



ADVANCE PLANNING DIVISION
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ADDENDUM TO THE NEGATIVE DECLARATION

Project Title and Culver City File No.: Culver City 2021-2029 Housing Element Update (General Plan Text Amendment, P2022-0222-GPTA)

Project Location: Citywide, Culver City, CA

Project Sponsor: City of Culver City

Background: On January 24, 2022, in compliance with California Government Code Section 65302(c), the City of Culver City (City) adopted the Culver City 2021-2029 Housing Element, which provides a framework for meeting the housing needs of existing and future resident populations within the City based on the 6th cycle Regional Housing Needs Allocation (RHNA) of 3,341 units.

The potential environmental effects of the adopted Housing Element were analyzed in a Negative Declaration (ND), which was also adopted by the City on January 24, 2022. The California Department of Housing and Community Development (HCD) reviewed the Housing Element to determine whether it complies with state law. Culver City received HCD's comments on the adopted 2021-2029 Housing Element on April 21, 2022, which stated that additional minor revisions were necessary to fully comply with State Housing Element Law (Article 10.6 of the Gov. Code). HCD comments include requiring stronger substantiation for the likelihood of redevelopment on some sites and a deeper analysis of fair housing issues.

This Addendum has been prepared with consideration of the adopted ND, which is hereby incorporated by reference pursuant to CEQA Guidelines, Section 15150, and is available at the City Planning Department at 9770 Culver Boulevard, Culver City.

CEQA Authority for the Addendum Analysis Document: The California Environmental Quality Act (CEQA) and *State CEQA Guidelines* establish the type of environmental documentation that is required when changes to a project occur after an EIR is certified or a negative declaration is adopted. *State CEQA Guidelines* Section 15164(b) states that:

An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for preparation of a subsequent EIR or negative declaration have occurred.

In order to give a degree of finality to certified EIR's and adopted negative declarations, Section 15162 (a) of the *State CEQA Guidelines* requires that a Subsequent EIR or negative declaration need only be prepared if:

- Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration,
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR,

- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative, or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The analysis below evaluates the proposed changes to the adopted Housing Element to determine whether any new significant environmental impacts, which were not previously identified in the adopted ND, would result. As the adopted ND did not identify any significant impacts, there are no previously identified significant impacts that would be substantially more severe. It has been determined by the analysis in the Addendum that none of the conditions requiring preparation of a subsequent ND have occurred and that the changes associated with the Housing Element Update would not result in new significant impacts or a substantial increase in the severity of previously identified impacts. Thus, pursuant to CEQA, this Addendum is the appropriate documentation to address the changes to the Project.

Adopted Housing Element: 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 RHNA of 3,341 units. The Housing Element identifies and analyzes existing and projected housing needs within the City and includes the City's goals, policies, quantified objectives, and scheduled programs to preserve, improve, and develop housing. To accommodate RHNA, the adopted Housing Element identified four strategies: applying two approaches to consolidate Low Density Two Family, Three Family, and Multiple Family designations into a new Incremental Infill designation; identifying sites for 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.

Housing Element Update: The adopted 2021-2029 Housing Element is being updated in order to respond to comments issued by the HCD. Based on the HCD comments, the City has made minor revisions to the adopted Housing Element. The revisions would retain the essential characteristics of the adopted Housing Element as no substantial policy changes are proposed. The revisions include minor verbiage changes and clarifications. The clarifications requested by HCD will provide additional detail and substantiation for the factors that contribute to fair housing, likelihood of completing projects to meet the RHNA, and suitability of nonvacant sites. In addition, the Housing Element Site Inventory map has been revised to reflect changes to the locations of adequate sites identified for low-income housing and an updated list of pipeline projects. The revisions do not include any changes to the strategies identified above used to demonstrate the City's fair share of affordable housing including a consolidated Incremental Infill designation, identification of sites for conversion/addition and redevelopment, identification of opportunity sites for residential housing, intensifying multi-family uses, and integrating residential uses in commercial/industrial areas.

Anticipated Project Actions: The discretionary entitlements, reviews and approvals required for implementation of the Housing Element Update would include, but would not necessarily be limited to, the following:

- Adoption of the Addendum;
- Adoption of the 2021-2029 Housing Element Update

Changed Circumstances: No substantial changes to the immediate environmental setting or circumstances under which the Housing Element Update would be undertaken have been identified since preparation of the 2022 adopted ND. The Project Site is comprised of the City and the immediately adjacent land uses remain essentially unchanged. In addition, as the City is currently preparing the General Plan Update, the land use designations within the City remain unchanged. Accordingly, existing conditions within the City have not materially changed. Furthermore, a review of plans, policies, and regulations applicable to the Project and the Project Site did not identify changes that would result in new or significant environmental effects or substantially more severe significant environmental effects.

It is acknowledged that in addition to regional growth, new development has continued to occur in the City. Therefore, the Housing Element Update includes a revised list of pipeline projects compared to those included in the adopted ND. The buildout year for the Housing Element has not changed, as the Housing Element Update is still for the years 2021-2029. This change in the pipeline projects, in combination with

the changes resulting from the Housing Element Update, would not result in new significant Project or cumulative impacts or a substantial increase in the severity of previously identified impacts.

Overall, no changes in the physical or regulatory environment have been identified since adoption of the ND in January 2022 that would result in new significant impacts or a substantial increase in the severity of the previously identified significant impacts.

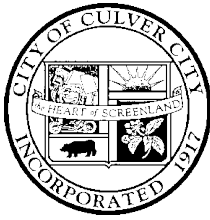
Environmental Determination: The focus of this Addendum is to assess the minor revisions to the Housing Element and provide a comparison of the potential environmental effects that could occur compared to those contained in the adopted ND.

As indicated in the adopted ND for the adopted Housing Element, the Housing Element is a policy document that provides the framework for the City to meet its 6th cycle RHNA allocation. As such, the Housing Element itself would not result in physical development since land use designations associated with the Housing Element were not under consideration. The amendments necessary to implement the 2021-2029 Housing Element are being processed as part of the General Plan update (General Plan 2045) that is currently underway. The adopted ND determined the Housing Element would not result in significant impacts to any environmental topic area analyzed CEQA.

The Housing Element Update would result in minor revisions to the adopted Housing Element, including language updates, clarifications, and updates to the Site Inventory. However, the four core strategies and the policies provided in the adopted Housing Element have not changed. Furthermore, the Housing Element Update would continue to provide the regulatory framework for the City relative to the provision, retention, and maintenance of housing, but no changes to the land use designations would occur at this time. Changes to the land use designations would continue to be analyzed in the City's upcoming General Plan 2045 Programmatic EIR. Therefore, the Housing Element Update would not result in physical development that would result in environmental impacts.

The City is in the process of preparing the program-level EIR for the General Plan 2045 and the Notice of Preparation (NOP) was released for public review on March 1, 2022, which began a 30-day scoping period that ended on April 4, 2022. A scoping meeting was also held on March 24, 2022. A comprehensive analysis of the potential impacts of changes in land use designations, including those necessary to implement the 2021-2029 Housing Element Update, will be evaluated in the General Plan 2045 EIR. Thus, the programmatic EIR will consider all land use changes that would result from the General Plan 2045, rather than limiting the analysis in the ND to changes in residential uses necessary to implement the 2021-2029 Housing Element Update.

The Housing Element Update would not result in significant environmental impacts and the environmental impact conclusions of the adopted ND remain valid. Therefore, the City has determined that an analysis of the project's environmental effects is best provided through the use of an Addendum (*State CEQA Guidelines* Section 15164) and that none of the conditions set forth in *State CEQA Guidelines* Section 15162, described above, requiring preparation of a subsequent or supplemental ND or other document have occurred.



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PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

FINAL NEGATIVE DECLARATION

Project Title: Culver City 2021-2029 Housing Element Update

Culver City Case No.: P2021-0241-MND

Project Location: Culver City, CA 90230

Project Sponsor: City of Culver City

Project Description: In compliance with Government Code Section 65580 et. seq., the City is updating its Housing Element for the planning period of 2021-2029. California Government Code Section 65302(c) mandates that each local agency within California includes a Housing Element in its General Plan. 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 (RHNA) of 3,341 units. The Housing Element identifies and analyzes existing and projected housing needs within the city and includes the City's goals, policies, quantified objectives, and scheduled programs to preserve, improve, and develop housing. To accommodate RHNA, the 2021-2029 Housing Element identifies four strategies: applying two approaches to consolidate Low Density Two Family, Three Family, and Multiple Family designations into a new Incremental Infill designation; identifying sites for 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.

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 to adopt this FINAL NEGATIVE DECLARATION based on the following finding:

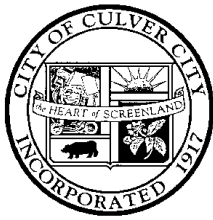
- ☒ The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- ☐ The Initial Study identified potentially significant effects, but:
1. Revisions in the project plans or proposals made by, or agreed to by the applicant before this 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 FINAL NEGATIVE DECLARATION may be obtained at:

City of Culver City Advance Planning Division
9770 Culver Boulevard, Culver City, CA 90232
www.pictureculvercity.com/draft-housingelement

Contact: Lauren Marsiglia, AICP, Advance Planning Manager (310) 253-5774 or
advance.planning@culvercity.org

December 17, 2021



ADVANCE PLANNING DIVISION
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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.:	Lauren Marsiglia, Advance Planning Manager (310) 253-5774		
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 (Commerical 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:

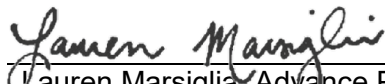
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Less Than Significant Impact With Mitigation Incorporated" as indicated by the checklist on the following pages:

- | | |
|---|--|
| <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.


Lauren Marsiglia, Advance Planning Manager
City of Culver City

12/17/2021
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
<u>VIII. GREENHOUSE GAS EMISSIONS</u> – Would the Project:				
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"/>
<u>IX. HAZARDS AND HAZARDOUS MATERIALS</u> – 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

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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:

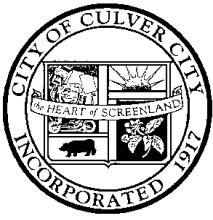
- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycles, and pedestrian facilities? | <input 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, also including a few sites due to further feasibility review and project status, and an updated Regional Housing Needs Allocation (RHNA) capacity summary are posted below.

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 communication with HCD to complete any necessary land use and zoning amendments needed to support the

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.

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

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

responsible agencies under SCAQMD's jurisdiction are considering to achieve Federal standards for healthful 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. The 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.