



# City of Culver City

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## Staff Report

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**File #: 23-358, Version: 1**

**Item #: PH-1.**

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PC - PUBLIC HEARING: (1) Adoption of a Resolution Recommending to the City Council Certification of the Environmental Impact Report (EIR), Adoption of the Findings Required by CEQA and a Mitigation Monitoring Program (MMP), and Adoption of Statement of Overriding Considerations (P2021-0272-EIR); (2) Adoption of a Resolution Recommending to the City Council Approval of Zoning Map Amendment (P2022-0144-ZCMA) and Comprehensive Plan (P2022-0144-CP); and (3) Adoption of a Resolution Recommending to the City Council Approval of a Request for Extended Construction Hours for a Creative Office Development on a 4.46-acre site at 8833 National Blvd and 8888 W. Venice Blvd (Project).

Meeting Date: November 9, 2022

Contact Person/Dept: Jeff Anderson / Contract Project Manager  
Erika Ramirez/ Current Planning Manager

Phone Number: 310-253-5710

Fiscal Impact: Yes ☐ No ☒

General Fund: Yes ☐ No ☒

Public Hearing: ☒

Action Item: ☐

Attachments: Yes ☒ No ☐

City Council Action Required Yes ☒ No ☐ Date [12/5/22]

Public Notification: (Mailed) Property owners and occupants within a 1,000-foot radius of the Project site (10/12/2022), (E-mail) Notification List (10/13/2022), (Posted) City website (10/12/2022), (Sign) Posted on the site (10/6/2022), (Published) Culver City News on 10/13/2022, (E-Mail) Meetings and Agendas - Planning Commission (11/3/22)

Department Approval: Jesse Mays, Assistant City Manager (11/1/22)

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### RECOMMENDATION:

That the Planning Commission:

1. Recommend to the City Council Certification of the Project EIR, Adoption of Findings Required by CEQA, Adoption of the Mitigation Monitoring Program (MMP) and Adoption of Statement of Overriding Considerations (P2021-0272-EIR), Resolution No. 2022-P019 (Attachment No. 1); and
2. Recommend to the City Council Approval of Zoning Map Amendment (P2022-0144-ZMA) from IG to PD-17 (Planned Development No. 17), and of Comprehensive Plan (P2022-0144-CP) subject to the Conditions of Approval as stated in Resolution No. 2022-P020 (Attachment No. 2); and
3. Recommend to the City Council Approval of an Extended Construction Hours request, subject to the Conditions of Approval as stated in Resolution No. 2022-P021 (Attachment No. 3).

### PROCEDURES:

1. Chair calls on staff for a staff report and Commission poses questions to staff as desired.

2. Chair opens the public hearing, providing the Applicant the first opportunity to speak, followed by the general public.
3. Chair seeks a motion to close the public hearing after all testimony has been presented.
4. Commission discusses the matter and arrives at its decision.

## BACKGROUND:

### Existing Conditions

The Project Site is 4.46 acres and split between the City of Culver City and the City of Los Angeles. The Project Site is bounded by Washington Boulevard, National Boulevard, Venice Boulevard, and the Helms Bakery campus. The Culver City portion is located adjacent to Washington and National Boulevards while the Los Angeles portion is adjacent to Venice Boulevard and the Helms Bakery campus.

The City of Culver City and City of Los Angeles are processing and coordinating required entitlements in parallel to ensure good planning and an integrated review process. The Planning Commission's action and subsequent City Council decision involves the Culver City portion, but plans include the entire development site. Project background and analysis of the staff report concentrates on the Culver City requirements except as otherwise noted.

The Project Site is currently two parcels that are improved with single-story structures that have been converted into retail, office, warehousing and surface and enclosed parking lots. The Culver City parcel is developed with two warehouse buildings including a 9,739 square foot building used for office and storage located on National Boulevard and a 9,082 square foot building that is vacant and located on Washington Boulevard. The Los Angeles parcel is improved with an 86,226 square foot warehouse building that is used for office and retail, as well as enclosed vehicular parking. The two parcels will be tied as one lot. All the existing improvements are proposed for demolition for the development of the Project.

The Culver City portion of the site has a General Plan land use designation of General Corridor Commercial. The site is currently zoned Industrial General (IG) with the frontage of Washington Boulevard and a portion of the frontage on National Boulevard (including the alley along the north side of the 8777 Washington Boulevard office building) located within the East Washington Boulevard Overlay (-EW) Zone. While the East Washington Boulevard Overlay Zone provides a more limited range of allowable uses relative to the underlying IG zone; office uses including creative office and multimedia production are allowed within the IG Zone and EW Overlay Zone.

The Los Angeles portion has a designation of Community Commercial by the West Adams-Baldwin Hills-Leimert Community Plan (Community Plan), which is part of the Los Angeles General Plan Land Use Element. The property is zoned C2-2D-CPIO. The C2 Zone permits a wide variety of commercial uses, including office uses and multimedia production. The "2D" designation following the C2 zone designates the Los Angeles Parcel as Height District 2 with a "D" Development Limitation.

Primary regional access to the Project is by the San Diego Freeway (I-405), located 2.09 miles west of the Project, and the Santa Monica Freeway (I-10), 630 feet northwest of the Project. The Project is served by various public transit options provided by the Los Angeles County Metropolitan Transportation Authority (Metro), the Los Angeles Department of Transportation (LADOT), and Culver City City Bus.

Entitlements for the Los Angeles portion include but are not limited to: Boundary Change to Expo Transit Neighborhood Plan, Amendment to Development Standards of Subarea A of CPIO and Site Plan Review.

The surrounding zoning and land uses are as listed below.

- \* North: City of LA; CM-2D-CPIO and C2-2D-CPIO Zones (one- and two-story commercial development)
- \* East: City of LA; C2-2D-CPIO Zone (one-story Helms Bakery campus)
- \* South: Commercial General (CG) Zone (four-story office building (8777 Washington Blvd.)
- \* West: Planned Development 12 Zone (six to seven-story Ivy Station development across National Blvd)

There are residential uses near the Project site to the west (100 feet, Ivy Station) and south (120 feet, Access Culver

City). There are also residential uses to the north (250 feet) behind the commercial buildings along Venice Boulevard and to the east (370 feet) south of Washington Boulevard.

#### Request

Culver Crossings Properties LLC (Applicant) is requesting approval of the proposed development (Project) for a creative office campus that could include associated production spaces for multimedia content creation and capture. The Project will serve as the Culver City headquarters for Apple Inc. The Project, including both Culver City and LA segments, would be 536,000 square feet on a 4.46-acre site. The development includes two buildings, one that is four story and the other five story. Both buildings include 3 levels of subterranean parking. These subterranean parking facilities are interconnected allowing vehicle access between them. A chart is provided in Attachment No. 11 showing the Project statistics as well as the subtotals for Culver City and Los Angeles.

The Project provides one building on National Boulevard (Building 1) that is located within the City of Culver City, and another building (Building 2) along Venice Boulevard and a portion of National Boulevard that is located within the City of Los Angeles. After construction, the two buildings would be connected when the shared wall along the National Boulevard frontage is opened. The buildings are proposed to frame an internal courtyard area of private open space available to the tenants of the building.

In addition, the Culver City parcel provides a small area that includes frontage on Washington Boulevard (8771 Washington Boulevard) that is currently improved with a commercial building. The commercial building would be demolished, and the area converted to a 7,120 square foot privately owned park open to the public (Washington Parklet). The applicant voluntarily offered this as part of their plan.

Pedestrian access to the buildings would be located at an entry alcove on National Boulevard and one on Venice Boulevard. Vehicular access would be provided via a drive aisle on National Boulevard to the north of the building at 8777 Washington Boulevard and a drive aisle on Venice Boulevard adjacent to the Helms Bakery campus alley. The drive accesses would allow access to the subterranean parking structures of the buildings. While there are traffic signals at the intersections surrounding the project, the drive accesses from the project are not located at traffic signal locations. As proposed, both vehicle access points are proposed as right-in, right-out only. A third vehicle access is provided as one-way ingress on Washington Boulevard for emergency vehicles only.

When a proposed development involves parcels in different jurisdictions, the California Environmental Quality Act (CEQA) allows one of the jurisdictions to act as the lead agency for the purpose of environmental review. For this project, the City of Culver City is the lead agency. Therefore, the City of Culver City reviews the proposed development and prepares an Environmental Impact Report (EIR). When Culver City has acted and certified the EIR, the City of LA will then review their portion of the development. However, they will not need to certify the EIR.

The Project requires the following entitlements for Culver City.

- \* Comprehensive Plan - to establish development standards and design for the Culver City portion of the development.
- \* Zoning Map Amendment - to change the zoning of the Culver City portion of the site to Planned Development No. 17, which requires the approval of a Comprehensive Plan.
- \* Extended Construction Hours - to allow construction to begin at 7:00 a.m. on weekdays rather than 8:00 a.m.

The Culver City Municipal Code (CCMC) requires a notification radius of 300 feet; however, the Community Development Director may expand the notification radius on a case-by-case basis. In this case the mailing radius was expanded to 1,000 feet from the boundary of the Project site. The mailing radius requires the notification of 989 property owners and occupants.

As part of the process of review of the entitlements, the applicant has provided a Preliminary Construction Management Plan, held Community Outreach meetings, and processed an Environmental Impact Report (EIR) to review the effect of the project on the environment. An analysis of these items is included following an analysis of the entitlements.

#### ANALYSIS:

To facilitate the proposed project, a Zoning Map Amendment and Comprehensive Plan are required pursuant to Zoning

Code Section 17.240, Planned Development Zoning Districts and Section 17.560, Comprehensive Plans. The proposed Zoning Map Amendment includes re-zoning the Culver City portion of the site. The proposed Comprehensive Plan includes the development standards and allowed land uses in the newly established PD zoning district. The intent of a Comprehensive Plan is to allow for flexibility in the application of the Zoning Code standards for larger scaled developments. A Comprehensive Plan considers innovation in site planning in order to respond more effectively to site features, uses on adjoining properties, and other impacts that the Zoning Code may not be able to adequately address. The PD zoning district is the zoning designation created for a site that has been entitled with a Comprehensive Plan.

#### Zoning Map Amendment

The portion of the Project in Culver City currently has a zoning designation of Industrial General (IG) and East Washington Boulevard Overlay (-EW) Zone. To facilitate the proposed development, the Applicant is requesting a Zoning Map Amendment to rezone the property to Planned Development No. 17 (PD-17). The Zoning Code states that the PD zone can be applied to "commercial complexes developed as a planned district, and sites suitable for similar large-scale development". In addition, sites must be a minimum of one acre. To develop within the PD zone, a Comprehensive Plan must be approved (CCMC Section 17.560) that includes standards and design for the proposed development.

The site is generally surrounded by commercial uses, with some residential uses (multi-family) in the vicinity. In addition, the site is located near the intersection of two primary arterials within Culver City, Washington Boulevard and National Boulevard, as well as a major roadway in Los Angeles (Venice Boulevard). The site is also located near the Metro E Line Culver City station located immediately to the west of Ivy Station. Therefore, the property is suitable for commercial complexes designed as a planned district. The site is greater than 1 acre and the applicant has submitted a Comprehensive Plan for the development of the project.

The frontage of the Culver City parcel on Washington Boulevard and a portion of the Project frontage on National Boulevard is located within the East Washington Boulevard Overlay (-EW) Zone. The Zoning Map Amendment would remove the parcel from the East Washington Overlay Zone.

#### Comprehensive Plan

Pursuant to Section 17.560 of the Zoning Code, the Applicant is requesting approval of a Comprehensive Plan for the development of the site (Attachment No. 5). The Comprehensive Plan proposes development standards that allow for the design and the uses of the proposed creative office development for the site. The Project also includes Conditions of Approval, included as Exhibit A and B to proposed Resolution No. 2022-P020 (Attachment No. 2).

The Comprehensive Plan has the following objectives:

- \* Redevelop a site with existing one-story improvements with an integrated project in both the City of Culver City and City of Los Angeles with consistent land use regulations and design parameters.
- \* Support City and regional goals and policies to reduce vehicle miles traveled and associated greenhouse gas and regional pollutant emissions by increasing employee density near transit, including the Expo Line, numerous bus routes and bike lanes.
- \* Provide high quality office space to attract and retain desirable innovative (entertainment, media, and/or) technology companies, including a secure project that fulfills such companies' needs for security and privacy.
- \* Strengthen the area's economic vitality by attracting and retaining highly skilled workers.
- \* Generate revenues for the City in the form of increased property and business license taxes, as well as increased sales taxes from increased economic activity from the additional jobs.
- \* Provide adequate parking that satisfies anticipated demand on the Project Site.
- \* Complement and improve the visual character of the area through a high level of architectural design, landscape features, and open space amenities.
- \* Provide a pedestrian-oriented development that enhances the pedestrian experiences around the Project Site.
- \* Support environmental sustainability and reduce energy consumption and water demand through such features as electric vehicle charging stations, energy-efficient lighting, water-efficient plumbing fixtures, and water-efficient landscaping.

The Comprehensive Plan document includes all the relevant land use and development standards for the Project including setbacks, building height, parking, permitted uses, site plan, floor plans, building elevations and renderings,

building materials and colors, landscaping, open space, a mobility plan, and sustainability provisions.

The Comprehensive Plan includes standards for the Project, including both the Culver City portion and the Los Angeles portion of the development. All standards include information for both cities and totals. Streetscape landscaping is proposed on Culver City locations on National Boulevard and Washington Boulevard and on Los Angeles locations on a small section of National Boulevard and on Venice Boulevard. This staff report will focus on the Culver City portion, the Los Angeles development proposal will be reviewed by City of Los Angeles after the certification of the EIR and approval of the Culver City portion of the development.

The Comprehensive Plan includes a Project Description with a locational map and summary of the project. The following is a summary of the sections of the Comprehensive Plan.

#### Land Use and Development Standards

The permitted uses of the PD-17 Zone are consistent with the General Corridor Land Use designation of the General Plan and the adopted Culver City Expo Transit Light Rail Station Design for Development (DFD) which encourages transit-oriented uses and pedestrian friendly amenities. The proposed Comprehensive Plan zoning provides for creative office and media production uses. The building design will support the pedestrian character of East Washington Overlay Zone, the Art's District, and the Transit Oriented Development District area.

#### Development Standards

The Applicant has provided Development Standards in the Comprehensive Plan. The following bullet points provide information on the proposed standards.

- \* Office Floor Area - Maximum of 167,000 sf
- \* Minimum Setback on National Boulevard is 12 feet to the building wall and the overhead building project may extend on National Boulevard as per the adopted plan
- \* Maximum Height is 56 feet
- \* Automobile Parking Spaces is 1/350 (477.14 required / 478 proposed)

Along the street front on National Boulevard, there is currently a 7-foot-wide sidewalk and parkway in the public right-of-way. The applicant is proposing to maintain the 7-foot public sidewalk and parkway and provide a 6-foot-wide easement of private property to the City for public sidewalk purposes. The proposed street front is a 7-foot-wide landscape area from back of sidewalk on public right-of-way, with a 6-foot-wide paved sidewalk (proposed easement area on private property) and then a 6-foot-wide landscape planter in front of the building wall within private property. The proposed building projections extend over the paved sidewalk easement area but would not encroach into public property. Public Works has included a condition requiring the applicant to grant a sidewalk easement.

#### Open Space

The proposed development includes a variety of open space areas totaling 81,142 square feet, with 38,198 square feet located within the City of Culver City. Landscaping is provided along the National Boulevard streetfront and along the alley. The emergency access between the National Boulevard alley and the Venice Boulevard alley will be finished with grasscrete. The Culver City portion also includes part of the courtyard that is surrounded by the buildings. Please see Chart 2 on Attachment 11.

A significant open space area is provided in the Washington Parklet. The Washington Parklet is a publicly accessible open space on the southeastern corner of the property, adjacent to the Helms Bakery campus on Washington Boulevard. In addition to a landscaped open space, the purpose is to provide a small park-like setting with seating and a flexible combination of community uses. Hours for the open space would follow the office business hours. The applicant has voluntarily designed the publicly accessible open space, it was not a requirement of the Municipal Code. The applicant determined to provide it for the community's benefit based on the initial feedback from the community.

### Parking and Security

The Culver City portion of the project would provide 478 vehicular parking spaces within the three-level subterranean garage. The number of parking spaces proposed provides the minimum number of parking spaces required by the Code. The Project complies with CCMC 17.320.035 - Non-residential Uses, providing 20 percent EV capable parking spaces, 10 percent EV ready parking spaces, and 10 percent of the required parking spaces are full EV charger/charging station spaces. The Culver City portion of the project provides a total of 192 EV capable parking spaces, 96 EV capable parking spaces, 48 EV ready parking spaces, and 48 full EV charger/charging station spaces.

The subterranean parking structure is accessed from the drive access on the southern elevation of the building and will have internal accessibility with the parking structure under Building 2. Vehicles would enter and exit on the ground level (from either of the two buildings) via an automatic entry system and sentry guard activated by a key card system. Employees may be directed to monthly parking spaces allocated within parking areas, while visitor parking is directed to designated spaces within the structure.

The below-grade parking levels include multiple tandem spaces. The CCMC requires an administrative use permit for tandem parking spaces. Because this project involves a PD Zone and a Comprehensive Plan, which will become the source of required zoning development standards for the property, any necessary review of tandem spaces or conditions, are incorporated in the Comprehensive Plan. Due to the nature of tandem spaces, a condition of approval is required that the parking be managed to ensure efficient use of the parking spaces. As stated in the Comprehensive Plan, parking on all levels will be managed with valet assist for both the office tenants and office visitors. In addition, preferred parking is provided for low emission vehicles (including hybrid, alternative fuel, and electrical automobiles) and carpool vehicles, as required by the California Green Building Code (CGBC). Handicapped accessible spaces are provided per California Building Code (CBC) regulations.

### Loading, Trash and Recycling

Trash and recycling will be provided through the Public Works Environmental Programs and Operations (EPO) Division. The trash pick-up point is located at the vehicular entrance off National Boulevard. All trash/recycling rooms will be visually shielded from public view from adjoining public streets. The Project fosters recycling of reusable materials (e.g., cardboard, plastics, and aluminum) by providing dedicated and accessible bins.

### Conceptual Signage

Signage is designed to be aesthetically compatible with the architecture of the Project and complies with the requirements of the Culver City and Los Angeles Codes. Signage includes identity, building, and tenant signage. No off premises or billboard advertising is proposed. The Project does not include signage with flashing, mechanical, or strobe lights. Signage is architecturally integrated into the design of the buildings and establishes the appropriate identification for the specific uses. Locations and final signage plans are subject to an approved Master Sign Program, which is required as a Project condition.

### Public Art

Pursuant to the City's Public Art Program CCMC 15.06.120, the development will trigger the Art in Public Places Program requirement. The Applicant has several options including payment of an in-lieu fee or commissioning original, site-specific permanent art. The Comprehensive Plan indicates that the applicant's intent is to pay the in-lieu fee.

### Special and Temporary Use Events

The Comprehensive Plan allows for various types of special and temporary events, either outdoor or indoor, public, or private may take place within the publicly accessible open space on Washington Boulevard and the private courtyard for office tenants. Special or temporary events may be allowed pursuant to the provisions of CCMC Section 17.520. Events include entertainment and assembly events such as concerts, food events, fundraisers, live entertainment, public relations activities, and other similar events.

### Sustainability

The Project design incorporates environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code, Culver City's Reach Codes, CALGreen, and is designed to LEED Gold Standards. The following sustainability features are incorporated as key objectives for meeting these measures:

- \* Divert a minimum 75% of total construction;
- \* Plant native and drought tolerant trees and groundcover, drip irrigation;
- \* Control and retain water runoff from the site for most rainfall events;
- \* Install electric vehicle charging stations with infrastructure to add more;
- \* Project-specific transportation demand management program designed to help implement strategies and amenities that shift travel demand and influence behavior;
- \* Prioritize natural materials and those designed with human health in mind;
- \* Create a system for on-site recycling;
- \* Provide long-term and short-term bicycle spaces;
- \* Select efficient indoor plumbing fixtures to reduce water consumption by 40%;
- \* Design an all-electric building with efficiency measures to lower energy consumption by at least 24%;
- \* Creates an active pedestrian-oriented and walkable streetscape and a parklet on Washington Boulevard to provide an interactive gathering space.

The final LEED scorecard is based upon the construction plans and so is subject to change upon completion of the Project. For more information about the LEED scoring criteria, please visit <https://www.usgbc.org/leed-tools/scorecard>.

#### Mobility Plan (TDM)

The proposed Comprehensive Plan includes a Mobility section to encourage safe movement, including shuttle service, bus stops, Metro ridership, and biking. Site design elements and regulatory standards provide enhanced use of walking, biking, and public transportation as alternatives to automobile use. It is anticipated that the proposed buildings would have 2,400 employees in the building with 1,216 parking spaces provided. So about 50 percent of the employees will be required to utilize alternative transportation. The project provides TDM measures that include support services, marketing and communications, commuter club, commute expert program, walking, public transit, bicycle subsidies and incentives, ride-share program, and pre-tax commuter benefit. A condition of approval is included requiring the submittal of a TDM plan during plan check for review and approval by staff.

The Project would also provide 51 bicycle parking spaces, including short-term and long-term spaces, in compliance with respective City codes. The Culver City Parcel would provide 17 short-term bicycle parking spaces, and 34 long-term bicycle parking spaces for a total of 51 bicycle parking spaces, which is compliant with the Bicycle and Pedestrian Action Plan. Short-term bicycle parking would be provided at the Washington Parklet as well as additional spaces proposed in the National Boulevard streetscape. Long-term bicycle parking would be located on the first level of the subterranean parking structure. The long-term parking would include 5 showers and with lockers.

#### Shuttle Service

The Project would be served by an existing fixed-route intercampus shuttle program that transports Apple employees between Apple buildings in Culver City and the Metro "E" Line Station. The shuttle runs from 8:00 am to 6:00 pm on weekdays. Specific pick-up/ drop-off locations for shuttle trips originating from the Project include other Apple-occupied buildings in the area. The Project would share the existing Culver City bus stops along Washington Boulevard near National Boulevard.

### Project Plans (Project Design)

The Comprehensive Plan includes a Project Plans section that includes a variety of plans including site plan, elevations, sections, renderings, and floor plans.

The Project is proposing a contemporary architectural design defined by simple lines, along with a neutral and unified color palette. The proposed buildings would feature full height glazing defined by horizontal architectural projections overhanging each of the stories. The projections would be 11 feet, six inches deep along the National Boulevard facade. The horizontal definition of the projections would create a stratified articulation of the building, reducing their perceived visual mass. The projections would also provide shading and passive solar control to reduce cooling loads on building interiors. Lastly, the projections will function as balconies that would be located at floors two through four along the National Boulevard. Outdoor terraces would also be provided within the interior courtyard to allow for indoor/outdoor use and fresh air circulation in the buildings.

The ground floor of the building would be separated from the sidewalk by landscaped planters while the Project's exterior glazing at street level would enhance the facade transparency and engagement with the sidewalk. The main entrances into the two buildings would be at street level, recessed back from the sidewalk, and featuring full height glazing. The full height glazing would allow for an open appearance and engage the adjacent sidewalks, while being open and transparent as viewed from a distance. The proposed building would have a single entryway with a length of at least 40 feet, and a depth varying from approximately 34 to 45 feet on National Boulevard.

The proposed structure would use a variety of building materials, with the primary exterior material being clear glazing, in compliance with Building Code requirements for energy efficiency. Bronze louver screens are proposed framing the entryway and near the end of the street elevation. The bronze screens are also proposed as the roof screen to screen the rooftop equipment. The horizontal articulation of the building is emphasized by the projections, glass guardrails on the projections, a bronze metal linear feature that defines each floor, as well as the bronze louver screens. Under the projections and visible from the ground level would be a Honey Oak soffit.

Rooftop mechanical equipment would be screened by the bronze screens which are architecturally coordinated into the building design. To reduce the visual prominence of the mechanical screens, the screens would be stepped back from the exterior walls. The height of the building is proposed at 56 feet, while the top of the equipment screen would be 66 feet, 6 inches.

Floor plans are provided in the Comprehensive Plan, though they are spec plans with no detail. Typically, the layout of the floors are completed through a tenant improvement plan submitted to the Building and Safety Division during or after construction.

### Conceptual Landscape

The conceptual landscape is based upon the Washington/National Streetscape Master Plan. Based on jurisdictional requirements, six street trees are planted along the Culver City building frontage on National Boulevard, with three additional trees located on National Boulevard within the jurisdiction of LA. The street trees are Lagerstroemia Indica "Natchez" (Crape Myrtle) on National Boulevard, which match the existing trees on that block. Accent trees at the building entrance are Phoenix Canariensis (Canary Island Date Palm). The planting palette includes a variety of native and drought-tolerant plants with low-irrigation water needs. The irrigation systems are tied to the LID storm water design system for water reuse and reclamation and are tied to rain sensors to reduce water.

### Streetscape Details

The project site is located within the Washington National Transit Oriented District (TOD) Streetscape Plan. The plan is intended to promote revitalization through the implementation of pedestrian friendly streetscape enhancements such as canopy street trees, planters and tree grates, sidewalk improvements, street furniture (benches, trash receptacles, and bicycle racks), new crosswalk paving and Low Impact Development (LID) features such as bioswales and filtration planters.

The applicant is proposing a 7-foot-wide landscaped parkway along National Boulevard with six street trees and drought-tolerant landscaping. Other improvements proposed for the streetscape include short-term bicycle parking, enhanced



paving areas decorative lighting, landscape planters and seating areas at the building entrance. Staff will continue to work with the applicant to further refine the streetscape plan so that the improvements are consistent with the TOD streetscape plan.

### Conceptual Lighting

The conceptual lighting design envisions an inviting ambiance utilizing energy efficient LED lighting to create a soft and warm presence. The building lighting is designed to prevent light transmittance and glare on adjacent properties, while providing an ambient glow that delivers safety for pedestrians and highlights the building architecture at night.

Exterior lighting incorporates low-level exterior lights on the buildings and along pathways for security and wayfinding purposes, while avoiding highly reflective surfaces that result in adverse glare effects. In addition, low-level lighting to accent signage, architectural features, and landscaping elements will be incorporated. All lighting will comply with CCMC Section 17.300.040.

### Civil Engineering

The last section of the Comprehensive Plan includes Civil Engineering plans. The plans provided include a concept demolition plan, concept grading plan, traffic striping plan, concept utility plan and concept LID/SUSMP plan.

### Extended Construction Hours Request

The applicant is requesting to extend construction hours beyond the construction hours stated in the Municipal Code (Attachment No. 9). Per Culver City Municipal Code Section 9.07.035, construction hours are limited to the following.

8:00 am and 8:00 pm Mondays through Fridays

9:00 am and 7:00 pm Saturdays

10:00 am and 7:00 pm Sundays

The applicant is requesting to extend the daily construction hours Monday through Friday to 7:00am - 8:00pm. The City of Los Angeles allows construction to begin at 7:00 am. The CCMC states the following.

C. Construction activity of a specific nature (such as the pouring of concrete), with a limited duration, in non-residential zoning districts (as set forth in Article 2 of Title 17, Zoning, of this Code), on construction sites one (1) acre or greater in size, during the times prohibited by Subsection A. of this Section may be authorized, provided such exception has been determined to be in the public interest and one (1) of the following permits has been issued:

1. A land use permit, processed in accordance with the provisions of Article 5 of Title 17, Zoning, of this Code. The request for extended construction hours shall accompany the land use permit application and include detailed facts showing that the public interest will be served by allowing the extended construction hours. The request shall be considered in conjunction with the project as a whole and shall be subject to conditions of approval as determined to be necessary by the decision-making authority.

Based on the CCMC requirements, the applicant can ask for extended construction hours of a specific nature if the exception is determined to be in the public interest. The applicant is requesting to extend daily construction hours for the duration of the construction of Building 1. The benefits to construction of the Project in extending the hours from 8:00 am to 7:00 am include the following.

\* A reduction in overall construction duration of 30 calendar days.

\* A reduction in the anticipated volume of project-related truck traffic during peak afternoon hours on business days around Culver City, as starting at 7:00 am would result in most construction activities ending by 3:00 pm.

\* Enable a more efficient daily flow of trade workers by increasing carpooling opportunities, as a 7:00 am start time would align with the working hours in Los Angeles for Building 2.

The extended construction hours will be subject to conditions of approval and mitigation measures, including the Construction Management Plan, Pedestrian Protection Plan, Construction Traffic Management Plan, and Noise studies. Any changes to the Construction Management Plan, Pedestrian Protection Plan, and Construction Traffic Management Plan will require approval by the Public Works Engineering Division, Building Safety Division, and the Current Planning Division. In addition, a condition of approval requires the Applicant provide further measures should the City determine if

necessary. The City may impose additional measures including construction signage informing the public of extended construction hours, increase sound attenuation, and added traffic control construction personnel.

#### EIR Analysis of Extended Hours

Since the Extended Construction Hours request is being reviewed as part of the entitlement, the environmental impacts were analyzed as part of the EIR (Attachment No. 9).

The Extended Construction Hours Request was considered and analyzed in the Noise section. The Draft EIR includes analysis on the Extended Hours request on page 4.10-22 4.20-37 and Table 4.10-10.

The Draft EIR disclosed the potential for potentially significant noise impacts to occur during the extended construction hours (i.e., 7:00 am to 8:00 am) whereby noise levels could exceed thresholds. The Draft EIR includes Mitigation Measures (NOI-MM-1 and NOI-MM-2) to reduce on-site construction-related noise levels via the use of temporary noise barriers and properly maintained equipment, respectively.

Thus, similar to construction activities occurring after 8:00 am Monday to Friday, construction occurring between 7:00 am and 8:00 am as part of an Extended Construction Hours Request, would also result in the same temporary, periodic significant and unavoidable impacts as shown in Table 4.10-10, of the Draft EIR. The Draft EIR adequately addressed the potential for noise impacts occurring with and without the Extended Construction Hours Request approval.

The analysis also discussed construction-related impacts (the same amount of maximum daily on-site equipment and trucks would occur at the Project) and traffic/transportation (per CEQA guidelines, transportation impact analyses and conclusions are not directly tied to construction hours). In both cases, with or without approval of the Extended Construction Hours Request the Project would have a less than significant impact with respect to VMT.

The analysis of the EIR was provided by ESA, the firm that prepared the EIR. The analysis reviewed the Noise impacts and discussed review of construction-related impacts and traffic/transportation impacts. The request for extended construction hours from 7:00 am to 8:00 am does not result in any greater impacts for the project without the extended construction hours.

#### Construction Management Plan

The Applicant has submitted a preliminary Construction Management Plan (Attachment No. 8). The purpose of the Construction Management Plan is to forecast how the project management team will implement and perform site management responsibilities during the course of construction. This plan provides a guide for an efficient and coordinated construction process and information to the public about the project's objectives. Issues addressed include construction fencing, pedestrian protection requirements, community notification, construction hours, and construction methodology and logistics planning. Furthermore, the Plan covers environmental issues such as noise and vibration management, dust control and erosion control and demolition debris recycling plan.

The Construction Management Plan provides an estimated construction sequence and planning. Based on the building's proposed design, the project's construction will be divided into 3 sequences.

Sequence 1. For Substructure including demolition, shoring, excavation, drainage, and waterproofing, and subterranean concrete structure. Estimated start date is February 2023 for Phase 1 (Culver City portion). Estimated start date is August 2023 for Phase 2 (Los Angeles portion).

Sequence 2. For Superstructure including concrete structure, enclosure, interior buildout, startups testing and commissioning, and inspections. Estimated start date is December 2023 for Phase 1 (Culver City portion). Estimated start date is September 2024 for Phase 2 (Los Angeles City portion).

Sequence 3. For Sitework including offsite improvements and landscaping. Estimated Start date is December 2024 for Phase 1 (Culver City portion). Estimated Start date is June 2025 for Phase 2 (Los Angeles portion)

The estimated date of completion for Phase 1 is April 2025 and for Phase 2 is April 2026. The applicant estimates completion of Building 1 one year prior to the completion of Building 2. For that year, all vehicle ingress and egress for Building 1 will occur on National Boulevard.

Project generated noise is mitigated with the following measures as described in the MMP:

\* Noise 1 - The provision of a 12-foot-tall temporary construction fence equipped with noise blankets along the northern and western boundaries of the project site. In addition, a 6-foot-tall temporary construction fence equipped with noise blankets along the southern boundary along Washington Boulevard.

\* Noise 2 - Contractors to ensure that all construction equipment are equipped with properly operating and maintained noise shielding and muffling devices.

The project construction is anticipated to take three years and two months. A Final Comprehensive Construction Management Plan (CMP) is required as a condition of approval.

#### COMMUNITY OUTREACH:

Pursuant to the City's Community Outreach Guidelines, the applicant hosted four community meetings as part of the outreach to neighbors and community members (Attachment No. 7). A description of each of the Community Meetings follows.

Community Meeting No. 1 - October 22, 2021. Due to covid pandemic concerns Meeting No. 1 was held virtually. The meeting was attended by 31 people. The applicant provided a conceptual plan for the development and then opened the meeting for comments. Comments received included the lack of residential use, transportation issues and traffic circulation in the vicinity, amount of parking proposed, desire for an attractive streetscape, how the meeting was noticed and concern that the noticing was not effective.

Community Meeting No. 2 - December 6, 2021. Meeting No. 2 was also virtual and associated with the Notice of Preparation (NOP) for the Project EIR. The meeting was attended by 97 people. The meeting was split into two segments, a community meeting and the Scoping Meeting required for the preparation of an EIR. During the community meeting, the Applicant described the development proposal. During the NOP portion of the meeting, the environmental consultant, ESA, presented the issues to be addressed in the Project EIR. Community concerns included the proposed amount of parking, lack of residential use, the streetscape, safety of pedestrians and bicyclists, and transportation and traffic.

Community Meeting No. 3 - May 12, 2022. Meeting No. 3 was also a virtual meeting with 37 people in attendance. The Applicant described the Project and then entertained comments. Concerns expressed included the amount of parking provided, lack of residential use, support for a traffic signal on Venice, encouraging a high building efficiency LEED certification and keeping the sidewalks open during construction.

Community Meeting No. 4 - October 6, 2022. Meeting No. 4 was held as a hybrid (in person and virtual) at the Helms Bakery campus. The Applicant provided a presentation of the proposed project and opened the meeting up for questions. Issues expressed included the status of the potential traffic signal on Venice Boulevard, if the potential traffic signal was a three-way signal, if Apple would provide security for the Parklet, whether changes to the Culver City parking requirements would have any impacts on the proposal, whether recent California State legislation would affect the project, recommendation to build the Parklet first, and how bicycle lanes would be affected on Venice Boulevard.

#### ENVIRONMENTAL DETERMINATION:

A Draft Environmental Impact Report (EIR) was prepared for the Crossings Campus Project (Attachment No. 6). Culver Crossings Properties LLC, the Applicant, proposes to develop two buildings up to five stories that would provide a total of 536,000 square feet (sf) of new office floor area, which is intended to be occupied by Apple Inc. on an approximately 4.46-acre (194,334 sf) site. The site is comprised of two properties: one 1.63-acre (71,016 sf) parcel is in the City of Culver City (Culver City Parcel) while the second 2.83-acre (123,318 sf) parcel is located in the City of Los Angeles (Los Angeles Parcel) (collectively referred to herein as the Project Site). The proposed office buildings would be designed to accommodate creative office uses as well as amenities for building tenants including a cafeteria, coffee stations, and other ancillary uses typical of an integrated office complex development.

As the proposed project is located within two jurisdictions, and is one project, one of the jurisdictions is required to be the lead agency for managing the California Environmental Quality Act (CEQA) process. The City of Culver City is the Lead Agency and is therefore responsible for preparing this Draft EIR for the entire project.

At the start of the process, the City prepared an Initial Study to identify potential environmental impacts. The Initial Study determined that the Project had the potential to result in significant impacts associated with a number of environmental issues. As a result, the Initial Study led to a determination that a Draft EIR should be prepared to address those issues where the Project could result in significant environmental impacts, and to consider feasible mitigation measures and alternatives to the Project. The issues studied in the Draft EIR are as follows.

- \* Aesthetics (for informational purposes)
- \* Air Quality
- \* Cultural Resources
- ◆ Historical Resources
- ◆ Archaeological Resources
- \* Energy
- \* Geology and Soils
- \* Greenhouse Gas Emissions
- \* Hazards and Hazardous Materials
- \* Hydrology and Water Quality
- \* Land Use and Planning
- \* Noise
- \* Public Services
- ◆ Fire Protection
- ◆ Police Protection
- \* Transportation
- \* Tribal Cultural Resources
- \* Utilities and Service Systems
- ◆ Water Supply
- ◆ Wastewater
- ◆ Solid Waste
- ◆ Electric Power, Natural Gas, Telecommunications Facilities

Pursuant to the provision of CEQA Guidelines Section 15082, the City circulated a Notice of Preparation of an Environmental Impact Report and Community Meeting/EIR Scoping Meeting (NOP) to State, regional, and local agencies, and members of the public for a 46-day review period commencing November 4, 2021 and ending December 20, 2021. The purpose of the NOP was to formally notice that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. The Community Meeting/EIR Scoping Meeting was held on December 6, 2021. During the public review period for the NOP, 38 commenters submitted responses to the NOP. Correspondence was received from various agencies including the State of California Department of Transportation (Caltrans), Native American Heritage Commission (NAHC), South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments (SCAG), Los Angeles Department of Water and Power (LADWP), and the City of Los Angeles Bureau of Sanitation (LASAN), interested organizations, and interested parties. All written comments are provided in Appendix A-4, of the Draft EIR.

#### Draft Environmental Impact Report

A Draft Environmental Impact Report (Draft EIR) was prepared pursuant to the requirements of the California Environmental Quality Act (CEQA) based upon the Initial Study and scoping. The Draft EIR is an informational document that informs public agency decision-makers and the public generally of the environmental effects associated with the Project, and ways to minimize significant environmental effects through mitigation measures or reasonable alternatives to the Project. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant; in such cases, impacts are considered significant and unavoidable. In accordance with CEQA Guidelines Section 15093(b), if a public agency approves a project that has significant impacts that are not substantially mitigated, the agency must state in writing the specific reasons for approving the project, based on the Final EIR and any other information in the public record for the project. This is known as a "statement of overriding considerations." The Draft EIR determined that there were four issues that were significant and unavoidable. These include the following.

1. Construction Air Quality - Regional NOX Emissions (Project-Level and Cumulative)
2. On-Site Construction Equipment Noise (Project-level and Cumulative)

3. Off-Site Construction Noise - Mobile Sources (Cumulative)
4. Off-Site Construction Vibration - Human Annoyance (Project-level and Cumulative)

These four issues are summarized below.

#### Construction Air Quality - Regional NOX Emissions (Project-Level and Cumulative)

As analyzed, there will be a period of time when Building 1 is operational and Building 2 is still under construction. The Project's overlapping construction and emissions of NOX in 2025 would exceed the SCAQMD thresholds of significance. Emissions of other criteria pollutants would be below SCAQMD thresholds. The NOX emissions result primarily from heavy-duty trucks during overlapping construction of Building 2 while Building 1 is operational. Therefore, the Project's temporary impact related to overlapping construction and operational regional NOX emissions would be potentially significant. Mitigation Measure AQ-MM-1 would be required to reduce overlapping construction-related NOX emissions that would be concurrent with the Building 1 regional operational emissions. In addition, there are no feasible mitigation measures to reduce construction emissions further or reduce operational emissions of NOX. With implementation of feasible mitigation, regional NOX emissions from overlapping construction and operations would remain above the regional operational significance threshold for NOX. The use of SCAQMD's operational significance threshold for NOX provides a conservative analysis of potential regional NOX emissions impacts as it is lower than the construction significance threshold for NOX. Therefore, based on this conservative methodology, short-term and temporary impacts related to regional NOX emissions occurring during this overlapping operational and construction phase would be significant and unavoidable after implementation of feasible mitigation measures. There would also be a cumulatively considerable net increase of NOX emissions, which would result in a significant and unavoidable cumulative impact.

#### On-Site Construction Equipment Noise (Project-level and Cumulative)

Off-site receptors located to the north, west and south have more than two-story buildings represented, and upper floor receivers/units that have outdoor living areas on the side facing the Project construction areas would be exposed to construction noise from the Project Site. Mitigation Measure NOI-MM-1 would provide at least a 10 dBA noise reduction at ground-floor sensitive receptors to the north and west and 5 dBA noise reduction at sensitive receptors to the south and east. Mitigation Measure NOI-MM-2 requires that muffler systems provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system. With implementation of mitigation measures maximum construction noise levels would not increase ambient noise levels at any of the ground-floor noise-sensitive receptor locations above the applicable thresholds of significance. With standard building exterior to interior noise attenuation provided by modern building construction, interior noise levels at these off-site receivers would not result in significant impacts. However, with respect to on-site construction equipment noise, noise barriers have a technical limitation with regard to height. It is not feasible to install a construction noise barrier of sufficient height that would block the line-of-sight for all noise-sensitive receptor locations, such as upper floor residential units, due to technical limitations including barrier foundation needs and wind load capacities. Because construction noise would exceed the ambient-based noise level thresholds at off-site sensitive receivers, including upper-floor residential units at receptor locations north, west, and south of the Project Site, construction noise would remain significant and unavoidable. Because construction noise would exceed the ambient-based noise level thresholds at off-site sensitive receivers, including upper-floor residential units at receptor locations north, west, and south of the Project Site, construction noise would remain significant and unavoidable.

Cumulative construction noise impacts associated with on-site construction equipment could be significant if construction activities as part of Related Project Nos. 5, 8, 9, 11, 14, and 15 occur within 1,000 feet of the Project Site. Each of these related projects are required to comply with the noise standards and ordinances of the City of Culver City and City of Los Angeles, as applicable. Exact construction schedules for these related projects are not known. It is not possible to predict whether construction of these related projects would overlap with construction of the Project. Therefore, it is conservatively assumed that construction of these related projects could occur at the same time as the Project. Because the Project would result in potentially significant construction noise impacts prior to mitigation measures, cumulative on-site noise from the Project and related projects could result in potentially significant cumulative construction noise impacts at similar off-site receptors and receivers between the Project Site and the nearest related project sites. Mitigation Measures NOI-MM-1 and NOI-MM-2 would serve to reduce cumulative on-site construction noise impacts. With respect to on-site construction equipment noise, noise barriers have a technical limitation with regard to height. It is not feasible to install a construction noise barrier of sufficient height that would block the line-of-sight for all noise-sensitive receptor locations, such as upper floor residential units at receptor locations to the north, west and south, due to technical limitations including barrier foundation needs and wind load capacities.

#### Off-Site Construction Noise - Mobile Sources (Cumulative)

With regard to off-site construction noise, construction traffic from related projects would contribute to noise levels on major thoroughfares throughout the region, although the related projects are located in different areas and, to some extent, would have varied haul routes and traffic patterns associated with their construction. Given that it is possible that the Project and related projects could together contribute to cumulative off-site construction traffic noise levels on the same roadways at the same time and could exceed a significance threshold with combined cumulative traffic levels, cumulative off-site construction traffic noise impacts would be potentially significant. The installation of sound barriers would be inappropriate for residential land uses that face the roadway as it would be impractical and create aesthetic and access concerns. Thus, there are no feasible mitigation measures that could be implemented to reduce the temporary cumulative off-site construction traffic noise impacts. Therefore, the Project's contribution to cumulative off-site construction noise would be cumulatively considerable and would represent a significant and unavoidable impact.

#### Off-Site Construction Vibration - Human Annoyance (Project-level and Cumulative):

It is unusual for groundborne vibration from sources such as rubber-tired trucks to be perceptible, even in locations close to major roads, unless the road surface is rough with uneven spaces. Per FTA guidance, the significance criteria for human annoyance is 72 VdB for sensitive uses, including residential, hotel and theater uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road. To provide a conservative analysis, the estimated vibration levels generated by construction trucks traveling along the anticipated haul route(s) were assumed to be within 25 feet of the sensitive use (residential and hotel use) along Venice Boulevard, Washington Boulevard, S. Robertson Boulevard, and National Boulevard. Temporary vibration levels could reach approximately 72 VdB periodically as heavy-duty construction trucks, including haul trucks and concrete trucks, pass sensitive receptors along the anticipated haul route(s). Therefore, the residential uses along National Boulevard, Washington Boulevard, S. Robertson Boulevard, and Venice Boulevard (between the Project Site and I-10), would be exposed to ground-borne vibration up to 72 VdB, which would be at the 72 VdB significance criteria from the heavy-duty construction trucks. As such, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent offsite vibration from heavy-duty construction trucks traveling along the anticipated haul route(s) would be significant. However, traffic travelling on public roadways, including haul trucks on the haul routes, is beyond the control of the Project. In addition, Project-related heavy-duty construction trucks would be restricted to the designated haul routes (Venice Boulevard, Washington Boulevard, National Boulevard, and La Cienega Boulevard) and avoid other neighborhood streets, so that this potential impact is minimized. Potential vibration impacts associated with heavy-duty construction trucks traveling on public roadways would remain significant and unavoidable.

Several related projects are in locations that could potentially lead construction traffic, including truck traffic near sensitive vibration receptors. Should construction of the Project and related projects overlap, there is a potential for cumulative vibration impacts to sensitive vibration receptors. Construction of the Project, both on-site and off-site, would not result in significant vibration impacts related to structural damage. However, the Project would result in vibration impacts related to human annoyance. As such, should construction traffic of the Project and related projects overlap, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from heavy-duty construction trucks traveling along the anticipated haul route(s) would be significant. Therefore, cumulative off-site construction vibration impacts would be potentially significant. However, no feasible mitigation measures are available for off-site construction truck route vibration impacts. Thus, the Project's contribution to cumulative off-site construction vibration would be cumulatively considerable and would represent a significant and unavoidable impact.

In order to provide the Draft EIR to the public, and in accordance with the provision of CEQA Guidelines, the City, serving as the Lead Agency:

- (1) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse;
- (2) published a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for public review at the City's Current Planning Division;
- (3) provided copies of the NOA and Draft EIR to the Culver City Julian Dixon Library, Baldwin Hills Branch Library, and City of Los Angeles Central Library;
- (4) posted the NOA and the Draft EIR on the City's Planning Division website at: <https://www.culvercity.org/City-Projects/G-Planning-Projects>;
- (5) sent a NOA to all property owners within 1,000 feet of the Project Site;
- (6) sent a NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project; and
- (7) filed the NOA with the County Clerk. The public review period commenced on July 21, 2022 and ended on September 6, 2022 for a total of 47 days.

During the Draft EIR public review period, the City received eleven (11) comment letters from agencies and organizations through written correspondence and emails. These comment letters are included in Appendix A, Original Comment Letters, of the Final EIR (Attachment No. 6). Also, during the Draft EIR public review period, the City conducted a virtual meeting focused on the Draft EIR on August 16, 2022. This meeting was not required by the CEQA Guidelines, but rather conducted to provide an additional opportunity for public input. The Draft EIR meeting provided an overview of the findings, explained the process for providing comments on the document, and outlined the remaining process for completion of a Final EIR.

#### Final Environmental Impact Report

The Lead Agency must evaluate comments received on the Draft EIR and prepare written responses and consider the information contained in a Final EIR before approving a project. The Final EIR consists of: (a) the Draft EIR or a revision of the Draft; (b) comments and recommendations received on the Draft EIR either verbatim or in summary; (c) a list of persons, organizations, and public agencies commenting on the Draft EIR; (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and (e) any other information added by the Lead Agency.

A Final EIR has been prepared and includes responses to comments (Attachment No. 6). Supplemental analysis to address comments on the Final EIR were provided as appendices for Human Health Risk Assessment, Soil characteristics, and Air Quality Emissions. Mitigation measures have been incorporated into the project's design. Mitigation Measures include mitigations for Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise, Public Services, Transportation, Tribal Cultural Resources and Utilities and Service Systems. With the inclusion of these mitigation measures, impacts on the environment are reduced to a less than significant level except for the four issues discussed previously that have significant and unavoidable impacts. Conditions of Approval require that the Applicant implement the Mitigation Measures as contained in the Mitigation Monitoring Program.

#### Statement of Overriding Considerations

As described in the preceding section, the City's approval of the Project will result in environmental impacts that are significant and unavoidable and cannot be mitigated. These impacts are described in detail in Attachment No. 6 in the Draft EIR. While mitigation measures would reduce these impacts, impacts would remain significant and unavoidable. To approve the project a Statement of Overriding Considerations must be approved along with the EIR document. A Statement of Overriding Consideration is a written statement explaining the specific reasons why the social, economic, legal, technical, or other beneficial aspects of the proposed project outweigh the unavoidable adverse environmental impacts, and why the Lead Agency is willing to accept those impacts. A copy of the Draft EIR, the Final EIR, the Responses to Comments document, and the Mitigation Measure and Reporting Program are included with the report as Attachment No. 6. The Statement of Overriding Considerations will be presented to the City Council at the time that certification of the EIR is considered.

#### Transportation Analysis

As listed above, one of the issues studied was Transportation. Since this issue sometimes generates interest, this report is summarizing the analysis and findings of transportation.

To analyze the impacts of the project on traffic and transportation issues, a Transportation Impact Study was completed for the proposed project by Fehr and Peers in July 2022. Because the Project Site is in both the City of Culver City and the City of Los Angeles, the Transportation Impact Study was prepared in accordance with the City of Culver City's (City) CEQA transportation thresholds of significance and the Transportation Study Criteria and Guidelines (TSCG), as well as the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG). Both cities have established the guidelines and methodology for assessing transportation impacts for development projects based on the updated CEQA guidelines from the State of California that require transportation impacts be evaluated based on vehicle miles traveled (VMT) rather than level of service (LOS) or any other measure of a project's effect on automobile delay.

The TSCG specifies Culver City's VMT screening criteria for development projects. Per the criteria, if a development project meets specific VMT screening thresholds, it is exempted from having to conduct VMT impact analysis to comply with CEQA, and a less than significant impact is presumed. The Project is located less than 600 feet from the Metro E

Line Culver City Station, within the 1/2 mile from a key Transit Priority Area. Therefore, the Project is screened from having to conduct VMT impact analysis and is presumed to have a less than significant impact on VMT and transportation impacts.

The following summarizes the results of this analysis:

\* The Project would involve the demolition of 105,047 sf of warehouse, office and retail space and involves the development of two adjacent parcels, one in the City of Culver City and the other in the City of Los Angeles. The Project will construct two, four- to five-story buildings that would provide a total of 536,000 square feet (sf) of new office floor area, which is intended to be occupied by Apple, Inc. The three Project driveways would be located on Venice Boulevard, National Boulevard, and Washington Boulevard.

\* Based on the TSCG, the Project is screened from having to conduct VMT impact analysis and is presumed to have a less than significant impact on VMT as it is located less than 600 feet from the Metro E Line Culver City Station, well within the 1/2 mile from a key TPA as identified in Threshold 2. Therefore, a less than significant impact is presumed. However, the Project proposes voluntary TDM measures which would reduce Project traffic.

\* The Project features, location, and design would be consistent with both City's plans, programs, ordinances, and policies that support alternative transportation and have been adopted to protect the environment. Therefore, the Project would have a less than significant impact on both City's transportation-related plans, programs, ordinances, and policies.

\* The Project is not projected to substantially increase hazards, conflicts, or preclude City action to fulfill or implement projects associated with surrounding transportation networks and will contribute to overall walkability through enhancements to the Project site and streetscape. Therefore, the Project is expected to have a less than significant impact.

\* Based on guidance from the LA TAG, the addition of Project traffic under all three analysis scenarios is not projected to cause or add to a queue extending onto the freeway mainline by less than two car lengths. Therefore, the Project is expected to cause a less than significant safety impact.

\* The Project would generate an estimated 403 trips (352 inbound/51 outbound) in the AM peak hour and 412 trips (64 inbound/348 trips outbound) in the PM peak hour.

\* The LOS analysis for the Existing plus Project, Future Year plus Project, and Horizon Year plus Project scenarios determined that the proposed Project would result in LOS E/F conditions at several intersections selected for analysis.

\* The street segment analysis for the Existing plus Project, Future Year plus Project, and Future plus Project scenarios determined that the proposed Project would not result in TSCG/LA TAG significant project conditions along street segments selected for analysis.

\* The Project would generate 150 new transit trips in the AM peak hour and 155 new transit trips in the PM peak hour. The Project is estimated to add fewer than 20 riders in each peak hour and no transit line would see boardings representing more than 30% of peak hour transit vehicle capacity.

\* Metro Line 33 may incur substantial additional delay on Venice Boulevard in the future based on increased traffic congestion and additional delay related to Project trips; the Los Angeles Mobility Plan 2035 identifies the Venice corridor as part of the Transit Enhanced Network which would add bus-only lanes throughout, and therefore resolve the potential increase in transit delay. All other routes in the project area primarily travel on other streets, and bus routes utilizing Washington Boulevard have the advantage of the MOVE Culver City mobility lanes which separate and prioritize buses through the study area

\* The Project would not worsen any hazardous conditions for transit operations.

The Project features, location, and design support multimodal transportation options and would be consistent with policies, plans, ordinances, and programs that support alternative modes of transportation for both cities. The Project design includes features to minimize impacts to the public right-of-way and enhance the user experience by integrating multimodal transportation options. The Project would not conflict with adopted policies, plans, ordinances, and programs,



or preclude city action to fulfill or implement projects associated with these networks and will contribute to overall walkability through enhancements to the Project Site. Therefore, the Project would have a less than significant impact on transportation-related plans, programs, ordinances, and policies.

#### CONCLUSION:

The Project would develop two parcels into a creative office campus for Apple. The two parcels are currently improved with one-story structures. The parcels are split between the City of Culver City and City of Los Angeles. Culver City is the lead agency for this project for CEQA purposes. The site is in close proximity to the Culver City Expo station and located in the Transit Oriented Development district.

The Project requires the certification of an EIR (with a Statement of Overriding Considerations), approval of a Comprehensive Plan and Zoning Map Amendment, and the applicant has requested Extended Construction Hours. A Comprehensive Plan is intended to reflect innovation in site planning and design to respond more effectively to site features and minimize impacts upon surrounding properties. Toward that end, the proposed PD zoning and Comprehensive Plan for the project will help advance the goals of good planning for the site and achieve the City's goals for transit-oriented development. The applicant is proposing Extended Construction Hours for an additional hour in the morning (from 8:00 am to 7:00 am) to work more efficiently with trade workers.

The Project will be developed on two existing parcels and will be built in phases. However, the intention of the Project is for the development to be integrated with access between the buildings and shared access between the subterranean parking structures. The Project includes a publicly accessible open space (Washington Parklet) that the applicant has voluntarily proposed.

Based on the analysis contained herein staff believes the findings for the Zoning Map Amendment, Comprehensive Plan, can be made as outlined in the Draft Resolution (Attachment No. 2) and recommends that the Planning Commission recommend to the City Council approval of the Project.

#### ALTERNATIVE OPTIONS:

The following alternative actions may be considered by the Planning Commission:

1. Approve the Project with additional or different Conditions of Approval, if deemed necessary, to meet the required findings and mitigate any new Project impacts identified at the meeting.
2. Recommend Disapproval of the Project to the City Council if it does not meet the required findings.

#### MOTIONS:

That the Planning Commission:

1. Recommend to the City Council Certification of the Project EIR, Adoption of Findings Required by CEQA, Adoption of the Mitigation Monitoring Program (MMP) and Adoption of Statement of Overriding Considerations (P2021-0272-EIR), Resolution No. 2022-P019 ; and
2. Recommend to the City Council Approval of Zoning Map Amendment (P2022-0144-ZMA) from IG to PD-17 (Planned Development No. 17), and Comprehensive Plan (P2022-0144-CP) subject to the Conditions of Approval as stated in Resolution No. 2022-P020 ; and
3. Recommend to the City Council Approval of an Extended Construction Hours request, subject to the Conditions of Approval as stated in Resolution No. 2022-P021.

**ATTACHMENTS**

1. Proposed Planning Commission Resolution No. 2022-P019, for (P2021-0272-EIR), with Exhibit A, Findings Required by CEQA and Exhibit B, Mitigation Monitoring Program
2. Proposed Planning Commission Resolution No. 2022-P020 for (P2022-0144-ZMA and CP P2022-144-CP) with Exhibit A, Zone Change Map; Exhibit B, Conditions of Approval; and Exhibit C, Code Requirements
3. Proposed Planning Commission Resolution No. 2022-P021 for Extended Construction Hours subject to the Conditions of Approval.
4. Project Site Map
5. Comprehensive Plan
6. Draft and Final Environmental Impact Report
7. Community Meeting Information
8. Preliminary Construction Management Plan
9. Extended Construction Hours Request
10. Public Correspondence
11. Informational Charts

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