, a less than significant impact would occur. g) <u><i>Less Than Significant Impact.</i></u> The proposed project would have no long-term effect on any emergency response or emergency evacuation plan or procedures. The project site is located within Fire District 2 with the closest fire station to the project site is Culver City Fire Station 2 located approximately 0.58 miles south. Culver City Fire Department 1 is located about 1.40 miles east of the project site and within the Fire District 1. 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. h) <u><i>Less Than Significant Impact.</i></u> The project site currently is surrounded by developed sites that includes commercial buildings. There are no wildlands on the project site or in the immediate vicinity of the site. Furthermore, the proposed project would adhere to applicable fire suppression regulations. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildfires. No impact would occur. <u>Mitigation Measure:</u> <i>MM HAZ-1 Soil Management Plan and Vapor Barrier System</i> Prior to issuance of grading and building permits, the project applicant shall prepare a Soil Management Plan (SMP). The SMP shall address onsite handling and management of impacted soils or other impacted wastes to reduce hazards to construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to: ▪ Stockpile management including stormwater pollution prevention and the installation of BMPs ▪ Proper disposal procedures of contaminated materials ▪ Monitoring and reporting ▪ A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection ▪ The health and safety plan will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Installation of a vapor barrier system.				
X. HYDROLOGY AND WATER QUALITY -- Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
Responses: a) <u>Less than Significant Impact.</u> The existing site is almost entirely developed with a vacant paved lot and is surrounded by residential and commercial uses in an urban area. Drainage is collected in existing grates on-site and stormwater is directed to the City's existing stormwater system via curb gutters along Sepulveda and Venice Boulevards. Construction of the proposed project would involve removal of four planted trees and ornamental landscaping on-site. However, the project would incorporate 2,080 square feet of on-site landscaping along the northern and western borders of the dispensary building and within the proposed parking lot, which would increase permeable surface area on-site. Therefore, upon completion, the proposed project would not increase existing stormwater flows off the site and would not affect water quality. In addition, the project includes the construction of a storm drain system which would include installation of a				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
trench drain with a traffic rated grate at each of the project driveways that would further assist in filtering and collecting stormwater from the site. The proposed project would be required to comply with all established regulations under the National Pollution Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (RWQCB), as applicable, to control both construction and operation stormwater discharges. In addition, the project would be required to comply with CCMC Chapter 5.05, <i>Stormwater and Urban Runoff Pollution Control</i>, which requires that the project develop a stormwater mitigation plan that complies with the most-recent Los Angeles RWQCB Standard Urban Stormwater Mitigation Plan. Further, the project proponent would be required to implement all applicable best management practices (BMPs) to reduce stormwater discharges and minimize potential downstream water quality impacts. The project site currently undergoes quarterly groundwater monitoring as the site contains soil and water contamination previously developed with a Mobil gasoline service station. According to the Groundwater Monitoring Report prepared for the project by ETIC, groundwater was encountered during exploration at depths between 80.5 and 87.1 feet below the ground surface. Construction activities would require excavations below ground surface to a depth of approximately eight feet. Therefore, it is unlikely that project construction activities would encounter groundwater as excavation would occur at shallow depths. Impacts would be less than significant. b) <u>Less Than Significant Impact</u>. The project site is located in a highly urbanized area of Culver City and is currently developed with a vacant paved lot and landscaping and thus, does not currently provide a substantial opportunity for recharge of groundwater. In addition, the project does not propose the development of long-term groundwater production wells. Given that the project site is less than one acre and the temporary nature of construction activities, while some dewatering could be necessary during construction activities, such dewatering activities would not be of an extent that would substantially alter groundwater supplies. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant. c.i) <u>Less Than Significant Impact</u>. The project site is generally flat, with minimal elevation change across the site. The project site does not contain any streams, rivers, or other drainage features. The project site is developed with a vacant lot and landscaping and is almost entirely paved with impermeable surfaces. The project would increase permeable surfaces on-site and include landscaping along the northern and western borders of the dispensary building and within the proposed parking lot. Therefore, runoff leaving the project site would be reduced when compared to existing conditions. Furthermore, as stated under Response X.a, the proposed project would be required to comply with the City's urban runoff requirements as stated in Chapter 5.05 of the CCMC, which would reduce the quantity and level of pollutants from runoff leaving the project site. Therefore, impacts related to erosion and siltation would be less than significant. c.ii, c.iv) <u>Less Than Significant Impact</u>. The project site is developed with a vacant lot and landscaping and is almost entirely paved with impermeable surfaces. Under the proposed project, the project site would be redeveloped from its current condition by constructing a 3,802-square foot commercial cannabis dispensary and surface parking lot, adding 2,080 square feet of on-site landscaping, and installing a storm drain system and vapor barrier. In addition, the project includes right-of-way improvements including the demolition and replacement of existing sidewalk and street features along Sepulveda and Venice Boulevards. The project would include landscaping along the northern and western borders of the dispensary building and within the				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
proposed parking lot, and would therefore, increase pervious surfaces, reducing the volume of runoff from the site when compared to existing conditions. In addition, any runoff from the site would be conveyed into the existing and proposed drainage system, and the construction of the project would not substantially change the site's drainage patterns. Project construction and operation would not alter a stream, river or other drainage course in a manner that would result in flooding or redirect flood flows. Furthermore, the proposed project would comply with the City's urban runoff requirements as stated in Chapter 5.05 of the CCMC, which would reduce the amount of runoff leaving the site. Therefore, the proposed project would not increase runoff such that flooding would occur, and impacts would be less than significant. c.iii) <u>Less Than Significant Impact</u>. The project site is generally flat, with minimal elevation changes across the site. The project site does not contain any streams, rivers, or other drainage features. The project site is developed with a vacant lot and landscaping and is almost entirely paved with impermeable surfaces. Construction of the project would increase permeable surfaces on-site and include landscaping along the northern and western borders of the dispensary building and within the proposed parking lot. Runoff from the site would be conveyed into the existing and proposed drainage system. As discussed under Response X.a, the proposed project would comply with the City's urban runoff requirements as stated in Chapter 5.05 of the CCMC, which would reduce the quantity and level of pollutants in runoff leaving the project site. Therefore, the proposed project would not create runoff that would exceed the capacity of the storm drain system and would not provide a substantial additional source of polluted runoff. Impacts would be less than significant. d) <u>Less Than Significant Impact</u>. As discussed above, the project site is designated Zone X on the most recent Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, indicating an area of minimal flood hazard.¹⁴ In addition, given the topography of the project site, it is unlikely that inundation of the site would occur in response to a storm event. Regardless, neither construction nor operation of the project involves storage or processing of pollutants that could be released due to inundation from a flood hazard. According to the Department of Conservation (DOC) California Tsunami Hazard Map, the project site is not located within the Tsunami Hazard Area¹⁵ and thus, is not subject to tsunamis. As shown in the Culver City Natural Hazards – Fire and Flooding Map, the project site is within the inundation zone for the Stone Canyon Dam;¹⁶ however, a breach of the dam facility is unlikely. The project site is located approximately 6.7 miles south of the Stone Canton Dam with various developments, hills, and terrain in between which would slow and limit any impacts of dam failures on the project site and surrounding area. In addition, the National Dam Safety Act of 2006 authorized the National Dam Safety Program to reduce the				

¹⁴ Federal Emergency Management Agency, 2018, FEMA Flood Map Service Center, Map 06037C1595G. Effective December 21, 2018, <https://msc.fema.gov/portal/search?AddressQuery=3800%20sepulveda%20boulevard%2C%20culver%20city#searchresultsanchor>, accessed September 2021.

¹⁵ California Department of Conservation, 2019, California Tsunami Maps and Data, <https://www.conservation.ca.gov/cgs/tsunami/maps>, accessed September 2021.

¹⁶ City of Culver City, 2007, Natural Hazards – Fire and Flooding Map, https://www.culvercity.org/files/assets/public/documents/information-technology/maps/culver_city_natural_hazards_map.pdf, accessed September 2021.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
risks to life and property from dam failure by establishing a safety and maintenance program.¹⁷ The program requires regular inspection of dams to reduce the risks associated with dam failures. If reservoir water from the Stone Canyon Dam were to reach the project site, the water would generally flow along roadways adjacent to or within the vicinity of the site. Therefore, during the unlikely failure of the dam, impacts relating to seiche flooding hazards would be less than significant. e) <u>Less Than Significant Impact</u>. As required by Section 303(d) of the Clean Water Act (CWA), the State and the Regional Water Boards assess water quality data for California's waters every two years to determine if they contain pollutants at levels that exceed protective water quality criteria and standards. As such, the Los Angeles RWQCB most recently prepared a list of impaired waterbodies in the region, referred to as the "303(d) list," as part of the 2018 assessment cycle.¹⁸ All waterbodies included on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL), which is a calculation of the maximum amount of a pollutant allowed to enter a waterbody so that the waterbody meets water quality standards for a particular pollutant.¹⁹ The nearest impaired waterbody within the Santa Monica Bay Watershed Management Area is Ballona Creek Reach 2, located between National Boulevard and Centinela Avenue, approximately 1.2 miles southeast of the project site. Impairment for Ballona Creek Reach 2 include metals, toxic pollutants, bacteria, trash, and viruses.²⁰ As previously discussed, the proposed project would comply with the City's urban runoff requirements as stated in Chapter 5.05 of the CCMC, including development of a stormwater mitigation plan and implementation of all applicable BMPs, which would reduce the quantity and level of pollutants in runoff leaving the project site. Therefore, the project would not conflict with or obstruct any water quality control plans for Ballona Creek Reach 2. Impacts would be less than significant. Mitigation Measure(s): None required.				
XI. 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?	☐	☐	☒	☐

¹⁷ Federal Emergency Management Agency, 2021, Dam Safety, <https://www.fema.gov/emergency-managers/risk-management/dam-safety>, accessed September 2021.

¹⁸ California Water Boards, 2021, 2018 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report), https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2018_integrated_report.html, accessed September 2021.

¹⁹ United States Environmental Protection Agency, 2020, Overview of Total Maximum Daily Loads (TMDLs), <https://www.epa.gov/tmdl/overview-total-maximum-daily-loads-tmdls>, accessed September 2021.

²⁰ California Water Boards, 2021, Appendix E: List of Approved TMDLs, https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2018_integrated_report.html, accessed September 2021.

EVALUATION OF ENVIRONMENTAL IMPACTS:		Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
<u>Responses:</u> a) <u>Less Than Significant Impact</u>. 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 development would occur within the boundaries of the project site as it currently exists. Accordingly, implementation of the proposed project would not disrupt or divide the physical arrangement of the established community, and no impact would occur. The proposed project will be consistent with the project site's zoning and general plan designations. The project will not require that streets connecting existing commercial areas be vacated or closed off. Therefore, the Project would not contribute to any potential cumulative physical division of an established community, and cumulative impacts would be less than significant. B) <u>Less Than Significant Impact</u>. The Culver City General Plan Land Use Element designates the property as General Corridor, which is a commercial designation. Land uses must be consistent with those identified in the Culver City General Plan Land Use Element. The property is zoned Commercial General (CG) which permits the proposed retail use, and which is consistent with the General Corridor land use designation. The proposed use is consistent with these designations and respects all provisions and development regulations of the Zoning Code and General Plan. The application does not include any variance or request to amend the General Plan or Zoning designation. Pursuant to the Zoning Code, the proposed use is allowed with approval of a Conditional Use Permit. c) <u>No Impact</u>. The site is not located within a Natural Community Conservation Plan area or other habitat conservation plan area. <u>Mitigation Measure(s):</u> None required					
XII. 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?	☐	☐	☐	☒
<u>Responses:</u> a-b) <u>No Impact</u>. The California Surface Mining and Reclamation Act of 1975 (SMARA) was enacted to promote conservation and protection of significant mineral deposits. According to the California DOC Mineral Land Classification Maps, the project site is in an area with Mineral Resource Zone 3 (MRZ-3) designation,					

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
indicating that the area may contain mineral deposits; however, the significance cannot be evaluated using available data.^{21,22} The Inglewood Oil Field (Oil Field) is located within Culver City and the unincorporated area of Los Angeles County known as Baldwin Hills. The current active Oil Field boundary is comprised of approximately 1,000 acres, including 77.8 acres located within Culver City.²³ The Oil Field is located approximately 2.2 miles southeast of the project site. The project site is located in a highly urbanized area of Culver City. In addition, the project site is currently developed with a vacant paved lot and was previously developed with a Mobil gasoline service station. Due to the previously disturbed nature of the site, the potential of uncovering mineral resources during project construction is considered low. Further, the project will not involve significant amounts of excavation that could potentially affect mineral resources. Therefore, no impact would occur. <u>Mitigation Measure(s):</u> None required.				
XIII. NOISE --Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
<u>Responses:</u> a) <u>Less Than Significant Impact</u>. Construction of the proposed project would include the temporary use of construction equipment and machinery. Such activities would be temporary and limited to the duration of the project construction period of one year. The nearest sensitive receivers to the project site are residences located approximately 215 feet to the east. Noise associated with construction of the proposed project may be perceptible at these residences during construction of the project; however, construction noise would be temporary and would be required to comply with the regulations included in Section 9.07.035 of the City's General Plan, including limiting construction activities to 8:00 a.m. – 8:00 p.m. Mondays through Fridays,				

²¹ California Department of Conservation, 2015, CGS Information Warehouse: Mineral Land Classification, <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>, accessed September 2021.

²² Miller, R.V., 1994, *Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part II - Los Angeles County*.

²³ City of Culver City, 2021, Inglewood Oil Field: Background, <https://www.culvercity.org/City-Hall/Departments/City-Manager/City-Hall/Get-Involved/Inglewood-Oil-Field/Background>, accessed September 2021.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
9:00 a.m. – 7:00 p.m. on Saturdays, and 10:00 a.m. – 7:00 p.m. on Sundays.²⁴ Therefore, construction noise impacts would be less than significant. Operation of the proposed project would generate noise from vehicles entering and exiting the parking lot, conversations between customers while entering and exiting the building, and HVAC equipment. As a commercial retail use, the proposed project would be required to comply with the City's interior noise standard of 55 dBA CNEL.²⁵ In addition, the project would be required to comply with Section 9.07 of the City's General Plan which includes regulations to limit unnecessary, excessive and annoying noise within the City, such as limiting operation of gasoline-powered lawn mowers and leaf blowers to 8:00 a.m. - 6:00 p.m. Mondays through Fridays and between the hours of 10:00 a.m. - 5:00 p.m. on Saturdays and Sundays. Therefore, operational noise impacts would be less than significant. b) <u>Less than Significant Impact</u>. Construction activities known to generate excessive ground-borne vibration, such as pile driving or blasting, would not be conducted by the project. The greatest anticipated source of vibration during general project construction activities would be from loaded trucks, bulldozers, and graders, which may be used at various stages of project construction. However, such effects would be temporary, and limited to the construction period. In addition, the nearest sensitive receivers to the project site are residences located approximately 215 feet to the east that are separated by commercial uses including a car wash and nursery. Due to this distance and the commercial uses that separate the project site from these sensitive receivers, any temporary ground vibration associated with construction of the proposed project is not anticipated to be perceptible to these receptors. Therefore, construction vibration impacts would be less than significant. As a retail cannabis dispensary, the proposed project would not include significant stationary sources of vibration, such as manufacturing or heavy equipment operations. Therefore, no operation-related vibration impacts would occur. c) <u>No Impact</u>. The airport nearest to the project site, Santa Monica Municipal Airport, is located approximately 1.8 miles to the northeast. The project would not be located within the noise contours of the airport.²⁶ Therefore, no substantial noise exposure from airport noise would occur to construction workers or customers of the project, and no impact would occur. <u>Mitigation Measures:</u> None required.				

²⁴ City of Culver City, 2021, Culver City Municipal Code, https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-33516, accessed September 2021.

²⁵ City of Culver City, 1996, Noise Element, <https://www.culvercity.org/files/assets/public/documents/community-development/advance-planning/general-plan/noiseelement.pdf>, accessed September 2021.

²⁶ Los Angeles County Airport Land Use Commission, 2003, Santa Monica Municipal Airport- Airport Influence Area, <https://planning.lacounty.gov/aluc/airports>, accessed September 2021.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING -- Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
<u>Responses:</u> a) <u>Less Than Significant Impact.</u> The proposed project would involve construction of a one-story, 3,802-square foot commercial cannabis dispensary, which would temporarily introduce customers to the project site, but would not result in long-term population growth as the dispensary is not a permanent residence. However, the proposed project would include a maximum of 18 employees, which could potentially increase the number of new employees in Culver City. Although these project employees would likely be drawn from the existing labor pool in the region and may not relocate to the city, this analysis conservatively assumes that all 18 new employees may relocate to the city and would become new residents. According to data provided by the California Department of Finance (DOF), the 2021 population of Culver City is 39,805.²⁷ SCAG forecasts the population of Culver City will increase to approximately 41,600 by the year 2045, which is an increase of 1,795 persons from the current population.²⁸ The addition of approximately 18 employees in the project area would constitute approximately one percent of the city's total projected population growth through year 2045. Therefore, any potential population growth associated with the proposed project would not exceed regional population projections. Therefore, the project would not directly or indirectly induce substantial unplanned population growth. Impacts with respect to population growth would be less than significant. b) <u>No Impact.</u> The project site is currently developed with a vacant paved lot. There are no existing permanent residences on the project site. Therefore, the project would not displace substantial numbers of existing people or housing as there are no existing permanent residences on the site. No impact would occur. <u>Mitigation Measure(s):</u> None required.				

²⁷ California Department of Finance, 2021, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark, <https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/>, accessed September 2021.

²⁸ Southern California Association of Governments, 2020, Connect SoCal Demographics and Growth Forecast, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579, accessed September 2021.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
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:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐
Responses: a) & b) <u>Less Than Significant Impact</u>. The Culver City Fire Department (CCFD) maintains three stations and the closest station to the proposed site is Station No. 2 located approximately 0.58 miles south of the site. 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 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 result in a less than significant impact to fire services. Construction and utilization of the project site and proposed project would comply with the Fire Code Regulations. The Culver City Police Department (CCPD) is located approximately 1.35 miles east 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 vacant paved lot; the site currently does not generate demand for Fire and Police services. As noted above onsite security measures and conformance with Culver City fire code standards will reduce the potential fire and police demands on the site. Further, the use will require specific security related project conditions such as security cameras and secured inventory areas. The impact from this proposed project is less than significant. c) <u>Less Than Significant Impact</u>. The Project Site is located within the boundaries of the Culver City Unified School District (CCUSD). The CCUSD includes one high school, one continuation high school, one middle school, five elementary schools, and one adult school. The project operation will not result in significant adverse impacts relative to schools because they are not expected to generate a substantial 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. Project construction would create temporary construction jobs, but construction workers would be drawn from an existing work pool and would work at the Project Site for only short durations. There would be no student population associated with Project construction.				

EVALUATION OF ENVIRONMENTAL IMPACTS:		Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Project impacts related to schools would be addressed through payment of required Senate Bill 50 (SB 50) development fees pursuant to Section 65995 of the California Government Code. In accordance with SB 50, the payment of these fees is deemed to constitute full and complete mitigation for impacts to school facilities. Therefore, impacts on school services and facilities would be less than significant. d) <u>Less Than Significant Impact</u>. The Culver City Parks, Recreation and Community Services (PRCS) division oversees the maintenance and operations of 11 City parks totaling approximately 79 acres, a community garden, community and recreational facilities, senior centers, swimming pools, and a theater facility. The closest park near the project site is located at approximately 0.26 miles southeast from the project site. The use of the existing neighborhood and regional parks is not expected to substantially increase. The project will not require new construction or expansion of parks facilities. e) <u>Less Than Significant Impact</u>. Other facilities have not been identified that could be impacted by the project. Mitigation Measure(s): None required					
XVI. RECREATION --					
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
Responses: a-b) <u>Less Than Significant Impact</u>. Culver City Parks, Recreation and Community Services division oversees the maintenance and operations of 13 City parks, totaling approximately 90 acres.²⁹ As discussed above in Response XV.d, the use of existing parks is not expected to substantially increase as a result of the proposed project given the minimal number of dispensary employees. In addition, although there is a possibility that dispensary customers may utilize parks and recreational facilities within the project area, the demand is expected to be negligible as customers would likely already be residents of Culver City or would likely utilize the parks and recreational facilities provided within their own communities. In addition, the retail use does not in and of itself generate subsequent park use. Therefore, impacts would be less than significant. Mitigation Measure(s): None required.					

²⁹ City of Culver City, 2021, Culver City Parks, [https://www.culvercity.org/Parks?dlv_OC%20CL%20Public%20Parks%20Reserves%20Listing=\(pageindex=1\)](https://www.culvercity.org/Parks?dlv_OC%20CL%20Public%20Parks%20Reserves%20Listing=(pageindex=1)), accessed September 2021.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
<u>Responses:</u> a-f) <u>Less Than Significant Impact.</u> Construction of the Project has the potential to increase traffic through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the project site. The project site is served by various bus routes operated by Metro and Culver City Bus with bus stops located in close proximity to the project site. The table below shows trip generation rates for the proposed cannabis dispensary.				

EVALUATION OF ENVIRONMENTAL IMPACTS:				Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project Trip Generation Rates									
Land Use	ITE Land Use	Size	Daily	Monitoring Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
Cannabis Dispensary	882	per 1,000 sf	252.7	56%	44%	10.44	50%	50%	21.83

Project Trip Generation Estimates									
Land Use	ITE Land Use	Size	Daily	Monitoring Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
Cannabis Dispensary Less 15% Transit/Walk-In [b]	882	3.802 ksf	961 (144)	22 (3)	18 (2)	40 (6)	42 (6)	41 (6)	83 (12)
Total - Project Trips			817	19	15	34	36	35	71

Notes:
ksf: 1,000 square feet
[a] Source: Trip Generation, 10th Edition, Institute of Transportation Engineers, 2017.
[b] The Project Site is located adjacent to the intersection of Sepulveda Boulevard & Venice Boulevard, which is identified as a key Transit Priority Area, therefore a 15% adjustment was applied, to account for transit / walk-in trips.

The proposed cannabis retail dispensary project does not meet the screening thresholds for a Vehicle Miles Travelled (VMT) analysis. The Project is located adjacent to the Sepulveda Boulevard & Venice Boulevard Intersection identified as a key Transit Priority Area. The project would provide bicycle parking in accordance with Culver City requirements. Additionally, the Project proposes local serving retail uses of less than 50,000 square feet. In addition, the proposed project would be replacing a former gas station with comparable traffic generation rates. Review of the project's Transportation Study did not identify significant impacts. Therefore, potential impacts related transportation and traffic would be less than significant. The proposed project would not cause a change to any traffic or emergency vehicle patterns in the project area. Additionally, no impacts to air traffic patterns would occur through project implementation.

Mitigation Measures: None required

XVIII. TRIBAL CULTURAL RESOURCES-- Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☒	☐
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EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐
<u>Responses:</u> a-b) <u>Less than Significant Impact.</u> <u>Tribal Cultural Resources Background</u> The project site is located in an urban area and is currently developed with a vacant paved lot and landscaping. Proposed project activities would occur in areas previously disturbed for the construction of the former Mobil gasoline service station. The past grading and earth disturbance associated the construction of the former Mobil gasoline service station would have disturbed or destroyed any potential prehistoric, older historic, or paleontological remains that may have resided below the ground surface. Based on this location within previously disturbed soils, project construction is not expected to encounter or otherwise impact tribal cultural resources. However, the project does not comply with the criteria required for a categorical exemption finding because project technical studies determined there was a reasonable foreseeable upset and accident involving the release of hazardous materials into the environment. Hazardous Materials related mitigations are proposed and will be incorporated into the project conditions and this impact will be reduced to less than significant. Under CEQA and State Law, a project that is not categorically exempt is subject to California Public Resources Code (PRC) section 21084.2 (also commonly referred to as AB 52). On July 1, 2015, AB 52 was enacted, expanding CEQA by defining a new resource category, "tribal cultural resources." AB 52 states, "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" It further states the lead agency shall establish measures to avoid impacts altering the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is: 1. Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC Section 5020.1(k), or 2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe. AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those having requested notice of projects proposed in the jurisdiction of the lead agency. As specified in PRC Section 21080.3.1 (d), within 14 days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Pursuant to AB 52, on May 17, 2022, the City conducted a consultation with members of the Gabrieleno Band of Mission Indians – Kizh Nation. During the consultation, City staff described the project which includes surface parking and a small building. The project does not require significant excavation however, approximately 5 feet of topsoil will be removed in order to regrade the site. The Kizh Nation expressed concern that Tribal Cultural Resources could be impacted, disturbed, or found during the demolition and excavation operations. The following Special Project Conditions will be required <u>Special Cultural Project Condition 1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities</u> A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Grounddisturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of grounddisturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.				
<u>Special Cultural Project Condition 2: Unanticipated Discovery of Human Remains and Associated Funerary Objects</u>				
A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.				
B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.				
C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).				
D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)				
E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) 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, it shall be offered to a local school or historical society in the area for educational purposes.				
F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.				
<u>Special Cultural Project Condition 3: Procedures for Burials and Funerary Remains:</u>				
A. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.				
B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials. D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains. These conditions are based on State Law that all construction sites must adhere to if human remains are found during excavation operations. Therefore, impacts to Tribal Cultural resources would be less than significant. Mitigation Measure(s): None required				
XIX. 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?	☐	☐	☒	☐

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
<u>Responses:</u> a),b),&e) <u>Less Than Significant Impact.</u> 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, while the City of Los Angeles owns and operates its own facilities and contracts with the City of Culver City for their use. Treatment occurs at the Hyperion Treatment Plant, located southwest of Culver City, which has sufficient capacity to serve the needs of the proposed project. Sewage flow would ultimately be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the proposed project. Therefore, impacts would be less than significant. The proposed project will have less than significant impact to the waste water system. No mitigation measures are therefore required. c) <u>Less Than Significant Impact.</u> 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 City of Los Angeles is served by the County system as well as its own systems. The project includes the installation of a storm drain system on-site consisting of a trench drain with traffic rated grate, 12-inch x 12-inch grate and drain, six-inch area drain, four-inch planter drain, drywell, Curb-O-Let outlet, and six-inch SDR-35 PVC pipe. The combined systems are adequate to serve the proposed project. d) <u>Less Than Significant Impact.</u> During construction activities associated with the future development within the Project Site, there would be a temporary, intermittent demand for water for such activities as soil watering for site preparation, fugitive dust control, concrete preparation, painting, cleanup, and other short-term activities. Water service for this project site is provided by the Los Angeles Department of Water and Power (LADWP), which sources water through wells, outside sources, and the Metropolitan Water District. Existing Groundwater monitoring network consists of 11 wells, 9 are completed in the Shallow Aquifer and 2 are completed in the Upper Silverado Aquifer. Construction-related water usage is not expected to have an adverse impact on available water supplies or the existing water distribution system, and impacts would be less than significant.				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
f) <u><i>Less Than Significant Impact.</i></u> All Project related solid and recyclable waste material handling shall be in accordance with CCMC Section 5.01.010 – “Solid Waste Management”, which outlines the Sanitation Division’s exclusive franchise for this service. The project shall provide adequate trash and recycling capacity and shall comply with Assembly Bills 939, 1826, and 341 waste diversion goals. The project shall provide streetscape improvements along the project’s street frontage including street trees in accordance with the Urban Forest Master Plan, and benches, bike racks, waste bins consistent with the specifications provided in the Washington National Streetscape plan. 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 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. g) <u><i>Less Than Significant Impact.</i></u> The project could generate solid waste during construction. Standard conditions requiring the contractor to remove and dispose of waste in accordance with applicable statutes and regulations would reduce this impact to a level that is less than significant. Solid waste, recyclable material, and organic waste handling would be performed by the City or its authorized agents. No mitigation measures are necessary. <u>Mitigation Measure(s):</u> None required				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE -- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, e) including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
Responses: a) <u>Less Than Significant Impact</u>. The project site is not located in a VHFHSZ or SRA. The nearest such zone is a CAL FIRE designated VHFHSZ LRA approximately 1.8 mile southeast of the project site between Jefferson Boulevard and Crenshaw Boulevard.³⁰ As discussed in Section XVII, <i>Transportation</i>, the project would not impede access to emergency services. The project would be designed, constructed, and operated pursuant to applicable standards outlined in the City's Building Code, 2019 California Fire Code, as amended and adopted in Section 9.02 of the CCMC, and any related codes as determined by the Building Official and Fire Marshal. Such requirements address building and emergency access, adequate emergency notification, and means of egress for emergency vehicles. Site access for the project would be provided via Sepulveda and Venice Boulevards. If temporary construction-related roadway or lane closures are required, the project would comply with applicable encroachment permit conditions including traffic control measures to maintain traffic flow and emergency access and evacuation, as appropriate. Therefore, impacts would be less than significant. b) <u>Less Than Significant Impact</u>. As discussed in Response XX.a, the project is not located in a designated VHFHSZ or SRA and would be designed, constructed, and operated pursuant to the applicable requirements of the 2019 California Fire Code to minimize risk associated with wildfire to project occupants. Therefore, impacts would be less than significant. c) <u>Less Than Significant Impact</u>. As discussed in Section XVIII, <i>Utilities and Service Systems</i>, the project would not cause significant environmental effects associated with the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. The project includes the installation of a storm drain system and may require				

³⁰ California Department of Forestry and Fire Protection, 2021, FHSZ Viewer, <https://egis.fire.ca.gov/FHSZ/>, accessed September 2021.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
installation of additional water, sewer, or electrical infrastructure improvements to serve the proposed cannabis dispensary. Such improvements would occur within the previously developed project site, and new or relocated utilities and systems associated with the project would comply with State and local fire codes to reduce the risk of fires. Because the project site is not located in a VHFHSZ or SRA and none of these potential infrastructure improvements would be anticipated to exacerbate fire risk on-site, this impact would be less than significant. d) <u>Less Than Significant Impact</u>. As discussed in Section VII, <i>Geology and Soils</i>, the entire project site is not located in a landslide zone of required investigation. In addition, the proposed project would not substantially alter drainage patterns on-site in a way that would make the site more susceptible to post-fire flooding, landslides, or slope instability as the project site would have similar drainage patterns as existing commercial uses surrounding the project site. Furthermore, as discussed in Response XX.b, the proposed project is not located within a VHFHSZ or SRA and is unlikely to exacerbate wildfire risks. As such, the project would also be unlikely to exacerbate risk of post-fire impacts including flooding, landslides, or slope instability. Impacts would be less than significant. <u>Mitigation Measure(s):</u> None required.				
XXI. 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?	☐	☐	☒	☐
<u>Responses:</u> a) <u>Less Than Significant Impact</u>. The proposed project will improve the project site, which currently is vacant. 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.				

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) <u>Less Than Significant Impact.</u> Any potential cumulative impacts will be substantially reduced to less than significant standards due to mitigations listed herein, standard City code requirements and conditions of approval. c) <u>Less Than Significant Impact.</u> 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. <u>Mitigation Measure(s):</u> None required				

XVIII. EARLIER ANALYSES:

None

References Utilized:

See footnotes at each section above for referenced materials

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 AND REPORTING PROGRAM (MMRP) Beyond Hello Cannabis Retailer-Storefront Business Conditional Use Permit, P2021-0276-CUP June 22, 2022				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<u>Hazards and Hazardous Materials</u> HAZ-1 Soil Management Plan and Vapor Barrier System Prior to issuance of grading and building permits, the project applicant shall prepare a Soil Management Plan (SMP). The SMP shall address onsite handling and management of impacted soils or other impacted wastes to reduce hazards to	Condition of Approval	Staff Review of SMP and Field Inspection	Prior to issuance of grading and building permits and field verification	Culver City Building Official

construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to: ▪ Stockpile management including stormwater pollution prevention and the installation of BMPs ▪ Proper disposal procedures of contaminated materials ▪ Monitoring and reporting ▪ A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection ▪ The health and safety plan will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction. ▪ Installation of a vapor barrier system.			during construction	
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