

ENVIRONMENTAL DETERMINATION:

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, an Initial Study was prepared for this project. The Initial Study determined that the project would not result in significant impacts on the environment. Therefore, a Negative Declaration (or ND) was prepared as the required CEQA clearance documentation for the project.

The Draft ND was circulated for public review from October 7, 2021 to November 8, 2021. A Notice of Availability and Intent to Adopt a Negative Declaration for the project was published in the Culver City News on October 7, 2021 and posted at the County Clerk's office in Norwalk. The Notice was also uploaded on CEQAnet for the Governor's Office of Planning and Research (OPR) State Clearinghouse and Planning Unit, who distributed the Draft ND to selected state agencies for review.

- Physical copies of the Draft ND were made available to the public at:
 - a. The City's Current Planning Division public counter at City Hall
 - b. The Culver City Julian Dixon Public Library
- A digital copy of the Draft ND was made available to the public on the General Plan Update (GPU) Project website at www.pictureculvercity.com/draft-housing-element.
- Information about the Draft ND, including requests to respond, the response deadline, and requests to share information about it were distributed:
 - a. In the "News" section on the City website at www.culvercity.org/News/GPU-DHE-ISND-NOA;
 - b. Through the City's virtual newsletter, GovDelivery, to those subscribed to the E-mail listservs to receive GPU project updates ('General Plan Advisory Committee' and 'General Plan Update') and to those subscribed to the City's 'Public Notifications' listserv;
 - c. On the City's social media channels, including Nextdoor, Instagram, Facebook, and Twitter; and its cable channel;
 - d. To various neighborhood groups and community-based organizations, including those representing the interests of lower-income persons, groups with special needs, and voices often missing from planning processes, such as youth; and
 - e. To the GPU's Volunteer Communications Network, and the GPU's advisory bodies (the General Plan Advisory Committee and the Technical Advisory Committee).

As a result of public review on the Draft ND, the City received one letter from a public agency with comments regarding the Draft ND, which was from California Department of Fish and Wildlife. In addition, 10 comment letters were received from members of the public.

A discussion of the items raised in the comment letters is provided below. The City will prepare a Final ND; no recirculation of the ND document or further environmental review per CEQA is necessary. However, as indicated in the ND Attachment A, Project Description, since the 2021-2029 Draft Housing Element is a policy document and the Land Use Element and Map changes are part of the ongoing General Plan Update, the Preferred Land Use Map and related zoning changes assumed in the Housing Element sites inventory are not under consideration at this time. General Plan land use designation changes will be processed as part of General Plan 2045 and the update to the Land Use Element and Land Use Map. After adoption, any necessary zoning amendments would be processed to comply.

Also, it is acknowledged that the CEQA Guidelines do not require formal responses to comments received on a Draft ND document [CEQA Guidelines Section 15074(b)]. Accordingly, some comments that are introductory, provide background information about the commenter, express opinions of the commenter on the project, and the like, need not be addressed in the environmental analysis within the Final ND. However, all comments have been provided to the Planning Commission and City Council for their consideration during the approval process.

The following is an overview of the agency comments and key environmental issues raised by the public within the comment letters. Each of the letters are provided as an attachment to this Staff Report.

Agency Comment Letter

California Department of Fish and Wildlife (November 8, 2021). The California Department of Fish and Wildlife (CDFW) has noted specific concerns regarding coastal California gnatcatcher, which is an Endangered Species Act (ESA)-listed threatened species and a California Species of Special Concern (SSC); bats, including the western mastiff bat, pallid bat, and hoary bat, which are designated SSC; and Crotch's bumble bee, a species that is considered rare within the State. The letter provides input regarding the potential impacts and includes recommended mitigation measures. As indicated in the ND, the Housing Element is a policy document and provides the framework for the City to meet its RHNA allocation. However, the plan does not propose any physical development and would not result in ground disturbance at this time. In addition, the Draft Housing Element would not change or alter existing City policies to protect biological resources. In addition, as indicated in the ND, further evaluation will be provided in a program-level analysis for the General Plan 2045. Future residential projects proposed to achieve the city's housing goals would be located primarily on developed, underused sites with only occasional development on limited vacant parcels within the city. The potential for biological resources to occur would be evaluated on a

site-by-site basis when reviewing those projects and within the necessary timeframes for such surveys before ground disturbance. In addition, future development would comply with all applicable Federal, State, and local policies, plans, and regulations established to protect biological resources. The CDFW's suggested mitigation measures will be considered when preparing the EIR for the overall General Plan 2045.

Individual Comment Letters

As mentioned above, the City received ten comment letters from members of the public. Below is a summary of the environmental concerns raised within the project.

General

The use of a ND as the CEQA clearance document for the Housing Element and an assertion that a full Environmental Impact Report (EIR) is necessary was the issue most frequently raised in the comment letters. Below is a list of primary community concerns regarding the ND CEQA document.

- General request to prepare a full EIR similar to the City of Santa Monica.
- Validity of data or lack thereof, provided for the Housing Element ND.

Response:

As indicated in the ND, the Housing Element is a policy document that provides the framework for the City to meet its RHNA allocation. As such, the plan would not result in physical development at this time since land use designations associated with the plan are not under consideration and will be processed as part of the General Plan 2045, which is anticipated to be adopted in 2022. The City will prepare a program-level EIR for the General Plan 2045 and will release the Notice of Preparation (NOP) for public review. The purpose of the NOP is to solicit input from agencies, organizations, and the public regarding the scope and content of the analyses to be included in the EIR (CEQA Guidelines Section 15082). The NOP will begin the scoping process for the program-level EIR to determine environmental issues that will be evaluated in the EIR. The issue areas identified as part of the NOP process will be addressed in detail in the EIR prepared for the General Plan 2045. The City will provide a notice in the newspaper and post the NOP for the General Plan 2045 EIR on the GPU project website. Please see the project's website (www.pictureculvercity.com) for more information on the General Plan 2045 and the overall environmental process.

Traffic

The following concerns regarding traffic, another frequently raised issue, were provided:

- General traffic and parking congestion from implementing the Draft Housing Element.
- Impacts to existing neighborhoods as a result of increased density.
- Traffic safety issues as a result of implementing the Draft Housing Element.

Response:

As indicated in the ND, the Housing Element is evaluated as a policy document and no physical development is proposed at this time. As a policy document, no traffic or parking would be generated and traffic-related fatalities or serious injuries would not occur. However, as indicated in the ND, the City will prepare a program-level EIR for the General Plan 2045. A comprehensive transportation analysis will be prepared for the General Plan 2045 EIR, which will result in a citywide transportation analysis. This will consider all land use changes that would result from the General Plan 2045, rather than limiting the analysis to changes in residential uses necessary to support the City's RHNA allocation.

Air Quality and Greenhouse Gas Emissions (GHG)

The following concerns regarding Air Quality and GHG were provided:

- Impacts as a result of increased density that would occur from implementing the Draft Housing Element.
- Impacts to air quality/GHG as a result of increased traffic.
- Impacts to public health as a result of an increase in GHG emissions.
- Request to review Air Quality and GHG calculations data for the Draft Housing Element.

Response:

As indicated in the ND, the Housing Element is evaluated as a policy document that provides the framework for the City to meet its RHNA allocation and proposes no physical development. As a policy document, no air pollution or greenhouse gas emissions would be generated and air quality/GHG-related impacts would not occur. Therefore, no air quality and GHG calculations were prepared for the ND. However, as indicated in the ND, the City will prepare a program-level EIR for the General Plan 2045. A comprehensive air quality/GHG analysis will be provided in the General Plan 2045 EIR that evaluates the buildout that would occur under the General Plan. This will provide a citywide air quality/GHG analysis that considers all land use changes that would result from the General Plan 2045, not just changes in residential uses necessary to support the City's RHNA allocation. In addition, future development would be required to meet relevant development standards and objective design guidelines in the General Plan 2045, Culver City Municipal Code (CCMC), and all

applicable air quality plans, policies, and regulations. For example, relevant South Coast Air Quality Management District (SCAQMD) goals and policies would apply.

Aesthetics

The following concern regarding Aesthetics was provided:

- Impacts regarding the size and scale of development as a result of implementing the Draft Housing Element.

Response:

As indicated in the ND, the Housing Element is evaluated as a policy document and no physical development is proposed at this time. Therefore, impacts to aesthetics or visual resources would not occur. However, as indicated in the ND, the City will prepare a program-level EIR for the General Plan 2045, which will include a comprehensive aesthetics analysis. This analysis will consider all land use changes citywide that would result from the General Plan 2045, rather than limiting the analysis to changes in residential uses necessary to support the City's RHNA allocation. In addition, potential environmental impacts to aesthetics associated with future residential development would be assessed on a site-by-site basis at the time a development is proposed. Future development projects that implement the Housing Element goals would need to meet relevant development standards and objective design guidelines set forth in the General Plan, Zoning Code, and Title 9 (General Regulations) of the CCMC to ensure quality development throughout the City.

Biological Resources

The following concerns regarding Biological Resources were provided:

- Impacts to existing trees and vegetation as a result of implementing the Draft Housing Element.
- Concern for the heat island effect from removing trees during residential development.

Response:

As indicated in the ND, the Housing Element is evaluated as a policy document and no physical development is proposed at this time. As such, there would be no removal of existing trees and vegetation and effects of removal, such as the heat island effect would not occur. In addition, as indicated in the ND, further evaluation will be provided in a program-level analysis for the General Plan 2045. Future residential projects proposed to achieve the City's housing goals would be located primarily on developed, underused sites with limited development on vacant parcels. The potential for biological resources to occur would be evaluated on a site-by-site basis when reviewing those projects and

mitigation measures, if necessary, would be implemented to reduce significant impacts to biological resources. Any street trees removed as part of future development projects would have to comply with CCMC Section 9.08.215, Removal of Trees in Parkways Related to Private Improvement or Development Project. In addition, future development would comply with all applicable Federal, State, and local policies, plans, and regulations established to protect biological resources.

Cultural and Tribal Cultural Resources

The following concerns regarding Cultural Resources were provided:

- The impacts of implementing the Draft Housing Element on historic properties and districts.
- Assembly Bill (AB) 52 and Senate Bill (SB) 18 Consultation with Native American Tribes identified by the Native American Heritage Commission (NAHC), pursuant to Government Codes §65352.3 and §65352.4.

Response:

As indicated in the ND, the Housing Element is evaluated as a policy document and no physical development is proposed at this time. As such, no impacts to historic properties and districts would occur and no other cultural resources-related impacts would result. However, as indicated in the ND, the City will prepare a program-level EIR for the General Plan 2045. The General Plan 2045 EIR will provide a citywide analysis that addresses historic, archeological, and paleontological resources and potential impacts that could result citywide from implementing the General Plan 2045. Future residential development would be evaluated on a site by site basis and would need to comply with the City's Historic Resources Preservation Ordinance, if applicable. To ensure that impacts to cultural resources, as defined in CEQA Guidelines Section 15064.5, are avoided or mitigated to the fullest extent possible, future development would be required to meet all applicable Federal, State, and local policies and ordinances, plans, and regulations related to preserving and protecting historic and cultural resources.

Regarding tribal consultations, the City initiated tribal consultation pursuant to AB 52 and SB 18 for the Housing Element ND. As discussed in the ND, the City received one response from the Gabrieleño Band of Mission Indians-Kizh Nation indicating that they agree with the Housing Element Update and future consultations will occur as part of the General Plan 2045 EIR and with any future ground disturbing activities.

Geology and Soils

The following concern with regards to Geology and Soils was provided:

- Unstable soils under Blair Hills and Culver Crest.

Response:

As indicated in the ND, based on the Environmental Background Report prepared as part of the General Plan Update, the Blair Hills and Culver Crest neighborhood are highly susceptible to instability, landslides, and liquefaction. The Housing Element provides the framework for the City to meet its RHNA allocation, the plan would not result in physical development at this time as land use designations associated with the plan are not currently under consideration and will be processed as part of the General Plan 2045 EIR. Future development would be constructed in accordance with the California Building Code and the CCMC, which address potential issues regarding unstable soils, landslides, liquefaction, and expansive soils. At that time, if required by the City, a geotechnical investigation would be prepared and recommendations would be implemented to reduce potential impacts.

Noise

The following concern regarding Noise was provided:

- General concern of noise increase resulting from an increase in housing units.

Response:

As indicated in the ND, the Housing Element is evaluated as a policy document and no physical development is proposed at this time. As such, no noise, groundborne vibration, or groundborne noise would be generated. Additionally, as indicated in the ND, the City will prepare a program-level EIR for the General Plan 2045. A comprehensive program-level noise analysis will be prepared for the General Plan 2045 EIR. This analysis will consider all land use changes citywide that would result from the General Plan 2045, rather than just changes in residential uses necessary to support the City's RHNA allocation. In addition, potential environmental impacts related to noise and vibration associated with future development would be assessed on a site-by-site basis, as needed, at the time when development is proposed. Mitigation measures, if necessary, would be implemented to reduce significant noise and vibration impacts. Future development would be required to comply with all applicable Federal, State, and local policies, plans, and regulations related to noise levels, including the City's Noise Ordinance contained in CCMC Chapter 9.07, Noise Regulations.

Population and Housing

The following concerns with regards to Population and Housing were provided:

- The need for affordable housing.
- Preserving the Residential Single Family (R1) Zone district.

Response:

As indicated in the ND, the Housing Element provides a framework to meet the City's RHNA allocation. The Housing Element is evaluated as a policy document in the ND and no physical development is proposed at this time. The plan identifies strategies and programs to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the City's fair share of the region's need, preserve at-risk affordable housing units, and affirmatively further fair housing in a strategic manner. Future development that implements the plan would provide additional housing, including affordable housing, within the city.

The City acknowledges comments and concerns raised regarding changes in the R-1 Zone district. As indicated in Attachment A, Project Description, of the ND, for the 2021-2029 housing cycle, Los Angeles County has been assigned a RHNA of 812,060 housing units, with Culver City receiving an allocation of 3,341 units. Given the built out nature of the city, identifying potential sites and strategies to increase the housing stock is challenging. The Housing Element considers various strategies to meet the city's housing needs, including consolidating Low Density Two Family, Three Family, and Multiple Family designations into a new Incremental Infill designation. Approaches to Incremental Infill include conversions/additions and redevelopment; identifying opportunity sites for future residential housing; intensifying existing multi-family neighborhoods; and integrating residential uses in commercial and industrial areas. The additional housing necessary to meet the City's RHNA allocation would be achieved through these different strategies and would be dispersed throughout the city.

Public Services and Utilities

The following concerns regarding Public Services and Utilities were provided:

- General concern for impacts to existing infrastructure and public and utility services due to increase in density and population from implementing the Draft Housing Element.
- Impacts to schools as a result of increase in density and population.
- Request to review data and sources for water and electricity usage resulting from implementing the Draft Housing Element.

Response:

As indicated in the ND, the Housing Element provides a framework for the City to meet its RHNA allocation and is evaluated as a policy document with no physical development proposed at this time. However, as indicated in the ND, the City will prepare a program-level EIR for the General Plan 2045, which will evaluate the potential growth that would result from the General Plan 2045 relative to the demand for public services and utilities. All required development fees would be paid on a project by-project basis to ensure that public services and utilities would increase at the same rate as development. In addition, future residential development that implements Housing Element goals would meet applicable Federal, State, and local goals, policies, and regulations in place at the time of

development relating to services and utilities. Such regulations, for example, include water conservation and diversion of solid waste, which serve to conserve resources and ensure sufficient infrastructure exists to support development throughout the city.



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November 8, 2021

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Subject: Negative Declaration for the Culver City 2021-2029 Housing Element Update Project, SCH #2021100099, Culver City, Los Angeles County

Dear Ms. Hoang:

The California Department of Fish and Wildlife (CDFW) has reviewed the Negative Declaration (ND) from Culver City (City; Lead Agency) for the Culver City 2021-2029 Housing Element Update (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Ashley Hefner Hoang
Culver City
November 8, 2021
Page 2 of 17

Project Description and Summary

Objective: The 2021-2029 Housing Element provides a framework for meeting the housing needs of existing and future resident populations within the city based on the Regional Housing Needs Allocation of 3,341 units. The Housing Element is required to identify and analyze existing and projected housing needs within the city. It also includes statements of the City of Culver City's goals, policies, quantified objectives, and scheduled programs to preserve, improve, and develop housing. In adopting its Housing Element, each local agency must consider economic, environmental, and fiscal factors, as well as community goals as set forth in the General Plan, in compliance with California Government Code section 65580 et. seq.

Location: The Project would apply to the entirety of Culver City. The city is surrounded by the City of Los Angeles to the north, east, and west. An unincorporated area of Los Angeles County (County) is located to the south and southeast.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

Specific Comments

Comment #1: Impacts on Coastal California Gnatcatcher

Issue: The Project could impact coastal California gnatcatcher (*Poliophtila californica californica*), an Endangered Species Act (ESA)-listed threatened species and a California Species of Special Concern (SSC).

Specific impacts: Project housing development activities during the coastal California gnatcatcher (gnatcatcher) breeding and nesting season could result in the incidental loss of fertile eggs or nestlings.

Why impacts would occur: After review of CNDDDB, there is a record of coastal California gnatcatcher within the Project boundary in an area currently designated as Open Space according to the [Culver City General Plan Land Use Element Map](#) (2007). According to Figure 5 Preferred Land Use Map – General Plan 2045, is proposed for Single Unit Residential. Also, according to the ND, there was no biological survey conducted within the Project area. Without a recent gnatcatcher survey, housing development could result in injury or mortality of unidentified gnatcatchers, including eggs or nestlings.

Evidence impact would be significant: CEQA provides protection for special status species, including Species of Special Concern (SSC). These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065). The reductions in the number of special status bird species, either directly or indirectly through nest

Ashley Hefner Hoang
 Culver City
 November 8, 2021
 Page 3 of 17

abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative 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 CDFW and/or U.S. Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure: CDFW recommends the City retain a qualified biologist with an appropriate USFWS permit to survey the areas currently designated as and adjacent to Open Space to determine presence/absence of gnatcatcher. The qualified biologist should conduct surveys according to USFWS [Coastal California Gnatcatcher \(*Poliophtila californica californica*\) Presence/Absence Survey Guidelines](#) (USFWS 1997). The survey protocol requires a minimum of six surveys conducted at least one week apart from March 15 through June 30 and a minimum of nine surveys at least two weeks apart from July 1 through March 14. The protocol should be followed for all surveys unless otherwise authorized by the USFWS in writing (USFWS 1997). CDFW recommends gnatcatcher surveys be conducted and USFWS notified (per protocol guidance) prior to the City's issuance of a grading permit.

Recommendation: Take under the ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS, in order to comply with ESA, is advised well in advance of any ground-disturbing activities and/or vegetation removal that may impact gnatcatcher.

Comment #2: Impacts on Bats

Issue: The Project could impact bat species including western mastiff bat (*Eumops perotis californicus*), pallid bat (*Antrozous pallidus*), and hoary bat (*Lasiurus cinereus*) all designated SSC.

Specific impacts: According to CNDDDB, there are records of the western mastiff bat, pallid bat, and hoary bat within the Project boundary. Activities associated with housing development can cause direct and indirect impacts to bats. Direct impacts include removal of trees and that may provide roosting habitat. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground-disturbing activities (e.g., staging, mobilizing, excavating, and grading), and vibrations caused by heavy equipment.

Why impacts would occur: There have been no biological surveys associated with the proposed Project. Without focused surveys to detect bats, future housing development facilitated by this Project may impact unidentified bat species within the Project area.

Evidence impact would be significant: Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Additionally, several bat species are considered Species of Special Concern and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines, § 15065).

Ashley Hefner Hoang
Culver City
November 8, 2021
Page 4 of 17

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: CDFW recommends the ND require any future proposed housing development that may occur near potential bat roosting habitat, require a qualified bat specialist to conduct bat surveys within these areas (plus a 100-foot buffer as access allows). These surveys should identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends using acoustic recognition technology to maximize detection of bats. A discussion of survey results, including negative findings should be provided to the City. Depending on the survey results, a qualified bat specialist should discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist should be completed and submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.

Mitigation Measure #2: If bats are not detected, but the bat specialist determines that roosting bats may be present, trees should be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts should not be bucked or mulched immediately. A period of at least 24 hours, and preferable 48 hours, should elapse prior to such operations to allow bats to escape.

Mitigation Measure #3: If maternity roosts are found, work should be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are ready to fly out of the roost (March 1 to September 30).

Comment #3 Crotch's Bumble Bee

Issue: The Project may have the potential to impact Crotch's bumble bee (*Bombus crotchii*), a species that is considered rare within the State.

Specific impacts: The Project may result in temporal or permanent loss of suitable nesting and foraging habitat. Project ground-disturbing activities in areas in or adjacent to open space, may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

Why impacts would occur: Ground disturbance and vegetation removal associated with future housing development during the breeding season could result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas in and adjacent to the Project area. Development projects that are adjacent to open space, such as the Holy Cross Cemetery, Fox Hills Park, and Kenneth Hahn State Recreation Area, may impact species such Crotch's bumble bee. Future housing development facilitated by the Project may result in temporal or permanent loss of colonies and suitable nesting and foraging habitat.

Evidence impact would be significant: Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Also, Crotch's bumble bee has a very restricted

Ashley Hefner Hoang
Culver City
November 8, 2021
Page 5 of 17

range and steep population declines make the species vulnerable to extirpation from the State. Crotch's bumble bee is also listed as an invertebrate of conservation priority under the [California Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) (CDFW 2017). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by the City or a project proponent (CEQA Guidelines, § 15065). Project activities may have potential to substantially reduce or adversely modify habitat, impair the viability of populations, and reduce the number and range of the Crotch's bumble bee.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: Due to potentially suitable habitat within the Project boundary, CDFW recommends the ND include a mitigation measure whereby individual subsequent projects analyze potential impacts on Crotch's bumble bee. If suitable habitats are on or adjacent to subsequent project sites, within one year prior to vegetation removal and/or grading for any subsequent projects, a qualified entomologist familiar with the species behavior and life history should conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys should be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983). Survey results, including negative findings, should be submitted to CDFW prior to implementing Project-related ground-disturbing activities. At minimum, a survey report should provide the following:

- a) A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee. CDFW recommends the map show surveyor(s) track lines to document that the entire site was covered during field surveys.
- b) Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched.
- c) Map(s) showing the location of nests/colonies.
- d) A description of physical (e.g., soil, moisture and slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

Mitigation Measure #2: If Crotch's bumble bee is detected, the subsequent CEQA document should require project proponents, in consultation with a qualified entomologist, to develop a plan to fully avoid impacts to Crotch's bumble bee. The plan should include effective, specific, enforceable, and feasible measures. An avoidance plan should be submitted to the City prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee.

Mitigation Measure #3: If Crotch's bumble bee is detected and if impacts to Crotch's bumble bee cannot be feasibly avoided during Project construction and activities, project proponents/qualified entomologist should coordinate with CDFW to obtain appropriate handling permits for incidental take of Crotch's bumble bee and provide appropriate mitigation for impacts to Crotch's bumble bee habitat. CDFW recommends the project proponent mitigate for impacts to Crotch's bumble bee habitat at a ratio comparable to the Project's level of impacts.

Ashley Hefner Hoang
Culver City
November 8, 2021
Page 6 of 17

Additional Recommendations

Nesting Birds. CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends if future housing development occurs between January 1 through September 15, a nesting bird and raptor survey should be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the project site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. CDFW recommends the ND require subsequent project proponents require surveys be conducted by a qualified biologist no more than 7 days prior to the beginning of any project-related activity likely to impact raptors and migratory songbirds, for the entire project site. If project activities are delayed or suspended for more than 7 days during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, CDFW recommends the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

It should be noted that the temporary halt of project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the project site based on acreage of impact and vegetation composition. Mitigation ratios should increase with the occurrence of a SSC and should further increase with the occurrence of a CESA-listed species.

Biological Baseline Assessment and Impact Analysis. CDFW recommends the ND require future proposed projects provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the project. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The ND should include the following information:

- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The ND should require subsequent projects to include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a [State-wide ranking](#) of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level (CDFW 2020);

Ashley Hefner Hoang
Culver City
November 8, 2021
Page 7 of 17

- b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities](#) (CDFW 2018);
- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. [The Manual of California Vegetation](#), second edition, should also be used to inform this mapping and assessment (Sawyer, 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project;
- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & Game Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and,
- f) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.

Rodenticides. CDFW recommends the ND require subsequent project proponents prevent the use of second-generation anticoagulant rodenticides on all future housing development associated with the Project.

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, CDFW recommends that the subsequent CEQA documents include measures where lead agencies of individual projects report any special status species detected during preparation of project-level environmental impact analyses/environmental documents. Special status species information should be submitted to the CNDDDB by completing the [Online Field Survey Form](#) (CDFW 2021). The lead agency should ensure all pertinent data has been properly submitted, with all applicable data fields filled out, prior to finalizing/adopting an environmental document.

Mitigation and Monitoring Reporting Plan. CDFW recommends the City update the Project's

Ashley Hefner Hoang
Culver City
November 8, 2021
Page 8 of 17

environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist project proponents in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).


Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

Conclusion

We appreciate the opportunity to comment on the Project to assist Culver City in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at (562) 292-8105 or by email at Felicia.Silva@wildlife.ca.gov.

Sincerely,

DocuSigned by:

B6E58CFE24724F5...

Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

Erinn Wilson-Olgin, Los Alamitos – Erinn.Wilson-Olgin@wildlife.ca.gov
Victoria Tang, Los Alamitos – Victoria.Tang@wildlife.ca.gov
Ruby Kwan-Davis, Los Alamitos – Ruby.Kwan-Davis@wildlife.ca.gov
Felicia Silva, Los Alamitos – Felicia.Silva@wildlife.ca.gov
Julisa Portugal, Los Alamitos – Julisa.Portugal@wildlife.ca.gov
Susan Howell, San Diego – Susan.Howell@wildlife.ca.gov
CEQA Program Coordinator, Sacramento – CEQACommentLetters@wildlife.ca.gov
State Clearinghouse, Office of Planning and Research – State.Clearinghouse@opr.ca.gov

Ashley Hefner Hoang
Culver City
November 8, 2021
Page 9 of 17

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- [CDFW] California Department of Fish and Wildlife. 2020. Natural Communities. Accessed at: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>
- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Accessed at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>
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- [USFWS] United States Fish and Wildlife Service. 1997. Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Guidelines February 28, 1997. Available from: https://www.fws.gov/ventura/docs/species/protocols/cagn/coastal-gnatcatcher_surveyguidelines.pdf.



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
 3883 Ruffin Road
 San Diego, CA 92123
 (858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-1-Coastal CA Gnatcatcher	The City shall retain a qualified biologist with an appropriate USFWS permit to survey the areas currently designated as and adjacent to Open Space to determine presence/absence of gnatcatcher. The qualified biologist should conduct surveys according to USFWS Coastal California Gnatcatcher (<i>Poliophtila californica californica</i>) Presence/Absence Survey Guidelines (USFWS 1997). The survey protocol requires a minimum of six surveys conducted at least one week apart from March 15 through June 30 and a minimum of nine surveys at least two weeks apart from July 1 through March 14. The protocol should be followed for all surveys unless otherwise authorized by the USFWS in writing (USFWS 1997). Gnatcatcher surveys shall be conducted and USFWS notified (per protocol guidance) prior to the City's issuance of a grading permit.	Prior to project ground-disturbing activities	Project-level lead agency
REC-1-Coastal CA Gnatcatcher	Take under the ESA is more broadly defined than CESA; take under ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS, in order to comply with ESA, is advised well in advance of any ground-disturbing activities and/or vegetation removal that may impact gnatcatcher.	Prior to project ground-disturbing activities	Project-level lead agency
MM-BIO-2-Bats	The ND shall require future proposed housing development that may occur near potential bat roosting habitat, a qualified bat	Prior to project	Project-level lead agency

Ashley Hefner Hoang
 Culver City
 November 8, 2021
 Page 11 of 17

	<p>specialist conduct bat surveys within these areas (plus a 100-foot buffer as access allows). These surveys shall identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be utilized to maximize detection of bats. A discussion of survey results, including negative findings shall be provided to the City. Depending on the survey results, a qualified bat specialist shall discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats.</p>	ground-disturbing activities	
MM-BIO-3-Bats	<p>If bats are not detected, but the bat specialist determines that roosting bats may be present, trees shall be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees shall be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree shall then be pushed to the ground slowly and remain in place until it is inspected by a bat specialist. Trees that are known to be bat roosts shall not be bucked or mulched immediately. A period of at least 24 hours, and preferable 48 hours, shall elapse prior to such operations to allow bats to escape.</p>	Prior to project ground-disturbing activities	Project-level lead agency
MM-BIO-4-Bats	<p>If maternity roosts are found, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are ready to fly out of the roost (March 1 to September 30).</p>	Prior to project ground-disturbing activities	Project-level lead agency
MM-BIO-5-Crotch's bumble bee	<p>Due to suitable habitat within the Project boundary, individual subsequent projects shall analyze potential impacts on Crotch's bumble bee. If suitable habitat is on subsequent project sites,</p>	Prior to project ground-	Project-level lead agency

Ashley Hefner Hoang
 Culver City
 November 8, 2021
 Page 12 of 17

	<p>within one year prior to vegetation removal and/or grading for any individual subsequent projects, a qualified entomologist familiar with the species behavior and life history shall conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys shall be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp et al. 1983). Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project-related ground-disturbing activities. At minimum, a survey report shall provide the following:</p> <ul style="list-style-type: none"> a) A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee. CDFW recommends the map show surveyor(s) track lines to document that the entire site was covered during field surveys. b) Field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched. c) Map(s) showing the location of nests/colonies. d) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). 	disturbing activities	
MM-BIO-6-Crotch's bumble bee	<p>If Crotch's bumble bee is detected, the subsequent CEQA document shall require project proponents, in consultation with a qualified entomologist, to develop a plan to fully avoid impacts to Crotch's bumble bee. The plan shall include effective, specific, enforceable, and feasible measures. An avoidance plan shall be</p>	Prior to project ground-disturbing activities	Project-level lead agency

Ashley Hefner Hoang
 Culver City
 November 8, 2021
 Page 13 of 17

	submitted to the project proponent prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee.		
MM-BIO-7-Crotch's bumble bee	If Crotch's bumble bee is detected and if impacts to Crotch's bumble bee cannot be feasibly avoided during Project construction and activities, project proponents /qualified entomologist shall coordinate with CDFW to obtain appropriate handling permits for incidental take of Crotch's bumble bee and provide appropriate mitigation for impacts to Crotch's bumble bee habitat. The project proponents shall mitigate for impacts to Crotch's bumble bee habitat at a ratio comparable to the Project's level of impacts.	Prior to project ground-disturbing activities	Project-level lead agency
REC-2-Nesting Birds	CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends if future housing development occurs between January 1 through September 15, a nesting bird and raptor survey should be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. CDFW recommends the ND require subsequent project proponents require surveys be conducted by a qualified biologist no more than 7 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds, for the entire Project site. If Project activities are delayed or suspended for more than 7 days during the breeding season, repeat the surveys. If nesting raptors and migratory songbirds are identified, CDFW recommends the following minimum no-disturbance buffers be implemented: 300 feet around active passerine (perching birds and songbirds) nests, 500 feet around active non-listed raptor nests and 0.5 mile around active listed bird nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that	Prior to finalizing ND /During/After project	City of Calabasas/project-level lead agency

Ashley Hefner Hoang
 Culver City
 November 8, 2021
 Page 14 of 17

	<p>the birds have fledged and are no longer reliant upon the nest or parental care for survival.</p> <p>It should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. Mitigation ratios should increase with the occurrence a SSC and should further increase with the occurrence of a CESA-listed species.</p>		
REC-3-Biological Assessment	<p>CDFW recommends the ND require future proposed projects provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The CEQA document should include the following information:</p> <p>a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The ND should require subsequent projects to include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result</p>		

Ashley Hefner Hoang
Culver City
November 8, 2021
Page 15 of 17

	<p>in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a State-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level (CDFW 2020).</p> <p>b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018);</p> <p>c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer, 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;</p> <p>d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project.</p>		
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Ashley Hefner Hoang
 Culver City
 November 8, 2021
 Page 16 of 17

	<p>e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & Game Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and,</p> <p>f) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.</p>		
REC-4-Rodenticides	CDFW recommends the ND require subsequent project proponents prevent the use of second-generation anticoagulant rodenticides on all future housing development associated with the Project.	Prior to finalizing ND /During/After project	Culver City/project-level lead agency
REC-5-Data	Project-level lead agencies shall ensure sensitive and special status species data has been properly submitted to the California	Prior to finalizing/	Project-level lead agency

Ashley Hefner Hoang
Culver City
November 8, 2021
Page 17 of 17

	Natural Diversity Database with all data fields applicable filled out. Confirmation of data submittal shall be provided to CDFW.	adopting project-level CEQA document	
REC-6-Mitigation and Monitoring Reporting Plan	The City shall update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures.	Prior to finalizing CEQA Document	Culver City

Marsiglia, Lauren

From: Amy Agzarian <amyducky@aol.com>
Sent: Tuesday, November 9, 2021 7:52 PM
To: ADVANCE PLANNING
Subject: SAVE SINGLE FAMILY ZONING IN CULVER CITY

We disagree. Here's Why:

1. **We find no information that the city has followed the law in consulting with the Californian Native American Tribes:**
Government Codes §65352.3 and §65352.4 require local governments to consult with California Native American tribes. identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans, and Community Plans.
2. A full environmental impact report (EIR) should be required as Santa Monica did.
3. The city is attempting to avoid its responsibilities to disclose potential environmental impacts.
4. The Site inventory includes historic properties and potential districts that would be eligible for the national register of historic places.
5. The city has identified properties for redevelopment on steep slopes and with unstable soils (Blair Hills and Crest).
6. The city has not considered traffic/air quality impacts the increase in land-use intensity that would be required if the HE is adopted.
7. The city has not considered greenhouse gas emissions that could reasonably be expected to be generated if the plan is adopted.
8. Implied reduction in street trees from an increase in development in R1 and R2 will have a negative impact on community aesthetics.

Three of the City Council members should be ashamed of themselves!!

Amy Agzarian
10614 Flaxton Street
Culver City, CA 90230
310-837-7668

Marsiglia, Lauren

From: Hayley Babcock <hayleybabcock@icloud.com>
Sent: Friday, November 5, 2021 5:00 PM
To: ADVANCE PLANNING
Subject: Attn: Ashley Hefner Hoang | Housing Element and Environmental Impact due to Upzoning

Dear Ms. Hefner Hoang ~

I am writing to you about the issue of Upzoning and its effects on the environment vis a vis what Culver City plans to do regarding UpZoning in

As far as I understand Culver City has not done a full environmental impact report (EIR) on upzoning here and absolutely should do so, as Santa Monica did.

The city is attempting to avoid its responsibilities to disclose potential environmental impacts and we citizens insist that you are proactively transparent about this issue with us.

The Site inventory includes historic properties and potential districts that would be eligible for the national register of historic places and that absolutely needs to be taken into account and accommodated for if this horrible law actually takes effect.

Culver City has identified properties for redevelopment on steep slopes and with unstable soils such as Blair Hills and Culver Crest

It seems clear that the city has not considered the traffic and air quality impact that the increase in land-use intensity would create if the HE is adopted.

What have you done to consider greenhouse gas emissions that can reasonably be expected to be generated if the plan is adopted?

There is also a logical implied reduction in trees on tree lawns and on properties from an increase in development in R1 and R2 that will not only have a negative impact on community aesthetics, but on air quality and overall temperature for the city, which has long lasting health implications.

For all of these reasons and more I wholeheartedly disagree with your declaration that housing changes here will not negatively impact the environment and I think there will be hell to pay at the ballot box and during the tenure of this City Council (for whom I had excitedly voted and who are now failing me terribly) if that judgment is not remedied.

Thank you for your time.

Mrs. Hayley Babcock

Marsiglia, Lauren

From: Carolyn Bosil <carolynbosil@gmail.com>
Sent: Friday, November 5, 2021 4:43 PM
To: ADVANCE PLANNING
Subject: Denied impact on Culver City residents

You have sent notice to the state of California that there's no negative impact on imposing extra housing In zone one areas.

That is absolutely a lie, not true, and how dare you do that without giving the residents a chance to vote. How do you think you can get away with everything is beyond all of us but there will come when you WILL account for all the destruction you have caused the citizens of Culver City. You can plan on massive lawsuits being filed locally and on the state/federal level.

STOP  STOP . STOP 

Marsiglia, Lauren

From: jeff bossin <jeffbossin@gmail.com>
Sent: Thursday, October 7, 2021 4:06 PM
To: ADVANCE PLANNING
Subject: Culver City 2021-2029 Housing Element Update

So...your proposed HE has been declared as having no "significant environmental impacts?"

That's great news! Congratulations!

But did you consider that 4 families in a quadplex where a SFH once was, will use 4X the water, 4X the gas, and 4X the electric?

Did you consider that 4X the trash will be dumped into landfills?

Did you consider that more trees will be cut down to make way for your large condos and apartments? Trees are good. We'd like them to stay.

Did you consider the strain on our aging sewers and the "significant environmental impact" when a mainline inevitably bursts and spews raw sewage all over our neighborhoods?

You may be fooling some people. Just know that you're not fooling as many people as you think you are.

Shame on you.

Jeff Bossin
(310) 612-0271
jeffbossin@gmail.com

Marsiglia, Lauren

From: Patricia Graf <pgraf2008@gmail.com>
Sent: Monday, November 8, 2021 4:05 PM
To: ADVANCE PLANNING
Subject: Culver City 2021-2029 Housing Element Update

In perusing the HE, I find it dubious that the city has determined that there are **no** negative environmental impacts in any of the categories listed.

A full Environmental Impact Report (EIR) should be required before this is submitted to the state.

Marsiglia, Lauren

From: Betty Isono <betty02051@aol.com>
Sent: Monday, October 11, 2021 1:38 PM
To: ADVANCE PLANNING
Subject: No environmental impact?

Dear council members and commission,

I am totally amazed at how far you will bend the truth to justify your positions. That you say there is no significant environmental impact is so unbelievable. More people equals more: water, traffic, trash, children in schools, more energy, gas and electric, not to mention noise, and congestion. How can your studies not reflect this? Or is this clever manipulation information?

Betty Isono

Sent from my iPhone

Sylvia Palomera

To: Marsiglia, Lauren; Luci Hise-Fisher
Cc: eric; Veronica Tam; Hefner, Ashley
Subject: RE: Culver City 2021-2029 Housing Element Update

From: shm@shmpublishing.com <shm@shmpublishing.com>
Sent: Sunday, October 10, 2021 3:37 PM
To: ADVANCE PLANNING <Advance.Planning@culvercity.org>
Subject: Culver City 2021-2029 Housing Element Update

The housing element update referenced above does NOT fully include the environmental impact of moving ahead with the Housing Element.

The negative impacts are many and perhaps purposefully omitted. The obvious negative impacts are:

1) New and unnecessary traffic density to be piled on terrible traffic issues already going unaddressed in Culver City.

One example: Pre-covid, my partner and I made a 7 pm dinner appointment for dinner in Korea Town. We left home in CC at 6 pm and were unable to leave CC boundaries until 6:50 pm, nearly an hour just to get “out of town”. Blocking us were traffic jams everywhere on our way east. Nearly an hour to leave CC, a trek which only 10 years ago took about 10 minutes.

Such traffic density issues will be made much the worse by the new Housing Element, unless the city redefines its methods of dealing with traffic in and through the city. Adding 3300 + units on top of the residential and commercial additions already underway will mean at least 3300 + automobiles moving through our city.

Whatever “measures” are cited in the Element to address dangerous high-density traffic are simply insufficient. Adding people and cars to an already snarling mess is dangerous and destructive. The City Council knows this and refuses to act in a fashion to reduce traffic, noise, congestion, fumes and other by-products of automobiles.

This seems like such an obvious problem that mentioning it again likely sounds redundant and pointless. But it is not redundant and pointless to point to toxic smog producing traffic density.

Putting aside the troubling matters of increased chemical pollution, there are also the human problems caused by traffic jams. People are not built to deal with stop-n-go traffic. Such congestion is harmful to the human nervous system and debilitating for all those who seek carry on business activities within the city limits.

Increased traffic with its dangers to all of us is an obvious devaluator of local home prices. No one with good common sense will find it attractive to live on streets which will be used as “traffic drainers”. Moving the traffic into our suburban neighborhoods is not only bad planning but total neglect of the needs of our community.

2) Careless negligent planning for our school system and the healthy future of our children.

Increased population density adds to the problem of jammed classrooms, which remains an unaddressed issue in the city as is and is an obvious negative factor in the Housing Element. Children forced to sit in small crowded rooms with bad student-teacher ratios detracts from healthy teaching. Students in such classrooms are deprived of the essential components of an educational setting. With too many students per teacher, individual students go without proper instruction and supervision, whether in person in the classroom or online during digital instruction. Increasing the

number of students to teachers decreases successful teaching outcomes, and thereby reduces the attractiveness of Culver City as a location for families to live. The Housing Element that fails to improve teaching and outcomes in Culver City is a stain on the gem that our school system has been. More students with the same or fewer teachers reduces the otherwise high educational standards widely recognized by Culver City residents whose families already have benefited from a good school system. To build without concern for our school system and the health of our children is negligent planning and constitutes a threat to the future of Culver City's reputation as an attractive and livable suburban town.

3) Violation of Trust by the Government of Culver City

The Housing Element fails miserably to address the issue of trust among homeowners and tax payers in Culver City. A majority of Culver City home owners purchased their homes and lived in Culver City with a stated and implied right that their homes will be contained in an R-1 region and that the mortgages and taxes paid for these homes would increase in value because of their R-1 status. The Housing Element risks those values and provides nothing to current home owners in exchange for that risk. The City, in essence, is breaking its deal with innocent home owners who bought their property and paid their expensive mortgages based on the specific benefits of home ownership in the city's defined R-1 areas. Those benefits include the size of houses, the numbers of people per square foot, codes regulating the look, size and feel of homes, and the financial filter created with R-1 zoning. People who can afford to live in our R-1 zones have most likely been and continue to be for now accomplished citizens with upwardly bound aspirations and abilities. By eliminating the R-1 zoning, this filter is removed and the value system by which CC's current and longstanding residents purchased their homes is no longer protected. The implied benefits of R-1 zoning have been withdrawn from the contract current residents have abided by for as many as 50 or more years. The city is breaking that contract after collecting taxes and real estate fees from those who abided by R-1 zoning regulations. We did NOT build homes of excessive sizes; we did not build valuable income earning apartments or triplexes. We did not resize our lawns or homes though it would have been an important convenience and benefit to us. R-1 home owners were willingly deprived of such benefits because they understood that their communities as a whole would benefit with population growth restricted, etc. Now, out of the blue, the city has removed R-1 housing and thereby broken its contract with current home buyers and R-1 residents. First the city denied us the right to make changes that would have allowed us to accrue new resources of funds, and now, after we've abided by those rules, the city is itself making arrangements to benefit from a new zoning through significant redevelopment which thereby undermines the values of the properties acquired under the city's earlier contractual agreements: "If you buy in this zone, you forgo your right to increase your wealth and conveniences in accord with the following R-1 zoning regulations...." That's an agreement that CC homeowners delivered on. But now, one-sidedly, the city is tearing up its contract with R-1 zoned homes, and leaving R-1 buyers with none of the guarantees and benefits the city previously promised. At the very least, Culver City government can no longer be trusted, and, in fact, might be liable for damages lost by R-1 home owners who abided by the R-1 contractual rules.

The above are but a few of the problems with the Housing Element the City of Culver City seeks to approve. The issues named above have not been addressed or resolved, and the City Council owes it to Culver City residents to explain how the Housing Element will contribute to improved traffic by reducing traffic density, how the Housing Element will uplift the standards and practices of Culver City schools, and how the city's R-1 homeowners, who are being asked in the Housing Element to sacrifice more than any other group of Culver City citizens, will be compensated for the losses already incurred and for others now planned by the City of Culver City.

The City Council should therefore halt the approval of the Housing Element, take two giant steps back and take another look at our city and its voters' concerns and revise the Housing Element accordingly, regardless of the amount of time and effort that would require.

Cordially,

Steven Mullen
11118 Franklin Avenue
Culver City, CA 90230

The City of Culver City keeps a copy of all E-mails sent and received for a minimum of 2 years. All retained E-mails will be treated as a Public Record per the California Public Records Act, and may be subject to disclosure pursuant to the terms, and subject to the exemptions, of that Act.

From: [Hefner, Ashley](#)
Sent: Thursday, November 11, 2021 11:06 AM
To: [Marsiglia, Lauren](#)
Subject: Fw: Unable to obtain public information from the City

Lauren,

Here's the chain from Crystal Alexander.

Ashley Hefner Hoang, AICP | City of Culver City | 1-310-253-5744 | ashley.hefner@culvercity.org

From: Crystal Alexander <ccaralex@gmail.com>
Sent: Monday, October 11, 2021 5:00 PM
To: Bryan Sanders <bryansanders@me.com>
Cc: Nachbar, John <john.nachbar@culvercity.org>; Attorney, City <city.attorney@culvercity.org>; Clerk, City <city.clerk@culvercity.org>; Public Comment at Culver City <public.comment@culvercity.org>; City Council - external public facing <City.Council@culvercity.org>; Blumenfeld, Sol <sol.blumenfeld@culvercity.org>; Hefner, Ashley <Ashley.Hefner@culvercity.org>
Subject: Re: Unable to obtain public information from the City

Ms. Hefner says this in her latest email to Mr. Sanders (included in this thread):

The information provided on the website, including the [Initial Study and Explanation of Checklist Determinations](#), represents the environmental review for the Housing Element. **For the larger General Plan Update, inclusive of all Elements, the City will conduct a full Environmental Impact Report**, which is where you will see the raw data, e.g., GHG, etc., used to inform the review. As I mentioned previously, the Housing Element environmental document will inform the housing section of the EIR that will be prepared for the General Plan Update.

In an email I received from Ms. Marsiglia, she said this (which appears to comport with the messaging on the City's website):

Marsiglia, Lauren

Thu, Oct 7, 2:38 PM (4 days ago)

to Technical, Ashley

Dear TAC members,

As you know, the City of Culver City is updating its Housing Element to plan for housing between 2021 and 2029. The [Housing Element](#) is a part of the [General Plan Update \(GPU\)](#), and is the City's blueprint to identify housing conditions and needs; establish goals, objectives, and policies; and design programs that create sustainable, varied-income neighborhoods across the city. Possible changes to single-family zoning are being studied as part of the GPU project's preferred land use map, which informed the Housing Element sites inventory.

What's new

The City invites the community to **submit comments on the Draft Housing Element's draft environmental study, referred to as the Initial Study and Negative Declaration, by November 8, 2021.**

The upcoming **Planning Commission public hearing on Tuesday, November 30, 2021, at 7 PM** will cover the final, revised Housing Element for the Planning Commission's consideration.

Before the City can approve a plan, like a Housing Element, the California Environmental Quality Act (CEQA) requires that the City study the plan's potential impacts on the environment and find ways to avoid or reduce any expected environmental damage. The Housing Element will not result in changes in the land use designations or development. **An environmental review conducted through an Initial Study and Negative Declaration (IS/ND) found that the plan would not result in significant environmental impacts.**

You can review copies of the Draft Housing Element and IS/ND and related noticing on the [GPU project website](#), at City Hall at the Current Planning Division counter on the Second Floor, and the Culver City Julian Dixon Library. If you'd like to pick up a hard copy from City Hall, please contact Advance Planning Division staff at [\(310\) 253-5740](tel:3102535740) or advance.planning@culvercity.org. The Advance Planning Division is located on the Third Floor of City Hall at 9770 Culver Boulevard, Culver City, CA 90232-0507 (handicap accessible location). [City Hall business hours](#) are 7:30 AM – 5:30 PM, Monday through Friday, except alternate Fridays.

Submit your comments on the Draft Housing Element environmental document

Let's see if I can be Crystal clear about this and help everyone out.

Is the communication from the City saying:

1. There will be NO environmental impact report (EIR) completed for the Housing Element portion of the General Plan, due to the proposed Negative Declaration.
2. There WILL be an EIR completed for the General Plan as a whole, which will come at a later date, expected to be after the time the Housing Element is adopted.
3. The raw data specifically for Culver City that Mr. Sanders is seeking will not be provided until the EIR for the General Plan is completed.
4. **This then leaves the open question: Is the Negative Declaration for the HOUSING ELEMENT based on non Culver City specific data, e.g. modeling data provided by Urban Footprints or others?**

On Mon, Oct 11, 2021 at 4:27 PM Bryan Sanders <bryansanders@me.com> wrote:

Hello, everyone —

I am forwarding this exchange, which has gone on for over a month, in which I have requested multiple times to receive the actual raw data used to compute the environmental report (in the housing element and/or general plan) VERSUS the modeling data downloaded from Urbanfootprint.

In other words, I want to see real numbers from real sources about greenhouse gases, water usage, electricity usage, et cetera, and NOT the software-generated numbers from the company known as Urbanfootprint.

I cannot understand why this request has not been met for so many weeks and frankly, do not understand the replies I have received from Ashley (sorry, Ashley — I am smart, but I cannot make heads or tails of your replies).

Respectfully submitted,

Bryan Sanders

4378 Elenda

----- Forwarded message -----

From: Bryan Sanders <bryansanders@me.com>

Date: Oct 11, 2021, 11:40 AM -0700

To: Hefner, Ashley <Ashley.Hefner@culvercity.org>

Subject: Re: Urbanfootprint Raw Data

Thanks for your reply. Maybe I don't understand the report. Can you show on what page the data resides?



Bryan Sanders, Ed.D.
[about:me/nayabgo](#)

On Oct 11, 2021, at 11:18 AM, Hefner, Ashley <Ashley.Hefner@culvercity.org> wrote:

Bryan,

The information provided on the website, including the [Initial Study and Explanation of Checklist Determinations](#), represents the environmental review for the Housing Element. For the larger General Plan Update, inclusive of all Elements, the City will conduct a full Environmental Impact Report, which is where you will see the raw data, e.g., GHG, etc., used to inform the review. As I mentioned previously, the Housing Element environmental document will inform the housing section of the EIR that will be prepared for the General Plan Update. Otherwise, the existing data documented in the various existing conditions reports found online inform the creation of the draft goals and policies that will be included in the elements, along with public input throughout the process. We need to document existing conditions to know what needs to be done to achieve the community's vision for its future.

Thanks,

Ashley Hefner Hoang, AICP | Advance Planning Manager | City of Culver City | 1-310-253-5744 | ashley.hefner@culvercity.org

From: Bryan Sanders <bryansanders@me.com>

Sent: Thursday, October 7, 2021 8:15 AM

To: Hefner, Ashley <Ashley.Hefner@culvercity.org>

Subject: Urbanfootprint Raw Data

Good morning!
I hope you are doing well.

I am following up on this thread now that I see there is an environmental report posted.

Could you please provide me with the raw data taken from actual readings in Culver City that informed the report?

I am still trying to understand how the actual readings, not the UrbanFootprint modeling numbers, works to inform the general plan and housing element.

Thank you so much!

Kind regards,
Bryan



Bryan Sanders, Ed.D.
[about.me/nayrbgo](#)

Begin forwarded message:

From: "Hefner, Ashley" <Ashley.Hefner@culvercity.org>
Date: September 20, 2021 at 1:10:36 PM PDT
To: Bryan Sanders <bryansanders@me.com>
Subject: Re: Urbanfootprint Raw Data

The Housing Element will have its own environmental review document that we are currently working on, and which is a separate document from the draft Housing Element itself. We anticipate that environmental document to be circulated for public review and comment in October. Once the environmental document for the Housing Element becomes publicly available, I will be happy to address any questions the public may have regarding its substance. Please note, the environmental document for the Housing Element is separate and apart from, and will inform, the housing section of the EIR that will be prepared for the General Plan Update.

Ashley Hefner Hoang, AICP | Advance Planning Manager | City of Culver City | 1-310-253-5744 | ashley.hefner@culvercity.org

From: Bryan Sanders <bryansanders@me.com>
Sent: Friday, September 17, 2021 3:01 PM
To: Hefner, Ashley <Ashley.Hefner@culvercity.org>
Subject: Re: Urbanfootprint Raw Data

I see. So the information that is in our Housing Element with regards to environmental impact and all that is solely based on the UrbanFootprint modeling data. Do I have that right?

<https://about.me/nayrbgo>

On September 17, 2021 at 2:59 PM, "Hefner, Ashley" <Ashley.Hefner@culvercity.org> wrote:

No, we have not started the environmental process yet. We will have the first public meeting on it at a date to be set likely in early November. It will be a process that takes several months and steps to get through, which will all be outlined at the public meeting.

Ashley Hefner Hoang, AICP | Advance Planning Manager | City of Culver City | 1-310-253-5744 | ashley.hefner@culvercity.org

From: Bryan Sanders <bryansanders@me.com>
Sent: Friday, September 17, 2021 2:56 PM
To: Hefner, Ashley <Ashley.Hefner@culvercity.org>
Subject: Re: Urbanfootprint Raw Data

I think I understand but then I'm confused — is the environmental report not done?



Bryan Sanders, Ed.D.
[about.me/nayrbgo](#)

On Sep 17, 2021, at 2:54 PM, Hefner, Ashley <Ashley.Hefner@culvercity.org> wrote:

Hi Bryan,

The raw data from the inventories will inform the GPU environmental impact report I mentioned; whereas the UrbanFootprint modeling data informed the alternatives analysis that you identified on page 19/Figure 8 of the CC/PC memo.

Ashley Hefner Hoang, AICP | Advance Planning Manager | City of Culver City | 1-310-253-5744 | ashley.hefner@culvercity.org

From: Bryan Sanders <bryansanders@me.com>
Sent: Wednesday, September 15, 2021 11:57 PM
To: Hefner, Ashley <Ashley.Hefner@culvercity.org>
Subject: Fwd: Urbanfootprint Raw Data

Hi there -- just following up on this question from last week. Thanks!
Bryan

<https://about.me/nayrbgo>

Begin forwarded message:

From: Bryan Sanders <bryansanders@me.com>
Date: 9/9/2021
To: "Hefner, Ashley" <Ashley.Hefner@culvercity.org>
Subject: Re: Urbanfootprint Raw Data

Ok I see some numbers

Can you help me understand how the raw data translates into page 19?

<image0.png>
<image1.png>
<image2.png>
<image3.jpeg>



Bryan Sanders, Ed.D.
[about.me/nayrbgo](#)

On Sep 9, 2021, at 8:21 AM, Hefner, Ashley <Ashley.Hefner@culvercity.org> wrote:

Gotcha! Ok, you'll want to look at the GHG Inventories. The data is found at the end of the documents.

https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/60aee21a58db6d44fe142fd8/1622073890672/2019_Community_GHG_Inventory_Clean.pdf
https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/60aee910cf36aa061b4c77aa/1622075668670/2019_Municipal_GHG_Inventory_Report_Clean.pdf

Ashley Hefner Hoang, AICP | Advance Planning Manager | City of Culver City | 1-310-253-5744 | ashley.hefner@culvercity.org

From: Bryan Sanders <bryansanders@me.com>
Sent: Thursday, September 9, 2021 8:18 AM
To: Hefner, Ashley <Ashley.Hefner@culvercity.org>
Subject: Re: Urbanfootprint Raw Data

I was looking for all the actual measured data used. I started at the top and couldn't find any — greenhouse gases.



Bryan Sanders, Ed.D.
about.me/navyrbgo

On Sep 9, 2021, at 8:14 AM, Hefner, Ashley <Ashley.Hefner@culvercity.org> wrote:

Bryan, The data is integrated throughout the existing conditions reports. It just depends on what you're looking for. Let me know times that work for you over the next couple of weeks.

Ashley Hefner Hoang, AICP | Advance Planning Manager | City of Culver City | 1-310-253-5744 | ashley.hefner@culvercity.org

From: Bryan Sanders <bryansanders@me.com>
Sent: Wednesday, September 8, 2021 10:43 PM
To: Hefner, Ashley <Ashley.Hefner@culvercity.org>
Subject: Re: Urbanfootprint Raw Data

Thanks for your email -- let's try to meet. I don't see any data that I can point to and say "yes, this is a chart of actual measured data" on the website you linked below. Maybe I missed it. . . . ?

I appreciate your willingness to meet and discuss.

Kind regards,
Bryan

<https://about.me/navyrbgo>

On September 3, 2021 at 3:39 PM, "Hefner, Ashley" <Ashley.Hefner@culvercity.org> wrote:

Hi Bryan,

I'm booked out in meetings this afternoon to chat but saw your VM content. The EIR will use actual existing conditions data from Culver City and it will be referenced and attached to the document once it's drafted and published. If there's particular data you are interested in seeing before that, let me know. Our existing conditions reports were informed by this data, so you can reference those for particular topics at <https://www.pictureculvercity.com/educational-forum>

Also, if you want to still touch base on a call next week let me know. We have a short week, so we're in Tues-Thurs. Hope you have a great Labor Day weekend!

Ashley Hefner Hoang, AICP | Advance Planning Manager | City of Culver City | 1-310-253-5744 | ashley.hefner@culvercity.org

From: Hefner, Ashley <Ashley.Hefner@culvercity.org>
Sent: Friday, September 3, 2021 1:38 PM
To: Bryan Sanders <bryansanders@me.com>
Cc: Bingener, Cicely <Cicely.Bingener@culvercity.org>; Metzler, David <David.Metzler@culvercity.org>; Hernandez, Diana <Diana.Hernandez@culvercity.org>; Vizcarra, Claudia <Claudia.Vizcarra@culvercity.org>; Renteria, Denise <Denise.Renteria@culvercity.org>; Capone-Newton, Peter <Peter.Capone-Newton@culvercity.org>; Bijvoet, Patricia <Patricia.Bijvoet@culvercity.org>; Pawling, Kristen <Kristen.Pawling@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Rosenau, Frances <Frances.Rosenau@culvercity.org>; Wallace, Jamie <Jamie.Wallace@culvercity.org>; Ogosta, Ed <Ed.Ogosta@culvercity.org>; Zatz, Noah <Noah.Zatz@culvercity.org>; Barba, Nancy <Nancy.Barba@culvercity.org>; Silva, Gabriela <Gabriela.Silva@culvercity.org>; Marks, Wally <Wally.Marks@culvercity.org>; Malsin, Scott <Scott.Malsin@culvercity.org>; Sayles, Dana <Dana.Sayles@culvercity.org>; Reilman, Andrew <Andrew.Reilman@culvercity.org>; Herbertson, Charles <charles.herbertson@culvercity.org>; Clerk, City <city.clerk@culvercity.org>; City Council - external public facing <City.Council@culvercity.org>; Nachbar, John <john.nachbar@culvercity.org>; Blumenfeld, Sol <sol.blumenfeld@culvercity.org>
Subject: Re: Urbanfootprint Raw Data

Bryan,

The purpose of using UrbanFootprint was to compare the alternatives, using modeled peer reviewed data based on existing and proposed land uses, to compare apples to apples. The environmental impact report will analyze the project and Culver City's existing and projected data and conditions to understand the environmental impacts, based on data like Culver City's greenhouse gas inventory, vehicle miles traveled, utilities, etc.

Ashley Hefner Hoang, AICP | Advance Planning Manager | City of Culver City | 1-310-253-5744 | ashley.hefner@culvercity.org

From: Bryan Sanders <bryansanders@me.com>
Sent: Friday, September 3, 2021 10:35 AM
To: Hefner, Ashley <Ashley.Hefner@culvercity.org>
Cc: Bingener, Cicely <Cicely.Bingener@culvercity.org>; Metzler, David <David.Metzler@culvercity.org>; Hernandez, Diana <Diana.Hernandez@culvercity.org>; Vizcarra, Claudia <Claudia.Vizcarra@culvercity.org>; Renteria, Denise <Denise.Renteria@culvercity.org>; Capone-Newton, Peter <Peter.Capone-Newton@culvercity.org>; Bijvoet, Patricia <Patricia.Bijvoet@culvercity.org>; Pawling, Kristen <Kristen.Pawling@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Rosenau, Frances <Frances.Rosenau@culvercity.org>; Wallace, Jamie <Jamie.Wallace@culvercity.org>; Ogosta, Ed <Ed.Ogosta@culvercity.org>; Zatz, Noah <Noah.Zatz@culvercity.org>; Barba, Nancy <Nancy.Barba@culvercity.org>; Silva, Gabriela <Gabriela.Silva@culvercity.org>; Marks, Wally <Wally.Marks@culvercity.org>; Malsin, Scott <Scott.Malsin@culvercity.org>; Sayles, Dana <Dana.Sayles@culvercity.org>; Reilman, Andrew <Andrew.Reilman@culvercity.org>; Herbertson, Charles <charles.herbertson@culvercity.org>; Clerk, City <city.clerk@culvercity.org>; City Council - external public facing <City.Council@culvercity.org>; Nachbar, John <john.nachbar@culvercity.org>; Blumenfeld, Sol <sol.blumenfeld@culvercity.org>
Subject: Re: Urbanfootprint Raw Data

Aha. Understood. So these numbers are all estimates and not actual numbers. We are relying on Urbanfootprint to provide their interpretation but we do not have any recorded data that we are using to inform the general plan update with regards to environmental factors.

Bryan



Bryan Sanders, Ed.D.
about.me/navyrbgo

On Sep 3, 2021, at 10:32 AM, Hefner, Ashley <Ashley.Hefner@culvercity.org> wrote:

Bryan,

Please refer to <https://www.pictureculvercity.com/fag>. The last question on the page gets to your question:

+ HOW WAS THE ANALYSIS CONDUCTED FOR THE LAND USE ALTERNATIVES?

The [memo](#) attached to the June 23 and 28, 2021, City Council/Planning Commission joint meeting included a section on land use analysis. It illustrates different metrics developed using Urban Footprint (UF). UF is a mapping and data analysis software being used to analyze the alternatives to understand the impacts of new development and policy options. Each alternative was input into UF, and the software's analytical models generate a range of social and environmental metrics. The metrics are organized by module:

- The transportation module estimates vehicle miles travel and mode share.
- The greenhouse gas module estimates emissions associated with energy use, water use, and transportation.
- The water use module estimates indoor/outdoor water demand associated with residential and commercial uses.
- The energy module estimates electricity and natural gas use for residential and commercial uses based on building type and climate zone.
- The household costs module estimates the expenses associated with energy, water, and transportation uses.

The data in UF comes from many different organizations, including the U.S. Environmental Protection Agency (EPA), EIA Residential Energy Consumption Survey (RECS), Commercial Building Energy Consumption Survey (CBECS), California Energy Commission (CEC), Federal Emergency Management Agency (FEMA), and more. All sources are listed under the "Input Parameters" section for each of these topics:

- [Emissions Analysis](#)
- [Energy Use Analysis](#)
- [Household Costs Analysis](#)
- [Land Consumption Analysis](#)
- [Risk and Resilience Analysis](#)
- [Transportation Analysis](#)
- [Transit Accessibility Analysis](#)
- [Walk Accessibility Analysis](#)
- [Water Use Analysis](#)
- [Conservation Impacts Analysis](#)

Ashley Hefner Hoang, AICP | Advance Planning Manager | City of Culver City | 1-310-253-5744 | ashley.hefner@culvercity.org

From: Bryan Sanders <bryansanders@me.com>

Sent: Friday, September 3, 2021 10:25 AM

To: Hefner, Ashley <Ashley.Hefner@culvercity.org>

Cc: Bingener, Cicely <Cicely.Bingener@culvercity.org>; Metzler, David <David.Metzler@culvercity.org>; Hernandez, Diana <Diana.Hernandez@culvercity.org>; Vizcarra, Claudia <Claudia.Vizcarra@culvercity.org>; Renteria, Denice <Denice.Renteria@culvercity.org>; Capone-Newton, Peter <Peter.Capone-Newton@culvercity.org>; Bijvoet, Patricia <Patricia.Bijvoet@culvercity.org>; Pawling, Kristen <Kristen.Pawling@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Rosenau, Frances <Frances.Rosenau@culvercity.org>; Wallace, Jamie <Jamie.Wallace@culvercity.org>; Ogosta, Ed <Ed.Ogosta@culvercity.org>; Zatz, Noah <Noah.Zatz@culvercity.org>; Barba, Nancy <Nancy.Barba@culvercity.org>; Silva, Gabriela <Gabriela.Silva@culvercity.org>; Marks, Wally <Wally.Marks@culvercity.org>; Malsin, Scott <Scott.Malsin@culvercity.org>; Sayles, Dana <Dana.Sayles@culvercity.org>; Reilman, Andrew <Andrew.Reilman@culvercity.org>; Herbertson, Charles <charles.herbertson@culvercity.org>; Clerk, City <city.clerk@culvercity.org>; City Council - external public facing <CityCouncil@culvercity.org>; Michael Allen <michael.allen@culvercity.org>; Nachbar, John <john.nachbar@culvercity.org>; Blumenfeld, Sol <sol.blumenfeld@culvercity.org>

Subject: Re: Urbanfootprint Raw Data

I appreciate this. Thank you!

Could you help me understand if the base scenario is actual usage and numbers pulled from what is currently happening in Culver City? I'm trying to understand what is the actual data set from which the calculations are made.

It's not clear to me if the raw data shows estimates generated from Urbanfootprint of what they would imagine our baseline data to be — or if they are using actual measured and documented data that could be found elsewhere, and not just on Urbanfootprint.

I hope my question is making sense.

Thanks!

Kind regards,

Bryan



Bryan Sanders, Ed.D.

about.me/navvrbeg

On Sep 3, 2021, at 9:04 AM, Hefner, Ashley <Ashley.Hefner@culvercity.org> wrote:

Hello Bryan,

Attached you will find the raw UrbanFootprint data.

Best,

Ashley Hefner Hoang, AICP | Advance Planning Manager | City of Culver City | 1-310-253-5744 | ashley.hefner@culvercity.org

From: Bryan Sanders <bryansanders@me.com>

Sent: Thursday, September 2, 2021 1:01 PM

To: Bingener, Cicely <Cicely.Bingener@culvercity.org>; Metzler, David <David.Metzler@culvercity.org>; Hernandez, Diana <Diana.Hernandez@culvercity.org>; Vizcarra, Claudia <Claudia.Vizcarra@culvercity.org>; Renteria, Denice <Denice.Renteria@culvercity.org>; Capone-Newton, Peter <Peter.Capone-Newton@culvercity.org>; Bijvoet, Patricia <Patricia.Bijvoet@culvercity.org>; Pawling, Kristen <Kristen.Pawling@culvercity.org>; Puza, Freddy <Freddy.Puza@culvercity.org>; Rosenau, Frances <Frances.Rosenau@culvercity.org>; Wallace, Jamie <Jamie.Wallace@culvercity.org>; Ogosta, Ed <Ed.Ogosta@culvercity.org>; Zatz, Noah <Noah.Zatz@culvercity.org>; Barba, Nancy <Nancy.Barba@culvercity.org>; Silva, Gabriela <Gabriela.Silva@culvercity.org>; Marks, Wally <Wally.Marks@culvercity.org>; Malsin, Scott <Scott.Malsin@culvercity.org>; Sayles, Dana <Dana.Sayles@culvercity.org>; Reilman, Andrew <Andrew.Reilman@culvercity.org>; Herbertson, Charles <charles.herbertson@culvercity.org>; Clerk, City <city.clerk@culvercity.org>; City Council - external public facing <CityCouncil@culvercity.org>; Michael Allen <michael.allen@culvercity.org>; Nachbar, John <john.nachbar@culvercity.org>; Blumenfeld, Sol <sol.blumenfeld@culvercity.org>; Hefner, Ashley <Ashley.Hefner@culvercity.org>

Subject: Urbanfootprint Raw Data

Hello! I hope everyone is doing well.

Attached is a screenshot of page 19 from the General Plan Update. On page 18, it states that the data on page 19 comes from Urbanfootprint. However, I do not see any citations on page 19 and would also like to see the actual raw data from Urbanfootprint, to which I do not have access.

Could you please provide that data?

Thanks so much!

Kind regards,

Bryan Sanders

<Screen Shot 2021-09-02 at 12.57.41 PM.jpg>

The City of Culver City keeps a copy of all E-mails sent and received for a minimum of 2 years. All retained E-mails will be treated as a Public Record per the California Public Records Act, and may be subject to disclosure pursuant to the terms, and subject to the exemptions, of that Act.

<emission.xlsx>
<energy.xlsx>
<hhd_costs.xlsx>
<transportation.xlsx>
<wateruse.xlsx>

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--

Crystal Czarnecki Alexander

"If it doesn't scare you, you're probably not dreaming big enough." --Tory Burch

Marsiglia, Lauren

From: Kim Warwick <kim@warwickgroup.net>
Sent: Friday, October 8, 2021 6:16 PM
To: ADVANCE PLANNING
Cc: Fisch, Alex; McMorris, Yasmine; Vera, Albert; Eriksson, Goran; Lee, Daniel; Mark Warwick
Subject: Impact on infrastructure on our community

Hi all. I want to voice my sincere and strong concern again as to the impact of 4-8 units going into our single family neighborhoods. We already have duplexes up to multiplexes in the Carlson Park area within a 3-6 blocks of the park. Council strongly opposed McMansions due to the enlarged footprint and came to the conclusion that the most restrictive .45 FAR was a good idea for our community, passing this large restriction close to midnight during the pandemic. In my own company, Warwick Group, we now struggle with new home buyers to Culver needing bedrooms and bathrooms for their families that simply don't fit into your FAR (reduced by approximately 750 sq. ft). New home buyers were not aware of this when they bought the property. Shocked and angered is the common sentiment. You don't see them every week, but we do. They are coming to us for new solutions for the problems you decided to enact. I understood some reduction but .45 was too much. During that call, points were made by council members that "it isn't really that much different than .55 or .50". In architecture, it is a very big difference and your staff should have made you aware of the real footage (i.e. needed bedroom and bathrooms) you were choosing to deny new residents.

Given this hamstringing of homeowners, how are you now ok with 4-8 units? Talk about being the size of a McMansion! You're talking about subterranean parking on our small 5700 sq. foot lots. I cannot understand how you can rationalize this. Developers have won the day as they can often overbid lots out from under a family and this was before passing the multiplex issue. Also, the impact of four to eight units which could house eight to sixteen or more people per property, brings added cars/parking and traffic to already crowded streets, use of older sewers, use of old water lines (which Golden State Water is charging the homeowners to upgrade to the tune of \$10-11K per residence at the end of projects), more needed electricity, more unwanted noise into our quiet community, more trash containers on our streets, etc. etc. etc. The list definitely goes on. How can you find "no significant environmental impact"? The simple math just doesn't add up. Of course, there is an environmental impact with higher density. And then there's the issue of none of this addressing more affordable housing which you had to admit during one of the calls. This will all be top dollar development since our land value is so strong. Being in this business, I do know what I am talking about here. The strategy does not add up to being beneficial to our community.

Our concerned citizens spoke out to you on multiple zoom meetings with approximately 70% of people opposed to this change but you continue to move forward. I know because we listened to all the meetings and spoke out against. I urge you to rethink what you have already been told by the majority of your constituents. This is of great concern to our community as it should be and we hope reason will prevail. There are a lot of outside influences coming to bear on this subject in Culver City. We will have to live with it, not them. In our business, the prudent strategy is to measure three times, cut once.

Thank you and respectfully,
Kim Warwick

WARWICK GROUP

Architecture | Interiors | Construction | Landscape

8800 Venice Blvd., Suite 315, LA, CA 90034

Phone: 310.558.1700

Fax: 310.349.3350

Located in the Helms Design District

Marsiglia, Lauren

From: Jeannine Wisnosky Stehlin <jeanninewisnosky@gmail.com>
Sent: Monday, November 8, 2021 11:36 AM
To: ADVANCE PLANNING; Clerk, City; City Council - external public facing; Nachbar, John; Attorney, City; Fisch, Alex; McMorrin, Yasmine; Eriksson, Goran; Lee, Daniel; Vera, Albert
Subject: Reject "Negative Impact" Finding

Dear City Staff and Culver City Council,

I have read that the city plans to declare a statement that says that Culver City declares 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..."

I disagree with this finding and I encourage you to reject it. Here's why:

1. I find no information that the city has followed the law in consulting with the Californian Native American Tribes:
Government Codes §65352.3 and §65352.4 require local governments to consult with California Native American tribes. identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans, and Community Plans.
2. A full environmental impact report (EIR) should be required as Santa Monica did. This is good stewardship of the environment, people's health, and the earth.
3. The city must not avoid its responsibilities to disclose potential environmental impacts, even if disclosing them might go against preconceived/politically charged notions.
4. The Site inventory includes/has included historic properties and potential districts that would be eligible for the national register of historic places.
5. The city has identified properties for redevelopment on steep slopes and with unstable soils (Blair Hills and Crest). Despite removal of some of these properties, it is unclear as to whether the inventory is correct.
6. The city has not considered traffic/air quality impacts the increase in land-use intensity that would be required if the HE is adopted.
7. The city has not considered greenhouse gas emissions that could reasonably be expected to be generated if the plan is adopted.
8. Implied reduction in street trees from an increase in development in R1 and R2 will have a negative impact on the environment, creating "heat islands. See:
["https://www.epa.gov/heatislands#:~:text=Heat%20islands%20are%20urbanized%20areas,as%20for%20ests%20and%20water%20bodies."](https://www.epa.gov/heatislands#:~:text=Heat%20islands%20are%20urbanized%20areas,as%20for%20ests%20and%20water%20bodies.)

Furthermore, Governor Gavin Newsom has declared a drought emergency across California. He urges residents to reduce water use after the state saw its second-driest year on record. This past July, Governor Newsom asked people and businesses to voluntarily cut how much water they use by 15%.

Thank you,

Jeannine Wisnosky Stehlin
Culver City



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The Gabrielino Tribal Council - San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

September 9, 2021

Project Name: Culver City Housing Element Update

Dear Ashley Hefner Hoang,

Thank you for your letter dated September 9, 2021 regarding the project above. This is to concur that we are in agreement with the Housing Element Update. However, our Tribal government would like to request consultation for any and all future projects within this location.

Sincerely,

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians – Kizh Nation
1(844)390-0787

Andrew Salas, Chairman

Albert Perez, treasurer I

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians.org

admin@gabrielenoindians.org



CITY OF CULVER CITY

□□□ Culver Boulevard □ Culver City □ California □□□□

September 9, 2021

Gabrielino-Tongva Tribe
Charles Alvarez,
23454 Vanowen Street
West Hills, CA, 91307
Phone: (310) 403 - 6048
roadkingcharles@aol.com

Subject: AB 52 Project Notification and Request to Consult Letter for the Proposed Culver City Housing Element Update, City of Culver City, Los Angeles County, California

Dear Mr. Alvarez,

The City of Culver City requests your participation in the City's process for the Housing Element Update, which is one of the required Elements of the City's General Plan. While the City is in the process of a comprehensive update to the General Plan, in light of the State requirements for adoption by October 15, 2021, this Element is being considered separately. The Housing Element will serve as the primary policy document for the City to achieve the 6th cycle Regional Housing Needs Assessment (RHNA) allocation. The Housing Element will not result in changes in the land use designations or development. The City will be preparing an Environmental Impact Report (EIR) for the General Plan Update and anticipates that a Notice of Preparation will be released later this year.

Since an EIR will be prepared for the Project and pursuant to California Assembly Bill (AB) 52, the City of Culver City Planning Division (City) is providing you with notification of the Housing Element Update and General Plan Update. Moreover, in order to provide Native American tribes with the opportunity to participate in local land use decisions at an early stage, in accordance with AB 52, please let us know if you would like to be consulted with on this Project. We are also seeking your comments on the proposed Housing Element Update. The Planning Area for the Housing Element Update includes the City and its Sphere of Influence, and is shown on the attached map. A search of the Sacred Lands File for sites within the Planning Area through the Native American Heritage Commission (NAHC) was conducted as part of the General Plan Update process. The NAHC notified the City that results were positive for the identification of a Native American resource in their database.

With this letter, the City is seeking input on concerns that uniquely or significantly affect your Tribe related to the proposed Project. Early identification of Tribal concerns will allow the City to consider ways to avoid or minimize potential impacts to tribal cultural resources and practices as project planning and alternatives are developed and refined. We would be pleased to discuss details of the proposed Project with you.

In accordance with AB 52, you have 30 calendar days from receipt of this letter to notify us in writing that you wish to consult on this Project. Please provide your contact information and mail your request to:

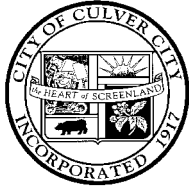
City of Culver City, Advance Planning Division
ATTN: Ashley Hefner Hoang, Advance Planning Manager
9770 Culver Boulevard
Culver City, CA 90232
Email: advance.planning@culvercity.org
Phone No: (310) 253-5740

Thank you for your assistance with our efforts to address tribal cultural resources that may be affected by the proposed Project.

Sincerely,

Ashley Hefner Hoang

Ashley Hefner Hoang
Advance Planning Manager



CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

September 9, 2021

Gabrielino-Tongva Tribe
Charles Alvarez,
23454 Vanowen Street
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Phone: (310) 403 - 6048
roadkingcharles@aol.com

Subject: SB 18 Project Notification and Request to Consult Letter for the Proposed Culver City Housing Element Update, City of Culver City, Los Angeles County, California

Dear Mr. Alvarez,

The City of Culver City requests your participation in the City's process for the Housing Element Update, which is one of the required Elements of the City's General Plan. While the City is in the process of a comprehensive update to the General Plan, in light of the State requirements for adoption by October 15, 2021, this Element is being considered separately. The Housing Element will serve as the primary policy document for the City to achieve the 6th cycle Regional Housing Needs Assessment (RHNA) allocation. The Housing Element will not result in changes in the land use designations or development. The City will be preparing an Environmental Impact Report for the General Plan Update and anticipates that a Notice of Preparation will be released later this year.

However, since the Project requires a General Plan Amendment, the Project is subject to Section 65352.3 of the Government Code (Senate Bill (SB) 18 [2004]). Pursuant to SB 18, for the purpose of protecting tribal cultural places, the City of Culver City is required to contact and consult with California Native American Tribes before adopting or amending a General Plan, or when designating land as open space. Cultural Places refer to places, features, and objects described in Public Resources Code Sections 5097.9 and 5097.993.¹

In order to provide Native American tribes with the opportunity to participate in local land use decisions at an early stage, in accordance with SB 18, please let us know if you would like to be consulted with on this Project. We are also seeking your comments on the proposed Housing Element Update. The Planning Area for the Housing Element Update includes the City and its Sphere of Influence, and is shown on the attached map. A search of the Sacred Lands File for sites within the Planning Area through the Native American Heritage Commission (NAHC) was conducted as part of the General Plan Update process. The NAHC notified the City that results were positive for the identification of a Native American resource in their database.

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The City of Culver City feels that your comments regarding decisions that may affect ancestral tribal sites are very important. Any information you have regarding tribal cultural places will be kept strictly confidential and will not be divulged to the public. Pursuant to California Government Code § 65352.3, you may request a consultation within 90 days of receiving this letter. **We would appreciate receiving your comments by October 11, 2021.** Please forward any comments regarding this Project to:

City of Culver City, Advance Planning Division
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CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

September 9, 2021

Soboba Band of Luiseno Indians
Scott Cozart, Chairperson
P. O. Box 487
San Jacinto, CA, 92583
Phone: (951) 654 - 2765
Fax: (951) 654-4198
jontiveros@soboba-nsn.gov

Subject: AB 52 Project Notification and Request to Consult Letter for the Proposed Culver City Housing Element Update, City of Culver City, Los Angeles County, California

Dear Mr. Cozart,

The City of Culver City requests your participation in the City's process for the Housing Element Update, which is one of the required Elements of the City's General Plan. While the City is in the process of a comprehensive update to the General Plan, in light of the State requirements for adoption by October 15, 2021, this Element is being considered separately. The Housing Element will serve as the primary policy document for the City to achieve the 6th cycle Regional Housing Needs Assessment (RHNA) allocation. The Housing Element will not result in changes in the land use designations or development. The City will be preparing an Environmental Impact Report (EIR) for the General Plan Update and anticipates that a Notice of Preparation will be released later this year.

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Advance Planning Manager



CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

September 9, 2021

Gabrielino Tongva Indians of
California Tribal Council
Robert Dorame, Chairperson
P.O. Box 490
Bellflower, CA, 90707
Phone: (562) 761 - 6417
Fax: (562) 761-6417
gtongva@gmail.com

Subject: AB 52 Project Notification and Request to Consult Letter for the Proposed Culver City Housing Element Update, City of Culver City, Los Angeles County, California

Dear Mr. Dorame,

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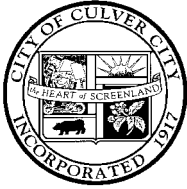
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Advance Planning Manager



CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

September 9, 2021

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
106 1/2 Judge John Aiso St., #231
Los Angeles, CA, 90012
Phone: (951) 807 - 0479
sgoad@gabrielino-tongva.com

Subject: AB 52 Project Notification and Request to Consult Letter for the Proposed Culver City Housing Element Update, City of Culver City, Los Angeles County, California

Dear Ms. Goad,

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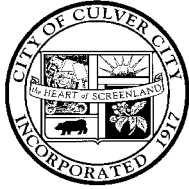
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Sincerely,

Ashley Hefner Hoang

Ashley Hefner Hoang
Advance Planning Manager



CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

September 9, 2021

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
106 1/2 Judge John Aiso St.,
#231
Los Angeles, CA, 90012
Phone: (951) 807 - 0479
sgoad@gabrielino-tongva.com

Subject: SB 18 Project Notification and Request to Consult Letter for the Proposed Culver City Housing Element Update, City of Culver City, Los Angeles County, California

Dear Ms. Goad,

The City of Culver City requests your participation in the City's process for the Housing Element Update, which is one of the required Elements of the City's General Plan. While the City is in the process of a comprehensive update to the General Plan, in light of the State requirements for adoption by October 15, 2021, this Element is being considered separately. The Housing Element will serve as the primary policy document for the City to achieve the 6th cycle Regional Housing Needs Assessment (RHNA) allocation. The Housing Element will not result in changes in the land use designations or development. The City will be preparing an Environmental Impact Report for the General Plan Update and anticipates that a Notice of Preparation will be released later this year.

However, since the Project requires a General Plan Amendment, the Project is subject to Section 65352.3 of the Government Code (Senate Bill (SB) 18 [2004]). Pursuant to SB 18, for the purpose of protecting tribal cultural places, the City of Culver City is required to contact and consult with California Native American Tribes before adopting or amending a General Plan, or when designating land as open space. Cultural Places refer to places, features, and objects described in Public Resources Code Sections 5097.9 and 5097.993.¹

In order to provide Native American tribes with the opportunity to participate in local land use decisions at an early stage, in accordance with SB 18, please let us know if you would like to be consulted with on this Project. We are also seeking your comments on the proposed Housing Element Update. The Planning Area for the Housing Element Update includes the City and its Sphere of Influence, and is shown on the attached map. A search of the Sacred Lands File for sites within the Planning Area through the Native American Heritage Commission (NAHC) was conducted as part of the General Plan Update process. The NAHC

¹ Governor's Office of Planning and Research, State of California Tribal Consultation Guideline, Supplemental to General Plan Guidelines, November 14, 2005. Pg. 4.

notified the City that results were positive for the identification of a Native American resource in their database.

The City of Culver City feels that your comments regarding decisions that may affect ancestral tribal sites are very important. Any information you have regarding tribal cultural places will be kept strictly confidential and will not be divulged to the public. Pursuant to California Government Code § 65352.3, you may request a consultation within 90 days of receiving this letter. **We would appreciate receiving your comments by October 11, 2021.** Please forward any comments regarding this Project to:

City of Culver City, Advance Planning Division
ATTN: Ashley Hefner Hoang, Advance Planning Manager
9770 Culver Boulevard
Culver City, CA 90232
Email: advance.planning@culvercity.org
Phone No: (310) 253-5740

Thank you for your assistance with our efforts to address tribal cultural places that may be affected by the proposed Project.

Sincerely,

Ashley Hefner Hoang

Ashley Hefner Hoang
Advance Planning Manager



CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

September 9, 2021

Gabrieleno/Tongva San Gabriel
Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, CA, 91778
Phone: (626) 483 - 3564
Fax: (626) 286-1262
GTTribalcouncil@aol.com

Subject: AB 52 Project Notification and Request to Consult Letter for the Proposed Culver City Housing Element Update, City of Culver City, Los Angeles County, California

Dear Mr. Morales,

The City of Culver City requests your participation in the City's process for the Housing Element Update, which is one of the required Elements of the City's General Plan. While the City is in the process of a comprehensive update to the General Plan, in light of the State requirements for adoption by October 15, 2021, this Element is being considered separately. The Housing Element will serve as the primary policy document for the City to achieve the 6th cycle Regional Housing Needs Assessment (RHNA) allocation. The Housing Element will not result in changes in the land use designations or development. The City will be preparing an Environmental Impact Report (EIR) for the General Plan Update and anticipates that a Notice of Preparation will be released later this year.

Since an EIR will be prepared for the Project and pursuant to California Assembly Bill (AB) 52, the City of Culver City Planning Division (City) is providing you with notification of the Housing Element Update and General Plan Update. Moreover, in order to provide Native American tribes with the opportunity to participate in local land use decisions at an early stage, in accordance with AB 52, please let us know if you would like to be consulted with on this Project. We are also seeking your comments on the proposed Housing Element Update. The Planning Area for the Housing Element Update includes the City and its Sphere of Influence, and is shown on the attached map. A search of the Sacred Lands File for sites within the Planning Area through the Native American Heritage Commission (NAHC) was conducted as part of the General Plan Update process. The NAHC notified the City that results were positive for the identification of a Native American resource in their database.

With this letter, the City is seeking input on concerns that uniquely or significantly affect your Tribe related to the proposed Project. Early identification of Tribal concerns will allow the City to consider ways to avoid or minimize potential impacts to tribal cultural resources and practices as project planning and alternatives are developed and refined. We would be pleased to discuss details of the proposed Project with you.

In accordance with AB 52, you have 30 calendar days from receipt of this letter to notify us in writing that you wish to consult on this Project. Please provide your contact information and mail your request to:

City of Culver City, Advance Planning Division
ATTN: Ashley Hefner Hoang, Advance Planning Manager
9770 Culver Boulevard
Culver City, CA 90232
Email: advance.planning@culvercity.org
Phone No: (310) 253-5740

Thank you for your assistance with our efforts to address tribal cultural resources that may be affected by the proposed Project.

Sincerely,

Ashley Hefner Hoang

Ashley Hefner Hoang
Advance Planning Manager



CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

September 9, 2021

Gabrieleno/Tongva San Gabriel
Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, CA, 91778
Phone: (626) 483 - 3564
Fax: (626) 286-1262
GTTribalcouncil@aol.com

Subject: SB 18 Project Notification and Request to Consult Letter for the Proposed Culver City Housing Element Update, City of Culver City, Los Angeles County, California

Dear Mr. Morales,

The City of Culver City requests your participation in the City's process for the Housing Element Update, which is one of the required Elements of the City's General Plan. While the City is in the process of a comprehensive update to the General Plan, in light of the State requirements for adoption by October 15, 2021, this Element is being considered separately. The Housing Element will serve as the primary policy document for the City to achieve the 6th cycle Regional Housing Needs Assessment (RHNA) allocation. The Housing Element will not result in changes in the land use designations or development. The City will be preparing an Environmental Impact Report for the General Plan Update and anticipates that a Notice of Preparation will be released later this year.

However, since the Project requires a General Plan Amendment, the Project is subject to Section 65352.3 of the Government Code (Senate Bill (SB) 18 [2004]). Pursuant to SB 18, for the purpose of protecting tribal cultural places, the City of Culver City is required to contact and consult with California Native American Tribes before adopting or amending a General Plan, or when designating land as open space. Cultural Places refer to places, features, and objects described in Public Resources Code Sections 5097.9 and 5097.993.¹

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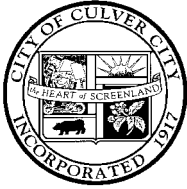
City of Culver City, Advance Planning Division
ATTN: Ashley Hefner Hoang, Advance Planning Manager
9770 Culver Boulevard
Culver City, CA 90232
Email: advance.planning@culvercity.org
Phone No: (310) 253-5740

Thank you for your assistance with our efforts to address tribal cultural places that may be affected by the proposed Project.

Sincerely,

Ashley Hefner Hoang

Ashley Hefner Hoang
Advance Planning Manager



CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

September 9, 2021

Santa Rosa Band of Cahuilla Indians
Lovina Redner, Tribal Chair
P.O. Box 391820
Anza, CA, 92539
Phone: (951) 659 - 2700
Fax: (951) 659-2228
lsaul@santarosacahuilla-nsn.gov

Subject: AB 52 Project Notification and Request to Consult Letter for the Proposed Culver City Housing Element Update, City of Culver City, Los Angeles County, California

Dear Ms. Redner,

The City of Culver City requests your participation in the City's process for the Housing Element Update, which is one of the required Elements of the City's General Plan. While the City is in the process of a comprehensive update to the General Plan, in light of the State requirements for adoption by October 15, 2021, this Element is being considered separately. The Housing Element will serve as the primary policy document for the City to achieve the 6th cycle Regional Housing Needs Assessment (RHNA) allocation. The Housing Element will not result in changes in the land use designations or development. The City will be preparing an Environmental Impact Report (EIR) for the General Plan Update and anticipates that a Notice of Preparation will be released later this year.

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With this letter, the City is seeking input on concerns that uniquely or significantly affect your Tribe related to the proposed Project. Early identification of Tribal concerns will allow the City to consider ways to avoid or minimize potential impacts to tribal cultural resources and practices as project planning and alternatives are developed and refined. We would be pleased to discuss details of the proposed Project with you.

In accordance with AB 52, you have 30 calendar days from receipt of this letter to notify us in writing that you wish to consult on this Project. Please provide your contact information and mail your request to:

City of Culver City, Advance Planning Division
ATTN: Ashley Hefner Hoang, Advance Planning Manager
9770 Culver Boulevard
Culver City, CA 90232
Email: advance.planning@culvercity.org
Phone No: (310) 253-5740

Thank you for your assistance with our efforts to address tribal cultural resources that may be affected by the proposed Project.

Sincerely,

Ashley Hefner Hoang

Ashley Hefner Hoang
Advance Planning Manager



CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

September 9, 2021

Santa Rosa Band of Cahuilla Indians
Lovina Redner, Tribal Chair
P.O. Box 391820
Anza, CA, 92539
Phone: (951) 659 - 2700
Fax: (951) 659-2228
lsaul@santarosacahuilla-nsn.gov

Subject: SB 18 Project Notification and Request to Consult Letter for the Proposed Culver City Housing Element Update, City of Culver City, Los Angeles County, California

Dear Ms. Redner,

The City of Culver City requests your participation in the City's process for the Housing Element Update, which is one of the required Elements of the City's General Plan. While the City is in the process of a comprehensive update to the General Plan, in light of the State requirements for adoption by October 15, 2021, this Element is being considered separately. The Housing Element will serve as the primary policy document for the City to achieve the 6th cycle Regional Housing Needs Assessment (RHNA) allocation. The Housing Element will not result in changes in the land use designations or development. The City will be preparing an Environmental Impact Report for the General Plan Update and anticipates that a Notice of Preparation will be released later this year.

However, since the Project requires a General Plan Amendment, the Project is subject to Section 65352.3 of the Government Code (Senate Bill (SB) 18 [2004]). Pursuant to SB 18, for the purpose of protecting tribal cultural places, the City of Culver City is required to contact and consult with California Native American Tribes before adopting or amending a General Plan, or when designating land as open space. Cultural Places refer to places, features, and objects described in Public Resources Code Sections 5097.9 and 5097.993.¹

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City of Culver City, Advance Planning Division
ATTN: Ashley Hefner Hoang, Advance Planning Manager
9770 Culver Boulevard
Culver City, CA 90232
Email: advance.planning@culvercity.org
Phone No: (310) 253-5740

Thank you for your assistance with our efforts to address tribal cultural places that may be affected by the proposed Project.

Sincerely,

Ashley Hefner Hoang

Ashley Hefner Hoang
Advance Planning Manager



CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

September 9, 2021

Gabrieleno Band of Mission
Indians - Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA, 91723
Phone: (626) 926 - 4131
admin@gabrielenoindians.org

Subject: AB 52 Project Notification and Request to Consult Letter for the Proposed Culver City
Housing Element Update, City of Culver City, Los Angeles County, California

Dear Mr. Salas,

The City of Culver City requests your participation in the City's process for the Housing Element Update, which is one of the required Elements of the City's General Plan. While the City is in the process of a comprehensive update to the General Plan, in light of the State requirements for adoption by October 15, 2021, this Element is being considered separately. The Housing Element will serve as the primary policy document for the City to achieve the 6th cycle Regional Housing Needs Assessment (RHNA) allocation. The Housing Element will not result in changes in the land use designations or development. The City will be preparing an Environmental Impact Report (EIR) for the General Plan Update and anticipates that a Notice of Preparation will be released later this year.

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Email: advance.planning@culvercity.org
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Thank you for your assistance with our efforts to address tribal cultural resources that may be affected by the proposed Project.

Sincerely,

Ashley Hefner Hoang

Ashley Hefner Hoang
Advance Planning Manager



CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

September 9, 2021

Gabrieleno Band of Mission
Indians - Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA, 91723
Phone: (626) 926 - 4131
admin@gabrielenoindians.org

Subject: SB 18 Project Notification and Request to Consult Letter for the Proposed Culver City
Housing Element Update, City of Culver City, Los Angeles County, California

Dear Mr. Salas,

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City of Culver City, Advance Planning Division
ATTN: Ashley Hefner Hoang, Advance Planning Manager
9770 Culver Boulevard
Culver City, CA 90232
Email: advance.planning@culvercity.org
Phone No: (310) 253-5740

Thank you for your assistance with our efforts to address tribal cultural places that may be affected by the proposed Project.

Sincerely,

Ashley Hefner Hoang

Ashley Hefner Hoang
Advance Planning Manager



ADVANCE PLANNING DIVISION
9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507
(310) 253-5740 • ADVANCE.PLANNING@CULVERCITY.ORG

PROPOSED NEGATIVE DECLARATION

Project Title and Culver City File No.: Culver City 2021-2029 Housing Element Update

Project Location: Culver City, CA

Project Sponsor: City of Culver City

Project Description: California Government Code Section 65302(c) mandates that each local agency within California includes a Housing Element in its General Plan. The Housing Element is required to identify and analyze existing and projected housing needs within the city and include statements of the City's goals, policies, quantified objectives, and scheduled programs to preserve, improve, and develop housing. In adopting its Housing Element, each local agency must consider economic, environmental, and fiscal factors, as well as community goals as set forth in the General Plan, in compliance with California Government Code Section 65580 et. seq. In compliance with Government Code Section 65580 et. seq., the City of Culver City is updating its Housing Element for the planning period of 2021-2029.

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 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 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.

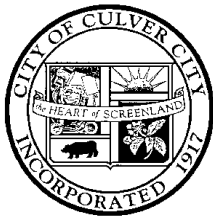
A copy of the Initial Study and any other material which constitute the record of proceedings upon which the City based its decision to adopt this NEGATIVE DECLARATION may be obtained at:

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

www.culvercity.org

Contact: Ashley Hefner Hoang, AICP, Advance Planning Manager
[\(310\) 253-5740](tel:(310)253-5740) or advance.planning@culvercity.org

The public is invited to comment on the proposed NEGATIVE DECLARATION during the review period, which begins on October 7, 2021 and ends on November 8, 2021.



ADVANCE PLANNING DIVISION
9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507
(310) 253-5740 • ADVANCE.PLANNING@CULVERCITY.ORG

INITIAL STUDY

ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title:	Culver City 2021-2029 Housing Element Update		
City of Culver City Case Nos:	P2021-0241-MND		
Lead Agency Name & Address:	City of Culver City, Advance Planning Division 9770 Culver Boulevard, Culver City, CA 90232		
Contact Person & Phone No.:	Ashley Hefner Hoang, Advance Planning Manager (310) 253-5740		
Project Location/Address:	Culver City, CA 90230		
Nearest Cross Street:	N/A	APN:	N/A
Project Sponsor's Name & Address:	City of Culver City, Advance Planning Division 9770 Culver Boulevard, Culver City, CA 90232		
General Plan Designation:	The City of Culver City has various General Plan land use designations, including Residential (Low Density Single Family, Low Density Two Family, Low Density Three Family, Low Density Multiple Family, Medium Density Multiple Family, And Planned Residential Development), Commercial (Neighborhood Serving Corridor, General Corridor, Downtown, Community Serving Center, and Regional Center), Industrial (Light Industrial, Industrial Park, and Industrial), Focused Special Studies Area (Hayden Industrial Tract, Blair Hills / Baldwin Hills, and Ballona Creek), and Other (Studio, Cemetery, Open Space, Institutional, School, City Boundary, and Freeway). However, these designations are subject to change as the City is in the process of updating the Land Use Element.		
Zoning:	The City has various zoning districts, including R1 (single-family residential), R2 (two-family residential), R3 (three-family residential), RLD (Low Density Multiple-Family Residential), RMD (Medium Density Multiple-Family Residential), RHD (High Density Multiple-Family Residential), CN (Commercial Neighborhood), CG (Commercial General), CC (Commercial Community), and CD (Commercial Downtown).. However, certain districts would be subject to change for compliance after adoption of the Land Use Element the City is in the process of updating.		
Overlay Zone/Special District:	The City has various overlay zones, including Residential Zero Setback Overlay (-RZ), Commercial Zero Setback Overlay (-CZ), Redevelopment Project Area Overlay (-RP), Civic Center Overlay (-CV), East Washington Boulevard Overlay (-EW), and Residential Hillside Overlay (-RH)		

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

The Culver City Housing Element Update (the Project) is being prepared pursuant to California Government Code Section 65302(c). California Government Code Section 65302(c) mandates that each local agency within California includes a Housing Element in its General Plan. The Housing Element is required to identify and analyze existing and projected housing needs within the city and include statements of the City's goals, policies, quantified objectives, and scheduled programs to preserve, improve, and develop housing. In adopting its Housing Element, each local agency must consider economic, environmental, and fiscal factors, as well as community goals as set forth in the General Plan, in compliance with California Government Code Section 65580 et. seq. In compliance with Government Code Section 65580 et. seq., the City of Culver City (City) is updating its Housing Element for the planning period of 2021-2029 (hereafter referred to as the 2021-2029 Housing Element or the plan).

Please refer to Attachment A, Project Description, for a detailed discussion of the Project.

Existing Conditions of the Project Site:

The city is located in the westside region of Los Angeles County, and is developed with a variety of land uses including established residential neighborhoods, commercial corridors, industrial uses, public facilities, studios, cemeteries, and parks.

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

The city is surrounded by the City of Los Angeles to the north, east, and west. An unincorporated area of Los Angeles County (County) is located to the south and southeast. The communities within the surrounding unincorporated County area include Baldwin Hills, Ladera Heights, View Park, and Windsor Hills. Other communities in the region include Santa Monica, Marina Del Rey, Beverly Hills, Inglewood, and El Segundo.

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

A review of the 2021-2029 Housing Element must be conducted by the California Department of Housing and Community Development (HCD) to determine compliance with State law. HCD will provide written findings based on its review to the City so the City may incorporate any additional requirements before adoption.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | |
|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Land Use / Planning |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Population / Housing |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Mandatory Findings of Significance | |

ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

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

Ashley Hefner Hoang
Ashley Hefner Hoang, Advance Planning Manager
City of Culver City

10/05/2021
Date

PURPOSE OF THE INITIAL STUDY

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

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>I. AESTHETICS</u> – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>V. CULTURAL RESOURCES</u> – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>VI. ENERGY</u> – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>VII. GEOLOGY AND SOILS</u> – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 surface in a manner which would:				
i) result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XI. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XIII. NOISE – Would the project result in:

a) Would the Project result in the 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) For a project located within a private air strip 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XIV. POPULATION AND HOUSING – Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVI. RECREATION

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XVII. TRANSPORTATION– Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycles, and pedestrian facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XVIII. TRIBAL CULTURAL RESOURCES– Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: | | | | |
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>XIX. UTILITIES AND SERVICE SYSTEMS</u> – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>XX. WILDFIRES</u> – Would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



ATTACHMENT A PROJECT DESCRIPTION

A. INTRODUCTION

California state law requires each city and county to adopt a general plan containing at least seven elements: Land Use, Transportation, Conservation, Noise, Open Space, Safety, and Housing. In 1969, California Legislature adopted the Housing Element Law, mandating that housing be included as an element of each general plan. California's Housing Element Law acknowledges that, for the private market to adequately address the housing needs and demand of Californians, local governments must adopt plans and regulatory systems that provide opportunities for (and do not unduly constrain), housing development. As a result, housing policy in California rests largely on effectively implementing local general plans and, in particular, local housing elements. The Housing Element is subject to detailed statutory requirements and mandatory review by the State Department of Housing and Community Development (HCD). This Housing Element Update is an update of the previous Housing Element for the City of Culver City (the City), which was adopted in January 2014.

The timing for jurisdictions to update their Housing Elements is based on the update schedule established for regional transportation plans (RTPs) prepared by federally-designated metropolitan planning organizations. The Southern California Association of Governments (SCAG) is the federally-designated metropolitan planning organization representing all jurisdictions in Los Angeles County, including Culver City. SCAG is required to update its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) every 4 years, which puts all member jurisdictions on a schedule to update their Housing Elements every 8 years. The SCAG Regional Council adopted the Connect SoCal plan (2020–2045 RTP/SCS) on September 3, 2020. For SCAG member jurisdictions, the 6th Cycle Housing Element planning period extends from 2021 to 2029. As part of Connect SoCal, SCAG assigns a number of housing units that the County is required to plan for in the 8-year Housing Element cycle. That number of units is called the Regional Housing Needs Allocation (RHNA), and it is broken down by income category, ensuring that all economic groups are accommodated.

The Housing Element is required to identify and analyze existing and projected housing needs within the city and include statements of the City's goals, policies, quantified objectives, and scheduled programs to preserve, improve, and develop housing. In adopting its Housing Element, each city must consider economic, environmental, and fiscal factors, as well as community goals as set forth in the General Plan, in compliance with California Government Code Section 65580 et. seq. In compliance with Government Code Section 65580 et. seq., the City is updating its Housing Element for the planning period of 2021-2029 (hereafter referred to as the 2021-2029 Housing Element or the plan). The 2021-2029 Draft Housing Element as submitted to HCD, is contained in Attachment 1 of this Initial Study.

The 2021-2029 Draft Housing Element has five chapters: 1) Introduction, 2) Housing Needs Assessment, 3) Resources and Opportunities, 4) Constraints, 5) Housing Plan, and Appendices. As part of the Housing Needs Assessment, the City examined general population and household characteristics and trends (e.g., age, employment, household composition and size, household income, and special needs) and characteristics of the existing housing stock (e.g., number of units and type, tenure, age and condition, and costs). The Housing Needs Assessment used the most recent data from the U.S. Census Bureau's American Community Survey (ACS),

data compiled by SCAG, Department of Finance (DOF) Housing and Population data, and other sources such as the Westside Regional Center (WRC), which serves persons with developmental disabilities.

The City is in the process of comprehensively updating its General Plan (General Plan 2045), which will include an updated Land Use Element. General Plan 2045 reexamines the City's land use distribution and intensity of uses. On June 28, 2021, the City Council provided direction on a Preferred Land Use Map. The 2021-2029 Draft Housing Element is consistent with the proposed land use changes included in the General Plan 2045 Preferred Land Use Map and other draft element materials. General Plan 2045 will be reviewed separately in an environmental impact report and is anticipated to be adopted in Fall 2022. Since the 2021-2029 Draft Housing Element is required to be updated and adopted in 2021, it is being analyzed separately from General Plan 2045 to ensure compliance with California Government Code Section 65580 et. seq. Before the General Plan is adopted, the Housing Element may be amended to reflect any necessary changes for consistency with the finalized General Plan.

B. DESCRIPTION OF THE PROPOSED PROJECT

Consistent with Government Code Section 65302(c) and California Government Code Section 65580 et. seq., the 2021-2029 Draft Housing Element provides a plan to accommodate the City's RHNA allocation. HCD consults with regional council of governments to allocate the RHNA across each region of the state. SCAG represents all jurisdictions in Los Angeles County, including Culver City. **Figure 1**, Regional and City Location, illustrates where Culver City is located within Los Angeles County.

For the 2021-2029 housing cycle, Los Angeles County has been assigned a RHNA of 812,060 housing units, with Culver City receiving an allocation of 3,341 units. Table 1 shows how the Culver City 2021-2029 Regional Housing Needs Assessment is allocated across five income levels (Extremely Low, Very Low, Low, Moderate, and Above Moderate).

Table 1
Culver City 2021-2029 Regional Housing Needs Assessment

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
Housing Units	554	554	604	560	1,069	3,341
Percentage	16.5%	16.5%	18%	17%	32%	100%

SOURCE: City of Culver City, 2021-2029 Draft Housing Element.

The 2021-2029 Draft Housing Element aims to support the City's long term housing goal to meet the community's diverse housing needs. Its objectives are to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the City's fair share of the region's housing need, preserve at-risk affordable housing units, and affirmatively further fair housing. Another important goal of the plan is to facilitate more housing production to reverse SCAG's projected jobs-to-housing imbalance trend. Accommodating diverse housing types in the city is necessary to accommodate a population with varying socioeconomic needs. The 2021-2029 Draft Housing Element provides policies and programs to address these issues.



SOURCE: ESRI, 2021

Culver City General Plan Update

Figure 1
Regional and City Location

When updating the Housing Element, State law requires that jurisdictions demonstrate that land inventory is adequate to accommodate that jurisdiction's share of the region's projected growth. Over the last seven years since the 2013-2021 Housing Element was adopted, the City's housing stock represented a growth rate of 1.9 percent. This growth rate is consistently lower than the neighboring cities of Santa Monica (2.8 percent) and West Hollywood (4.7 percent) and LA County (3.7 percent) from 2013 to 2020. Due to these development trends, the City has identified multiple strategies through its sites inventory process to achieve its RHNA allocation of 3,341 housing units.

Section 65583(a)(3) of the Government Code requires Housing Elements to have an "inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites." The sites identified represent a subset of sites made available through the General Plan Update. They meet certain criteria showing they have development or redevelopment potential at the time of drafting the Housing Element. Some of the criteria include existing uses, existing floor area ratio (FAR), age of structures (year structure built), improvement to-land ratio, lot size, adjacency to parcels with redevelopment potential and lot consolidation potential, and expressed interest of developers or property owners.

The Housing Element considers strategies to meet the city's housing needs. Such strategies include consolidating Low Density Two Family, Three Family, and Multiple Family designations into a new Incremental Infill designation with two scenarios; conversions/additions and redevelopment, identifying opportunity sites for future residential housing, intensifying existing multi-family neighborhoods, and integrating residential uses in commercial and industrial areas. Each of these strategies are discussed in greater detail below.

Table 2, Culver City RHNA Allocation Under Current General Plan and 2045 General Plan, summarizes the City's RHNA allocations. It considers the number of dwelling units approved and the City's land inventory strategies' projected capacities to meet the 3,341 housing units required by the RHNA allocation. As shown in the table, the available sites selected in the City's current General Plan using objective criteria and known conditions do not have the capacity to accommodate the 6th cycle RHNA. In fact, Table 2 shows that the City has an overall shortfall of 895 units (105 lower income, 247 moderate income, and 543 above moderate income) based on the current General Plan and approved, entitled, proposed, and pipeline development projects. As such, the City would be required to add another 895 housing units through the 2029 planning year for this Housing Element cycle. Adopting the 2045 General Plan, which is anticipated in 2022, will significantly expand opportunities for housing development in Culver City. It will result in an overall 64 percent buffer above the RHNA for Culver City in the 6th cycle. The HCD recommends a buffer of at least 15 to 30 percent to ensure that the Housing Element has enough capacity to accommodate the RHNA throughout the planning period.

The 2021-2029 Draft Housing Element contains four strategies to meet the RHNA 6th cycle allocation and demonstrates that there will be enough housing sites to accommodate the City's fair share of affordable housing. The City's various housing programs that focus on conservation, development, and incentives of housing for all low income and very low-income communities will support affordable housing development. The four strategies are briefly discussed below.

Table 2
Culver City RHNA Allocation Under Current General Plan and 2045 General Plan

	Housing Units ^{a,b}			
	Lower	Moderate	Above Moderate	Total
RHNA	1,712	560	1,069	3,341
Approved/Entitled/Proposed/Pipeline Projects	122	20	358	500
Current General Plan				
Projected accessory dwelling units (ADUs) (Conversion/Expansion)	240	24	136	400
Low Density Two-Family/Medium Density Multi-Family	0	196	0	196
Commercial General/Commercial Neighborhood (CG/CN)	1,245	73	32	1,350
Capacity (Projects + Sites)	1,607	313	526	2,530
Surplus/(shortfall)	(105)	(247)	(543)	(895)
2045 General Plan				
Incremental Infill				
Conversion/Expansion Scenario	240	24	136	400
Redevelopment Scenario	---	47	100	147
Opportunity Sites	60	40	493	593
Neighborhood Multi-Family (50 du/ac)	184	477	0	661
Mixed Use Medium (65 du/ac)	755	28	124	907
Mixed Use High (100 du/ac)	645	26	78	749
Neighborhood/Corridor MU 1	0	73	32	105
Neighborhood/Corridor MU 2	1,426	0	0	1,426
Capacity (Projects + Sites)	3,432	735	1,321	5,488
Surplus/(Shortfall)	1,720	175	252	2,147
Percent Buffer	100%	31%	24%	64%

a: The numbers reflect the Draft 2021-2029 Housing Element with revisions as directed by City Council on September 27, 2021. Upon recommendation by the Planning Commission, the City Council directed the site inventory be revised to remove properties in the Culver Crest Residential Hillside Zone where accessory dwelling units are prohibited due to findings related to fire hazard, slope, and emergency access. Removed sites include a few others due to further feasibility review and project status. The list of affected sites can be viewed at www.pictureculvercity.com/draft-housing-element.

b: du/ac = dwelling units per acre, MU = mixed use

SOURCE: City of Culver City

Incremental Fill. The proposed 2045 General Plan Preferred Land Use Map will introduce a new concept, Incremental Infill, into the City's existing low density residential neighborhoods. It allows for more than just detached single-family units, Accessory Dwelling Units (ADUs), and Junior ADUs (JADUs), in these neighborhoods. Lots over 4,950 square feet will allow up to four units if the fourth unit is dedicated as affordable housing to lower income households, inclusive of ADUs and JADUs. As part of the sites inventory process, the City identified over 5,000 parcels within the Incremental Infill designation and therefore eligible to apply this designation's flexibility. Infilling single-family neighborhoods can occur under two different scenarios: Conversions and/or Additions or Redevelopment. The City estimates that a total of 547 housing units will use this strategy.

Opportunity Sites. The City identified the following three opportunity sites for future residential housing to accommodate at least an additional 593 housing units: the Virginia Lot, Westfield Shopping Center, and the entrance parcels to West Los Angeles Community College.

Residential Recycling. Recent residential development trends in the City demonstrate that recycling residential properties continues to provide additional housing opportunities throughout the city. Residential recycling in Culver City primarily occurs on small lots zoned for R1 (Single-Family Residential), R2 (Two-Family Residential), R3 (Three-Family Residential), RLD (Low Density Multiple-Family Residential), and RMD (Medium Density Multiple-Family Residential). The City's inventory analysis under the 2021-2029 Draft Housing Element used an increased density for recycling residential properties. Recycling opportunities would be focused on a new Neighborhood Multi-Family land designation. The Neighborhood Multi-Family designation offers a density of up to 50 dwelling units per acre (du/ac), significantly above the current allowable densities.

The City identified a total of 162 Low Density Two Family and Medium Density Multi-Family parcels that would yield only 265 net new units under the current General Plan. Under the 2045 General Plan land designation of Neighborhood Multi-Family, density would increase and these parcels would have the potential to yield a total of 656 low and moderate income units. However, these individual parcels are too small to accommodate affordable housing pursuant to the state law threshold of 0.5 acre as minimum size and would need to be consolidated. As such, consolidated and contiguous parcels under the 2045 General Plan designation of Neighborhood Multi-Family could accommodate up to 661 units (184 lower income units and 477 moderate income units).

Integrating Residential Uses in Commercial and Industrial Areas. The 2021-2029 Draft Housing Element identifies underused parcels as potential redevelopment sites under new mixed use land designations proposed in the 2045 General Plan. They would allow for increased density and provide approximately 3,187 units. The new mixed use land designations proposed in the 2045 General Plan including Neighborhood/Corridor Mixed Use, Mixed Use Medium, and Mixed Use High, are briefly discussed below.

Neighborhood/Corridor Mixed Use. A total of 26 parcels were identified to have near-term potential due to existing conditions and uses in areas proposed to be designated as Neighborhood/Corridor Mixed Use 1. The challenge in these areas is small lot sizes. These parcels total 3.84 acres and can accommodate 105 units.

Several blocks (total 35.9 acres) of commercial strip businesses within the Neighborhood/Corridor Mixed Use 2 area have been identified with redevelopment potential. Based on existing conditions, these areas present potential for redevelopment and can facilitate the development of lower income housing. An estimated 1,426 units can be accommodated.

Mixed Use Medium. A total of 37 parcels of existing underused commercial and industrial uses offer potential for redevelopment, including a shopping center with single-story structures and significant areas designated for surface parking. Under the 2045 General Plan Preferred Land Use Map, these areas are designated for Mixed Use Medium and would allow for increased density. The City determined that these sites have the potential to accommodate 907 units.

Mixed Use High. The 6.9-acre area is currently developed with hotels, office parks, commercial/retail uses, and public institutional uses; most may not have near-term redevelopment potential. The 2045 General Plan Preferred Land Use Map designation of Mixed Use High would allow this area to intensify. The City has identified the potential to accommodate 749 units at an increased density.

C. PLANNING AND ZONING

The City of Culver City has various General Plan land use designations including Residential (Low Density Single Family, Low Density Two Family, Low Density Three Family, Low Density Multiple Family, Medium Density Multiple Family, and Planned Residential Development), Commercial (Neighborhood Serving Corridor, General Corridor, Downtown, Community Serving Center, and Regional Center), Industrial (Light Industrial, Industrial Park, and Industrial), Focused Special Studies Area (Hayden Industrial Tract, Blair Hills / Baldwin Hills, and

Ballona Creek), and Other (Studio, Cemetery, Open Space, Institutional, School, City Boundary, and Freeway). However, designations are subject to change as the City is currently updating the Land Use Element as a part of the comprehensive General Plan Update.

The City has various zoning districts, including R1 (single-family residential), R2 (two-family residential), R3 (three-family residential), RLD (Low Density Multiple-Family Residential), RMD (Medium Density Multiple-Family Residential), RHD (High Density Multiple-Family Residential), CN (Commercial Neighborhood, CG (Commercial General), CC (Commercial Community), and CD (Commercial Downtown. The City has various overlay zones, including Residential Zero Setback Overlay (-RZ), Commercial Zero Setback Overlay (-CZ), Redevelopment Project Area Overlay (-RP), Civic Center Overlay (-CV), East Washington Boulevard Overlay (-EW), and Residential Hillside Overlay (-RH). However, certain districts and overlays could be subject to change for compliance after adoption of the Land Use Element the City is in the process of updating. The Project proposes no changes to the Project Site's existing Zoning districts.

D. EXISTING CONDITIONS

The City is located in the Westside region of Los Angeles County. The City is developed with various land uses, including established residential neighborhoods, commercial corridors, industrial uses, public facilities, studios, cemeteries, and parks. The city is surrounded by the City of Los Angeles to the north, east, and west. An unincorporated area of Los Angeles County (County) is located to the south and southeast. The unincorporated County communities include Baldwin Hills, Ladera Heights, View Park, and Windsor Hills. Surrounding communities include Santa Monica, Marina Del Rey, Beverly Hills, Inglewood, and El Segundo.

E. NECESSARY APPROVALS

The City of Culver City Council will consider adoption after receiving the Planning Commission's recommendation. After adoption, the Housing Element will be submitted to HCD to consider for certification.

Since the 2021-2029 Draft Housing Element is a policy document and the Land Use Element and Map changes are part of the ongoing General Plan Update, the Preferred Land Use Map and related zoning changes assumed in the Housing Element sites inventory are not under consideration at this time. General Plan land use designation changes will be processed as part of General Plan 2045 and the update to the Land Use Element and Land Use Map. After adoption, any necessary zoning amendments would be processed to comply.

Previously, State law required that local jurisdictions complete necessary land use, and related zoning, amendments assumed in the Housing Element sites inventory no later than three years after adoption of the Housing Element. However, per recent adoption of Assembly Bill (AB) 1398, the timeline for local government to rezone sites identified within the Housing Element has been changed to one year from the statutory deadline if HCD finds a Housing Element not in substantial compliance with state law within 120 days of the statutory deadline.¹ Should the City adopt a Land Use Element that would require changes to the Housing Element sites inventory, the Housing Element would be considered for amendment to comply when the Land Use and remaining General Plan elements are considered for adoption. The City will make diligent efforts in

¹ On September 28, 2021, Governor Newsom approved Assembly Bill (AB) 1398 to ensure that cities and counties are adequately rezoning to meet their housing needs. AB 1398 reduces the allowable timeframe for rezoning for jurisdictions that do not adopt a housing element that HCD finds to be in substantial compliance with state law within 120 days of the statutory deadline. Previously three years were allowed for the rezoning if the Housing Element was adopted within 120 days of the statutory deadline. AB 1398 requires a jurisdiction that does not adopt a housing element that HCD finds to be in substantial compliance with state law within 120 days of the statutory deadline to complete rezoning no later than one year from the statutory deadline for the adoption of the housing element. AB 1398 amends Government Code Sections 65583, 65583.2, and 65588.

communication with HCD to complete any necessary land use and zoning amendments needed to support the sites inventory within the required timeframe to ensure consistency between the 2021-2029 Draft Housing Element and the General Plan.

ATTACHMENT B EXPLANATION OF CHECKLIST DETERMINATIONS

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. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**
- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

a.–d. No Impact. The 2021-2029 Draft Housing Element provides a framework to meet the housing needs of existing and future residents. The plan identifies strategies and programs to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the City's fair share of the region's need, preserve at-risk affordable housing units, and affirmatively further fair housing in a strategic manner. To accommodate the RHNA allocation of 3,341 units, the plan identifies several strategies: identifying opportunity sites for future residential housing; creating a new incremental infill land use designation; allowing residential recycling by intensifying existing multi-family neighborhoods; and considering integrating residential uses in commercial and industrial areas.

While the plan provides the framework for the City to meet its RHNA allocation, the plan would not result in development projects at this time. Future development projects that implement the 2021-2029 Draft Housing Element goals would need to meet relevant development standards and objective design guidelines. These are set in the City's General Plan, Zoning Code, and Title 9 (General Regulations) of the Culver City Municipal Code (CCMC) to ensure quality development throughout the city. Potential environmental impacts to aesthetics associated with future residential development would be assessed on a site-by-site basis at the time the development is proposed. Also, mitigation measures, if necessary, would be implemented to reduce significant impacts through the application and environmental review process. Because the 2021-2029 Draft Housing Element is a policy document that does not include any physical development, adopting the plan would have no impact on aesthetics or visual resources within the city.

II. Agriculture and Forest Resources

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?**

a.–e. No Impact. There is no designated agricultural land within the city and no designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.¹ Since the city does not have agricultural land or forestland, adopting the plan would not impact any existing designated agricultural lands or forest lands, lands with an active Williamson Act contract, or properties zoned as Timberland Production. As the city does not contain any agricultural land or forestland, and because the 2021-2029 Draft Housing Element is a policy document that does not include any physical development, adopting the plan would have no impact on agricultural resources within the city.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district 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?**

No Impact. The city is within the 6,745-square-mile South Coast Air Basin (SCAB), which is regulated and monitored by the South Coast Air Quality Management District (SCAQMD). SCAQMD is responsible for measuring the region's air quality. The SCAB is classified as a Federal nonattainment area for ozone (O₃), particulate matter less than 2.5 microns (PM_{2.5}), and lead (Pb). It is also classified as a state nonattainment area for O₃, PM_{2.5}, and particulate matter less than 10 microns (PM₁₀). The current 2016 Air Quality Management Plan (AQMP) was adopted on March 3, 2017 and outlines the air pollution control measures needed to meet Federal PM_{2.5} and O₃ standards. The AQMP also proposes the policies and measures that responsible agencies under SCAQMD's jurisdiction are considering to achieve Federal standards for healthful

¹ State of California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed September 2021.

air quality in the Basin. The current AQMP also addresses several Federal planning requirements. It incorporates updated emissions inventories, ambient measurements, meteorological data, and air quality modeling tools from earlier AQMPs.²

The 2021-2029 Draft Housing Element is a policy document that identifies strategies and programs to preserve and increase housing within the city to meet the housing needs of existing and future populations and does not propose any development. While implementing the plan would ultimately require amendments to the City's Land Use Plan, Zoning Code, and Accessory Dwelling Units Ordinance to accommodate an increase in residential densities throughout the city to meet its RHNA allocation, such amendments will be considered as part of the 2045 General Plan. The region's RHNA allocation has also been included in SCAG's Connect SoCal growth forecast for the years 2020-2030. Thus, the plan would not conflict with or obstruct implementation of the State Implementation Plan or the SCAQMD's AQMP. Therefore, the plan would not obstruct an applicable air plan.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

c. Expose sensitive receptors to substantial pollutant concentrations?

No Impact (b-c). As indicated above, the 2021-2029 Draft Housing Element provides the framework for the City to meet its RHNA allocation and proposes no development. Therefore, adopting the plan would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment under an applicable Federal or State ambient air quality standard. Also, it would not expose sensitive receptors to substantial pollutant concentrations.

Furthermore, future development that implement the plan goals would need to meet relevant development standards and objective design guidelines in the City's 2045 General Plan and CCMC and all applicable air quality plans, policies, and regulations. Future development projects that implement the plan goals would also be consistent with all applicable SCAQMD goals and policies. Environmental impacts would be assessed at the time the developments are proposed on a site-by-site basis with mitigation measures implemented, if necessary. Because the plan is a policy document and does not include any physical development, the Housing Element would not result in a cumulatively considerable net increase in a criteria pollutant for which the region is in non-attainment and would not expose sensitive receptors to substantial pollutant concentrations.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. The 2021-2029 Draft Housing Element provides a framework for potential land use and zoning changes. It sets housing programs to preserve and improve the existing housing stock within the city in a strategic manner in accordance with the 6th cycle RHNA allocation. As such, the plan would not result in a new land use designation that is typically associated with creating objectionable odors (such as rendering plants, landfills, and treatment plants). Therefore, the plan would not create a new source of objectionable odors, preventing any risk of impact.

² South Coast Air Quality Management District, 2016 Air Quality Management Plan, <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>, accessed September 2021.

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 Wildlife 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 nursery sites?**
- e. **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**
- f. **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

No Impact (a-f). Government Code Section 65583(a)(3) requires Housing Elements to have a site inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites. When preparing the 2021-2029 Draft Housing Element, the City analyzed the site inventory at the parcel-level, relying on the Preferred Land Use Map of the General Plan update. The City prepared a General Plan update *Environmental Background Report*,³ that describes the environmental conditions in Culver City. The existing conditions report considered various environmental factors, including sensitive habitat for biological resources, and evaluated the potential for properties to be redeveloped. The existing conditions report found that there were no sensitive natural communities, critical habitat, or wetlands (as designated by the California Department of Fish and Game, Regional Water Quality Control Board, or U.S. Army Corps of Engineers) present within the General Plan update planning area. However, the report identified potential planning issues for future development within or adjacent to the remnant patches of native vegetation. While the plan provides the framework for the City to meet its RHNA

³ City of Culver City. General Plan Update Environmental Background Report. November 2020. https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/609b1c6f3a5d70733cb4ad40/1620778109292/Environmental_ECR_Final_Reduced.pdf

allocation, the plan does not propose any development. In addition, the Draft Housing Element would not change or alter existing City policies to protect biological resources.

Future residential projects proposed to achieve the City's housing goals would be located primarily on developed, underused sites with only occasional development on the limited vacant parcels. The potential for biological resources to occur would be evaluated on a site-by-site basis when reviewing those projects and mitigation measures, if necessary, would be implemented to reduce significant impacts. In addition, future development would comply with all applicable Federal, State, and local policies, plans, and regulations established to protect biological resources. As the plan is a policy document that does not include any physical development and future development projects would be evaluated separately and required to comply with applicable regulations and plans for protection of biological resources, adoption of the plan would have no impact on biological resources within the city.

V. CULTURAL RESOURCES

Would the project:

- a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?**
- b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**
- c. Disturb any human remains, including those interred outside of dedicated cemeteries?**

No Impact (a-c). The 2021-2029 Draft Housing Element is a policy document that identifies strategies and programs to preserve and increase housing within the city to meet the housing needs of existing and future resident populations and does not propose any development. To accommodate the RHNA allocation of adding 3,341 units within the City limits, the plan proposes additional residential densities within a new infill land use designation, identifies opportunity sites, allows for residential recycling, and considers integrating residential housing in commercial and industrial areas.

Adopting the plan would not change existing City policies to protect cultural resources. Depending on the location, future development in the city has the potential to cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5, cause a substantial adverse change in the significance of an archaeological resource pursuant to Guidelines Section 15064.5, or disturb human remains, including those interred outside of a formal cemetery. To ensure that impacts to cultural resources are avoided or mitigated to the fullest extent possible, future development would be required to meet all applicable Federal, State, and local policies and ordinances, plans, and regulations related to preserving and protecting historic and cultural resources. Specifically, future development in the city would be required to comply with applicable policies, goals, and objectives for cultural resources in the General Plan update.

Also, future residential development would need to comply with the City's Historic Resources Preservation Ordinance, if applicable, due to the presence of potential historic resources on any parcels identified as a future housing site within the plan.

General Plan amendments and rezoning will be evaluated programmatically as part of the General Plan update. Potential environmental impacts to cultural resources associated with future residential development projects would be assessed on a site-by-site basis and programmatically as part of the General Plan update land use and zone changes at the time when development is proposed. Mitigation measures would be adopted to reduce significant impacts, if necessary. Because of plans and regulatory requirements addressing cultural resources that would apply where relevant to future residential development projects, and because the plan is a policy document that does not include physical development, adopting the plan would have no impact on cultural resources within the city.

VI. ENERGY

Would the project:

- a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**
- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

No Impact (a-b). The 2021-2029 Draft Housing Element is the framework to meet the housing needs of existing and future residents in the city. It identifies strategies and programs to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the City's fair share of the region's need, preserve at-risk affordable housing units; and strategically further fair housing opportunities. While the plan provides the framework for the City to meet its RHNA allocation, the plan would not result in development at this time.

While constructing and operating future development under the plan would increase energy use in the city, future development would be required to comply with all applicable Federal, State, and local policies, plans, and regulations to conserve and reduce energy usage. On the local level, future developments would be required to comply with the City's Energy Action Plan (EAP) to comply with the City's greenhouse gas (GHG) emissions and energy usage goals to achieve targeted energy savings.

Pursuant to Government Code Section 65583(a)(7), the plan provided analysis of opportunities to conserve energy in residential development, including promoting and encouraging energy-efficient retrofitting of existing homes and meeting the City's Solar Photovoltaic and Green Building Ordinances. The City's Solar Photovoltaic Ordinance requires all new commercial or multi-family projects that have 3 or more units or are 10,000 square feet or greater to install 1 kilowatt of solar photovoltaic power for each 10,000 square feet of new construction, not including parking garage areas. The City's Green Building Ordinance also helps to reduce energy costs by requiring new developments to incorporate Leadership in Energy and Environmental Design (LEED) equivalent measures. Moreover, during construction, contractors would be required to comply with the California Air Resources Board's (CARB) regulations that restrict the idling of heavy-duty diesel motor vehicles. They would also be required to comply with the CARB's regulations on the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment to reduce the inefficient, wasteful, or unnecessary consumption of energy.

Once operating, future development would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations), and building regulations of the CCMC (Title 15, Chapter 15.02). The California Energy Code, which provides energy conservation standards for all new and renovated residential buildings, provides guidance on construction techniques to maximize energy conservation. The California Energy Code sets minimum efficiency standards for various building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The California Energy Code emphasizes saving energy during peak periods/seasons and improving the quality of installing energy efficiency measures. In addition to all current Title 24 Energy Code requirements, the City adopted the "Reach Code" standards to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional, and global ecosystems (CCMC Section 15.02.1100). The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diverting construction waste from landfills; and using environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. Future developments would also be required to comply with various CCMC sections, which set mandatory measures for installing energy efficiency features.

Furthermore, potential environmental impacts related to energy demand and supply associated with future development would be assessed at the time when development is proposed. Mitigation measures, if necessary, would be implemented to reduce significant impacts through the application and environmental review process. Because the plan is a policy document that does not include any development, adopting the plan would not use energy in a wasteful, inefficient, or unnecessary manner and would not conflict with or obstruct state or local plans for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS

Would the project:

- a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**
 - ii. Strong seismic ground shaking?**
 - iii. Seismic-related ground failure, including liquefaction?**
 - iv. Landslides?**

No Impact a. (i-iv). Similar to most areas in Southern California, the city lies within a region known to be seismically active and is subject to periodic seismic shaking due to earthquakes along remote or regional faults. Therefore, the potential exists for people and structures in the city to be exposed to seismic-induced hazards, including the rupture of a known earthquake fault, strong seismic ground shaking, and seismicity-related ground failure, including liquefaction and landslides.

The 2021-2029 Draft Housing Element provides the framework for the City to meet its RHNA allocation and would not result in development. All future projects that implement the goals of the plan would be required to meet relevant development standards and objective design guidelines contained in the CCMC adopted 2019 California Building Code (CBC), which includes seismic building requirements, and the specifications outlined in project-specific Geotechnical Investigations to ensure all structures are designed and constructed to withstand seismic events to the greatest extent feasible. In addition, the City is in the process of preparing a Soft Story Seismic Retrofit Program that will identify all soft-story structures within the city and a draft a building code amendment that addresses the threat of seismic hazards. The building code amendment will specify requirements for retrofitting soft-story buildings and include an implementation schedule for impacted properties to comply with the code.⁴

Potential environmental impacts related to seismically-induced hazards associated with future residential development projects would normally be avoided by complying with CCMC and CBC requirements. In other limited circumstances, if warranted due to unusual site constraints, impacts would be assessed on a site-by-site basis when development is proposed. Mitigation measures would be implemented, if necessary, to reduce significant impacts through the application and environmental review process. Because the plan is a policy document that does not include any physical development, and given regulatory requirements in the CCMP and CBC, adopting the plan would not result in significant impacts related to seismically induced hazards.

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

No Impact. The 2021-2029 Draft Housing Element provides a framework for meeting the housing needs of existing and future residents. To accommodate the RHNA allocation, the plan proposes additional residential densities within a new infill land designation, identifies opportunity sites, allows for residential recycling, and considers integrating residential housing in commercial and industrial areas. While the plan provides the framework for the City to meet its RHNA allocation, the plan does not propose any development.

Future projects that implement the goals of the plan would be required to meet relevant development standards in the CCMC to comply with the City's standard erosion control practices required pursuant to the 2019 CBC. They would also need to meet the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB) and applicable Federal, State, and local regulations related to erosion and topsoil loss. Although the majority of the city is developed, ground disturbance activities (e.g., excavation and grading) associated with demolishing existing development and constructing new development could result in erosion and topsoil loss. Areas of ground disturbance one acre or greater in size would be required to comply with the Construction General Permit. This involves implementing erosion- and sediment-control Best Management Practices (BMPs) as detailed in a Stormwater Pollution Prevention Plan (SWPPP) prepared for the development. The BMPs would prevent erosion from occurring and would retain any eroded soils within property boundaries. In addition, potential environmental impacts related to erosion or loss of topsoil associated with future development would be assessed on a site-by-site basis at the time development is proposed. Mitigation measures, if necessary, would be implemented to reduce significant impacts through the application and environmental review process. Because the plan is a policy document that does not include any physical development, adopting the plan would not result in impacts related to erosion or loss of topsoil.

⁴ City of Culver City, Request for Proposals for Soft Story Seismic Retro-Fit Consultant Services, September 20, 2018, <https://www.culvercity.org/home/showdocument?id=15695>, accessed September 2021.

- 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 direct or indirect risks to life or property?**

No Impact (c-d). According to the City's General Plan update *Environmental Background Report*, the Blair Hills and Culver Crest neighborhood are highly susceptible to instability, landslides, and liquefaction.⁵ According to the US Census, over 87 percent of houses in the city were constructed before 1980, and therefore may be vulnerable if not retrofitted.⁶ As such, any new structure would be required to be constructed per the CBC and CCMC. As previously mentioned, the City is in the process of preparing a Soft Story Seismic Retrofit Program that will identify soft-story structures. The City will also develop a draft building code amendment, which will specify requirements for retrofitting soft-story buildings and include an implementation schedule for impacted properties to comply with the code.

While the 2021-2029 Draft Housing Element provides the framework for the City to meet its RHNA allocation, the plan does not propose any physical development. Future development that implements the plan would be required to meet relevant development standards in the CCMC and the CBC. In addition, potential environmental impacts related to unstable soils, landslides, liquefaction, and expansive soils associated with future development would be assessed on a site-by-site basis at the time when development is proposed. If required by the City, a geotechnical investigation would be prepared and recommendations would be implemented to reduce potential impacts. Because the plan is a policy document that does not include any physical development, adopting the plan would not result in impacts related to unstable soils, landslides, lateral spreading, subsidence, liquefaction, collapse, and expansive soils.

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

No Impact. Development that implements the programs of the 2021-2029 Draft Housing Element would be infill within an urbanized area that is served by existing sewer connections and wastewater system. Therefore, no impact related to septic tanks would occur.

- f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

No Impact. The 2021-2029 Draft Housing Element is a policy document that identifies strategies and programs to preserve and increase housing within the city to meet the housing needs of existing and future residents and does not propose any development. Future development would be required to meet all applicable Federal, State, and local policies, plans, and regulations related to protecting and/or preserving paleontological resources. Potential impacts to paleontological resources located within future development sites would be assessed on a site-by-site basis. Mitigation measures, if necessary, would be implemented through the application and

⁵ Ibid 3.

⁶ City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan, April 2017, <https://www.culvercity.org/files/assets/public/documents/community-development/multi-jurisdictional-hazard-mitigation-plan.pdf>, accessed September 2021.

environmental review process. Therefore, the plan would not destroy, either directly or indirectly, a unique paleontological resource or site or unique geologic feature.

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

No Impact (a-b). The 2021-2029 Draft Housing Element is a policy document that identifies strategies and programs to preserve and increase housing within the City to meet the housing needs of existing and future residents and does not propose any development. Implementing the programs in the plan would accommodate development required to meet the City's RHNA allocation. The potential impacts related to GHG emissions and climate change associated with future residential projects would be assessed at the time specific development projects are proposed. Future development consistent with the plan would be required to meet all applicable Federal, State, and regional policies, plans, and regulations related to GHG emissions. It would also be required to comply with the City's identified GHG reduction measures as applicable under CEQA. Therefore, the plan would not directly or indirectly generate GHG emissions or conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions.

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?**

No Impact (a-c). The 2021-2029 Draft Housing Element is a policy document that identifies strategies and programs to preserve and increase housing within the city to meet the housing needs of existing and future resident populations and does not propose any development. Adopting the plan would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous material. Adopting the plan also would not 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. Furthermore, as a policy document, approving the plan would not result in the emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of existing or proposed schools. Adopting the plan would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, adopting the plan would not result in environmental impacts related to hazards and hazardous materials.

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?

No Impact. According to the City's General Plan update *Environmental Background Report*, the California Department of Toxic Substances Control (DTSC) Envirostor database identified eight sites in the city on the list of hazardous materials sites. Of those sites, two are active cleanup sites, three are certified and require no further action, two are inactive, and one has been referred to another agency. The Geotracker database maintained by the State Water Resources Control Board (SWRCB), identified a total of 79 sites for the city. However, 63 of those listings have been closed and require no further action and two are eligible for closure. The remaining 14 sites are actively being remediated, assessed, or are in a verification monitoring program.⁷

The 2021-2029 Draft Housing Element is a policy document with associated housing programs. At the time of individual development proposals, the sites of proposed future residential projects would be evaluated using appropriate databases including the SWRCB Geotracker database and DTSC EnviroStor database. Pursuant to Government Code Section 65962.5, the DTSC EnviroStor database lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action sites. The potential impacts related to any listed hazardous materials sites associated with future development would be assessed at the time development is proposed. Mitigation measures, if necessary, would be implemented through the application and environmental review process. Adopting the plan would result in no impact related to hazardous materials sites because no development is proposed at this time.

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

No Impact. The closest airports to the city include the Los Angeles International Airport (LAX), located about two miles to the southwest in the City of Los Angeles and the Santa Monica Airport, a municipal general aviation airport located about two miles north of the western part of Culver City. The city is not located within any of these airports' influence areas and is not subject to the requirements of an Airport Land Use Compatibility Plan.^{8,9} Therefore, the plan would not expose people living or working in the city to excessive noise levels associated with an airport.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The 2021-2029 Draft Housing Element would be consistent with all related General Plan policies, including the City's emergency response plans. All future development would be reviewed to ensure consistency with such applicable plans. Therefore, they would not physically interfere with an adopted emergency response

⁷ Ibid 3.

⁸ Los Angeles International Airport, Airport Influence Area, https://planning.lacounty.gov/assets/upl/project/aluc_airport-lax.pdf, accessed September 2021.

⁹ Santa Monica Airport, Airport Influence Area, https://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf, accessed September 2021.

plan or emergency evacuation plan. Adopting the plan would result in no impact related to emergency or evacuation plans because no development is proposed at this time.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. Cal Fire prepares fire hazard severity maps and maps areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors, referred to as Fire Hazard Severity Zones (FHSZ). According to the City's General Plan update *Environmental Background Report*, the Los Angeles County FHSZ map identifies the eastern portion of the city as being located within a Very High Fire Severity Zone (VHFSZ).¹⁰ City areas within the VHFSZ include the eastern portion of the Culver Crest neighborhood, the Blair Hills neighborhood, and the Inglewood Oil Field. As such, development within these areas must follow State, Federal, local, and regional regulations related to development type, landscaping requirements, fuel management, and brush clearance restrictions to reduce risks associated with wildfires.

The 2021-2029 Draft Housing Element is a policy document that identifies strategies and programs to preserve and increase housing within the city to meet the housing needs of existing and future residents, and does not propose any development. Adhering to State and City Fire regulations would reduce the risk of wildfire to the greatest extent possible. When proposed, future development will assess potential environmental impacts related to wildfire on a site-by-site basis. Mitigation measures, if necessary, would be implemented through the application and environmental review process. Because the plan is a policy document that does not include any physical development, adopting the plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

X. HYDROLOGY AND WATER QUALITY

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

No Impact. The 2021-2029 Draft Housing Element is a policy document that identifies strategies and programs to preserve and increase housing within the city to meet the housing needs of existing and future residents and does not propose any development. Residential projects developed to meet the RHNA requirement would be located on infill or underused sites in urbanized areas and the City has procedures and regulations in place to ensure that there would be no significant impacts associated with stormwater runoff, erosion, and water quality. In addition, the City is required to comply with the Municipal Separate Storm Sewer System (MS4) permit issued by the LARWQCB. The MS4 permit requires the City to implement BMPs to minimize pollutant runoff and improve water quality. Future development consistent with the plan would be required to meet all applicable City regulations. This includes Chapter 5.05, Stormwater and Urban Runoff Pollution Control, Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects of the CCMC, which requires a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. Conforming with applicable requirements would also ensure that development would not result in increased rates or amounts of surface runoff, exceed the capacity of existing or planned stormwater drainage systems, or impede or redirect flood flows. Project-specific effects would be assessed at the time future development projects are proposed. Mitigation measures, if necessary, would be implemented in accordance

¹⁰ Ibid 3.

with CEQA. Therefore, the plan, as a policy document, would result in no impact related to water quality, discharge, or drainage.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. According to the City's General Plan update *Environmental Background Report*, the City is located within three subbasins of the Coastal Plain of Los Angeles Groundwater Basin, which include the Santa Monica, Central, and West Coast Subbasins. The City's potable water is supplied by the Golden State Water Company (GSWC) and the City of Los Angeles Department of Water and Power, which depend on imported water from Metropolitan Water District (MWD). The GSWC has not used groundwater as a supply source since 1998.¹¹ The GSWC is assessing the feasibility of potential groundwater development projects. If developed, these projects would provide some increment of local groundwater which would improve the reliability of imported water within the city. However, under the Sustainable Groundwater Management Act of 2014, the unadjudicated portion of the Central Subbasin is considered a "high" priority basin. As such, the GSWC must form a Groundwater Sustainability Agency and develop a groundwater sustainability plan. Adopting the plan would not change existing groundwater demand or deplete groundwater supplies because the plan does not specifically propose any development projects. Additionally, adopting the plan would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan and no impact would occur.

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 surface 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?**
- iv. Impede or redirect flood flows?**

No Impact. The 2021-2029 Draft Housing Element is a policy document that identifies strategies and programs to preserve and increase housing within the City to meet the housing needs of existing and future residents and does not propose any development. Residential projects developed to meet the RHNA requirement would be located on infill or underused sites in urbanized areas. Furthermore, the City has procedures and regulations in place to ensure that there would be no significant impacts associated with stormwater runoff, erosion, and water quality. Future development consistent with the plan would be required to meet all applicable City regulations. These regulations include Chapter 5.05, Stormwater and Urban Runoff Pollution Control, Section 5.05.040, SUSMP Requirements for New Development and Redevelopment Projects of the CCMC to ensure stormwater runoff is controlled in a manner that would minimize water quality degradation and ensure that drainage patterns are not altered and that substantial erosion would not occur. Development conforming with applicable requirements would not result in increased rates or amounts of surface runoff, exceed the capacity of existing or

¹¹ GSWC, 2015 Urban Water Management Plan: Culver City, http://www.gswater.com/download/CulverCity_2015_UWMP-FinalDraft.pdf, accessed September 2021.

planned stormwater drainage systems, or impede or redirect flood flows. Site-specific effects would be assessed at the time future development projects are proposed. Mitigation measures, if necessary, would be implemented in accordance with CEQA. Therefore, the plan, as a policy document, would result in no impact related to water quality or drainage.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The main waterway in the city is Ballona Creek. It is a flood protection channel that drains the Los Angeles basin and runs about 9 miles from the Mid-Wilshire neighborhood of Los Angeles through the city and out to the Pacific Ocean at Marina Del Rey.¹² According to the City's General Plan update *Environmental Background Report*, Federal Emergency Management Agency (FEMA) flood maps indicate that the northern part of the city is at an elevated risk for flooding. This area is bordered by Ballona Creek, Fairfax Avenue, and Adams Boulevard, and lies within a 100-year flood zone for a 1 to 3-foot flood (Zone AO). This designation means that there is a 1 in 100 chance that a flood event enough to cause 1 to 3 feet of inundation will occur in any given year. Other smaller areas nearby are also within a 100-year flood zone (Zone A), or are at risk from a flood capable of causing inundation of less than 1 foot with a chance of occurring between 1 in 100 and 1 in 500 in any given year (Zone X). As such, the City has established building regulations in CCMC Chapter 15.03 to reduce flooding hazards. While there is a risk of flooding in certain areas of the city, the potential for seiche is considered low, as there are no large bodies of water located within the city. Due to the city's location, the city is not at risk for tsunami, seiche, or dam failure.

The 2021-2029 Draft Housing Element is a policy document that identifies strategies and programs to preserve and increase housing within the city to meet the housing needs of existing and future residents and does not propose any development. Constructing and operating future residential development projects implementing the plan would have the potential to be located within areas of the city that are at-risk of flooding or tsunami inundation. However, when proposed, future development will be assessed on a site-by-site basis for all potential environmental impacts related to flooding, tsunami inundation, and seiche. Mitigation measures, if necessary, would be implemented in accordance with CEQA. Therefore, the plan would result in no impact related to flooding, tsunami inundation, or seiche.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. As discussed under Response VX.b, the City's potable water is imported from MWD and supplied by the GSWC and the City of Los Angeles Department of Water and Power. The GSWC is assessing potential groundwater development projects that would provide some increment of local groundwater which would improve the reliability of imported water within the city. The city is located within the Santa Monica, Central, and West Coast Subbasins. The Central Subbasin has an unadjudicated portion that is considered a "high" priority basin, and as such, the GSWC must form a Groundwater Sustainability Agency and develop a groundwater sustainability plan pursuant to the Sustainable Groundwater Management Act of 2014. Adopting the 2021-2029 Draft Housing Element would not change existing groundwater demand or deplete groundwater supplies because the plan does not specifically propose any development projects. Additionally, adopting the plan would

¹² City of Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan, April 2017, <https://www.culvercity.org/files/assets/public/documents/community-development/multi-jurisdictional-hazard-mitigation-plan.pdf>, accessed September 2021.

not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan and no impact would occur.

XI. LAND USE AND PLANNING

Would the project:

a. Physically divide an established community?

No Impact. The 2021-2029 Draft Housing Element is consistent with the Preferred Land Use Map of the 2045 General Plan, which is anticipated to be adopted in Fall of 2022. The plan provides a framework to meet the housing needs of existing and future residents. It identifies strategies and programs to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the City's fair share of the region's need, preserve at-risk affordable housing units, and strategically further fair housing opportunities. To accommodate the RHNA allocation, the plan proposes additional residential densities within a new infill land use designation, identifies opportunity sites, allows for residential recycling, and considers integrating residential housing in commercial and industrial areas. Based on the land inventory process conducted for the plan and 2045 General Plan, the City has identified that the majority of future housing development would occur on developed or underused parcels, with limited development on vacant parcels. Therefore, future housing development would constitute infill development within an urbanized area and there would be no potential to divide an established community. Thus, the plan would not physically divide a community and no impact would occur.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. As discussed above, the 2021-2029 Draft Housing Element is consistent with the Preferred Land Use Map associated with the 2045 General Plan that is anticipated to be adopted in Fall of 2022. The plan identifies strategies and programs to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the City's fair share of the region's need, preserve at-risk affordable housing units; and strategically further fair housing opportunities. To accommodate the RHNA allocation, the plan proposes additional residential densities within a new infill land use designation, identifies opportunity sites, allows for residential recycling, and considers integrating residential housing in commercial and industrial areas.

The land use designations associated with the plan are not under consideration at this time and the amendments will be processed as part of the 2045 General Plan. Related zoning amendments will be processed after adoption of the 2045 General Plan. Adopting the 2021-2029 Draft Housing Element would be inconsistent with the City's existing General Plan until land use and zoning amendments are adopted and implemented. Once the City has adopted the 2045 General Plan (anticipated Fall 2022), a comprehensive update to the Zoning Code would be necessary to ensure that the Zoning Code is consistent with and effectively implements the 2045 General Plan. The plan has a program implementation summary identifying the objective of addressing the land use and zoning code amendments outlined in the plan by 2023. Future development that implements the plan could not occur until any necessary General Plan amendments and rezoning are adopted. However, adopting the plan does not specifically propose any development projects, meaning no physical environmental impacts would occur. While the plan is currently inconsistent with the adopted General Plan, no physical environmental impacts would occur from this inconsistency. When adopting the 2045 General Plan, the plan would be consistent with the updated Land Use Element and Land Use Map. Any potential environmental impacts associated with adopting the Land

Use Plan would be evaluated and mitigated, as necessary, during the environmental review process for the 2045 General Plan. Therefore, no conflict would remain upon adopting the 2045 General Plan. Adopting the 2045 General Plan, anticipated for Fall 2022, and addressing the zoning code amendments within the required timeframe,¹³ would result in consistency between the Land Use and Housing Elements. Therefore, adopting the plan would not conflict with applicable land use plans, policies, or regulations, resulting in no significant environmental impacts.

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?**

No Impact (a-b). Mineral resources are defined as any naturally occurring chemical element or compound, or groups of elements and compounds, formed from inorganic processes and organic substances. These can include coal, peat, and bituminous rock, excluding geothermal resources, natural gas, and petroleum (Public Resources Code Section 2005). About 78 acres of the Inglewood Oil Field is located within the city. In June 2021, the City Council introduced an Ordinance amending the zoning code to end these nonconforming uses by July 28, 2026.

The 2021-2029 Draft Housing Element provides a framework for meeting the housing needs of existing and future residents. It proposes additional residential densities within a new infill land use designation, identifies opportunity sites, allows for residential recycling, and considers integrating residential housing in commercial and industrial areas. As most future development would occur on developed and underused parcels, with limited development on vacant parcels, future development would not be expected to impact mineral resources. Also, the plan does not identify the oil field for housing, include any policies related to mineral resources, or conflict with existing General Plan policies or City ordinances regulating the conservation and use of mineral resources. Therefore, the plan would not result in a loss of availability of a known mineral resource or loss of a locally-important mineral resource recovery site and no impact would occur.

¹³ On September 28, 2021, Governor Newsom approved Assembly Bill (AB) 1398 to ensure that cities and counties are adequately rezoning to meet their housing needs. AB 1398 reduces the allowable timeframe for rezoning for jurisdictions that do not adopt a housing element that HCD finds to be in substantial compliance with state law within 120 days of the statutory deadline. Previously three years were allowed for the rezoning if the Housing Element was adopted within 120 days of the statutory deadline. AB 1398 requires a jurisdiction that does not adopt a housing element that HCD finds to be in substantial compliance with state law within 120 days of the statutory deadline to complete rezoning no later than one year from the statutory deadline for the adoption of the housing element. AB 1398 amends Government Code Sections 65583, 65583.2, and 65588.

XIII. NOISE

Would the project:

- a. Would the Project result in the 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?**

No Impact (a-b). The 2021-2029 Draft Housing Element identifies strategies and programs to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the City's fair share of the region's need, preserve at-risk affordable housing units, and strategically further fair housing opportunities. While the plan provides the framework for the City to meet its RHNA allocation, the plan would not result in development at this time.

While the construction and operation of future development under the plan would increase noise levels in the City, future development would be required to comply with all applicable Federal, State, and local policies, plans, and regulations related to ambient noise levels as well as adhere to the allowable noise thresholds established in the City's Noise Ordinance contained in Chapter 9.07, Noise Regulations, of the CCMC.

During construction associated with future residential development, the potential would exist for temporary or periodic increases in noise levels and/or ground-borne noise and vibration levels on and adjacent to project sites. The degree of such increases would depend on the type and intensity of construction activity, equipment type used, duration of equipment used, and distance between the noise source and noise receiver. Residential development also has the potential to result in incremental increases in long-term noise levels generated by increased vehicular traffic as well as new stationary sources of noise. Adherence to the City's Noise Ordinance and compliance with General Plan Noise Element Policies would ensure that any such noise and vibration increases, both temporary and permanent, would be reduced to the greatest extent possible. Potential environmental impacts related to noise and vibration associated with future development would be assessed on a site-by-site basis at the time when development is proposed and mitigation measures, if necessary, would be implemented to reduce significant impacts through the application and environmental review process. Therefore, because the plan is a policy document that does not include any physical development, adoption of the plan would not result in impacts related to increased ambient noise and vibration levels in the short- and long-term.

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

No Impact. The closest airports to the City include the Los Angeles International Airport (LAX), located approximately two miles to the southwest in the City of Los Angeles and the Santa Monica Airport, a municipal general aviation airport, which is located approximately two miles north of the western part of Culver City. The City is not located within any of these airports' influence areas and is not subject to the requirements of an Airport Land Use Compatibility Plan. would not expose people residing or working in the City to excessive noise levels associated with an airport.

XIV. POPULATION AND HOUSING

Would the project:

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

No Impact (a-b). The 2021-2029 Draft Housing Element provides a framework for meeting the housing needs of existing and future resident populations and identifies strategies and programs to conserve and improve the existing housing stock; provide housing for special needs populations; supply enough new housing to meet the City's fair share of the region's need; preserve at-risk affordable housing units; and strategically further fair housing opportunities. To accommodate the RHNA allocation, the plan proposes additional residential densities within a new infill land use designation, identifies opportunity sites, allows for residential recycling, and considers integrating residential housing in commercial and industrial areas. While the plan provides the framework for the city to meet its RHNA allocation, the Housing Element would not result in development at this time. The necessary amendments associated with the plan to accommodate the RHNA allocation will be considered as part of the 2045 General Plan effort that includes changes to the City's Land Use Plan.

Future development that implements the plan would increase the population in the City by providing housing. The RHNA allocation for the region has been included in SCAG's Connect SoCal growth forecast for the years 2020-2030. As such, the growth that could occur from implementing the plan has been accounted for in regional growth projections. Future development that implements the plan would provide additional housing within the city. As such, it would not displace substantial numbers of existing people or housing, requiring replacement housing to be constructed elsewhere, and no impact would occur.

XV. PUBLIC SERVICES

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

- a. Fire protection?**
- b. Police protection?**
- c. Schools?**
- d. Parks?**
- e. Other public facilities?**

No Impact (a-e). The 2021-2029 Draft Housing Element provides a framework for meeting the housing needs of existing and future resident populations and identifies strategies and programs to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the City's fair share of the region's need, preserve at-risk affordable housing units, and strategically further fair

housing opportunities. To accommodate the RHNA allocation, the plan proposes additional residential densities within a new infill land use designation, identifies opportunity sites, allows for residential recycling, and considers integrating residential housing in commercial and industrial areas. While the plan provides the framework for the City to meet its RHNA allocation, the plan would not result in development at this time.

However, future development that implements the goals of the plan would add new housing units in the city, which in turn would increase the demand on public services, including police and fire protection, schools, and libraries. At the time future development projects are proposed, potential environmental impacts to public services would be assessed on a site-by-site basis. All required development fees would be paid on a project-by-project basis to ensure that public services would increase at the same rate as development. In addition, mitigation measures, if necessary, would be implemented to reduce significant impacts through the application and environmental review process. Therefore, because the plan is a policy document that does not include any physical development, adopting the plan would have no impact on public services like fire and police protection, schools, or parks in the city.

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?**

No Impact (a-b). As indicated above, to accommodate the RHNA allocation, the 2021-2029 Draft Housing Element proposes additional residential densities within a new infill land designation, identifies opportunity sites, allows for residential recycling, and considers integrating residential housing in commercial and industrial areas. The plan provides the framework for the City to meet its RHNA allocation and adopting the Housing Element would not result in development at this time. However, future development that implements the plan would add new housing units in the city, which in turn would increase the demand on the City's parks and recreational facilities.

Potential environmental impacts to parks and recreational facilities associated with future development would be assessed on a site-by-site basis at the time the development is proposed. Future development would be required to pay development fees, including Quimby fees, on a project-by-project basis to ensure that parkland and recreational facilities are upgraded and expanded, as necessary, in conjunction with population growth in the city. Quimby fees would apply to projects that require the approval of a tentative or parcel subdivision map. The fee would be determined by a formula that considers the average fair market value of the amount of land that would otherwise be required for dedication or by the fee cap. During the application and environmental review process, if mitigation measures - like developing new parkland - are determined necessary to reduce significant impacts, any potential environmental impacts associated with those measures would also be evaluated and mitigated, as necessary. Because the plan is a policy document that does not include any physical development, adopting the plan would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur nor would it require expanding or constructing new recreational facilities. No impact to parks and recreation would occur from adopting the plan.

XVII. TRANSPORTATION

Would the project:

- a. Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycles, and pedestrian facilities?**
- b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**
- c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**
- d. Result in inadequate emergency access?**

No Impact (a-d). The 2021-2029 Draft Housing Element, as a policy document, identifies strategies and programs to preserve and increase housing within the city to meet the housing needs of existing and future residents and does not propose any development. However, implementing the programs in the plan would accommodate development required to meet the City's RHNA allocation. New residential development typically results in more vehicular trips and the increased use of streets for all modes of transportation. The plan plans for infill development that would occur primarily on underused properties within an urbanized area and consist of various housing types. Additionally, many of the housing sites included within the plan are strategically located near existing transit routes for the Culver City Bus and Los Angeles Metro. Future development would be consistent with the City's Circulation Element, Neighborhood Traffic Management Program, the Culver City Bicycle and Pedestrian Action Plan, Short Range Transit Plan, the ADA Transition Plan, Complete Streets Policy, and Senate Bill (SB) 743.

Pursuant to SB 743, the State of California's Governor's Office of Planning and Research (OPR) was tasked with developing new guidelines for evaluating transportation impacts under CEQA. These guidelines were meant to shift the transportation performance metric from automobile delay and level of service (LOS) to one that would promote reduced greenhouse gas emissions and develop multimodal and diverse transportation networks. Under the proposed update to the CEQA guidelines, OPR determined that vehicle miles traveled (VMT) would be established as the primary metric for evaluating environmental and transportation impacts. In response to the updated CEQA guidelines, the City of Culver City updated its Transportation Study Criteria and Guidelines in July 2020 to conform with SB 743's requirements. The new guidelines replaced the 2012 Traffic Study Criteria for the Review of Proposed Development Projects within the City of Culver City. They also shifted the performance metric for evaluating transportation impacts under CEQA from LOS to VMT for studies completed within the City. The new criteria and guidelines establish thresholds to identify development projects that would substantially increase VMT.

The goals, policies, and improvements set in the City's 2021-2029 Draft Housing Element are also meant to promote new development that is adequately and effectively served by a balanced system of transportation and transit; incentivize transit-oriented community programs; encourage improvements to the roadway network and traffic control systems; continue to enforce City's Capital Improvement Program, the Travel Demand Management strategies, and Mobility Improvement Fees, which require developers to pay a fair share into citywide mobility improvements to reduce VMT; reduce traffic congestion; and promote the use of public transit, such as the LA Metro E Line Culver City Station. Therefore, future development consistent with the plan would be expected to generate fewer VMT and more multi-modal trips than conventional development.

Potential traffic impacts related to increased transportation system demands associated with future development would be assessed on a project-by-project basis at the time development is proposed. The City's Traffic Engineer would require project-specific transportation analysis, if warranted. Mitigation measures, if necessary, would be implemented to reduce potential impacts in accordance with CEQA. Because the plan is a policy document that does not include any physical development, adopting the plan would not generate additional demand on the regional and local circulation systems. This would therefore not cause a conflict or obstruct a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), create new roadway hazards, or restrict emergency access in the City. Thus, no impacts related to transportation would occur when adopting the 2021-2029 Draft Housing Element.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project:

- a. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
 - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or**
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

No Impact. Additional tribal consultations in accordance with Assembly Bill (AB) 52 will occur at the time of the City's General Plan update and any future physical development. Regarding Senate Bill (SB) 18, while the 2021-2029 Draft Housing Element amends the City's existing General Plan, the land use designations and zoning amendments are not currently under consideration. The City initiated tribal consultation pursuant to AB 52 and SB 18. The City has received one response to date from the Gabrieleno Band of Mission Indians-Kizh Nation indicating that they are in agreement with the Housing Element Update.¹⁴ Future consultations will occur as part of the General Plan update and with any future ground disturbing activities. This will allow consultation on the entire 2045 General Plan, including the Preferred Land Use Map, and when specific sites are developed. The plan is a policy document that identifies strategies and programs to preserve and increase housing within the city to meet the housing needs of existing and future residents. It proposes additional residential densities within a new infill land use designation, identifies opportunity sites, allows residential recycling, and considers integrating residential housing in commercial and industrial areas. Adopting the plan would not change or alter existing City policies to protect tribal cultural resources.

Depending on the location, future development in the city could substantially change the significance of a historical resource in an adverse manner, as defined in Public Resources Code section 5020.1(k) or cause a substantial adverse change in the significance of a tribal cultural resource pursuant to Public Resources Code

¹⁴ Letter from Andy Salas, Gabrieleno Band of Mission Indians-Kizh Nation, dated September 9, 2021

Section 5024, subdivision (c). To avoid or mitigate impacts to tribal cultural resources to the fullest extent possible, future development would be required to meet all applicable Federal, State, and local policies, plans, and regulations related to preserving and protecting historic and tribal cultural resources. Specifically, future development in the city would be required to follow the protocols pursuant to AB 52 and SB 18 regarding notifying and consulting Native American Tribes. The potential impacts to tribal cultural resources of future residential projects would be assessed at the time specific development projects are proposed. Mitigation measures would be adopted to reduce significant impacts, if necessary. Therefore, because the plan is a policy document that does not include physical development, adopting the plan would not cause a substantial adverse change in the significance of a tribal cultural resource and no impact would occur.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

- a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**
- b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**
- c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**
- d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**
- e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

No Impact (a-e). The City receives its water service from the GSWC, which purchases water from the West Basin Municipal Water District (WBMWD). According to WBMWD's Urban Water Management Plan, water supply is projected to be 195,760 acre-feet per year (AFY), while water demand is expected to reach 165,660 AFY in 2040. Supply would thus exceed demand.¹⁵ In addition, since the RHNA allocation for the region has been included in SCAG's Connect SoCal growth forecast for the years 2020-2030, the projected population growth has also been captured in the WBMWD's 2020 Urban Water Management Plan. Therefore, adequate water supply is available to accommodate the city's housing needs through 2040, well beyond the current RHNA planning period. It should also be noted that some of the future residential development facilitated by the 2021-2029 Draft Housing Element would provide new housing opportunities for residents already living in the city who may be currently living in overcrowded units and would not necessarily constitute new residents to the city. For

¹⁵ West Basin Municipal Water District, 2020 Urban Water Management Plan, June 28, 2021, <https://www.westbasin.org/wp-content/uploads/2021/08/West-Basin-2020-Urban-Water-Management-Plan.pdf>, accessed September 2021.

this reason, projected population growth may not directly correlate with the amount of new housing units that could be developed under the plan.

Existing sewer lines within the city are maintained by the Culver City Department of Public Works. The City's wastewater treatment and conveyance system includes four wastewater treatment and water reclamation plants that LA Sanitation (LASAN) operates. LASAN provides service within two service areas: the Terminal Island Service Area and the Hyperion Service Area. The Hyperion Wastewater Treatment Plant, which has a design capacity of 450 million gallons per day (mgd), serves the city. It is currently functioning at about 275 mgd which is about 61 percent of its capacity. Therefore, the plant has a remaining daily capacity of approximately 175 mgd, which would be enough to serve future development facilitated by the plan.

Dry utilities for the city include gas, electricity, cable, Internet, and telephone services that are provided by Southern California Gas Company, Southern California Edison, AT&T, Spectrum, and Verizon Communications. All systems are adequate and are upgraded as demand increases. Supplies of natural resources, such as gas, currently appear adequate.

Parcels identified for future development in the land inventory process for the 2021-2029 Draft Housing Element are within an urbanized area and are currently served by existing wet and dry utilities. These utilities include water, wastewater, solid waste removal systems, natural gas, electricity, telephone and/or cellular service, cable or satellite television systems, and Internet or Wi-Fi services. The 2021-2029 Draft Housing Element provides a framework for meeting the housing needs of existing and future residents. It sets strategies and programs to conserve and improve the existing housing stock, provide housing for special needs populations, supply enough new housing to meet the City's fair share of the region's need, preserve at-risk affordable housing units, and strategically further fair housing opportunities. To accommodate the RHNA allocation, the plan proposes additional residential densities within a new infill land designation, identifies opportunity sites, allows for residential recycling, and considers integrating residential housing in commercial and industrial areas.

While the plan provides the framework for the City to meet its RHNA allocation, the plan would not result in development at this time. Future residential development that implements the goals of the plan would result in an increase in population. This population increase would increase the demand on the City's utility systems and services, including water, wastewater, and solid waste systems. Future development that implements the plan goals would meet relevant development standards and objective design guidelines in the City's General Plan and the CCMC adopted 2019 CBC, Title 9, General Regulations, and Chapter 5.04, Public Utilities, of the CCMC. It would also need to meet all applicable Federal, State, and local goals, policies, and regulations associated with reducing water consumption and diverting solid waste to conserve these resources and maintain the infrastructure to support them throughout the City.

Potential environmental impacts to utilities and service systems associated with future development would be assessed on a site-by-site basis at the time the development is proposed. All required development fees would also be paid at that time to ensure that utilities and service systems would increase at the same rate as development. In addition, mitigation measures, if necessary, would be adopted in accordance with CEQA. Therefore, adopting the plan would not cause existing water, wastewater, storm water drainage, electric power, natural gas, or telecommunications systems to be expanded or require new facilities to be constructed due to demand exceeding supply. In addition, the plan would not generate solid waste levels that exceed State or local standards, exceed the capacity of local infrastructure, or otherwise hinder meeting solid waste reduction goals. Thus, no impact to existing utilities and service systems in the City would occur.

XX. WILDFIRES

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 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, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

No Impact (a-d). According to the City's General Plan update *Environmental Background Report*, the Los Angeles County FHSZ map identifies the eastern portion of the City as being located within a Very High Fire Severity Zone (VHFSZ).¹⁶ City areas within VHFSZ include the eastern portion of the Culver Crest neighborhood, the Blair Hills neighborhood, and the Inglewood Oil Field. As such, development within these areas must follow State, Federal, local, and regional regulations related to development type, landscaping requirements, fuel management, and brush clearance restrictions to reduce risks associated with wildfires.

The 2021-2029 Draft Housing Element is a policy document that identifies strategies and programs to preserve and increase housing within the City to meet the housing needs of existing and future residents and does not propose any development. Adhering to State and City Fire regulations would reduce the risk of wildfire to the greatest extent possible. Additionally, future development projects would assess potential environmental impacts related to wildfire on a site-by-site basis at the time when development is proposed. Mitigation measures, if necessary, would be implemented during the application and environmental review process. Therefore, the plan would not result in increased risk of wildfire, impede an adopted emergency response plan, require installing or maintaining facilities or features used to suppress wildfires, or expose people or structures to geological hazards from wildfires. Thus, no impacts associated with wildfires would occur when adopting the plan.

¹⁶ Ibid 3.

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?**

No Impact (a-c). As discussed throughout this Initial Study Checklist, the 2021-2029 Draft Housing Element is a policy document and adopting it would not result in environmental impacts. Although implementing the programs in the document would accommodate development required to meet the City's RHNA allocation, adopting the plan would not amend the General Plan designations or zoning and would not entitle or permit any particular residential development project. Adopting the plan does not, therefore, have the potential to result in environmental impacts, either limited or cumulative, affecting habitat; plant or animal communities; rare, endangered, or threatened species; historic resources; or human beings. Potential impacts resulting from the development of future residential projects would be assessed at the time development is proposed. Mitigation measures would then, if necessary, be adopted in conformance with CEQA. Because the plan is a policy document that does not include physical development, the plan would not result in environmental impacts.

Attachment 1
2021-2029 Housing Element