

# Culver CITY

## PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

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### PROPOSED MITIGATED NEGATIVE DECLARATION

**Project Title and Culver City File No.:** Synapse at Platform  
P2016-0050-SPR, P2016-0050-MND

**Project Location:** 8888 Washington Boulevard, Culver City, CA 90232

**Project Sponsor:** Platform Hayden Tract III, LLC

**Project Description:** The project would redevelop a 0.60-acre property located at 8888 Washington Boulevard on the south side of Washington Boulevard between Higuera Street and Landmark Street in Culver City. The existing single-story auto repair shop building and associated asphalt-paved surface parking lot and vehicular storage area would be removed as part of the project. The project is proposing a mix of retail, restaurant, and office uses within a 4-story building (up to 56 feet). On Level 1 (Ground Level), the building would include approximately 2,878 square feet (SF) of retail uses within the eastern portion and 3,184 SF of restaurant uses within the western portion. Levels 2 through 4 would include approximately 59,325 SF of office uses. Parking for the proposed uses would be provided on the Ground Level and within a 3-level subterranean automated parking structure.

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

- ☐ The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- ☒ The Initial Study identified potentially significant effects, but:
  1. Revisions in the project plans or proposals made by, or agreed to by the applicant before this proposed MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY was released for public review would avoid the effects or mitigate the effects or mitigate the effects to a point where clearly no significant effects would occur, and
  2. There is no substantial evidence before the agency that the project as revised may have a significant effect on the environment.

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

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

[www.culvercity.org](http://www.culvercity.org)

Contact: Susan Yun, Senior Planner (310) 253-5755 or [susan.yun@culvercity.org](mailto:susan.yun@culvercity.org)

The public is invited to comment on the proposed MITIGATED NEGATIVE DECLARATION during the review period, which ends **Wednesday, March 22, 2017, 4:00p.m.**





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# Environmental Checklist and Environmental Determination

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## PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

### INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

<b>Project Title:</b>	Synapse at Platform		
<b>City of Culver City Case Nos:</b>	Site Plan Review P2016-0050-SPR Mitigated Negative Declaration P2016-0050-MND		
<b>Lead Agency Name &amp; Address:</b>	City of Culver City, Planning Division 9770 Culver Blvd., Culver City, CA 90232		
<b>Contact Person &amp; Phone No.:</b>	Susan Yun, Senior Planner (310) 253-5755 Gabriela Silva, Associate Planner (310) 253-5726		
<b>Project Location/Address:</b>	8888 Washington Boulevard, Culver City, CA 90232		
<b>Nearest Cross Street:</b>	South side of Washington Boulevard between Higuera Street and Landmark Street	<b>APN:</b>	4206-015-002 4206-015-033 4206-015-023
<b>Project Sponsor's Name &amp; Address:</b>	Platform Hayden Tract III, LLC 9900 Culver Boulevard, 1A Culver City, CA 90232		
<b>General Plan Designation:</b>	General Corridor	<b>Zoning:</b>	Commercial General (CG)
<b>Overlay Zone/Special District:</b>	N/A		
<b>Project Description and Requested Action:</b> <i>(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)</i> <p>The project would redevelop a 0.60-acre property located at 8888 Washington Boulevard on the south side of Washington Boulevard between Higuera Street and Landmark Street in Culver City. The existing single-story auto repair shop building and associated asphalt-paved surface parking lot and vehicular storage area would be removed as part of the project. The project is proposing a mix of retail, restaurant, and office uses within a 4-story building (up to 56 feet). On Level 1 (Ground Level), the building would include approximately 2,878 square feet (SF) of retail uses within the eastern portion and 3,184 SF of restaurant uses within the western portion. Levels 2 through 4 would include approximately 59,325 SF of office uses. Parking for the proposed uses would be provided on the Ground Level and within a 3-level subterranean automated parking structure. Please refer to Attachment A, Project Description, for a detailed discussion of the proposed project.</p>			
<b>Existing Conditions of the Project Site:</b> <p>The project site is currently improved with a 9,992 SF single-story auto repair shop building occupied by "ICC Collision Center" and 48,039 SF of asphalt-paved surface parking lot and storage area. The 18-vehicular space gated surface parking lot is located adjacent to Washington Boulevard with the vehicular storage area located directly behind the lot separated by a 12-foot metal wall. The auto repair shop is located on the western portion of the site with the surface parking lot and storage area located on the eastern portion. Ingress/egress to the project site is available via a curb cut driveway directly into the central portion of the auto repair shop building along Washington Boulevard and two curb cut driveways into the surface parking lot in the eastern portion of the site along Washington Boulevard.</p>			

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

The project site is located on the south side of Washington Boulevard between Higuera Street and Landmark Street within Culver City's Transit Oriented Development (TOD) area. Downtown Culver City is located approximately 0.5 miles to the west. The San Diego Freeway Interstate 405 (I-405) is located approximately two miles west of the project site and the Santa Monica Freeway Interstate 10 (I-10) is less than 0.5-mile north of the project site.

The project site is surrounded by office, commercial, and light industrial uses to the north and east; light industrial and residential uses to the south; and light industrial uses to the west. Surrounding land uses include:

North - Across Washington Boulevard is an approximate 3-story light industrial building (Howard Industries) with associated surface parking lot, and an office and light industrial complex with associated parking structure. Further north is the Los Angeles Metropolitan Transportation Authority (Metro) Exposition Light Rail Transit Line ("Expo" or "Culver City Expo Line") and an associated surface parking lot for the Metro Station (future site of the Ivy Station Mixed-Use TOD Project). The Ivy Station project would include a mix of commercial, residential, hotel and office uses in multiple buildings up to a maximum of 6-stories.

East - A 1-story "L" shaped commercial brick building is located immediately east of the site along Washington Boulevard, and also borders the southern boundary of the project site. This building is followed by the Platform commercial project along Washington Boulevard, which includes retail and restaurants on ground floor, offices on the upper floors and associated parking garages. Located at 3939 Landmark Street, and south/east of Platform, is Park Century School which serves 2nd through 8th grades. Other light industrial facilities, along with the Turning Point School which serves preschool to 8th grade students, are located further east along Landmark Street.

South - One and 2-story light industrial/commercial uses are generally located to the south of the site, including the 1-story "L" shaped commercial brick building which also borders the project site to the east. There is also a 2-story multi-family apartment building located at 8925 Lindblade Street which borders the southwest corner of the project site.

West - Single-story light industrial/commercial buildings are located to the west/southwest of the project site along Washington Boulevard and Lindblade Street. West of Higuera Street/Robertson Boulevard are low-rise commercial uses.

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

- City of Culver City (Construction-related permits (i.e., demolition permit, haul route permit, building permit, grading permit, etc.)
- Los Angeles Regional Water Quality Control Board
- South Coast Air Quality Management District
- Other agencies as needed.

## 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 checked="" type="checkbox"/> Air Quality                   | <input checked="" type="checkbox"/> Noise                              |
| <input checked="" type="checkbox"/> Biological Resources          | <input type="checkbox"/> Population / Housing                          |
| <input checked="" type="checkbox"/> Cultural Resources            | <input checked="" type="checkbox"/> Public Services                    |
| <input checked="" type="checkbox"/> Geology / Soils               | <input type="checkbox"/> Recreation                                    |
| <input type="checkbox"/> Greenhouse Gas Emissions                 | <input type="checkbox"/> Transportation/Traffic                        |
| <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Utilities / Service Systems                   |
| <input checked="" type="checkbox"/> Hydrology / Water Quality     | <input checked="" 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.



Susan Yun, Senior Planner, City of Culver City

February 28, 2017

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
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### **I. AESTHETICS** – Would the project:

- |  |                          |                          |                                     |                                     |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Have a substantial adverse effect on a scenic vista?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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) Substantially degrade the existing visual character or quality of the site and its surroundings?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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
<b>III. AIR QUALITY</b> – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### **V. CULTURAL RESOURCES** – Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### **VI. GEOLOGY AND SOILS** – Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GREENHOUSE GAS EMISSIONS</b> – 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS</b> – 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<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
<b><u>IX. HYDROLOGY AND WATER QUALITY</u> – Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**X. LAND USE AND PLANNING – Would the project:**

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### **XI. MINERAL RESOURCES** – Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>

#### **XII. NOISE** – Would the project result in:

a) Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 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"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### **XIII. POPULATION AND HOUSING** – Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<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
<b>XIV. PUBLIC SERVICES</b>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>XV. RECREATION</b>				
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

<b>XVI. TRANSPORTATION/TRAFFIC – Would the project:</b>				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### **XVII. UTILITIES AND SERVICE SYSTEMS** – Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### **XVIII. MANDATORY FINDINGS OF SIGNIFICANCE**

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



## Attachment A – Project Description

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## ATTACHMENT A PROJECT DESCRIPTION

### A. INTRODUCTION

Platform Hayden Tract III, LLC (the applicant) proposes to redevelop a 0.60-acre property located at 8888 Washington Boulevard on the south side of Washington Boulevard between Higuera Street and Landmark Street in Culver City. The proposed mixed-use development ("Synapse at Platform" or the "project") would include a mix of commercial (retail and restaurant) and office uses. The project is contemplated as an extension of the Platform development located to the east of the project site, which includes similar uses as the project (commercial and office uses). The project site is currently developed with a single-story auto repair shop building occupied by "ICC Collision Center" and an associated asphalt-paved surface parking lot and vehicular storage area. All existing site uses would be demolished and removed to support development of the project.

The project is proposing a mix of retail, restaurant, and office uses within a 4-story building (up to 56 feet). On Level 1 (Ground Level), the building would include approximately 2,878 square feet (SF) of retail uses within the eastern portion and 3,184 SF of restaurant uses within the western portion. Levels 2 through 4 would include approximately 59,325 SF office uses. Parking for the proposed uses would be provided on the Ground Level and within a 3-level subterranean automated parking structure. A detailed description of the project is provided below.

### B. PROJECT LOCATION AND SURROUNDING USES

The project site is located on the south side of Washington Boulevard between Higuera Street and Landmark Street within Culver City's Transit Oriented Development (TOD) area. Downtown Culver City is located approximately 0.5 miles to the west. The San Diego Freeway Interstate 405 (I-405) is located approximately two miles west of the project site and the Santa Monica Freeway Interstate 10 (I-10) is less than 0.5-mile north of the project site. **Figure A-1, *Regional and Project Vicinity Locations***, illustrates the location of the project site from a regional and local perspective.

The project site is surrounded by office, commercial, and light industrial uses to the north and east; light industrial and residential uses to the south; and light industrial uses to the west. Surrounding land uses include:

- **North** - Across Washington Boulevard is an approximate 3-story light industrial building (Howard Industries) with associated surface parking lot, and an office and light industrial complex with associated parking structure. Further north is the Los Angeles Metropolitan Transportation Authority (Metro) Exposition Light Rail Transit Line ("Expo" or "Culver City Expo Line") and an associated surface parking lot for the Metro Station (future site of the Ivy Station Mixed-Use TOD Project). The Ivy Station project would include a mix of commercial, residential, hotel and office uses in multiple buildings up to a maximum of 6-stories.



SOURCE: Open Street Map, 2016.

Synapse at Platform

**Figure A-1**  
Regional and Project Vicinity Locations

- East - A 1-story “L” shaped commercial brick building is located immediately east of the site along Washington Boulevard, and also borders the southern boundary of the project site. This building is followed by the Platform commercial project along Washington Boulevard, which includes retail and restaurants on ground floor, offices on the upper floors and associated parking garages. Located at 3939 Landmark Street, and south/east of Platform, is Park Century School which serves 2<sup>nd</sup> through 8<sup>th</sup> grades. Other light industrial facilities, along with the Turning Point School which serves preschool to 8<sup>th</sup> grade students, are located further east along Landmark Street.
- South - One and 2-story light industrial/commercial uses are generally located to the south of the site, including the 1-story “L” shaped commercial brick building which also borders the project site to the east. There is also a 2-story multi-family apartment building located at 8925 Lindblade Street which borders the southwest corner of the project site.
- West – Single-story light industrial/commercial buildings are located to the west/southwest of the project site along Washington Boulevard and Lindblade Street. West of Higuera Street/Robertson Boulevard are low-rise commercial uses.

**Figure A-2, Aerial Photograph with Surrounding Land Uses**, illustrates the surrounding uses.

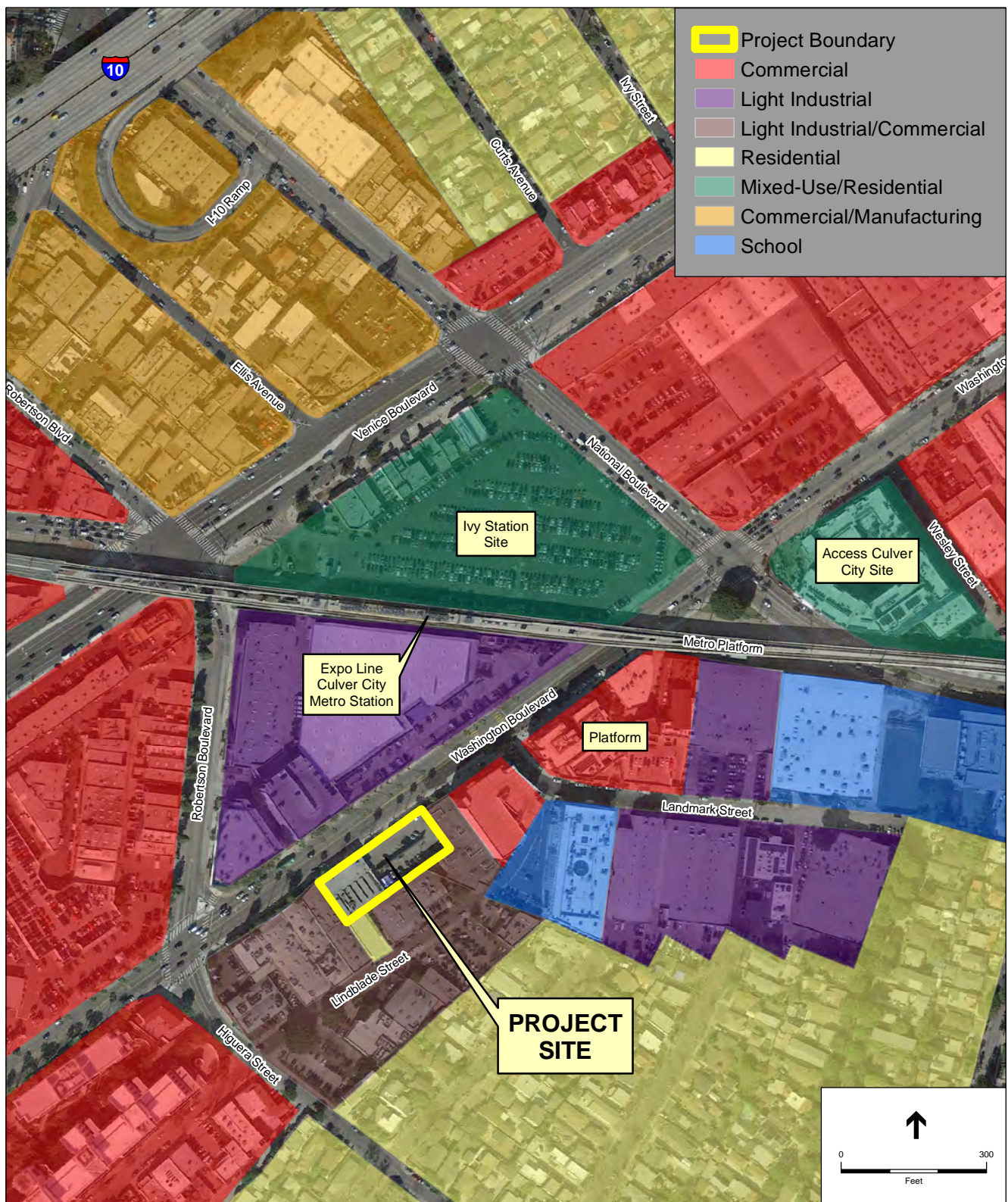
### **C. PLANNING AND ZONING**

The Culver City General Plan designation for the project site is General Corridor which allows for a range of small to medium scale commercial uses with an emphasis on community serving retail, office, and service uses along major corridors. The General Corridor designation is intended to support desirable existing and future neighborhood and community serving commercial uses and housing opportunities that are compatible with nearby residential neighborhoods. No change to the site's existing general plan designation is proposed by the project. The site's existing zoning designation is Commercial General (CG). The CG zone permits small to medium scale commercial uses, emphasizing community-serving retail, office and service uses. No change to the site's existing zoning designation is proposed by the project. The project would be consistent with the permitted uses within the Culver City General Plan and Zoning Code.

### **D. EXISTING CONDITIONS**

The project site is currently improved with a 9,992 SF single-story auto repair shop building occupied by “ICC Collision Center” and 48,039 SF of asphalt-paved surface parking lot and storage area. The 18-vehicular space gated surface parking lot is located adjacent to Washington Boulevard with the vehicular storage area located directly behind the lot separated by a 12-foot metal wall. The auto repair shop is located on the western portion of the site with the surface parking lot and storage area located on the eastern portion. Ingress/egress to the project site is available via a curb cut driveway directly into the central portion of the auto repair shop building along Washington Boulevard and two curb cut driveways into the surface parking lot in the eastern portion of the site along Washington Boulevard.





SOURCE: Google Map, 2016 (Aerial).

Synapse at Platform

**Figure A-2**

Aerial Photograph with Surrounding Land Uses

## E. DESCRIPTION OF PROPOSED PROJECT

### 1. Project Uses

The project is proposing a mix of retail, restaurant, and office uses within a 4-story building (up to 56 feet). The retail and restaurant uses would be located on the Ground Level. On Levels 2 through 4, the project would include office uses. Parking for the proposed uses would be provided on site on the Ground Level and within a 3-level subterranean automated parking structure. **Figure A-3, Site Plan**, illustrates the site plan for the project. The uses proposed by the project are described in detail below and a summary of the project is provided in **Table A-1, Proposed Project Land Use Summary**. As shown in Table A-1, the project would provide a total of approximately 2,878 SF of retail uses, approximately 3,184 SF of restaurant uses, 59,325 SF of office uses, 3,303 SF of utility/common area circulation, and 24,789 SF of automated parking area for a total building area of 93,479 SF.

**Table A-1**

**Proposed Project Land Use Summary**

<b>Retail (Level 1)</b>	<b>2,878 SF</b>
<b>Restaurant (Level 1)</b>	<b>3,184 SF</b>
<b>Office (Levels 2-4)</b>	
Level 1	0 SF
Level 2	19,480 SF
Level 3	19,655 SF
Level 4	<u>20,190 SF</u>
	<b>59,325 SF</b>
<b>Utility/Common Area Circulation (Level 1)</b>	<b>3,303 SF</b>
<b>Parking</b>	
Basement	23,271 SF
Level 1	<u>1,518 SF</u>
	<b>24,789 SF</b>
<b>Total Buildable Area</b>	<b>93,479 SF</b>

*SF = square feet*

*Notes:*

- *SF represents amount of floor area (FA) as calculated for purposes of determining floor area per Culver City Municipal Code (CCMC) requirements.*

*Source: 8888 Washington Boulevard, Culver City, CA 90232, Project Plans, Cover Sheet T0.0, prepared by Abramson Teiger Architects, Planning Commission Review January 2017.*

#### (a) Ground Level Commercial Component

The Ground Level would consist of approximately 2,878 SF of retail uses within the east half of the building and approximately 3,184 SF of restaurant uses within the west half of the building; refer to Figure A-3.



Synapse at Platform  
**Figure A-3**  
 Site Plan

SOURCE: Abramson Teiger Architects, 2017



## **(b) Office Component**

The 59,325 SF office component would include 3 levels of office uses atop the Ground Level. Office spaces within the 3 levels would include: approximately 19,480 SF on Level 2; 19,655 SF on Level 3; and 20,190 SF on Level 4. A 480 SF office lobby/hall would be located within the central portion of the building on the Ground Level. Level 2 would include a balcony situated within the central portion of the building along Washington Boulevard. Level 4 would include two balconies situated along the eastern and western portions of the building along Washington Boulevard and two additional balconies situated along the rear eastern and western portions of the building. A “green” roof deck on the Roof Level would be provided for use by office tenants (described below).

## **2. Building Heights and Elevations**

Building heights would be up to the maximum allowed height for the site at 56 feet. Building heights would slightly vary at different points and elevations of the building to provide focal relief and visual interest to the building. Roof mounted mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts, etc.) would be screened from public view from adjoining public streets and rights-of-way. The method of screening would be architecturally compatible with other on-site development in terms of colors, materials, and architectural style as approved by the City Planning Manager. The roof mounted mechanical equipment screening and stair parapets would be consistent with and allowed for under Culver City Municipal Code (CCMC) requirements.

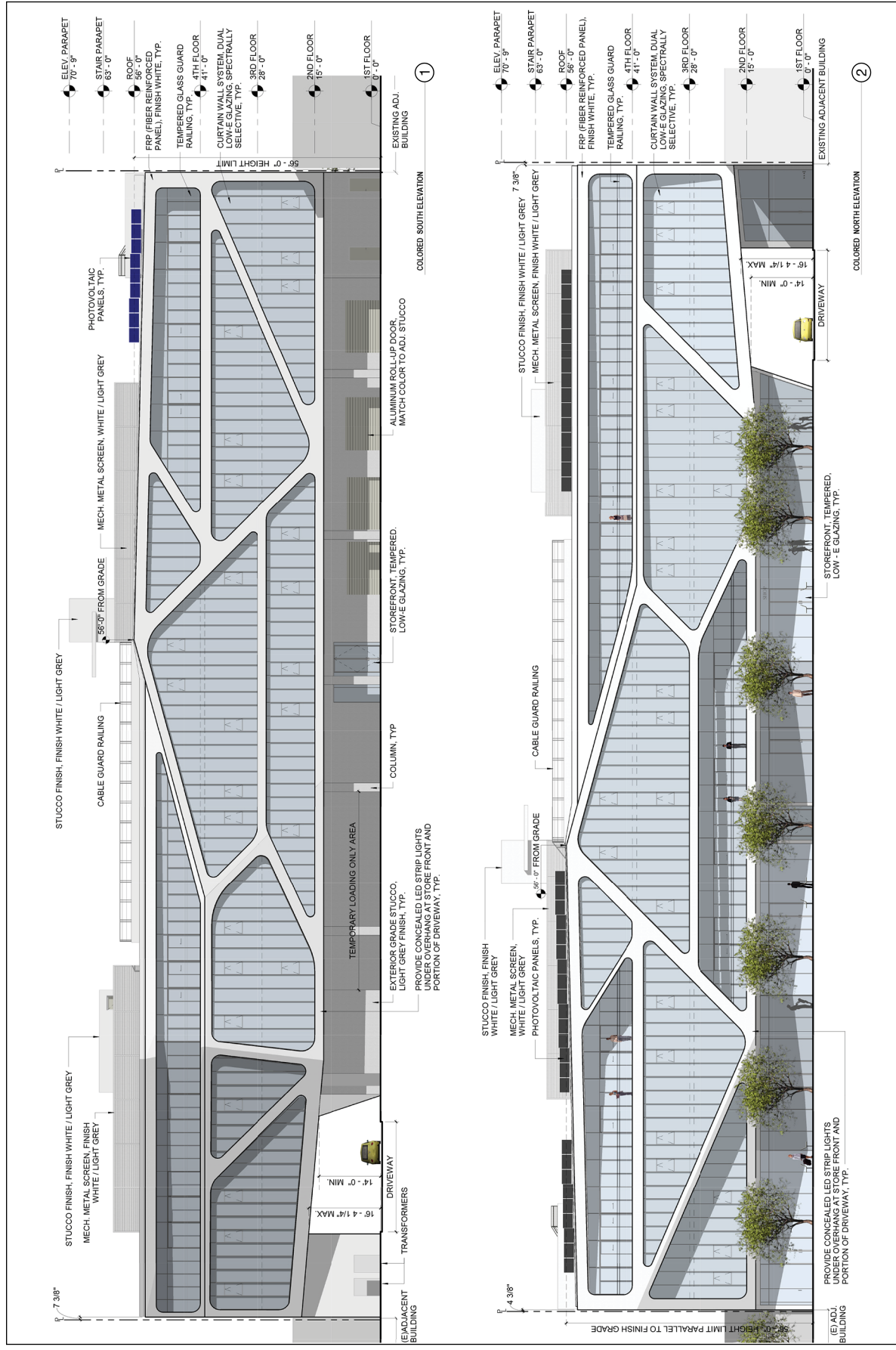
Building elevations for the project are illustrated in **Figure A-4, North and South Elevations**, and **Figure A-5, East and West Elevations**. Building sections are illustrated in **Figure A-6, Building Sections**.

## **3. Parking and Access**

### **(a) Parking**

The project would include 207 vehicular parking spaces distributed within the three levels of subterranean automated parking structure and 5 additional outdoor surface vehicular parking spaces (1 ADA van accessible space and 4 short term/loading spaces) located on the Ground Level for a total of 212 vehicular parking spaces. The total number of parking spaces required per the CCMC is 211 spaces. The CCMC requirements for vehicular parking are summarized below in **Table A-2, Project Vehicular Parking Code Requirements**. As shown in Table A-2, the project would exceed the minimum number of vehicular parking spaces required by the CCMC.

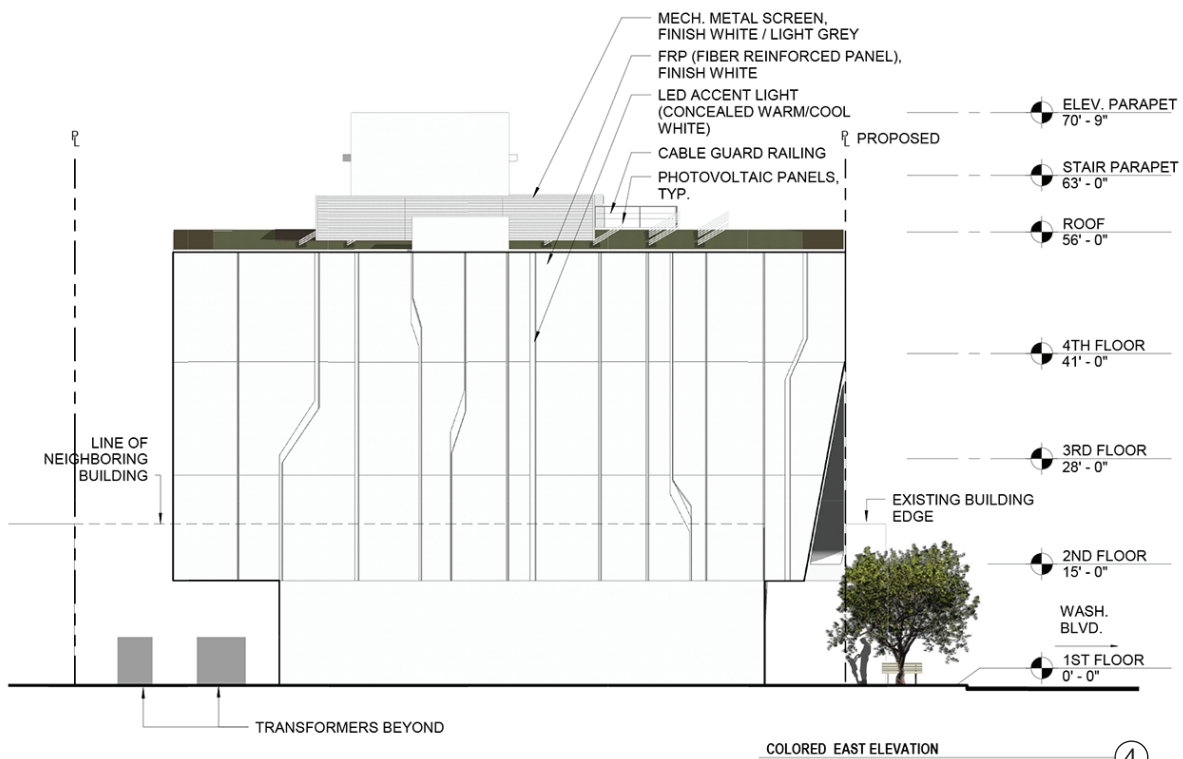
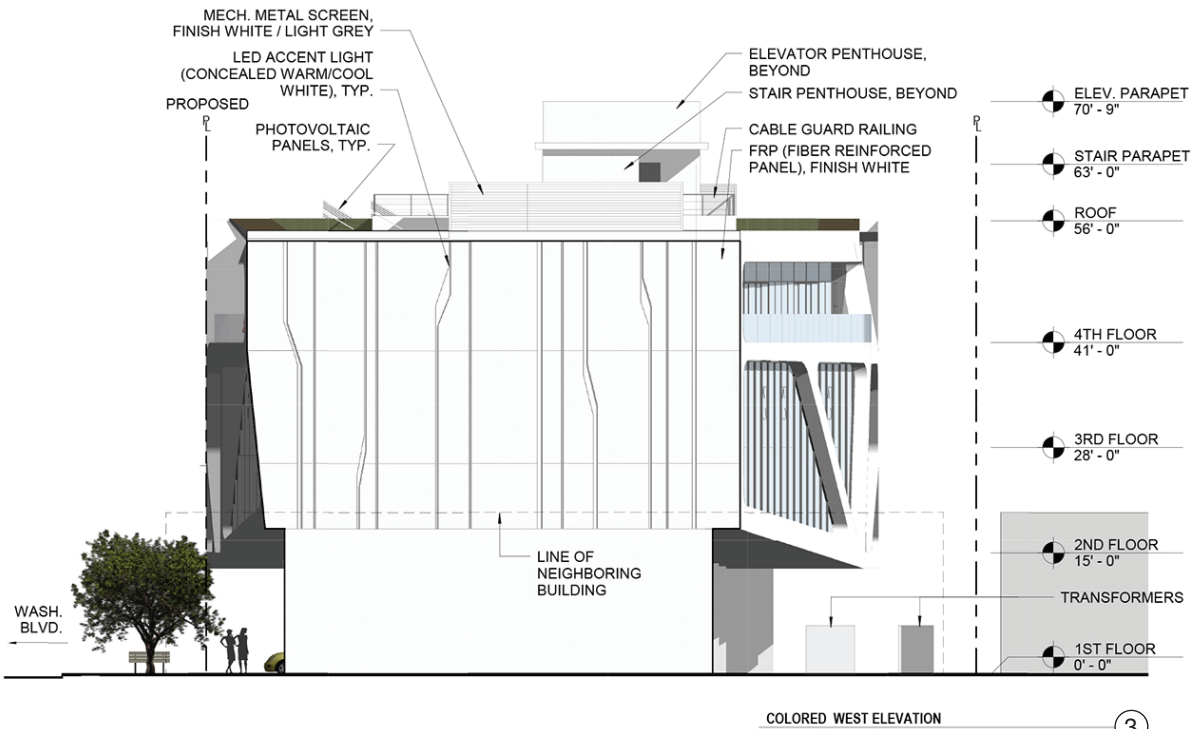
As shown in Figure A-3, direct vehicular access for the proposed uses and to the 3-level subterranean automated parking structure would be provided via a single entrance/exit driveway along Washington Boulevard located in the western portion of the project site. Vehicular access to the subterranean parking structure would be from four loading bays/vehicular lifts via an automated parking aisle system based on a rack and rail system where the vehicles are stored on a shelving system. Upon entering the project site, the office employee/visitor would be directed by a parking attendant or the digital automated parking guidance system to an available loading bay with an open garage door. Up to two parking attendants during non-peak hours and up to four parking attendants during peak hours would be available to provide parking assistance. Available bays would have a green light indicator while bays in use would have a red light indicator. Either the office employee/visitor or attendant would pull the vehicle into the available loading bay.



SOURCE: Abramson Teiger Architects, 2017

Synapse at Platform

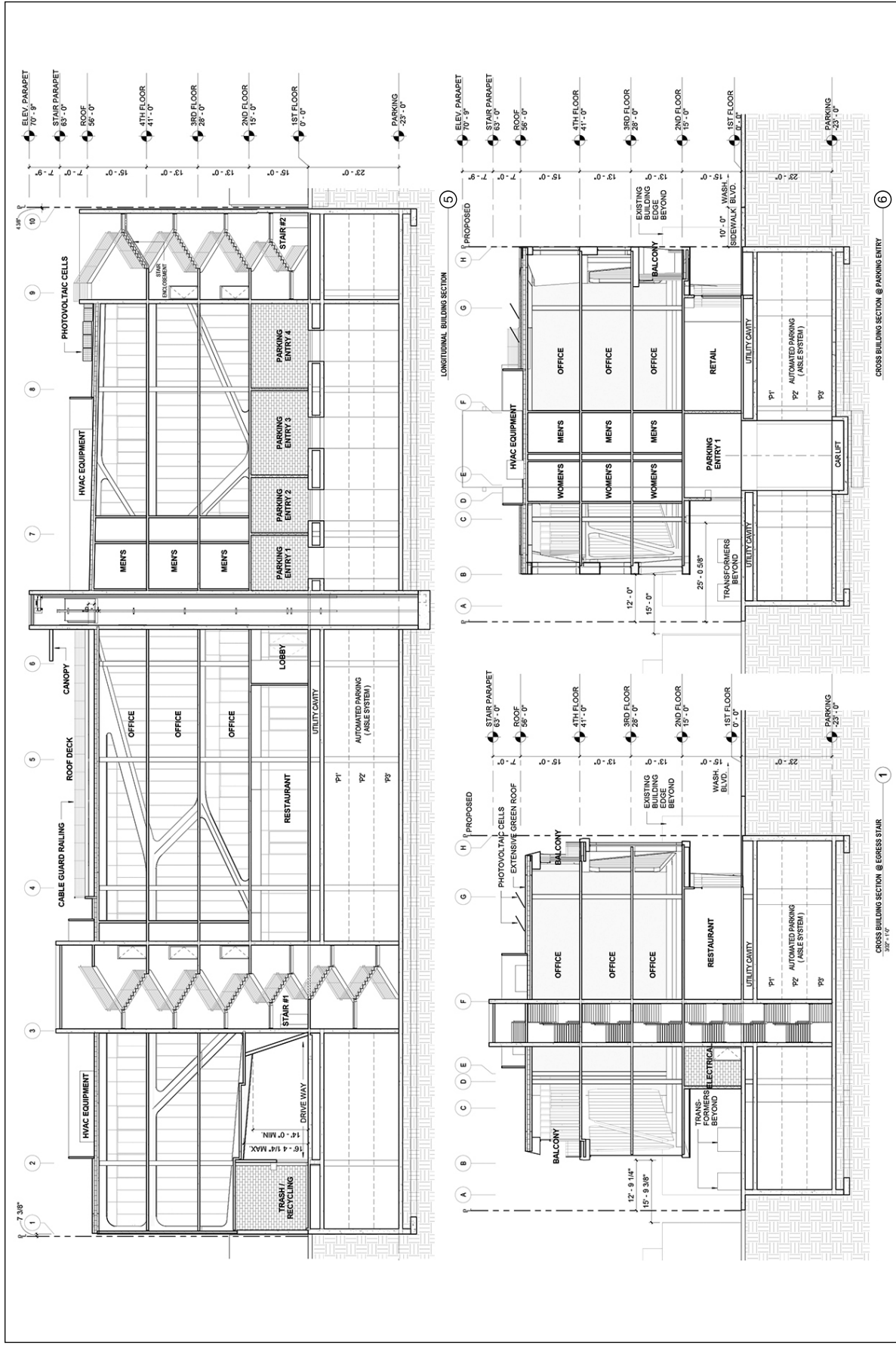
**Figure A-4**  
North and South Building Elevations



SOURCE: Abramson Teiger Architects, 2017

Synapse at Platform

**Figure A-5**  
East and West Building Elevations



Synapse at Platform  
**Figure A-6**  
 Building Sections

SOURCE: Abramson Teiger Architects, 2017

**Table A-2**  
**Project Vehicular Parking Code Requirements**

	Areas (SF)	Required/ Factor <sup>a</sup>	Required
<b>Office Space</b>	<b>59,325</b>	<b>1/350 SF</b>	<b>170</b>
<b>Retail Space</b>	<b>2,878</b>	<b>1/350 SF</b>	<b>9</b>
<b>Restaurant</b>	<b>3,184</b>	<b>1/100 SF</b>	<b>32</b>
<b>Total Project Parking Required</b>			<b>211</b>
<b>Total Project Parking Provided</b>			<b>212<sup>b</sup></b>

Notes: SF = square feet

<sup>a</sup> Parking requirements based on CCMC, Title 17: Zoning Code, Chapter 17.320: Off-Street Parking and Loading, Section 17.320.020 – Number of Parking Spaces Required, Table 3-3B.

<sup>b</sup> The project would include 207 vehicular parking spaces distributed within the three levels of subterranean automated parking structure and 5 additional vehicular parking spaces (1 ADA van accessible space and 4 temporary loading spaces) located on the Ground Level for a total of 212 vehicular parking spaces.

Source: 8888 Washington Boulevard, Culver City, CA 90232, Project Plans, Cover Sheet T0.0, prepared by Abramson Teiger Architects, Planning Commission Review January 2017.

Once the vehicle is positioned in an available loading bay, the office employee/visitor or attendant would shut down the engine, secure the parking brake, and exit the vehicle and loading bay. The ticket dispenser, which is located outside by the garage bay doors, would issue a parking ticket that is digitally attached to the vehicle. The parking system software would analyze the vehicle to determine its size and overall shape and then determine the best parking location within the shelving system. The vehicle would then be transferred including its dedicated parking platform from the lift to a shuttle, which would bring the vehicle adjacent to its final parking stall. The platform would then be pushed into the parking position within the shelf. Upon retrieval of the vehicle, the office employee/visitor or attendant would feed the parking ticket into one of the four automated parking kiosks. The parking system software would locate the vehicle and then a shuttle would retrieve and transport the vehicle towards the nearest available vehicular lift. The automated ticket kiosks would inform the office employee/visitor or attendant to proceed to the respective loading bay where the vehicle would be returned. Once the lift has retrieved the vehicle and placed into the loading bay, the garage bay door would open to allow entry to the vehicle and to exit the bay.

The retrieval rate would be dependent on the location of the vehicle and range between 65 seconds per vehicle to 150 seconds per vehicle. The retrieval rate is the speed of the system and does not include the time associated with loading, unloading, etc. that would comprise of the overall processing rate. The processing rate is dependent primarily upon the vertical and horizontal distance a vehicle has to be transported to and from its parking space, whether the space is a tandem space or not, etc. The (non-tandem) spaces closest to

the elevator shaft take the least amount of time to process while those spaces farthest from the elevator shaft take the most amount of time to process. A processing rate of 90 seconds per vehicle would be available in the automated parking structure for approximately 50 spaces per level (total of 150 spaces).

### **(b) Bicycle Parking**

The project would be required to provide 10 long term bicycle parking spaces and 7 short term bicycle parking spaces for a total of 17 bicycle spaces based on the City's Bicycle and Pedestrian Master Plan requirements or 12 long term bicycle parking and 12 short term bicycle parking for a total of 24 bicycle spaces based on applicable CALGreen requirements (i.e., 5 percent of required parking spaces). The project would provide 16 long term bicycle parking spaces and 12 short term bicycle parking spaces for a total of 28 bicycle parking spaces, which would be well above the required number of bicycle spaces per the CCMC and CALGreen. Long term bicycle parking spaces would be located within an enclosed bicycle storage facility along Washington Boulevard in the western portion of the project site. Short term bicycle parking spaces via bicycle racks would be provided on the public sidewalk along the Washington Boulevard frontage. In addition, the office tenants would have access to 15 bicycles as a component of the adjacent Platform development's bike share program.

### **(c) Pedestrian Access**

Pedestrian access to the retail and restaurants uses and office lobby/hall would be provided from at-grade sidewalks along Washington Boulevard. From the automated parking structure loading bays/vehicular lifts, office employees/visitors would access the retail and restaurants uses and office lobby/hall from an entrance in the rear of the building. Office employees would access the office uses and green roof deck via elevators located in the central lobby/hall or stairways with access corridors located in the eastern and western edges of the building. Office employees would be restricted through the use of an electronic key system.

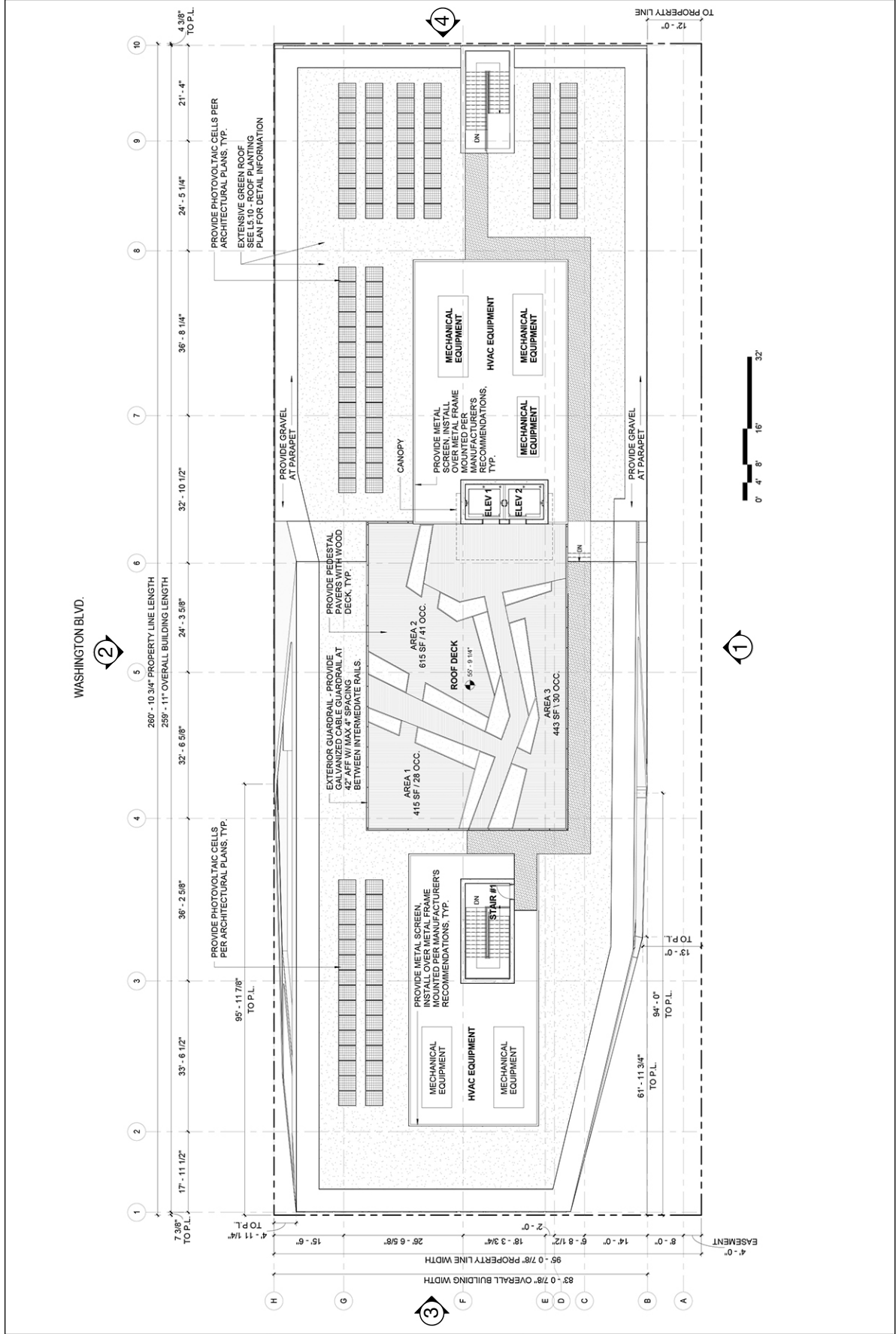
## **4. Open Space, Landscaping and Amenities**

The Ground Level public open space along Washington Boulevard would include a streetscape design that includes wide public sidewalks with street trees, landscape planters, tree grates, and benches, tables for outdoor seating, trash receptacles, and street furniture to activate the pedestrian environment. The project includes balconies, breezeways, and a "green" roof deck with for use by office employees. **Figure A-7, Roof Plan**, illustrates the roof deck and extensive green space to be provided on the roof. The green space would be covered by a mix of plantings consisting of low-lying (approximately 1-foot high) *sedum reflexum* and *senecio serpen*, and clusters of *leymus arenarius* (glaucous) (approximately 387 total, 3-feet tall).

## **5. Lighting and Signage**

New site signage would be used for project identity, building identification, retail, restaurant, and office tenant advertising/branding, pedestrian wayfinding, and security markings. It would be designed and located to be compatible with the architecture and landscaping of the project. No off-site signage is proposed. All signage would be provided consistent with Culver City requirements.





SOURCE: Abramson Teiger Architects, 2017

Synapse at Platform  
**Figure A-7**  
 Roof Plan

Pedestrian areas would be well lit for security. The proposed buildings would include accent lighting to complement the building architecture. Façade lighting is intended to reinforce the architecture of the building and to provide a nighttime presence for the project. Fixtures would be designed to prevent light trespass on adjacent properties. Recessed LED fixtures would be designed to eliminate unwanted glare and set to limit all light pollution into the sky. Surface mounted LED fixtures would be integrated into the landscape planters throughout the site. Ingrade LED fixtures would provide focused uplight on the site trees along the perimeter of the property. Project lighting would include time scheduling and on-demand dimming.

## **6. Sustainability Features**

Energy saving and sustainable design would be incorporated throughout the project which would be LEED equivalent. The project would incorporate green building design which would promote conservation, energy efficiency, and carbon emission reduction.

### **Conservation and Energy Efficiency**

1. Recycling of building materials during demolition of existing structures.
2. Using local manufactures and recycled products where possible.
3. Stormwater filtration and capture systems.
4. Green roof and permeable exterior paving surfaces to reduce stormwater runoff.
5. Installation of a photovoltaic system, which meets or exceeds the Culver City requirements.
6. Water saving fixtures in all locations including waterless urinals in restrooms and water saving landscaping.
7. Water meter installation for irrigation as well as monitoring for tenants, food service/restaurants, and other occupants that consume more than 1,000 gallons of water per day.
8. Incorporation of low-water and drought tolerant plants in the landscape plan for the streetscape and green roof.
9. Irrigation using captured stormwater.
10. Irrigation timers with rain sensors.
11. Dual and triple low emissivity glazing.
12. High efficiency heating and air conditioning systems.
13. Occupancy sensor lighting in all common areas.
14. Reliance on fluorescent, LED or other type of high efficiency systems for all interior and exterior lighting. New lighting installed in parking structures and all common areas shall be motion sensor controlled.
15. Natural ventilation.
16. On-site recycling collection facilities.



## **Mobility Features**

1. Access to multi-modal transit including bike, bus, and train routes. The property is located immediately south of the Culver City Metro Station, which is the approximate center of the EXPO line, connecting Downtown Los Angeles to Santa Monica.
2. New bike lanes to be provided along Washington Boulevard that would connect to the bike lane in front of Platform Project to the east.
3. Bike friendly design with bicycle parking for visitors and occupants as well as access to Platform bike-share services.
4. Office development/employment area adjacent to public transit.
5. The perimeter of the site area will incorporate the City's approved TOD Streetscape plan which will create an attractive and inviting walkable environment.

## **7. Site Security**

Site security would include provisions of 24-hour video surveillance and full-time security guard. Duties of the security personnel would include, but would not be limited to, assisting office employees and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property. The site security would interface and collaborate with the Culver City Police Department (CCPD), as necessary. Site security features would include building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. The project design would include lighting of entry-ways and public areas for site security purposes. The buildings would include controlled access to office uses in order to ensure the safety of office employees.

## **8. Loading and Trash Removal**

Delivery vehicles would access the site via the entrance/exit driveway along Washington Boulevard. Loading for retail, restaurant, and office uses would occur in the temporary parking spaces located on the Ground Level in the rear of the restaurant portion of the building. Access for deliveries would be from the building's rear office lobby/hall entrance. Delivery vehicles would not block access to the four loading bays/vehicular lifts.

A trash and recycling room designated for use by all tenants would be located on the Ground Level behind the bike storage facility located in the western portion of the site. All trash would be collected by on-site maintenance and collectively disposed or recycled. The project would foster recycling of reusable materials (i.e., cardboard, plastics and aluminum) by providing dedicated and easily accessible bins. Trash and recycling bins would be pulled from the trash and recycling room and preliminarily staged in the southwestern portion of the project site near the trash room. The bins would be transported by the City's Scout/Stinger service truck to the final staging area, located curbside on the northwest corner of the project site along Washington Boulevard. Due to limited staging area on the street, the bins would be staged by type and be based on a separate pick up schedule (Trash Bins vs. Recycling Bins). Trash trucks would pick up the bins at this final staging area.

## 9. Construction Schedule/Activities

A Preliminary Construction Management Plan and Traffic Control Plan have been prepared for the project.<sup>1</sup> These plans document how the project's construction management team would implement and conduct its site management responsibilities during the construction phase of the project. The goal of these plans are to describe the scope and anticipated scheduling of construction as a means of ensuring and facilitating an integrated and coordinated construction phase and informative framework for public education of the objectives of the project. These plans describe how the construction management team would comply with City requirements relating to construction; defines the project objectives and targets of particular relevance to the construction phase; describes constraints specific to the construction phase and the project in general; and details the proposed strategy for the construction phase, with particular regard to establishment resourcing, site organization, and construction controls. As the scope of work is further detailed in the later design phases of the project, the Preliminary Construction Management Plan and Traffic Control Plan would also require modifications. A Final Construction Management Plan and Final Traffic Control Plan will ultimately be required to be reviewed and approved by the City.

As discussed within the Preliminary Construction Management Plan, the project would comply with Culver City's allowable construction hours of:

- Monday-Friday: 8:00 AM through 8:00 PM
- Saturdays: 9:00 AM through 7:00 PM
- Sundays: 10:00 AM through 7:00

Any work outside of the above hours would require consultation and approval with pertinent Culver City departments prior to any works being scheduled. Businesses and surrounding residents would be given notification of the proposed after hours work prior to the starting said work including details of the work to be performed with an anticipated time required to undertake each activity. After hours work would be limited, but may be required for specific tasks in order to minimize impacts to pedestrians, vehicular traffic or in the interest of safety.

Dirt hauling and construction material deliveries or removal would not be allowed during morning (7:00 AM – 9:00 AM) and afternoon (4:00 PM – 6:00 PM) peak traffic periods. It should be noted that this requirement will have the effect of prolonging overall construction time. However, this would minimize peak hour traffic impacts. Also, every effort would be made to minimize the need for lane closures. Should lane closures be required, neighbors and city officials would be notified via the email notification system set up at the commencement of construction. Lane closures, if required, will occur only between the hours of 9:00 AM – 3:00 PM. Again, avoiding the peak traffic periods. Such events would be coordinated with neighboring construction projects, as necessary.

A series of permits would be required for project phases including demolition, excavation, subterranean and above ground construction. These approvals may include contingencies requiring additional design and submittals that must be approved before work can begin. Some anticipated items requiring further approval might include, but not be limited to: Final Construction Management Plan; Final Traffic Control Plan; Erosion

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<sup>1</sup> Preliminary Construction Management Plan, 8888 Washington Boulevard, prepared by Millie and Severson General Contractors, 2016, and Platform III Traffic Control Plan, prepared by Millie and Severson General Contractors, 2017, which are available for review at the Culver City Planning Division.

and Sediment Control Plan; and Shoring and Excavation Plan. The Final Construction Management Plan would include measures to minimize traffic impacts associated with any concurrent construction activities occurring in the project vicinity.

Before any lane closures and/or other temporary modifications to traffic are implemented, further approvals would be required from Culver City Public Works Traffic Management Division and/or other pertinent city departments. These items may include, but would not be limited to: Final Traffic Control Plan including, but not limited to vehicular, bicycle, and pedestrian traffic routing; temporary closure of parking spaces in front of the project site along Washington Boulevard; Off-site Civil work including lighting, signage, landscape, paving, and striping; and After Hours Application.

It is anticipated that construction activities would occur over approximately 18 months beginning in mid-2017 through late 2018.

## **F. NECESSARY APPROVALS**

It is anticipated that approvals required for the project from the Culver City would include, but may not be limited to, the following:

- Site Plan Review.
- Demolition Permits to remove the existing on-site structure to allow for construction of the proposed building.
- Construction Permits, including building, grading, excavation, foundation, and associated permits.
- Haul Route Permit, as may be required by Culver City.
- Other approvals as needed.



## Attachment B – Explanation of Checklist Determinations

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## ATTACHMENT B EXPLANATION OF CHECKLIST DETERMINATIONS

### I. AESTHETICS

*Would the project:*

#### a. Have a substantial adverse effect on a scenic vista?

**Less Than Significant Impact.** The project site is located in a highly urbanized area with a mix of commercial, restaurant, office, light industrial, mixed use residential, low- and high-density residential uses, and the Metro Expo Line and Station in the nearby vicinity. The topography surrounding the project site is flat with no notable ocean, mountain or other scenic vistas that would be affected by the project. In addition, although the project proposes building heights up to four stories (56 feet), the immediate surrounding area consists of a range of low-rise buildings at varying heights up to five stories, including the recently constructed Platform and Access Culver City projects. Further, the conceptually approved two to six-story (up to 80' tall), Ivy Station mixed-use project is located nearby to the northwest of the project site along Washington Boulevard. As such, given the flat topography in the area, the proposed buildings would not substantially obstruct views not already obscured or blocked by other buildings and structures in the area. It is also acknowledged that the Metro Expo Line and Metro Station is an elevated railway that provides public views. Long-range views would be partially obstructed by the adjacent Platform project. Regardless, these City views are typical of other areas along the line with any obstruction to the field of view caused by the proposed project being limited. Further, the project site is not located in a scenic resource area or area with protected views designated by Culver City. As such, the project would have a less than significant impact with respect to scenic vistas.

#### b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

**No Impact.** The project site is located in a highly urbanized area of Culver City and is currently developed with a single-story auto repair shop building with an associated asphalt-paved surface parking lot and vehicular storage area.

The project site is not located in the vicinity of a City or State-designated scenic highway. In addition, the project site does not contain any unique or locally recognized, natural (i.e., rock outcroppings and trees), features. Also, as further described below under Response V.a, based on a recent historical resources survey, no buildings or improvements on the project site are eligible for the National Register, California Register, or Local designation; therefore, no damage to historical resources would occur with implementation of the project.

Vegetation on the project site is largely confined to five mature palm trees are situated along Washington Boulevard, all of which would be removed as part of the project. As discussed under Response IV.e, below, the project would comply with the City's Transit Oriented Development (TOD) Streetscape Plan and applicable provisions pertaining to the removal and replacement of street trees in the Culver City Municipal Code (CCMC) within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.220:

Removal of Trees in Parkways Related to Private Improvement or Development Project. Per the City's requirements, the project is required to plant two new Street Right-of-Way trees or Parkway trees for each tree that is removed from the site. The size and location of the replacement trees would be determined by the TOD Streetscape Plan and by the Public Works Director based on what is appropriate for the particular Street Right-of-Way or Parkway.

Overall, based on the above, the project would not substantially damage scenic resources located within the vicinity of a scenic highway and no impact would occur.

**c. Substantially degrade the existing visual character or quality of the site and its surroundings?**

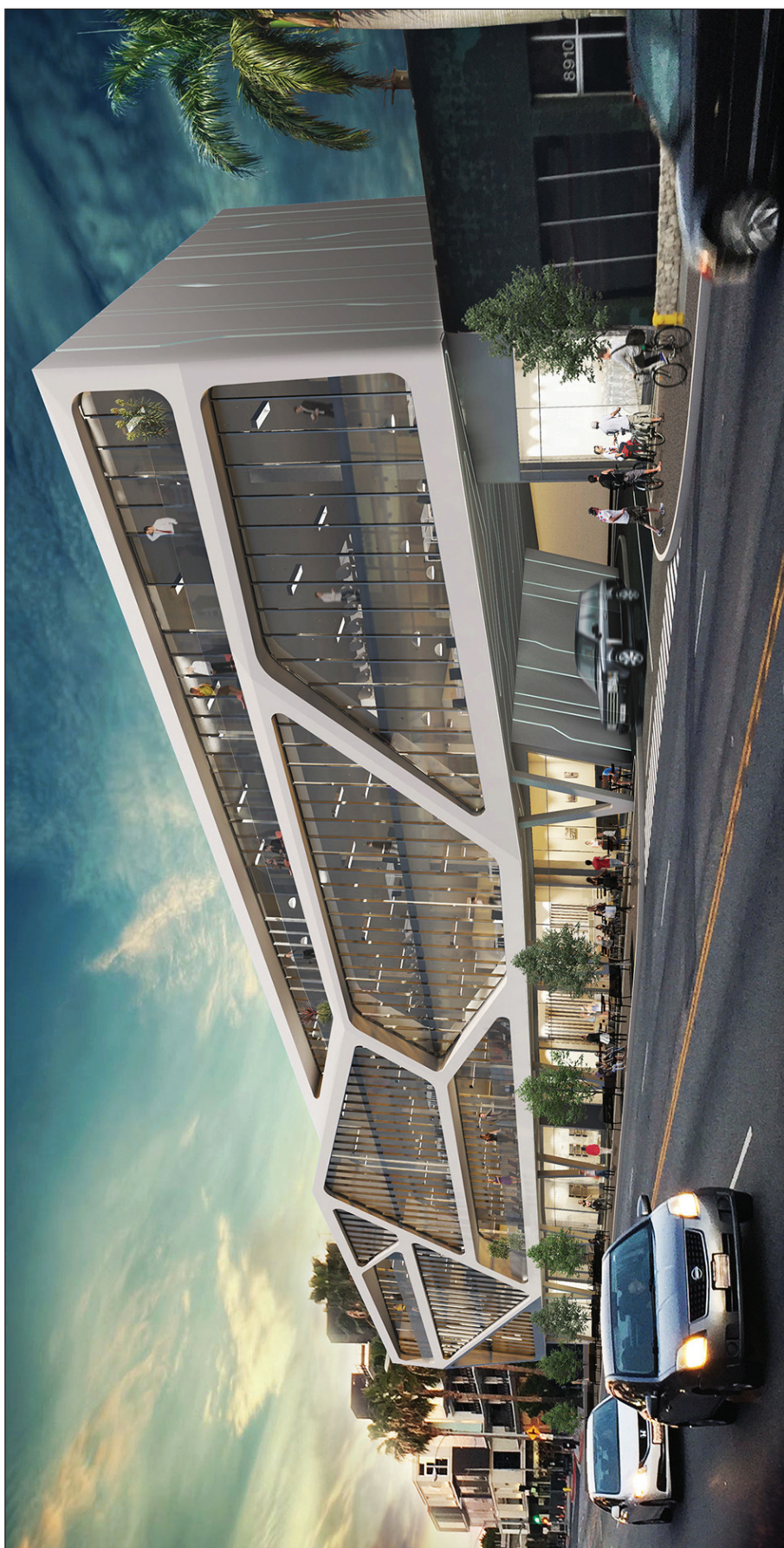
**Less Than Significant Impact.** The project site is located in a highly urbanized area of Culver City and is currently developed with a single-story auto repair shop building with an associated asphalt-paved surface parking lot and vehicular storage area. The site's existing buildings and features do not convey a high level of visual quality, and as previously stated, there are no unique natural or urban features on the project site and no historic buildings. There are a limited number of street trees around the perimeter of the site, none of which are considered unique or highly valued visual resources.

Upon project completion, the project would include a mix of retail, restaurant, and office uses within a 4-story building (up to 56 feet). The retail and restaurant uses would be located on the Ground Level. On Levels 2 through 4, the project would include office uses. Parking for the proposed uses would be provided on site on the Ground Level and within a 3-level subterranean automated parking structure.

The project has been designed as an extension of the Platform development located east of the project site along Washington Boulevard. While the project's contemporary modern architecture is unique to the design of Synapse, it connects to the Platform via a pedestrian street frontage with a recessed façade and colonnade sidewalks which further links the connection of the Helms Bakery Complex and Arts District to downtown Culver City. Geared at attracting technical industry tenants, the project's design was conceptualized as a brain with cellular abstract shapes which frame large glass panels and a glossy white exterior membrane made from custom molded glass fiber reinforced concrete panels. Integrated LED lighting strips would weave throughout the façade designed to mimic neurotransmitters firing along the electrical synapses in the brain. The unique architectural design elements of the building creates the appearance that the structure is floating over the recessed glass storefronts on the Ground Level. The building cantilevers over the outdoor seating area on the widened pedestrian sidewalk. The office component (Levels 2 through 4) is recessed with balconies with wide opening façades to blend exterior and interior spaces and create an interaction of the office users with the urban surrounding. Atop the Roof Level would be cable guard railings, photovoltaic cells, and mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts, etc.) which would be screened from public view from adjoining public streets and rights-of-way with a stucco white and light grey finish screening, as well as landscaped open space. Building heights would vary slightly at different points and elevations to provide focal relief and visual interest.

**Figure B-1, *Washington Boulevard View*,** illustrates an easterly view of the project from Washington Boulevard. Figure B-1 provides views of the Ground Level commercial component storefronts and streetscape. Figure B-1 also shows the project's single entrance/exit driveway, the enclosed bicycle storage facility, and the office spaces (Levels 2 through 4).





RENDERING 1. Easterly view of project from Washington Boulevard.

SOURCE: Abramson Teiger Architects, 2016

Synapse at Platform

**Figure B-1**

Washington Boulevard View

The rear side of the building would include an exterior graded stucco light grey finish with four light grey aluminum roll-up garage doors of the loading bays/vehicular lifts of the automated parking aisle system. Levels 2 through 4 of the office component would have similar design to that of the front of the building.

**Figure B-2, *Washington Boulevard Ground Level Commercial and Streetscape Views***, provides detailed easterly and westerly views of the project's restaurant and retail uses, storefronts, and streetscape design from Washington Boulevard. As seen in Figure B-2, the Ground Level public open space along Washington Boulevard would include a streetscape design, consistent with the TOD Streetscape Plan, that includes wide public sidewalks with street trees, landscape planters, tree grates, and benches, tables for outdoor seating, trash receptacles, and street furniture to activate the pedestrian environment and to improve the street-level visual corridor of Washington Boulevard. Thus, the project would introduce a pedestrian friendly environment to an area that currently has minimal streetscape and landscape improvements. Per Culver City's standard conditions of approval, all planted areas on the property would be landscaped and irrigated pursuant to CCMC Chapter 17.310 - Landscaping. Signage would be integrated into the architecture of the buildings and outdoor lighting installed per applicable City standards.

While the proposed structures would be taller and greater in mass than some of the nearby buildings in the surrounding project vicinity, primarily to the south and west, the TOD area is in the process of revitalization and transition with recent and new redevelopment projects occurring throughout the project vicinity. For example, the proposed building heights and massing would be compatible with the one- and multi-story building(s) and parking structure (up to 5-stories) constructed as part of the Platform project located to the east. In addition, along Washington and just beyond the Metro Expo Line, the recently constructed 5-story Access Culver City mixed-use project also includes architecturally modern buildings that support a mix of land uses. Further, the recently approved two to six-story Ivy Station mixed-use project will be located nearby to the northwest of the project site across Washington Boulevard on the north side of the Expo Line. The proposed project along with these adjacent projects would contribute to the local area's ongoing revitalization and would be compatible in their urban character. Further, as discussed under Response I.a, there would be no substantial or significant effects on scenic vistas due to construction of the project's buildings at the proposed height(s).

As the project site does not currently reflect a high level of visual quality, and because the project has been designed at a scale and with a unified architectural aesthetic that would be compatible with existing and planned development in the vicinity, the project would not substantially degrade the visual character and quality of the site and its surroundings. Furthermore, the project would enliven the pedestrian experience through a new streetscape design that would provide street trees, landscape planters, tree grates, benches, tables for outdoor seating, trash receptacles, and street furniture. Thus, impacts on visual quality would be less than significant.

**d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

**Light and Glare**

**Less Than Significant Impact.** The project site is located in a highly urbanized area and is surrounded by office, commercial, and light industrial uses to the north and east; light industrial and residential uses to the south; and commercial/light industrial uses to the west/southwest.





RENDERING 1. Easterly view of the project's restaurant uses and streetscape from Washington Boulevard.



RENDERING 2. Westerly view of project's retail uses and streetscape from Washington Boulevard.

SOURCE: Abramson Teiger Architects, 2016

Synapse at Platform

## Figure B-2

Washington Boulevard Ground Level  
Commercial and Streetscape Views

The project vicinity exhibits considerable ambient nighttime illumination levels due to the densely developed nature of the area, existing building and parking lot on-site, as well as from adjacent properties. Artificial light sources from the on-site uses and other surrounding properties include interior and exterior lighting for security, parking, architectural enhancement, incidental landscape lighting, and illuminated signage. Automobile headlights, streetlights and stoplights for visibility and safety purposes along the major and secondary surface streets contribute to overall ambient lighting levels as well.

Similar to existing site and surrounding uses, the project would include low to moderate levels of interior and exterior lighting for security, parking, signage and architectural enhancement. Soft accent lighting used for signage, and architectural enhancement would be directed to permit visibility of the highlighted elements but, would not be so bright as to cause substantial light spillover. All proposed signage and outdoor lighting would be subject to applicable regulations contained within the CCMC. Compliance with these regulations would ensure that impacts regarding project lighting are less than significant.

Glare occurs from sunlight reflected from reflective materials utilized in existing buildings along the adjacent roadways and from vehicle windows and surfaces. Glare-sensitive receptors include the residential uses to the south and motorists on the roadways surrounding the site. As glare is a temporary phenomenon that changes with the movement of the sun, receptors other than motorists are generally less sensitive to glare impacts than to light impacts. Glass fenestration incorporated into the Ground Level commercial component and the office component have been designed with low-reflectivity values (no mirror-like tints or films), minimizing off-site glare. To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets it would be temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Based on the above, glare impacts would be less than significant.

### Shade and Shadow

**Less Than Significant Impact.** Shading impacts were addressed in in the project's *Shade/Shadow Report* prepared by ESA PCR in January 2017. The report is available for review at the Culver City Planning Division. Potential shading impacts could result when shadow-sensitive uses are located to the north, northwest, or northeast of new structures in excess of 60 feet in height. The potential for impacts decreases the further the sensitive use is located from a project site. Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. For purposes of this analysis, a project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (PST), between early November and mid-March or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (PDT) between early mid-March and early November.<sup>1</sup> The Shade/Shadow Report illustrates shadows cast by the project on nearby surrounding uses during the fall equinox on September 21 from 9:00 A.M. to 6:00 P.M.; the spring equinox on March 21 from 9:00 A.M. and 6:00 P.M.; the summer solstice on June 21 from 9:00 A.M. and 6:00 P.M., and the winter solstice on December 21 from 9:00 A.M. and 3:00 P.M.

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<sup>1</sup> The durations originally cited in the L.A. CEQA Threshold Guide, were originally geared to change in early April and Late October, consistent with the change to daylight savings time that was in effect at that time. The durations used here have been modified to match the current starting and ending dates for daylight savings time.

Shade sensitive uses in the project vicinity are limited to the single-room occupancy (SRO) apartments located immediately to the south and the single family housing located to the southeast of the project site. There are no shade sensitive uses located to the north, northwest, and northeast. Because the nearby shade sensitive uses are located to the south and southeast of the project site, the project building's shadow would not reach the nearby shade sensitive uses during the shadow scenarios evaluated during the course of the year, with one exception. Shadows cast during the summer solstice could shade a small portion of the outdoor space at the apartments to the south for less than 1 hour before 6:00 PM, which would be well below the 4-hour significance threshold. As a result, the addition of the project would not significantly shade any nearby shadow-sensitive uses based on the significance thresholds stated above, and a less than significant impact would occur.

## II. AGRICULTURE AND FOREST RESOURCES

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

**a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

**No Impact.** The project site is located in a highly urbanized area of Culver City and is currently developed with a single-story auto repair shop building with an associated asphalt-paved surface parking lot and vehicular storage area. The project site does not contain agricultural uses or related operations and is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.<sup>2</sup> Furthermore, the Culver City General Plan does not identify the project site as an area designated for agriculture use. Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Accordingly, project implementation would have no impact on farmland.

**b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** The project site's existing zoning designation is Commercial General (CG). No change to the site's existing zoning designation is proposed by the project. No portion of the project or surrounding land uses are zoned for agriculture and no nearby lands are enrolled under the Williamson Act. As such, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract and no impact would occur in this regard.

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<sup>2</sup> State of California Department of Conservation, California Important Farmland Finder, <http://maps.conservation.ca.gov/ciff/ciff.html>, accessed September 2016.

- 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))?**

**No Impact.** As discussed under Response II.b, the project site's existing zoning designation is Commercial General (CG). No forest land or timberland zoning is present on the project site or in the surrounding area. As such, the project would not conflict with existing zoning for forest land or timberland and no impact would occur in this regard.

- d. Result in the loss of forest land or conversion of forest land to non-forest use?**

**No Impact.** No forest land exists on the project site or in the surrounding area. As such, the project would not result in the loss of forest land or conversion of forest land to non-forest use and no impact would occur in this regard.

- 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?**

**No Impact.** Since there are no agricultural or forest uses or related operations on or near the project site, the project would not involve the conversion of farmland or forest land to other uses, either directly or indirectly. No impacts to agricultural land or uses would occur.

### III. AIR QUALITY

The following impact analysis pertaining to air quality impacts is based on information contained in the *Synapse at Platform Project – Air Quality Technical Memorandum* (herein referred to as the "Air Quality Memorandum"), prepared by Michael Baker International, dated January 31, 2017 (provided under separate cover available at the Culver City Planning Division).

*Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:*

- a. Conflict with or obstruct implementation of the applicable air quality plan?**

**Less Than Significant Impact.** According to the *CEQA Air Quality Handbook*, in order to determine consistency with the South Coast Air Quality Management District (SCAQMD) *Air Quality Management Plan* (AQMP) two main criteria must be addressed:

Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

- i. *Would the project result in an increase in the frequency or severity of existing air quality violations?*



Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of the project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating project consistency. As discussed in Response III.d, below, localized concentrations of CO, NO<sub>x</sub>, and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) would be less than significant. Therefore, the project would not result in an increase in the frequency or severity of existing air quality violations. Because reactive organic gasses (ROG) are not a criteria pollutant, there is no ambient standard or localized threshold for ROG. Due to the role ROG plays in ozone formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

ii. *Would the project cause or contribute to new air quality violations?*

As discussed below under Response III.b., below, the project would result in emissions that would be below the SCAQMD thresholds. Therefore, the project would not have the potential to cause or affect a violation of the ambient air quality standards.

iii. *Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?*

As discussed under Response III.d, below, the project would result in less than significant impacts with regards to localized concentrations during project construction. As such, the project would not delay the timely attainment of air quality standards or AQMP emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and Southern California Association of Governments (SCAG) air quality policies, it is important to recognize that air quality planning within the South Coast Air Basin (Basin) focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the project exceeds the assumptions utilized in preparing the forecasts presented in the AQMP. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

i. *Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?*

A project is consistent with the AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2012 AQMP, four sources of data form the basis for the projections of air pollutant emissions: the City of Culver City General Plan (Culver City General Plan), SCAG's Growth Management Chapter of the Regional Comprehensive Plan and Guide (RCPG), and SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS also provides socioeconomic forecast projections of regional population growth. The project involves the construction of an approximately 93,479 square-foot commercial building within a developed area of the City. The Culver City General Plan Land Use Map designates the project site as General Corridor, and

Commercial General (CG) in the City's Zoning Map. According to the Culver City General Plan, the General Corridor land use category allows a range of small-to-medium scale commercial uses, with an emphasis on community-serving retail to which patrons often travel by car. The City's Zoning Code allows for restaurants, retail, and office uses under its CG zoning designation. Therefore, the project would be considered consistent with the current General Plan land use designations and Zoning Code. Furthermore, the project does not involve any uses that would increase population beyond what is considered in the Culver City General Plan and therefore, would not affect City-wide plans for population growth at the project site. Thus, the project would be consistent with the types, intensity, and patterns of land use envisioned for the site vicinity in the RCPG. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to Culver City; these are used by SCAG in all phases of implementation and review. Additionally, as the SCAQMD has incorporated these same projections into the 2012 AQMP, it can be concluded that the project would be consistent with the projections.

ii. *Would the project implement all feasible air quality mitigation measures?*

The project would result in less than significant air quality impacts. Compliance with emission reduction measures identified by the SCAQMD would be required as identified under Response III.b, below. As such, the project meets this AQMP consistency criterion.

iii. *Would the project be consistent with the land use planning strategies set forth in the AQMP?*

The project would serve to implement various City and SCAG policies. The project site is located within a developed portion of the City and would be consistent with the intended use of the site by the Culver City General Plan.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Basin. The project would not result in a long-term impact on the region's ability to meet State and Federal air quality standards. As discussed above, the project's long-term influence would also be consistent with the goals and policies of the 2012 AQMP and is, therefore, considered consistent with the SCAQMD's 2012 AQMP. It is noted the SCAQMD has released the Draft 2016 AQMP, which is a comprehensive and integrated plan primarily focused on addressing the ozone and PM<sub>2.5</sub> standards. However, the Draft 2016 AQMP is not anticipated to be adopted by the SCAQMD Governing Board until February 2017. The 2016 AQMP will incorporate the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, Regional Transportation/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories. The 2016 AQMP uses the same assumptions as the 2012 AQMP, and adoption of the 2016 AQMP would not affect Project consistency. Based on the above discussion of applicable air quality plans, implementation of the project would result in less than significant impacts.



**b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

**Less Than Significant Impact With Mitigation Incorporated.**

**Short-Term Construction**

Short-term air quality impacts are predicted to occur during demolition, grading, and construction operations associated with implementation of the project. Temporary air emissions would result from particulate (fugitive dust) emissions from grading and building construction and exhaust emissions from the construction equipment and the motor vehicles of the construction crew.

It is anticipated that construction activities would occur over approximately 18 months beginning in mid-2017 through late 2018. Construction activities would include demolition, grading, building construction, paving, and architectural coating. Site grading would require approximately 22,559 cubic yards of cut that would be exported off-site. Construction equipment would include, but not be limited to, graders, rollers, scrapers, excavators, paving equipment, tractors, loaders, and backhoes. Emissions for each construction phase have been quantified based upon the phase durations and equipment types. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod). Refer to the Air Quality Memorandum, Appendix A, Air Quality Emissions Data, for the CalEEMod outputs and results. **Table B-1, Short-Term (Construction Emissions)**, presents the anticipated daily short-term construction emissions.

**Table B-1**

**Short-Term (Construction) Air Emissions (pounds per day)<sup>a</sup>**

Construction Emissions	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Year 1</b>						
Unmitigated Emissions	4.23	56.23	24.02	0.09	8.55	4.95
Mitigated Emissions <sup>b</sup>	4.23	56.23	24.02	0.09	5.00	3.11
SCAQMD Thresholds	75	100	550	150	150	55
<b>Is Threshold Exceeded After Mitigation?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Year 2</b>						
Unmitigated Emissions	13.88	28.79	23.89	0.04	2.63	1.84
Mitigated Emissions <sup>b</sup>	13.88	28.79	23.89	0.04	2.63	1.84
SCAQMD Thresholds	75	100	550	150	150	55
<b>Is Threshold Exceeded After Mitigation?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

<sup>a</sup> Emissions were calculated using the California Emissions Model, as recommended by the SCAQMD.

<sup>b</sup> The reduction/credits for construction emission mitigations are based on mitigation included in CalEEMod and as typically required by the SCAQMD through Rule 403. The mitigation includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.

Source: Synapse at Platform Project – Air Quality Technical Memorandum, prepared by Michael Baker International, dated January 31, 2017.

Emitted pollutants would include ROG, CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. ROG emissions would be the greatest during the paving phase of construction. The largest amount of CO and NO<sub>x</sub> emissions would occur during the construction phases. PM<sub>10</sub> and PM<sub>2.5</sub> emissions would occur from fugitive dust (due to earthwork and excavation) and from construction equipment exhaust. The majority of PM<sub>10</sub> and PM<sub>2.5</sub> emissions would be

generated by fugitive dust from earthwork activities. Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to and from the site.

As indicated in Table B-1, construction-related emissions would not exceed the established SCAQMD thresholds for criteria pollutants. During construction activities, the project would also be required to comply with standard SCAQMD regulations such as Rule 403 (Dust Control). Additionally, implementation of Mitigation Measure AQ-1 would ensure compliance with SCAQMD standard regulations, resulting in a less than significant impact.

### **Naturally Occurring Asbestos**

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by State, Federal, and international agencies and was identified as a toxic air contaminant by the CARB in 1986. Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation Division of Mines and Geology, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report, dated August 2000, serpentinite and ultramafic rocks are not known to occur within the project area. Thus, there would be no impact in this regard.

### **Construction Odors**

Potential odors could arise from the diesel construction equipment used on-site, as well as from architectural coatings and asphalt off-gassing. Odors generated from the referenced sources are common in the man-made environment and are not known to be substantially offensive to adjacent receptors. Additionally, odors generated during construction activities would be temporary. Therefore, construction odors are not considered to be a significant impact.

### **Long-Term (Operational) Emissions**

#### **Mobile Source Emissions**

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are all pollutants of regional concern (NO<sub>x</sub> and ROG react with sunlight to form O<sub>3</sub> [photochemical smog], and wind currents readily transport SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>). However, CO tends to be localized pollutant, dispersing rapidly at the source.

Both existing and project-generated vehicle emissions have been estimated using CalEEMod in order to obtain the net increase. Trip generation rates associated with the project were based on trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9<sup>th</sup> Edition. Based on ITE trip generation

rates, the project would result in approximately 1,146 new daily trips. **Table B-2, Long-Term Air Emissions**, presents the anticipated mobile source emissions. As shown on Table B-2, emissions generated by vehicle traffic associated with the project would not exceed established SCAQMD regional thresholds.

**Table B-2**

**Long-Term Air Emissions (pounds per day)<sup>a</sup>**

<b>Source</b>	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Area Sources	1.50	0.00	0.03	0.00	0.00	0.00
Energy Sources	0.04	0.37	0.31	0.00	0.03	0.03
Mobile Sources	3.48	15.04	37.11	0.10	7.91	2.20
<b>Total Emissions</b>	<b>5.02</b>	<b>15.41</b>	<b>37.45</b>	<b>0.10</b>	<b>7.94</b>	<b>2.23</b>
<b>SCAQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Is Threshold Exceeded? (Significant Impact)</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

<sup>a</sup> Based on CalEEMod modeling results, worst-case seasonal emissions for area and mobile emissions have been modeled.

Source: Synapse at Platform Project – Air Quality Technical Memorandum, prepared by Michael Baker International, dated January 31, 2017.

### Area Source Emissions

Area source emissions would be generated due to an increase demand for consumer products, architectural coating, and landscaping. The project would not include wood burning fireplaces or other devices per SCAQMD Rule 445 (Wood Burning Devices). As shown in Table B-2, area source emissions from the project would not exceed SCAQMD thresholds for ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>.

### Energy Source Emissions

Energy source emissions would be generated as a result of electricity and natural gas (non-hearth) usage associated with the project. The primary use of electricity and natural gas by the project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. As shown in Table B-2, unmitigated energy source emissions from the project would not exceed SCAQMD thresholds for ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. It is noted that the energy emissions in Table B-2 include the use of a 9 kilowatt-hour (kWh) photovoltaic system on the project site, as required by Section 15.02.1005 of the CCMC, and a reduction from the project's LEED design features.

Overall, as indicated in Table B-2, operational emissions from the project would not exceed SCAQMD thresholds. As such, the project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. Thus, operational air quality impacts would be less than significant.

### Mitigation Measure

- AQ-1** Prior to issuance of a grading permit or demolition permit (whichever occurs first), the City Engineer shall confirm that the project plans and specifications stipulate that, in compliance with SCAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD's Rules and Regulations. In addition, SCAQMD Rule 402 requires implementation of dust suppression

techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors:

- All active portions of the construction site shall be watered every three hours during daily construction activities and when dust is observed migrating from the project site to prevent excessive amounts of dust;
- Pave or apply water every three hours during daily construction activities or apply non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas. More frequent watering shall occur if dust is observed migrating from the site during site disturbance.
- Any on-site stockpiles of debris, dirt, or other dusty material shall be enclosed, covered, or watered twice daily, or non-toxic soil binders shall be applied;
- All grading and excavation operations shall be suspended when wind speeds exceed 25 miles per hour;
- Disturbed areas shall be replaced with ground cover or paved immediately after construction is completed in the affected area;
- On-site vehicle speed shall be limited to 15 miles per hour;
- Visible dust beyond the project limits which emanates from the project shall be prevented to the maximum extent feasible;
- All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust prior to departing the job site; and
- Reroute construction trucks away from congested streets or sensitive receptor areas to the extent feasible.

**c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

**Less Than Significant Impact.**

**Cumulative Construction Impacts**

With respect to the project's construction-period air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2012 AQMP pursuant to Federal Clean Air Act mandates. As such, the project would comply with SCAQMD Rule 403 requirements, and implement all feasible mitigation measures (i.e., Mitigation Measure AQ-1). Rule 403 requires that fugitive dust be controlled with the best available control measures in order to reduce dust so that it does not remain visible in the atmosphere beyond the property line of the project. In addition, the project would comply with adopted 2012 AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects throughout the Basin, which would include related projects.

Compliance with SCAQMD rules and regulations would minimize the project's construction-related emissions and ensure that impacts are reduced to a less than significant level. Thus, it can be reasonably inferred that the project-related construction emissions, in combination with those from other projects in the area, would not substantially deteriorate the local air quality. Thus, a less than significant impact would occur in this regard.

### **Cumulative Long-Term Impacts**

As discussed previously, the project would not result in long-term air quality impacts, as emissions would not exceed the SCAQMD adopted operational thresholds. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, cumulative operational impacts associated with implementation of the project would be less than significant.

### **d. Expose sensitive receptors to substantial pollutant concentrations?**

**Less Than Significant Impact With Mitigation Incorporated.** Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. The CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

Sensitive receptors nearest the project site include residential uses adjoining the project site to the south, and a school located approximately 215 feet to the east. In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing localized significance thresholds for construction and operations impacts (area sources only).

### **Localized Significant Thresholds (LST)**

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology, dated June 2003 and revised 2008, for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with proposed projects. The SCAQMD provides the LST lookup tables for one, two, and five acre projects emitting CO, NO<sub>x</sub>, PM<sub>2.5</sub>, or PM<sub>10</sub>. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD recommends that any project over five acres should perform air quality dispersion modeling to assess impacts to nearby sensitive receptors. The project site is located within Sensitive Receptor Area (SRA) 2, Northwest Coastal LA County.

### **Construction**

THE SCAQMD guidance on applying CalEEMod to LSTs specifies the amount of acres a particular piece of equipment would likely disturb per day. The project would disturb approximately 0.60 acres. Therefore, the LST thresholds for the smallest acreage (one acre) were utilized for the construction LST analysis. The nearest sensitive receptors to the project site are residential uses located adjoining the project site to the south. These sensitive land uses may be potentially affected by air pollutant emissions generated during on-site construction activities. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters.

As the nearest sensitive uses are directly adjoining the project site, the LST values for 25 meters conservatively utilized.

**Table B-3, *Localized Significance of Construction Emissions***, shows the construction-related emissions for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> compared to the LSTs for SRA 2, Northwest Coastal Los Angeles County. It is noted that the localized emissions presented in Table B-3 are less than those in Table B-1 because localized emissions include only on-site emissions (i.e. from construction equipment and fugitive dust), and do not include off-site emissions (i.e. from hauling activities). As shown in Table B-3, mitigated construction emissions would not exceed the LSTs thresholds. Therefore, localized significant impacts from construction would be less than significant with implementation of Mitigation Measure AQ-1.

**Table B-3**

**Localized Significance of Construction Emissions**

Source	Pollutant (pounds/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Year 1</b>				
Total Unmitigated On-Site Construction Emissions <sup>a</sup>	42.75	23.01	7.01	4.44
Total Mitigated On-Site Emissions <sup>a</sup>	42.75	23.01	3.75	2.67
<i>Localized Significance Threshold<sup>b</sup></i>	103	562	4	3
<b><i>Thresholds Exceeded?</i></b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Year 2</b>				
Total Unmitigated On-Site Construction Emissions <sup>c</sup>	23.39	17.58	1.49	1.41
Total Mitigated On-Site Emissions <sup>c</sup>	23.26	17.53	1.49	1.41
<i>Localized Significance Threshold<sup>b</sup></i>	103	562	4	3
<b><i>Thresholds Exceeded?</i></b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

<sup>a</sup> For construction year 1, the demolition phase is presented as the worst-case scenario and NO<sub>x</sub> and CO emissions and the grading phase is presented with the worst-case scenario for PM<sub>10</sub> and PM<sub>2.5</sub> emissions.

<sup>b</sup> The Localized Significance Threshold was determined using Appendix C of the SCAQMD Final Localized Significant Threshold Methodology guidance document for pollutants NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The Localized Significance Threshold was based on the anticipated daily acreage disturbance for construction (approximately 0.60-acre; therefore the 1-acre threshold was conservatively used), the distance to sensitive receptors, and the source receptor area (SRA-2).

<sup>c</sup> For construction year 2, the building construction phase is presented as the worst-case scenario for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions.

Source: Synapse at Platform Project – Air Quality Technical Memorandum, prepared by Michael Baker International, dated January 31, 2017.

## Operations

For project operations, the five-acre threshold was conservatively utilized, as the project site is approximately 0.60 acres. As the nearest sensitive uses adjoin the project site, the most conservative LST values for 25 meters were used. As seen in **Table B-4, *Localized Significance of Operational Emissions***, project-related

mitigated operational area source emissions would be negligible and would be below the LSTs. As such, operational LST impacts would be less than significant in this regard.

**Table B-4**

**Localized Significance of Operational Emissions**

Source	Pollutant (pounds/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Total Area Source Emissions <sup>a</sup>	0.00	0.03	0.00	0.00
<i>Localized Significance Threshold<sup>b</sup></i>	<i>103</i>	<i>562</i>	<i>1</i>	<i>1</i>
<b>Thresholds Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

<sup>a</sup> The project does not include hearths.

<sup>b</sup> The Localized Significance Threshold was determined using Appendix C of the SCAQMD Final Localized Significant Threshold Methodology guidance document for pollutants NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The Localized Significance Threshold was based on total acreage, the distance to sensitive receptors, and the source receptor area (SRA-2).

Source: Synapse at Platform Project – Air Quality Technical Memorandum, prepared by Michael Baker International, dated January 31, 2017.

### Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.). The SCAQMD requires a quantified assessment of CO hotspots when a project increases the volume-to-capacity ratio (also called the intersection capacity utilization) by 0.02 (two percent) for any intersection with an existing level of service (LOS) D or worse. Because traffic congestion is highest at intersections where vehicles queue and are subject to reduced speeds, these hot spots are typically produced at intersections.

The City is located in the South Coast Air Basin (Basin), which is designated as an attainment/maintenance area for the Federal CO standards and an attainment area for State standards. There has been a decline in CO emissions even though vehicle miles traveled on U.S. urban and rural roads have increased. On-road mobile source CO emissions have declined 24 percent between 1989 and 1998, despite a 23 percent rise in motor vehicle miles traveled over the same 10 years. California trends have been consistent with national trends; CO emissions declined 20 percent in California from 1985 through 1997 while vehicle miles traveled increased 18 percent in the 1990s. Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

A detailed CO analysis was conducted in the Federal Attainment Plan for Carbon Monoxide (CO Plan) for the SCAQMD's 2003 Air Quality Management Plan. The locations selected for microscale modeling in the CO Plan are worst-case intersections in the Basin, and would likely experience the highest CO concentrations. Thus, CO analysis within the CO Plan is utilized in a comparison to the project, since it represents a worst-case scenario with heavy traffic volumes within the Basin.

Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles experienced the highest CO concentration (4.6 parts per million [ppm]), which is well below the pm 1-hr CO Federal standard.

The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, it can be reasonably inferred that CO hotspots would not be experienced at any intersections within Culver City near the project site due to the low volume of traffic (1,146 net daily trips) that would occur as a result of project implementation. Therefore, impacts would be less than significant in this regard.

**e. Create objectionable odors affecting a substantial number of people?**

**Less Than Significant Impact.**

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project does not include any uses identified by the SCAQMD as being associated with odors.

Construction activities associated with the project may generate detectable odors from heavy-duty equipment exhaust, application of building materials, finishes, and coatings. Construction-related odors would be short-term in nature and cease upon project completion. Any impacts to existing adjacent land uses would be short-term and are less than significant.

**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?**

**No Impact.** The project site is located in a highly urbanized area of Culver City and is currently developed with a single-story auto repair shop building with an associated asphalt-paved surface parking lot and vehicular storage area. The project site does not include suitable habitat for candidate, sensitive, or special status species. Due to high levels of human activity and density of development in the project area, there is no potential for sufficient natural habitat to support candidate, sensitive, or special status species on the project site. As such, the project would not have a substantial adverse effect on candidate, sensitive, or special status species and no impact would occur in this regard.

**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?**

**No Impact.** As discussed under Response IV.a, the project site is currently developed with urban uses. No designated riparian habitat or natural communities exist on the project site or in the surrounding area. Five mature palm trees are situated along Washington Boulevard adjacent to the existing single-story auto repair shop building and associated asphalt-paved surface parking lot. The project site and surrounding area does not include any vegetation that constitutes a plant community. As such, the project would not have a



substantial adverse effect on any riparian habitat or other sensitive natural community and no impact would occur in this regard.

**c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No Impact.** As discussed under Response IV.a, the project site is currently developed and located within an urbanized area. It does not contain any federally protected wetlands as defined by Section 404 of the Clean Water Act. As such, the project would not have a substantial adverse effect on federally protected wetlands and no impact would occur in this regard.

**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?**

**Less Than Significant Impact with Mitigation Incorporated.** The project site is located in a highly urbanized area of Culver City and is currently developed with urban uses. No wildlife corridors or native wildlife nursery sites are present on the project site or in the surrounding area. Further, due to the urbanized nature of the project area, the potential for native resident or migratory wildlife species movement through the site is negligible.

Nonetheless, the project area does include ornamental trees that could support nesting bird habitat. As discussed under Response IV.b, five mature palm trees are situated along Washington Boulevard adjacent to the existing single-story auto repair shop building and associated asphalt-paved surface parking lot. Washington Boulevard is a highly utilized street with high levels of ambient noise and human disturbance resulting from pedestrian and vehicular traffic. Species tolerant of human disturbance have the potential to nest within these palm trees.

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. Mitigation provided below would reduce this impact to a less than significant level.

**Mitigation Measure**

- BIO-1** The applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would insure that no active nests are disturbed.

If avoidance of the avian breeding season (February 15 through August 31) is not feasible, then a qualified biologist shall conduct a preconstruction nesting bird survey within 15 days and again within 72 hours prior to any ground disturbing activities (staging, grading, vegetation removal or clearing, grubbing, etc.). The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code are avoided. Survey areas shall include suitable nesting habitat within 200 feet of construction site boundaries. This two-tiered survey method is intended to provide the project applicant with time to understand the potential issue and evaluate solutions if nests are present, prior to mobilizing resources. If active nests are not identified, no further action is necessary.

If active nests are identified during pre-construction surveys, an avoidance buffer shall be demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Given the high disturbance level, general avoidance buffers include a minimum 100-foot avoidance (for smaller birds more tolerant of human disturbance) to a 250-foot avoidance buffer for passerine and a 500-foot avoidance buffer from active raptor nests, or reduced buffer distances determined at the discretion of a qualified biologist familiar with local nesting birds and breeding bird behavior within the project area.

Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the Culver City Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.

**e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**Less Than Significant Impact.** The project site does not support protected tree species. Vegetation within the project area is confined to five mature palm trees situated along Washington Boulevard adjacent to the existing single-story auto repair shop building and associated asphalt-paved surface parking lot, all of which would be removed as part of the project. The project would comply with the applicable provisions pertaining to the removal and replacement of street trees in the CCMC within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.220: Removal of Trees in Parkways Related to Private Improvement or Development Project. Per the City's requirements, the project is required to plant two new Street Right-of-Way trees or Parkway trees for each tree that is removed from the site. The size and location of the replacement trees would be determined by the Director of the Culver City Department of Public Works based on what is appropriate for the particular Street Right-of-Way or Parkway. With compliance to the applicable street tree removal and replacement provisions of the CCMC, a less than significant impact would occur in this regard.

**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.** As discussed above, no designated riparian habitat or natural communities exist on the project site or in the surrounding area. Additionally, there is no adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or State habitat conservation plan in place for the project site or the City. Thus, no impact would occur in this regard.

**V. CULTURAL RESOURCES**

The following impact analysis pertaining to the site's cultural resources is based on information contained in the *Cultural Resources Assessment of the 0.5-acre Culver Arts Building Project Site Located at 8888 Washington Boulevard, Culver City, Los Angeles County* (herein referred to as the "Cultural Resources Assessment"), prepared by John Minch and Associates, Inc., dated September 2016 and the *Paleontological Survey of the ½ acre Multi-Use Commercial Development Building Site, 8888 Washington Boulevard, Culver City, Los Angeles County, California* (herein referred to as the "Paleontological Survey"), prepared by John Minch and Associates, Inc., dated April 2016 (provided under separate cover available at the Culver City Planning Division).

*Would the project:*

**a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

**No Impact.** A historical resource is defined in Section 15064.5(a)(3) of the CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register of Historical Resources, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

A project with an effect that may cause substantial adverse change in the significance of a historical resource is a project that may have a significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.<sup>3</sup> Direct impacts are those that cause substantial adverse physical change to a historical resource. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historical resource such that the significance of a historical resource would be materially impaired.

According to the Cultural Resources Assessment, the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historical Landmarks (CHL), California Points of Historical

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<sup>3</sup> California Code of Regulations, Title 14, Chapter 3, Article 5, Section 15064.5 (b) (1)

Interest (CPHI), and the California Directory of Properties (DOP or the Historic Resources Inventory [HRI]) were reviewed for the purpose of identifying historical resources. No listed NRHP, CRHR, CHL, CPHI, or DOP resources have been recorded within the project site. Outside of the project site, several historic buildings and structures have been recorded within a one-mile radius; refer to Table 2, Historic Buildings/Structures Located Within a One-Mile Radius, of the Cultural Resources Assessment. These include four NRHP listed properties (Culver Hotel, Ivy Park Station, Citizen Publishing Company Building, and the Washington Building); three CRHR listed properties (Culver Hotel, Citizen Publishing Company Building, and the Washington Building); and one CPHI listed property (Citizen Publishing Company Building). Several Los Angeles Historic-Cultural Monuments (LAHCM) and Culver City Historically Designated Properties have also been identified. The DOP also lists numerous buildings within Culver City that have been previously evaluated for historical significant.

In addition to the records searches, supplementary archival research included a review of early USGS topographic maps for the purpose of identifying locations of potential historical resources. These maps are on file with one or more of the following entities: Bureau of Land Management; Map Room of the Science Library; University of California at Riverside (UCR); South Central Coastal Information Center (SCCIC); the USGS TopoView Historic Topographic Map Database; and the California Historic Topographic Map Collection housed in Special Collections at the Merriam Library at California State University, Chico. Topographic maps examined include the 1902 Santa Monica 15' USGS Quadrangle (surveyed 1893); the 1921 Santa Monica 15' Quadrangle (Corps of Engineers, U.S. Army Tactical Map); the 1924 and 1926 Hollywood 7.5' USGS Quadrangles; and the 1966 Beverly Hills 7.5' USGS Topographic Quadrangle. Digital versions of the 1919, 1924, 1929, and 1929-150 Sanborn Fire Insurance Maps for Culver City, Los Angeles County, were also reviewed from the Los Angeles Central Library. Information gathered from the various maps is listed below:

- 1902 Santa Monica 15' USGS Quadrangle (surveyed 1893): This map depicts Ballona Creek, Washington Boulevard, the Southern Pacific Tracks (i.e., Santa Monica Branch Line), the Ivy Park Station, and the street grid for the community of Palms. The vast majority of what is today Culver City is displayed as vacant land. There are several scattered buildings north of Washington Boulevard at the Southern Pacific Tracks. No man-made structures are indicated on the south side of Washington Boulevard.
- 1919 Culver City Sanborn Fire Insurance Map: The location of 8888 Washington Boulevard in Culver City is shown on the map as parcel number 274 and appears to be undeveloped.
- 1921 Santa Monica 15' Quadrangle (Corps of Engineers, U.S. Army): This map depicts the general urbanization of Los Angeles including a street grid for Culver City and numerous arterial and secondary roads. No structures are depicted on the project site. The Santa Monica Branch Line of Southern Pacific Railroad has been relabeled Pacific Electric. In addition, a new Pacific Electric Line transects the community of Palms and Culver City from southwest to northeast.
- 1924 Culver City Sanborn Fire Insurance Map: This map depicts the well-established site of the Hal E. Roach Studios on the south side of Washington Boulevard. The studio comprises numerous buildings both large and small. Some of the larger structures located on the estimated 10-acre site include the Administration Building (nearest to Washington Boulevard), Dark Stages Number 1 and 2, and the Mill Building. Located just south of the studios is the Pacific Military Academy which was thought to have occupied approximately 4.5 acres. There is one structure depicted within the footprint of the project site which is listed as "Garage & Auto Sales" with a concrete floor, wood trusses, and concrete construction.

- 1924 and 1926 Hollywood 7.5' USGS Quadrangles: These maps depict the community of Palms and Culver City becoming increasingly urbanized. A large building is shown at the project site. The Hal E. Roach Studios are shown at a very short distance to the east and southeast.
- 1929 Culver City Sanborn Fire Insurance Map: This map shows the Pacific Military Academy had been demolished and the area depicted as vacant land. The site of the Hal E. Roach Studios shows the addition of several new buildings. The structure on the project site continues to be listed as "Garage & Auto Sales."
- 1929-1950 Culver City Sanborn Fire Insurance Map: This map depicts the continued expansion of the Hal E. Roach Studios both within the initial 10-acre studio site and the adjacent 4.5-acre parcel formerly occupied by the Pacific Military Academy. The building on the project site is now listed as "Laundry Service, Inc.". A boiler room has been added to the southwest interior corner of the building.
- 1966 Beverly Hills 7.5' USGS Quadrangle: This map indicates the entire project area and project site has been completely urbanized.

In summary, the archival research has indicated that the existing building within the project site was constructed approximately in 1922 and is over 50 years of age and therefore analyzed as a potential historical resource. During its lifetime it served first as a garage and auto sales facility. Around 1929, it became a commercial laundry service and remained so until at least 1950. Currently, it's utilized as an auto body repair facility. The existing building occupied by "ICC Collision Center" was evaluated for significance under CEQA.

According to the Cultural Resources Assessment, it is abundantly clear from its location and construction that the architecture of the commercial building is entirely functional in character. Clearly some modifications to the building have taken place over time, namely replacement of the original fenestration with more modern frames. Despite these and other modifications that have been touched upon, the building appears to be in good condition and well maintained. In any event, it may be confidently said that the commercial building lacks architectural distinction. Further, the building is not associated with any prominent events or historical figures and therefore does not appear to be eligible for listing in the CRHR under Criteria 1 or 2. Specifically, no previous property owners have been identified as historical figures on either the state or local levels. Moreover, a reasonably thorough research effort has failed to yield evidence suggesting that the building is likely to yield information important to history and therefore does not appear to be eligible for listing in the CRHR under Criterion 4. Lastly, the building was constructed as a commercial automobile garage, converted to a laundry service and then back to servicing the auto industry. Over the years it has been modified, but not extensively. Architecturally, the building is ubiquitous in nature and devoid of any unique or special architectural qualities. Consequently, it does not appear eligible for listing in the CRHR under Criterion 3. Therefore, the building is not considered a historical resource pursuant to CEQA. Furthermore, the project would result in no significant indirect impacts to historical resources in the vicinity of the project site as no historic-period buildings or structures are located immediately adjacent to the project site. Additionally, the historic setting in the area around the project site has already largely been affected by contemporary development. Therefore, project implementation would not cause a substantial adverse change in the significance of a historical resource.

**b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

**Less Than Significant Impact With Mitigation Incorporated.** The project site is located in a highly urbanized area of Culver City and is currently developed with a single-story auto repair shop building with an associated

asphalt-paved surface parking lot and vehicular storage area, which allowed for no direct observation of the native ground surfaces.

A South Central Coastal Information Center (SCCIC) records search of the project site and vicinity was performed to determine potential impacts of the project on cultural resources. The SCCIC records search included review of all previously recorded prehistoric and historic archaeological sites situated on or within a one-mile radius of the project area. According to the Cultural Resources Assessment, the results of the records search indicated that the project site has not been subject to previous survey and no prehistoric or historic archaeological resources have been previously recorded within the boundaries of the project site. Outside the project site, approximately 15 percent of the surrounding one-mile radius has been previously investigated for cultural resources. This information is reflected in a minimum of 30 studies on file with the SCCIC for the area and include small (i.e., 40 acres or less) and large (i.e., more than 40 acres) acreage surveys, linear projects (i.e., roads, railroad and utilities), and cellular phone sites. Other studies include the results of test/salvage excavation and construction monitoring programs. Eight archaeological sites (historic and prehistoric) have been recorded within one-mile radius of the project site; refer to Table 1, Archaeological Sites Located Within a One-Mile Radius of the Study Area, of the Cultural Resources Assessment. Seven of the eight resources are prehistoric in age, and have been described as seasonal village or camp sites that include shell, ground stone artifacts, chipped stone artifacts, fire-affected rock, faunal bone, and human remains. The one historic archaeological resource is described as a historic refuse deposit that includes artifacts (i.e., liquor and soda bottles, sanitary seam cans, and other household items). The nearest recorded resource of the eight resources is a seasonal prehistoric village site on the west bank of La Ballona Creek that is located approximately 0.66 miles southeast of the project site.

In addition, according to the Cultural Resources Assessment, the results of a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search indicated that no prehistoric or Native American resources have been recorded within the boundaries of the project site or vicinity. To learn more about the potential archaeological sensitivity of the project area, letters of inquiry were sent to Native American individuals and groups included on the NAHC consultation list. No responses were received during preparation of the Cultural Resources Assessment. As part of the their AB 52 tribal consultations, the City received one response from the Native American groups that were contacted. This response was received by the City from Mr. Andrew Salas of the Gabrieleno Band of Mission Indians – Kizh Nation in a letter dated January 17, 2017. In stated that he has concerns for cultural resources at the project site and requested the presence of one of his Tribe's certified Native American monitors during all ground-disturbing activities associated with project implementation due to the high sensitivity of the project site.

Archival research has indicated that the project site was undeveloped until circa 1922, when the existing commercial building within the western portion of the project site was constructed. The eastern portion of the project site appears to have been undeveloped until circa 1950 when it was improved with a paved surface parking lot that exists today. The building initially served as a garage and auto sales facility. It later housed a commercial laundry service circa 1929 (boiler room added to the interior southwest corner) and remained as such until at least 1950. Currently, it is utilized as an auto body repair facility (ICC Collision Center). The potential to encounter buried historic archaeological resources (e.g. privies, bottle dumps, refuse deposits, building foundations, etc.) is considered low since the current and former uses of the existing building (constructed circa 1922) were commercial in nature and there is no indication that any other buildings or structures were located at the project site prior to its construction. However, given that seven prehistoric archaeological resources have been recorded within one-mile of the project site and since the Ballona Creek (located one-half mile south of the project site) would have attracted prehistoric inhabitants to the project area,

the potential to encounter buried prehistoric archaeological resources (e.g., Native American artifacts and features) during construction excavations is considered high. Mitigation Measures CULT-1 to CULT-4 are prescribed to ensure that potentially significant impacts to previously unknown archaeological resources that are unexpectedly discovered during project implementation are reduced to a less than significant level.

### **Mitigation Measures**

- CULT-1:** Prior to issuance of demolition permit, the applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist). Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the Qualified Archaeologist and Gabrielino Tribe and shall focus on how to identify archaeological and cultural resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.
- CULT-2** Prior to issuance of demolition permit, the applicant shall retain a Native American tribal monitor from a Gabrieleno Tribe who shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall take into account the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrieleno Tribe.
- CULT-3:** In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and the Gabrielino Tribe. If the resources are Native American in origin, the Gabrieleno Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall incorporate the Gabrielino Tribe's treatment and curation recommendations. Preservation in place (i.e.,

avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area for educational purposes.

**CULT-4:** Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

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

**Less Than Significant Impact With Mitigation Incorporated.** The project site is completely developed and there is no visible soil/sediment or rock outcrops to examine for paleontological resources or fossiliferous geological formations. However, the proposed three-level subterranean automated parking structure would likely warrant excavations occurring at depths to approximately 30 feet. According to the Paleontological Survey, the geologic units that underlie the project are mapped as younger Quaternary Alluvium which represents the undifferentiated relatively thin surface and near surface unconsolidated sediments. According to a paleontological resources records search for a nearby project<sup>4</sup> (0.1 miles north of the project site), this alluvium is derived primarily as fluvial deposits from Ballona Creek that flow just a half-mile southeast of the project site. These deposits typically do not contain vertebrate fossils in the uppermost layers, but at relatively shallow depth (six feet) in this area there are older Quaternary sediments that are conducive to retaining paleontological resources. For instance, resource LACM 3368 produced a fossil horse while LACM 4250 produced a fossil mammoth-both resources were recovered at unknown depths. Moreover, LACM 4232 (also designated as archaeological resource CA-LAN-172) produced the remains of fossil human at a depth of 12 to 13 feet below the surface. These three localities (LACM 3368, 4250, and 4232) are located approximately one-half mile to three-quarters of a mile away from the project site. Additional vertebrate fossil localities (LACM 1159, LACM 3366, LACM 3367 and LACM 3369 and LACM 3370) have also been recorded between Crenshaw Boulevard and Ballona Creek (along the Southern Pacific Railway and Rodeo Road) approximately one to three miles from the project site during excavations for the Outfall Sewer area in the 1920s. LACM 1159 yielded a fossil human at a depth between 19 to 23 feet below the surface. LACM 3366 (fossil camel), LACM 3367 (fossil mastodon), and LACM 3370 (sabretooth cat) were all recovered at unknown depths. LACM 3369 produced a fossil horse at a depth of six feet below the surface.<sup>5</sup> Lastly, 78 fossil specimens were encountered less than a quarter-mile northeast of the project site during construction monitoring for the

<sup>4</sup> McLeod, Samuel (2015): *Paleontological Records Check for the proposed Washington National Mixed Use Project, in Culver City, Los Angeles County.*

<sup>5</sup> *Ibid.*



Washington National Project. These specimens included plant, mammal, and mollusks that were encountered between 28 and 29 feet below the street grade.<sup>6</sup>

Based on the rich paleontological findings near the project site and given that the proposed excavations for the subterranean parking will extend into fossiliferous native soils (i.e., older Quaternary alluvium), the potential to encounter paleontological resources during construction excavations extending past artificial fill is considered high. As a result, Mitigation Measures CULT-5 to CULT-7 are prescribed to ensure that potentially significant impacts to previously unknown paleontological resources that are unexpectedly discovered during project implementation are reduced to a less than significant level.

### Mitigation Measures

**CULT-5:** A qualified Paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter older Quaternary sediments. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older Quaternary sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Paleontologist.

**CULT-6:** If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the paleontologist shall implement a paleontological salvage program to remove the resources from the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

**CULT-7:** The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the

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<sup>6</sup> SWCA Environmental Consultants (2016): *Final Paleontological Resources Monitoring and Mitigation Report for the Washington National Project, Culver City, Los Angeles County, California.*

fossils collected and their significance. The report shall be submitted by the project applicant to the City and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

**d. Disturb any human remains, including those interred outside of dedicated cemeteries?**

**Less Than Significant Impact With Mitigation Incorporated.** According to the Cultural Resources Assessment, the results of the NAHC SLF search indicated that no Native American resources have been recorded within the boundaries of the project site or vicinity. Also, letters of inquiry were sent to Native American individuals and groups included on the NAHC consultation list. No responses were received during preparation of the Cultural Resources Assessment. One prehistoric human remain resource, CA-LAN-172 (also designated as paleontological locality LACM 4232), is recorded within one-mile radius of the project site. CA-LAN-172 is described as the skeletal remains of a male (dubbed “The Los Angeles Man”) that were encountered approximately 12 feet below the surface in Ballona Creek river bed deposits. No other known human remain resources have been recorded within the project site or within a one-mile radius. It is possible that the original construction of the existing uses on the Project Site have displaced human remains or other types of cultural resources. However, the negative results of the SCCIC records search and the developed nature of the Project Site do not preclude the existence of buried human remains that may be encountered during construction. As a result, in the event that previously unknown human remains are encountered during construction excavations, Mitigation Measure CULT-8 is prescribed to ensure that potentially significant impacts in this regard are reduced to a less than significant level.

**Mitigation Measures**

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

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of

Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

**e. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?**

**No Impact.** The analysis of tribal cultural resources is based on project notification and request to consult letters that the City submitted to seven Native American individuals and organizations on the City's AB 52 Notification List on December 28, 2016. The City's AB 52 Project notification and request to consult letters, along with the single response letter received (discussed below), are provided under separate cover and are available at the Culver City Planning Division. As of January 31, 2017, the City has received one response to their AB 52 request to consult letters from the Native American contacts. This response was received by the City from Mr. Andrew Salas of the Gabrieleno Band of Mission Indians – Kizh Nation in a letter dated January 17, 2017. In his letter, Mr. Salas did not provide information to the City to suggest that a known tribal cultural resource exists at the project site or vicinity. As a result of AB 52 consultations for the Project, no known tribal cultural resources have been identified at the project site or vicinity and therefore no impact to known tribal cultural resource would occur.

## **VI. GEOLOGY AND SOILS**

The following impact analysis pertaining to the site's underlying geology and soils is based on information contained in the *Geotechnical Investigation Proposed Four-Story Mixed Use Building Over One Subterranean Level 8888 W Washington Boulevard, Culver City, CA 90232* (herein referred to as the "Geotechnical Investigation"), prepared by Feffer Geological Consulting, dated November 11, 2015. A supplemental discussion of groundwater depths was conducted by Feffer with results included a Memo titled "Discussion of Groundwater" dated September 29, 2016. These documents are provided under separate cover available at the Culver City Planning Division.

*Would the project:*

**a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**Less Than Significant Impact.** Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive. In addition, there are buried thrust faults, which are low angle reverse faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS has established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones, which extend from 200 to 500 feet on each side of a known active fault, identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures.

The project site is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The Geotechnical Investigation conducted for the project indicates that no currently known active or potentially active surface faults traverse the project site, and the site is not located within a designated Alquist-Priolo Earthquake Fault Zone. The nearest known potentially active faults to the project site are the Newport Inglewood Fault and the San Andreas Fault, with the closest fault trace approximately 1.24 miles from the project site. As such, the potential for surface rupture on the project site is considered very low. Furthermore, project buildings would be designed and constructed to resist the effects of seismic ground motions as provided in the Culver City Building Code and the 2013 California Building Code (CBC). Thus, a less than significant impact would occur in this regard.

## ii. Strong seismic ground shaking?

**Less Than Significant Impact With Mitigation Incorporated.** Seismicity is the geographic and historical distribution of earthquakes, including their frequency, intensity, and distribution. The level of ground shaking at a given location depends on many factors, including the size and type of earthquake, distance from the earthquake, and subsurface geologic conditions. The type of construction also affects how particular structures and improvements perform during ground shaking. A common measure of ground motion is the peak ground acceleration (PGA). It is not a measure of total energy of an earthquake, such as the Richter and moment magnitude scales, but rather of how hard the ground shakes in a given geographic area. PGA is expressed as the percentage of the acceleration due to gravity (G), which is approximately 980 centimeters per second squared. According to the United States Geological Survey (USGS), **Table B-5, Seismic Acceleration**, shows the extent of perceived shaking and potential damage associated with a given acceleration:

Table B-5

Seismic Acceleration		
Acceleration (g)	Perceived Shaking	Potential Damage
< 0.0017	Not felt	None
0.0017 - 0.014	Weak	None
0.014 - 0.039	Light	None
0.039 - 0.092	Moderate	Very Light
0.092 - 0.18	Strong	Light
0.18 - 0.34	Very Strong	Moderate
0.34 - 0.65	Severe	Moderate to Heavy
0.65 - 1.24	Violent	Heavy
> 1.24	Extreme	Very Heavy

Source: United States Geological Survey. Accessed from website at:  
[http://en.wikipedia.org/wiki/Peak\\_ground\\_acceleration](http://en.wikipedia.org/wiki/Peak_ground_acceleration), accessed September 2016.

Per the CBC, an estimated PGA is determined for a site of proposed construction based on the mapping by the USGS along with detailed analysis as an estimate of anticipated ground shaking for use by the project

structural engineer in design of the proposed structures to resist ground shaking. There is potential for significant ground shaking at the project site during a strong seismic event on the Newport Inglewood Fault, the San Andreas Fault, as well as on the other large active faults in the Southern California region. According to the Geotechnical Investigation, a maximum probable event could produce a PGA value at the project site of 0.664g.<sup>7</sup> This is a relatively high acceleration due to the proximity of the Newport Inglewood Fault and the San Andreas Fault. If this relatively high ground acceleration was not considered in the design and construction phase, ground shaking at this intensity could result in heavy damage to buildings and improvements associated with project implementation.

Culver City requires that all new construction meet or exceed the Culver City Building Code and the latest standards of the 2013 CBC for construction which requires structural design that can accommodate maximum ground accelerations expected from known faults. Furthermore, the project would comply with the CGS Special Publications 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provides guidance for evaluation and mitigation of earthquake-related hazards. While the project would be required to comply with applicable seismic-related regulatory requirements, implementation of the site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation of the Final Geotechnical Engineering Investigation per Mitigation Measure GEO-1 would further ensure that seismic-related ground shaking impacts would be less than significant.

## Mitigation Measures

**GEO-1:** Site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation shall be implemented per the project's Final Geotechnical Engineering Investigation, subject to review and approval by the Culver City Building Safety Division.

### iii. Seismic-related ground failure, including liquefaction?

**Less Than Significant Impact With Mitigation Incorporated.** Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. Liquefaction typically occurs in areas where groundwater is less than 50 feet from the surface, and where the soils are composed of poorly consolidated, fine to medium-grained sand. In addition to the necessary soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to initiate liquefaction.

According to the State of California Seismic Hazard Zones Report for the Beverly Hills 7.5-minute Quadrangle, Los Angeles County, California, Seismic Hazard Zone Report 023, the project site is located within an area that is potentially affected by earthquake-induced liquefaction. This determination is based on groundwater depth records, soil types, and distance to faults capable of producing a substantial earthquake. According to the Supplemental Phase II, groundwater was encountered at approximately 25 to 27 feet below grade in the

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<sup>7</sup> According to the Geotechnical Investigation, deaggregation website for a PGA corresponding to a 10 percent probability in 50 years (475-year return period) and a 2 percent probability of exceedance in 50 years (2475-year return period). The Geotechnical Investigation used a ground acceleration of 0.442g (2/3<sup>rd</sup> of PGA for 10 percent exceedance) and 0.664g (PGA for 2 percent exceedance) and a design magnitude earthquake of 6.7.

borings.<sup>8</sup> Historically, the highest groundwater in the project vicinity within Culver City is estimated to be 20 feet below the ground surface. To further evaluate the potential for liquefaction hazards, the Geotechnical Investigation conducted a site-specific liquefaction analysis which considered groundwater depths and soil conditions. Based upon the results of the liquefaction analysis, the over-consolidated nature of the alluvial deposits and the depth of the groundwater at the site, the potential for liquefaction at the project site during an earthquake shaking is considered to be negligible. These findings are consistent even with an assumed groundwater level that is equal to the highest historical measurements of 20 feet below the ground surface, per Feffer's supplemental discussion of groundwater depths included in their Memo titled "Discussion of Groundwater" dated September 29, 2016. While the project would be required to comply with applicable seismic-related regulatory requirements of the Culver City Building Code and the 2013 CBC, implementation of the site-specific design parameters and recommendations of the Final Geotechnical Engineering Investigation per Mitigation Measure GEO-1 to be implemented during construction would ensure that seismic-related ground failure impacts, including liquefaction, would be less than significant.

### **Mitigation Measures**

Refer to Mitigation Measure GEO-1. No additional mitigation measures are necessary.

#### **iv. Landslides?**

**No Impact.** The project site is relatively flat with less than five feet of overall elevation change across the property. The site is located in a highly urbanized area of Culver City and is currently developed with a single-story auto repair shop building with an associated asphalt-paved surface parking lot and vehicular storage area. According to the State of California Seismic Hazard Zone Map of the Beverly Hills Quadrangle, the project site is not located within an earthquake-induced landslide hazard zone. Further, according to the Geotechnical Investigation, the project site can be improved without the hazard of landslides and improvements can occur without the hazard of landslides to adjoining properties. Thus, the project would not be subject to, or result in, landslides and there would be no impact in this regard.

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

**Less Than Significant Impact.** Soil erosion refers to the process by which soil or earth material is loosened or dissolved and removed from its original location. Erosion can occur by varying processes and may occur in a project area where bare soil is exposed to wind or moving water (both rainfall and surface runoff). The processes of erosion are generally a function of material type, terrain steepness, rainfall or irrigation levels, surface drainage conditions, and general land uses. Topsoil is used to cover surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms.

The project site is currently developed with a single-story auto repair shop building with an associated asphalt-paved surface parking lot and vehicular storage area. Negligible, if any, native topsoil is likely to occur on the project site as it is currently developed with structures and surface parking. Project construction would result in ground surface disruption during excavation, grading, and trenching that would create the potential for erosion to occur. Wind erosion would be minimized through soil stabilization measures required by the SCAQMD Rule

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<sup>8</sup> *Supplemental Phase II Investigation Report, 8888 West Washington Boulevard, Culver City, California*, prepared by Hillman Consulting, dated March 11, 2015 (all provided under separate cover available at the Culver City Planning Division).

403 (Fugitive Dust), such as daily watering. Potential for water erosion would be reduced by implementation of standard erosion control measures imposed during site preparation and grading activities. As discussed in more detail under Section IX, *Hydrology and Water Quality*, the project would be subject to all existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with applicable Culver City standard erosion control practices required pursuant to the CBC and the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. Consistent with these requirements, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates Best Management Practices (BMPs) to control water erosion during the project's construction period. Following project construction, the site would be covered completely by paving, structures, and landscaping. Thus, impacts due to erosion of topsoil would be less than significant with compliance to applicable regulatory requirements.

**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?**

**Less Than Significant Impact With Mitigation Incorporated.** According to the Geotechnical Investigation, the project site is underlain by Quaternary Age Alluvium (Qa) overlain by fill. The fill consists of fine grained silty and sandy clay. The color varies from gray-brown, to brown. The fill is moist medium dense to firm. Fill was found in all borings down to a depth of approximately two feet. The alluvium consists of silty and clayey fine grained sands which vary from brown to gray-green brown orange-brown and brown. The alluvium is moist, medium dense to dense, containing occasional shells. The alluvium is generally weakly horizontally layered with no significant structural planes. Generally, the alluvium becomes more granular with depth. At a depth of 25 to 27.5 feet below the ground surface, shells were encountered in the borings that are indicative of a marine environment. The material at and below these depths is part of the Pleistocene age Lakewood Formation which is Pleistocene in age and over-consolidated. Laboratory testing indicates that the alluvium at the depth of the proposed foundation has a low potential for consolidation and hydrocollapse. According to the Geotechnical Investigation, the alluvium at the project site is competent and capable of supporting engineered structures and appurtenances.

Impacts related to liquefaction and landslides are discussed above in Responses VI.a.iii. and VI.a.iv. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to the combination of gravity and earthquake shaking. Such movement can occur on slope gradients of as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and structures. Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e. retaining wall, slope, or channel) and to a lesser extent on ground surfaces with a very gentle slope. As stated in Response VI.a.iii., according to the site-specific liquefaction analysis within the Geotechnical Engineering Investigation, liquefaction should not pose a significant hazard to the project. Further, due to the absence of any channel, slope, or river within or near the project site, the potential for lateral spreading occurring on or off the site is considered to be negligible. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the project site. Thus, there appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the project site.

While the project construction and design would be required to comply with the 2013 CBC, which is designed to assure safe construction, implementation of the site-specific design measures including foundation design

recommendations of the Final Geotechnical Engineering Investigation per Mitigation Measure GEO-1 would ensure that ground and soil stability hazards would be less than significant.

#### **Mitigation Measures**

Refer to Mitigation Measure GEO-1. No additional mitigation measures are necessary.

**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?**

**Less Than Significant Impact With Mitigation Incorporated.** Soils with shrink-swell or expansive properties typically occur in fine-grained sediments and cause damage through volume changes as a result of a wetting and drying process. Structural damage may occur over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. According to the Geotechnical Investigation, the on-site, near surface soil was found to possess low to medium expansive characteristics based upon field soil classifications. These expansive soils would be removed and/or replaced as part of standard construction practices pursuant to Culver City and the 2013 CBC building requirements. Furthermore, with incorporation of the site-specific design measures including foundation design slabs on grade recommendations of the Final Geotechnical Engineering Investigation per Mitigation Measure GEO-1, a less than significant impact would occur in this regard.

#### **Mitigation Measures**

Refer to Mitigation Measure GEO-1. No additional mitigation measures are necessary.

**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.** The project site is located in an urbanized area where municipal wastewater infrastructure already exists. The project would be required to connect to the existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

## **VII. GREENHOUSE GAS EMISSIONS**

The following impact analysis pertaining to greenhouse gas (GHG) impacts is based on information contained in the *Greenhouse Gas Assessment Synapse at Platform Project*, prepared by Michael Baker International, dated January 31, 2017 (provided under separate cover available at the Culver City Planning Division).



*Would the project:*

**a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Less Than Significant Impact.**

**GHG Thresholds**

At this time, there is no absolute consensus in the State of California among CEQA lead agencies regarding the analysis of global climate change and the selection of significance criteria. In fact, numerous organizations, both public and private, have released advisories and guidance with recommendations designed to assist decision-makers in the evaluation of GHG emissions given the current uncertainty regarding when emissions reach the point of significance. Lead agencies may elect to rely on thresholds of significance recommended or adopted by State or regional agencies with expertise in the field of global climate change. (See *CEQA Guidelines* Section 15064.7[c].)

The SCAQMD has formed a GHG CEQA Significance Threshold Working Group (Working Group) to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. As of the last Working Group meeting (Meeting No. 15) held in September 2010, the SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency.

With the tiered approach, a project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact.<sup>9</sup> Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with Assembly Bill (AB) 32 GHG reduction goals.<sup>10</sup> Tier 3 excludes projects with annual emissions lower than a screening threshold. For all non-industrial projects, the SCAQMD is proposing a screening threshold of 3,000 MTCO<sub>2</sub>eq per year. SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three decision tree options. Under the Tier 4 first option, the project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. Under the Tier 4 second option the project would be excluded if it had early compliance with AB 32 through early implementation of the California Air Resources Board's (CARB) Scoping Plan measures. Under the Tier 4 third option, the project would be excluded if it was below an efficiency-based threshold of 4.8

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<sup>9</sup> SB 97, signed in August 2007 (Chapter 185, Statutes of 2007; PRC Sections 21083.05 and 21097), acknowledges that climate change is a prominent environmental issue that requires analysis under CEQA. This bill directs the Governor's Office of Planning and Research (OPR), which is part of the State Natural Resources Agency, to prepare, develop, and transmit to California Air Resources Board (CARB) guidelines for the feasible mitigation of GHG emissions (or the effects of GHG emissions), as required by CEQA.

<sup>10</sup> California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

MTCO<sub>2</sub>eq per service population (SP) per year.<sup>11</sup> Tier 5 would exclude projects that implement offsite mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

GHG efficiency metrics are utilized as thresholds to assess the GHG efficiency of a project on a per capita basis or on a “service population” basis (the sum of the number of jobs and the number of residents provided by a project) such that the project would allow for consistency with the goals of AB 32 (i.e., 1990 GHG emissions levels by 2020 and 2035). GHG efficiency thresholds can be determined by dividing the GHG emissions inventory goal of the State, by the estimated 2035 population and employment. This method allows highly efficient projects with higher mass emissions to meet the overall reduction goals of AB 32, and is appropriate, because the threshold can be applied evenly to all project types (residential or commercial/retail only and mixed-use).

As the proposed Synapse project involves a commercial (retail, restaurant, office) development, SCAQMD’s 3,000 MTCO<sub>2</sub>eq/yr threshold has been selected as the significance threshold, as it is most applicable to the proposed project. The 3,000 MTCO<sub>2</sub>eq/yr threshold is used in addition to the qualitative thresholds of significance set forth below from Section VII of Appendix G to the CEQA Guidelines.

Please refer to the Greenhouse Gas Assessment for a detailed description of other applicable GHG regulatory programs and plans.

### **Project-Related Greenhouse Gas Emissions**

Project-related GHG emissions would include emissions from direct and indirect sources. The project would result in direct and indirect emissions of carbon monoxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), and methane (CH<sub>4</sub>), and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Operational GHG estimations are based on energy emissions from natural gas usage and automobile emissions. Project GHG emissions were calculated using the California Emissions Estimator Model (CalEEMod), which relies on trip generation data, and specific land use information to calculate emissions. **Table B-6, *Estimated Greenhouse Gas Emissions***, presents the estimated CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub> emissions of the project.

### **Project Design Features**

It is noted that GHG emissions calculated in CalEEMod, as shown on Table B-6, include project design features that would reduce project-related GHG emissions. The project consists of an approximately 93,000 square-foot commercial building including restaurant, retail, and office uses that would incorporate water conservation measures, such as low-flow faucets, showers, toilets, and water- efficient landscaping and irrigation systems that would reduce operational GHG emissions. In addition, rooftop solar panels, and installation of high-efficiency lighting would be used for on- site electricity that would reduce energy-related GHG emissions.

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<sup>11</sup> The project-level efficiency-based threshold of 4.8 MTCO<sub>2</sub>eq per SP per year is relative to the 2020 target date. The SCAQMD has also proposed efficiency-based thresholds relative to the 2035 target date to be consistent with the GHG reduction target date of SB 375. GHG reductions by the SB 375 target date of 2035 would be approximately 40 percent. Applying this 40 percent reduction to the 2020 targets results in an efficiency threshold for plans of 4.1 MTCO<sub>2</sub>eq per SP per year and an efficiency threshold at the project level of 3.0 MTCO<sub>2</sub>eq/year.

Table B-6

Estimated Greenhouse Gas Emissions

Source	CO2 Metric Tons/yr <sup>a</sup>	CH4 Metric Tons/yr <sup>a</sup>	CH4 Metric Tons of CO2eq <sup>b</sup>	N2O Metric Tons/yr <sup>a</sup>	N2O Metric Tons of CO2eq <sup>b</sup>	Total Metric Tons of CO2eq <sup>c</sup>
<b>Direct Emissions</b>						
Construction (amortized over 30 years)	14.77	0.00	0.00	0.00	0.00	14.77
Area Source	0.01	0.00	0.00	0.00	0.00	0.01
Mobile Source	1,458.28	0.09	2.30	0.00	0.00	1,460.67
<b>Total Direct Emissions<sup>3</sup></b>	<b>1,473.06</b>	<b>0.09</b>	<b>2.30</b>	<b>0.00</b>	<b>0.00</b>	<b>1,475.45</b>
<b>Indirect Emissions</b>						
Energy	766.40	0.02	0.50	0.01	3.00	769.93
Water Demand	90.00	0.31	7.80	0.01	3.00	101.12
Solid Waste	6.20	0.37	9.30	0.00	0.00	15.87
<b>Total Indirect Emissions<sup>c</sup></b>	<b>862.60</b>	<b>0.70</b>	<b>17.60</b>	<b>0.02</b>	<b>6.00</b>	<b>886.92</b>
<b>Total Project-Related Emissions<sup>c</sup></b>			<b>2,362.37 MTCO2eq/yr</b>			
<b>SCAQMD Significant Threshold</b>			<b>3,000 MTCO2eq/yr</b>			
<b>Significant Impact?</b>			<b>No</b>			

<sup>a</sup> Emissions calculated using CalEEMod (version 2016.3.1) computer model.

<sup>b</sup> CO2 Equivalent values calculated using the EPA Website, Greenhouse Gas Equivalencies Calculator, <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>, accessed January 30, 2017.

<sup>c</sup> Totals may be slightly off due to rounding.

Source: Greenhouse Gas Assessment, Synapse at Platform Project, prepared by Michael Baker International, dated January 31, 2017.

Reduction measures applied in CalEEMod and accounted for in Table B-6 from project design features include the following: water-efficient irrigation systems; low-flow faucets, toilets, and showers; high efficiency lighting; and installation of solar panels.

#### Direct Project-Related Sources of Greenhouse Gases

- Construction. Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions. Construction GHG emissions have been amortized, and would result in 14.77 MTCO<sub>2</sub>eq/yr, which are added to the total operational GHG emissions.
- Area Source. Area source emissions were calculated using CalEEMod and project-specific land use data. As noted in Table B-6, the project would generate nominal area source of GHG emissions. Mobile Source. CalEEMod relies upon project specific land use and traffic data derived from the Institute of Transportation Engineers' Trip Generation Manual, 9<sup>th</sup> Edition, to calculate mobile source emissions. The project would directly result in approximately 1,460.67 MTCO<sub>2</sub>eq/yr of mobile source-generated GHG emissions; refer to Table B-6.

### Indirect Project-Related Sources of Greenhouse Gases

- Energy Consumption. Consumption emissions were calculated using CalEEMod and project-specific land use data. Electricity would be provided to the project site via Southern California Edison. The project would indirectly result in 555.26 MTCO<sub>2</sub>eq/yr due to energy consumption; refer to Table B-6. It is noted that the energy emissions in Table B-6 include the use of a 9 kWh photovoltaic system on the project site, as required by Section 15.02.1005 of the CCMC, and a reduction from the project's LEED design features (high efficiency lighting, etc.).
- Water Demand. The project operations would result in a demand of approximately 15.63 million gallons of water per year. Emissions from indirect energy impacts due to water supply would result in 101.12 MTCO<sub>2</sub>eq/yr; refer to Table B-6. It is noted that the project's water emissions in Table B-6 include the use of water-efficient irrigation systems, and low-flow faucets, toilets, and showers (project design features).
- Solid Waste. Solid waste associated with operations of the proposed project would result in 15.87 MTCO<sub>2</sub>eq/yr; refer to Table B-6.

### Total Project-Related Sources of Greenhouse Gases

As shown in Table B-6, the project's GHG emissions would be 2,362.37 MTCO<sub>2</sub>eq/yr. As such, the project would not exceed the 3,000 MTCO<sub>2</sub>eq/yr GHG threshold. Impacts in this regard would be less than significant.

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

**Less Than Significant Impact.** The Global Warming Solutions Act of 2006, also known as AB 32, requires the State to achieve 1990 GHG emission levels by 2020 by setting statewide GHG reduction targets. To achieve these goals, CARB has established an emissions cap and developed a Climate Change Scoping Plan to identify mandatory strategies for reducing statewide GHG emissions. In addition, the California Climate Action Team (CAT) was formed which consists of members of various state agencies tasked with identifying strategies to reduce GHG emissions. Several other bills have been passed as a companion to AB 32 which include SB 1368 (electricity generation standards), SB 97 (CEQA analysis for GHGs), Low Carbon Fuel Standards, SB 375 (Regional Transportation Planning and GHG emissions), CALGreen building standards and others plans to achieve the goals of AB 32.

The State has promulgated regulations and programs for the purpose of reducing GHG emissions. The GHG emissions analysis in this MND was performed in accordance with SCAQMD and CARB guidance developed in compliance with, and as a result of, those regulations and programs. The result of the analysis of the project's potential impacts in terms of GHG and global climate change indicates that the construction-related GHG emissions from the project alone would not be expected to cause a direct physical change in the environment. Therefore, the project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHG.

According to CARB in its First Update to the Climate Change Scoping Plan, infill development that offers a mix of uses can reduce dependence on motor vehicles, thus reducing associated GHG emissions.<sup>12</sup> Thus, the

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<sup>12</sup> California Air Resources Board, *First Update to the Climate Change Scoping Plan*, (2014) 104.

project would be consistent with reducing GHG emissions via infill development strategies in close proximity to public transportation and other nearby off-site land uses.

In support of AB 32, the State has promulgated laws and strategies aimed at reducing GHG emissions, some of which are applicable to the project. Consistent with AB 32, the project would minimize construction-related GHG emissions by using equipment that meet stringent USEPA emissions standards, using low carbon vehicle fuels as required under state law, and prohibiting diesel-fueled commercial motor vehicle idling consistent with CARB requirements.

Since 2000 the City initiated various sustainability focused community visioning efforts that ultimately helped identify a range of GHG reduction activities and strategies that is anticipated to form the basis of the City's future Sustainable Community Plan (SCP). GHG reduction activities and strategies are grouped into six categories: Community Education and Civic Participation; Environmental Pollution and Public Health Protection; Resource Conservation; Waste Management and Recycling; Sustainable Land Use and Open Space; and Sustainable Transportation. While the SCP has not been formally adopted by the City, the analysis below provides an assessment of the project's consistency with the considered SCP strategies.

Culver City adopted their Mandatory Green Building Program in June 2009. The Mandatory Green Building Program applies to all new construction, new additions, and major renovations within the City. The project would be required to meet the Mandatory Green Building Program and latest codes. The Mandatory Green Building Program requires implementation of several sustainability measures adopted for the purpose of reducing GHG emissions. Sustainability measures contained within the Mandatory Green Building Program relate to energy efficiency, water conservation, recycling, and landscaping. In addition to the Mandatory Green Building Program requirements, the project would be subject to the 2013 California Green Building Standard Code (CalGreen). Similar to the Mandatory Green Building Program, CalGreen requires the project applicant to implement GHG emission reduction measures for new projects.

**Table B-7**, *Consistency with Applicable and Comparable GHG Regulatory Schemes*, contains a list of GHG-reducing strategies and actions applicable to the project. The project-level analysis describes the consistency of the project's GHG emission sources with local and regional GHG emissions reduction strategies. As discussed in Table B-7, the project would be consistent with the applicable portions of Culver City's Green Building Program, Culver City SCP strategies, is located within the Culver City's Washington/National TOD area in a transit priority area, and is consistent with applicable SCAG RTP/SCS policies intended to meet the region's GHG reduction targets as assigned by CARB. Thus, the project would be consistent with GHG reduction measures from applicable plans..

Since AB 32 sets statewide targets for future GHG emissions, the Scoping Plan and other implementing tools of the law are clear that the reductions are not expected to occur uniformly from all sources or sectors. As discussed previously and shown in Table B-8, the project would be consistent with the applicable GHG reductions strategies and local actions considered by the City in the SCP (not formally adopted). Additionally, the project would be consistent with GHG reduction measures from other applicable regional plans. **Table B-8**, *Applicable GHG Reduction Strategies*, contains a list of other state, regional, and local GHG-reduction strategies applicable to the project, the identified related projects, and future development similar in scope and location. Included are the regulations or guidelines from which the strategies were developed. The project-level

Table B-7

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
<b>Culver City Strategies (not formally adopted)</b>		
<b>Environmental Pollution and Public Health Protection</b>	Working hard to improve stormwater quality by implementing a Stormwater Management Program.	<p><b>Consistent.</b> Construction activities would be carried out in accordance with the requirements of the NPDES General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented by the project that incorporates Best Management Practices (BMPs) to minimize pollutant runoff during the project's construction period by preventing the off-site movement of potential contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides.</p> <p>With regards to long-term water quality impacts, per the applicable requirements of 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, the project would require a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. Stormwater infiltration was considered but determined to be infeasible due to high historic groundwater levels located at or slightly above the proposed base of the building foundations. Instead, the stormwater collected from roof drains, area drains, and downspouts would be routed through a filtration system (Contech 8-foot by 6-foot StormFilter) that utilizes cartridges for filtration. The stormwater would then be pumped up and released through a 10-inch pipe that connects to a proposed catch basin (to replace existing catch basins) located along Washington Boulevard.</p>
	Catching as much trash as we can before it enters the storm drain system by installing catch basin inserts in storm drain sites throughout the City with the help of Proposition 50 grant funds and EPA appropriations.	<p><b>Consistent.</b> The project's storm drain filtration system would prevent large pieces of debris from entering the parkway drain.</p>
	Completing improvements to make our traffic signal system more intelligent and efficient. The City has already completed a new traffic control center and traffic signal synchronization program, and has plans to implement an Adaptive Traffic Control System. These improvements will allow the City to better manage its traffic flow and reduce congestion and associated emissions.	<p><b>Consistent.</b> The project's traffic impact analysis, <i>Raju Associates, Inc., Draft Traffic Study for the 8888 Washington Boulevard Project, (2017)</i>, includes an impact assessment of project traffic as well as signalization. Details of the analysis are provided in Section XVI, Transportation and Circulation, of this MND document. Required improvements to the network of traffic signals in the project area would be made in accordance with the findings and recommendations of the traffic impact analysis, with traffic impacts being less than significant.</p>

Table B-7 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
<b>Resource Conservation</b>	Encouraging environmental sustainability and resource conservation through changes to the City's code. Within the last several years, the City has 1) Revised the City's Water Conservation Ordinance to bring it in line with Municipal Water District's model ordinance; 2) Passed a Mandatory Solar Photovoltaic Ordinance requiring 1 kilowatt of solar photovoltaic energy generation for each 10,000 square feet of gross floor area of new commercial or multi-family construction, including additions and major renovations. This was the first such mandatory program in the US; and 3) Approved a Mandatory Green Building Ordinance.	<b>Consistent.</b> The project would meet applicable City Code requirements for environmental sustainability and resource conservation. The project would include the installation of a photovoltaic system.
	Managing the City's urban forest in an environmentally sustainable way, and emphasizing species in the Street Tree Master Plan that are drought-tolerant and emit low or moderate amounts of Biogenic Volatile Organic Compounds (biogenics) as practicable.	<b>Consistent.</b> The project would incorporate low-water and drought tolerant plants in the landscape plan.
	Operating in compliance with California State Model Water Model Efficiency Landscape Ordinance (AB 1881) by conducting water audits at all the city parks, medians, parkways and buildings; using evapotranspiration (ET) based weather station controllers; and, upgrading existing irrigation systems using the latest technology to increase efficiency and reduce run-off.	<b>Consistent.</b> The project would incorporate low-water and drought tolerant plants in the landscape plan.
	Showcasing the versatility, conservation properties and beauty of native and indigenous plants in our public landscape areas through design techniques that both reduce the City's maintenance and water costs and raise public awareness of the benefits of non-traditional plantings.	<b>Consistent.</b> The Ground Level public open space along Washington Boulevard would include a streetscape design that includes wide public sidewalks with street trees, landscape planters, tree grates, and benches, tables for outdoor seating, trash receptacles, and street furniture to activate the pedestrian environment. The project includes balconies, breezeways, and a "green" roof deck with for use by office employees. The project would incorporate low-water and drought tolerant plants in the landscape plan.
	Providing the public with recycling opportunities to recycle a wide range of materials including: bottles, cans, plastics, paper, batteries, cell phones, hearing aids and eyeglasses.	<b>Consistent.</b> The project would provide areas for the collection of recyclable materials on the project site.
<b>Waste Management and Recycling</b>	Helping all businesses comply with AB 341 by providing recycling assessments, presentations, and easy to use templates to businesses starting recycling programs. AB 341 is a state law that, among other things, requires businesses with four or more cubic yards of commercial solid waste per week to arrange for recycling services.	<b>Consistent.</b> The project would provide areas for the collection of recyclable materials on the project site. Consistent with AB 341, the project would separate recyclable waste and/or subscribe to a recycling service that may include mixed waste processing that yields diversion results comparable to source separation.
<b>Sustainable Land Use and Open Space</b>	Encouraging multi-use developments that make the City more walkable.	<b>Consistent.</b> The project would include a mix of retail, restaurant, and office uses located within Culver City's Washington/National TOD area. The project has been designed as an extension of the

Table B-7 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
		Platform development located to the east of the project site along Washington Boulevard. The project connects to Platform via a pedestrian street frontage with a recessed façade and colonnade sidewalks which further links the connection of the Helms Bakery Complex and Arts District to downtown Culver City. Also, a new bike lane would be provided along Washington Boulevard that would connect to bike lane in front of Platform. The Ground Level public open space along Washington Boulevard would include a streetscape design that includes wide public sidewalks with street trees, landscape planters, tree grates, and benches, tables for outdoor seating, trash receptacles, and street furniture to activate the pedestrian environment. The perimeter of the site area would incorporate a City approved Streetscape plan which would create an attractive and inviting walkable environment. Further, the project would provide access to multi-modal transit including bike, bus, and train routes. The property is located immediately south of the Culver City Metro Station, which is the approximate center of the Metro Expo line, connecting Downtown Los Angeles to Santa Monica.
	Promoting revitalization, encouraging reinvestment and eliminating blight in the City's Area Improvement Projects.	<b>Consistent.</b> The project has been designed as an extension of the Platform development located to the east of the project site along Washington Boulevard. The project connects to the Platform via a pedestrian street frontage with a recessed façade and colonnade sidewalks which further links the connection of the Helms Bakery Complex and Arts District to downtown Culver City. The Ground Level public open space along Washington Boulevard would include a streetscape design that includes wide public sidewalks with street trees, landscape planters, tree grates, and benches, tables for outdoor seating, trash receptacles, and street furniture to activate the pedestrian environment. The perimeter of the site area would incorporate a City approved Streetscape plan which would create an attractive and inviting walkable environment.
	Raising public awareness of the importance of reducing the City's overall carbon footprint by continually striving to meet the "Net Goal" of grounds maintenance; that is, achieving a net landscape benefit by producing more oxygen than carbon dioxide through the use of environmentally responsible maintenance practices. Practices that the City has implemented that have been or can be easily adopted by community members include limiting the pruning of trees and shrubs, increasing water efficient irrigation practices and utilizing energy efficient machinery to	<b>Consistent.</b> The project would include measures to reduce the overall carbon footprint. The project would install efficient water fixtures and flush technology that will reduce indoor water use and exceed the California Green Building Code's mandatory 20 percent potable water reduction, and reduce wastewater generation. The project would include the installation of a photovoltaic system. The project would rely on fluorescent, LED, or other type of high efficiency lighting systems for all interior and exterior lighting. New lighting installed in parking structures and all common areas would be motion sensor



Table B-7 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
	maintain landscaped areas.	controlled. The project would incorporate low-water and drought tolerant plants in the landscape plan
	Implementing the Parks and Recreation Master Plan, which is a comprehensive report that catalogues and analyzes the condition of the City's recreation programs and facilities and also presents recommendations for the future growth and development of parks and recreation that are based on the cornerstones of public input, objective data, technical expertise and emerging best practices.	<b>Consistent.</b> Because the project does not include residential uses, it does not require the development of parks and would not adversely impact park facilities. Nonetheless, it is acknowledged that the project's Ground Level public open space along Washington Boulevard would include a streetscape design that includes wide public sidewalks with street trees, landscape planters, tree grates, and benches, tables for outdoor seating, trash receptacles, and street furniture to activate the pedestrian environment. The project also includes balconies, breezeways, and a "green" roof deck with for use by office employees.
<b>Sustainable Transportation</b>	<p>Relying heavily on alternative fuels to power the City's fleet. The City's use of alternative fuel vehicles and other environmentally-friendly activities has earned it high rankings as a Best Green Fleet in North America by the Top 100 Fleets Certification Program (Best Fleet in 2013) and has resulted in:</p> <ul style="list-style-type: none"> <li>Reduced diesel fuel consumption by 60% over the past five years, annually displacing over 800,000 gallons of diesel fuel with CNG, and saving the City over \$1.2 million per year in fuel costs.</li> <li>Removal of over 80,000 pounds of NO<sub>x</sub> (oxides of nitrogen - the brown emission exhaust) from the air</li> <li>Removal of over 32,000 pounds of PM (particulate matter - the black soot exhaust) from the atmosphere.</li> </ul>	<p><b>Consistent.</b> While the measure applies to the City, the project would nonetheless support the City efforts to reduce transportation-related emissions by encouraging alternative transit. Located within located Culver City's Washington/National TOD area, the project would provide access to multi-modal transit with connecting bike, bus, and train routes. The project is located immediately south of the Culver City Metro Station, which is the approximate center of the Metro Expo Line, connecting Downtown Los Angeles to Santa Monica. The project site is located in an area well served by public transportation. In the existing transit system, 16 bus lines currently operate under four different transportation agencies that currently serve the project site. Four bus lines are operated by the Culver City Bus (CC); nine bus lines are operated by the Los Angeles County Metropolitan Transportation Authority (Metro); two bus lines are operated by the Santa Monica Big Blue Bus (SM); and one bus line is operated by LADOT. The project would be developed with a bicycle friendly design with bicycle parking for visitors and occupants as well as access to Platform bike-share services. A new bike lane would be provided along Washington Boulevard that would connect to the bike lane in front of Platform.</p>
	Implementing a rideshare program to encourage employees to use alternative forms of transportation. The City's Employee Rideshare Program removes over 2.8 tons of emissions per year by encouraging alternative modes of commuting to work.	<b>Consistent.</b> The project would promote bicycle and public transportation use by providing bike racks for site tenants and public use; bike storage facilities; access to Platform bike-share services; convenient access to multi-modal transit including buses and trains. Rideshare programs are anticipated to be explored by future office tenants.
	Operating Culver CityBus, a high-quality municipal bus service that provides transportation options for the community. Culver CityBus was the first public transit fleet	<b>Consistent.</b> While the measure applies to the City, the project would nonetheless support the City efforts to reduce transportation-related emissions by encouraging alternative transit.

Table B-7 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
	in the South Coast Air Quality Management District (AQMD) to operate on 100 percent compressed natural gas (CNG), and the second in the State of California.	Located within Culver City's Washington/National TOD area, the project would provide nearby and convenient access to multi-modal transit with connecting bike, bus, and train routes. The property is very near the Culver City Metro Station, which is the approximate center of the Metro Expo Line, connecting Downtown Los Angeles to Santa Monica.
	Coordinating with the construction of an Expo Light Rail Station in Culver City. The Culver City station opened in 2012. It marks the furthest rail has reached into the Westside in more than 50 years, allowing commuters to travel 7.9 miles between downtown Los Angeles and the eastern area of Culver City in about half an hour.	<b>Consistent.</b> Located within Culver City's Washington/National TOD area, the project would provide nearby and convenient access to multi-modal transit with connecting bike, bus, and train routes. The project is very near the Culver City Metro Station, which is the approximate center of the Metro Expo Line, connecting Downtown Los Angeles to Santa Monica. The project would also be developed with a bicycle friendly design with bicycle parking for visitors and occupants as well as access to Platform bike-share services. Also, a new bike lane would be provided along Washington Boulevard that would connect to bike lane in front of Platform project to the east.
<b>Regional Strategies</b>		
<b>Sustainable Communities Strategy</b>	The RTP/SCS, developed by SCAG, demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. The RTP/SCS successfully achieves and exceeds the GHG emission reduction targets, set by CARB by achieving a 9 percent reduction by 2020 and 16 percent reduction by 2035 compared to the 2005 level on a per capita basis.	<b>Consistent.</b> Located within Culver City's Washington/National TOD area, the project would provide nearby and convenient access to high-quality multi-modal transit with connecting bike, bus, and train routes. A new bike lane would be provided along Washington Boulevard that would connect to bike lane in front of Platform project to the east. The property is very near the Culver City Metro Station, which is the approximate center of the Metro Expo Line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to 16 bus routes and bicycle lanes/routes. As shown in Table B-27, Estimated Project Trip Generation, Section XVI, Transportation and Circulation, the office component of the project would provide a 25 percent transit trip use with an internal capture trip credit of 10 percent. Both the retail and restaurant components of the project would each provide a 10 percent internal capture trip credit and a 25 percent pass-by trip reduction. The project would provide bicycle parking for visitors and occupants as well as access to Platform bike-share services. As a result, the project would be consistent with the goals and the intent of the RTP/SCS to focus new housing and job growth in high-quality transit areas and to reduce transportation-related GHG emissions.

Source: ESA PCR, 2016.

Table B-8

Applicable GHG Reduction Strategies

Source	Description	Demonstration of Project Consistency
<b>AB 1493 (Pavley Regulations)</b>	Reduces GHG emissions in new passenger vehicles from 2012 through 2016. Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	<b>Consistent.</b> This measure applies to all new vehicles and the project would not conflict with its implementation.
<b>SB 1368</b>	Establishes an emissions performance standard for power plants within the State of California.	<b>Consistent.</b> Southern California Edison provided power is subject to the performance standards. The project would not conflict with the implementation of this measure
<b>Low Carbon Fuel Standard</b>	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	<b>Consistent.</b> This measure applies to transportation fuels utilized by vehicles in California. The project would not conflict with the implementation of this measure. Construction and operational vehicles associated with the project would utilize low carbon transportation fuels as required under this measure.
<b>CALGREEN Requirements</b>	Comply with applicable site development planning and design measures such as bicycle parking and light pollution reduction.	<b>Consistent.</b> The project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen code.
	Comply with indoor water usage requirements by using low-flow water fixtures that meet the prescribed flow rates (residential and non-residential) or reduce water use by 20 percent from the water use baseline (non-residential).	<b>Consistent.</b> The project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen code.
	Comply with material conservation and resource efficiency measures including applicable weather resistance and moisture management measures.	<b>Consistent.</b> The project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen code.
	Comply with VOC emissions limits for carpet systems, composite wood products, and flooring.	<b>Consistent.</b> The project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen code.
	Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	<b>Consistent.</b> The project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen code.
<b>CALGREEN Voluntary Actions</b>	Reduce diesel-fueled commercial motor vehicle idling.	<b>Consistent.</b> The project is committed to implementing this action to the extent feasible. Construction trucks would comply with CARB's anti-idling measure.
<b>Climate Action Team</b>	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	<b>Consistent.</b> CALGreen Code implements this goal, and the project would be consistent with the requirements.
	Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	<b>Consistent.</b> The project would provide appropriate landscaping on the project site including vegetation and trees.

**Table B-8 (Continued)**

**Applicable GHG Reduction Strategies**

<b>Source</b>	<b>Description</b>	<b>Demonstration of Project Consistency</b>
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	<b>Consistent.</b> CALGreen Code implements this goal, and the project would be consistent with the requirements.
	The California Energy Commission updates building energy efficiency standards that apply to newly constructed buildings and additions to and alterations to existing buildings. Both the Energy Action Plan and the Integrated Energy Policy Report call for ongoing updating of the standards.	<b>Consistent.</b> CALGreen Code implements this goal, and the project would be consistent with the requirements.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	<b>Consistent.</b> CALGreen Code implements this goal, and the project would be consistent with the requirements.
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors, and implementing intelligent transportation systems.	<b>Consistent.</b> The project would be located in an infill location in proximity to existing residential and commercial businesses, which would minimize trip lengths and associated emissions.
<b>Culver City</b>		
<b>Green Building Program</b>	Enhance building insulation, low flow fixtures, efficient lighting and HVAC systems.	<b>Consistent.</b> The project would be consistent with this requirement via compliance with City ordinances and/or the Green Building Program.
	For new construction totaling more than 50,000 square feet, the project must attain the Leadership in Energy and Environmental Design (LEED) "Certified" level or equivalent.	<b>Consistent.</b> The project would be consistent with this requirement via compliance with City ordinances and/or the Green Building Program.
	For parking garages which requires all new lighting to be motion sensor controlled and minimum base level lighting is permitted using high efficiency lighting.	<b>Consistent.</b> The project would be consistent with this requirement via compliance with City ordinances and/or the Green Building Program.
<b>Photovoltaic Requirement</b>	Requires 1 kilowatt (kw) of photovoltaic power installed per 10,000 square feet of new development	<b>Consistent.</b> The project would be consistent with this requirement via compliance with City ordinances.

*Source: ESA PCR, 2016; Climate Action Team, Attorney General's Office, 2011.*

analysis highlights the manner by which the project intends to meet the applicable strategies. Because the project would not conflict with strategies to reduce GHG emissions, it would be consistent with the overarching regulation to reduce GHG emissions.

Through incorporation of the project's green building features discussed above, the project complies with applicable portions of the CalGreen Code for non-residential uses (Calif. Code of Regs. Title 24, Part 11), as required by the Culver City Green Building Ordinance which requires LEED certification or equivalent, and the

Culver City Mandatory Solar Photovoltaic requirement which requires 1 kW of solar power per 10,000 s.f. of applicable building area. In summary, the project, as designed, meets or exceeds the applicable requirement of the CalGreen Code and the Culver City Green Building Ordinance, all of which is supportive of the State's GHG-reduction goals under state law AB 32. Therefore, the project would not conflict with applicable plans, policies, or regulations to reduce GHG emissions.

## VIII. HAZARDS AND HAZARDOUS MATERIALS

The following hazardous materials discussion is based, in part, on the *Phase I Environmental Site Assessment Report – Final, 8888 Washington Boulevard, 8919-8921 Lindblade Street, Culver City, California 90232* (herein referred to as the "Phase I", prepared by Citadel Environmental Services, Inc., dated July 17, 2014; *Limited Phase II Investigation – Soil Sampling, 8888 Washington Boulevard, Culver City, California 90232* (herein referred to as the "Limited Phase II"), prepared by Citadel Environmental Services, Inc., dated August 27, 2014; *Supplemental Phase II Investigation Report, 8888 West Washington Boulevard, Culver City, California* (herein referred to as the "Supplemental Phase II"), prepared by Hillman Consulting, dated March 11, 2015; and *Supplemental Site Investigation Report ICC Collision Center 8888 Washington Boulevard, Culver City, California 90232 DTSC Docket No. HAS-VCA 15/16-043* (herein referred to as the "SSI Report"), prepared by Leighton Consulting, Inc., dated October 10, 2016 (all provided under separate cover available at the Culver City Planning Division).

*Would the project:*

### a. **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Less Than Significant Impact.** Hazardous materials may be used during the construction phase of the project. Hazardous materials that may be used include, but are not limited to, fuels (gasoline and diesel), paints and paint thinners, adhesives, surface coatings and possibly herbicides and pesticides. Generally these materials would be used in concentrations that would not pose significant threats during the transport, use and storage of such materials. Furthermore, it is assumed that potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, including California Occupational Safety and Health Administration (OSHA) requirements, and Title 8 and 22 of the Code of California Regulations. Accordingly, risks associated with hazards to the public or environment posed by the transport, use or disposal of hazardous materials during construction are considered less than significant due to compliance with applicable and required standards and regulations.

Operation of the retail, restaurant, and office uses would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents and painting supplies. These hazardous materials are regulated by stringent federal and state laws mandating the proper transport, use, storage, and disposal of hazardous materials in accordance with product labeling. The use and storage of these substances is not considered to present a health risk when used in accordance with manufacturer specifications and with compliance to applicable regulations.

Overall, based on the above, construction and operation of the project would result in a less than significant impact with regard to routine transport, use, or disposal of hazardous materials relative to the safety of the public or the environment.

**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?**

**Less Than Significant With Mitigation Incorporated.** The main objective of the Phase I was to review past and present land use practices and to evaluate the presence, or likely presence, of any hazardous substances or petroleum projects as defined in the American Testing and Materials Practice E 1527 as a “recognized environmental condition” (REC) that have been discharged into the property’s structure, ground, groundwater, or surface water. In order to identify RECs at the project site, the Phase I included the following: a site inspection to verify current site conditions and to check for visible evidence of previously disposed and/or currently present hazards waste, surface contamination, underground and above ground storage tanks (USTs/ASTs), suspect polychlorinated biphenyls (PCBs), and other potential hazards; a visual survey of the adjacent properties and the immediate vicinity to determine if any nearby sites posed a significant environmental threat to the site; review of currently and readily available documents, including maps, aerial photographs, governmental databases of known hazardous waste sites and underground tanks, other consultant reports if applicable, fire insurance maps, and other accessible records; and consultation with appropriate governmental agencies having jurisdiction relative to past history of the property, complaints or incidents in the immediate area, and permits that may have been issued.

The project site is currently developed with a single-story auto repair shop building occupied by “ICC Collision Center” and an associated asphalt-paved surface parking lot and vehicular storage area. All existing site uses would be demolished and removed to support development of the project. As the current building was constructed in 1950, it is possible that lead-based paint (LBP), asbestos-containing building materials (ACBMs) and/or other hazardous paint residues are present in the buildings. Lead is a highly toxic metal that affects virtually every system of the body. LBP is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm<sup>2</sup> (or 5,000 ug/g or 0.5 percent by weight) or more of lead. If released into the environment, these materials could pose a significant hazard to construction workers or the public. Implementation of Mitigation Measures HAZ-1 and HAZ-2 would require comprehensive surveys of the existing building prior to demolition in accordance with applicable regulations—including the National Emissions Standards for Hazardous Air Pollutants standards, SCAQMD Rule 1403, and California Division of Occupational Safety and Health (Cal/OSHA)—to verify the presence or absence of any of these materials. If LBPs and/or asbestos containing materials (ACMs) are encountered, Mitigation Measures HAZ-1 and HAZ-2 require remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences. Adherence with these Mitigation Measures HAZ-1 and HAZ-2 would reduce risks associated with LBPs and ACMs to acceptable levels and associated impacts would be less than significant.

The Federal Environmental Protection Agency (EPA) Radon Zone for Los Angeles County is Zone 2, which indicates an average indoor concentration greater than or equal to 2 picocuries per liter (pCi/L) and less than or equal to 4.0 pCi/L of air. According to the Phase I, 13 tests were tested within the project area for the presence of radon. Of these, zero tests were found to contain radon in excess of 4 pCi/L, the Federal Action level. Based upon the radon zone classification, radon is not considered to be a significant environmental concern.

The project site is not located within a methane zone or methane buffer zone recognized by the Los Angeles Department of Building and Safety (LADBS). Additionally, as discussed in the SSI Report, a voluntary methane survey was conducted at the site by analyzing soil gas samples from the project site. Methane concentrations

were below the field instrument detection limits. Based on the test results, the SSI Report concluded that methane is not a significant environmental concern at the site.

The existing auto repair shop uses two types of automobile lifts for repair purposes (drive-on electric/air lifts and post surface mounted hydraulic lifts) and auto detailing equipment powered by air compressors. One historical subsurface lift is located within the northwestern corner of the existing building but is no longer in use. The auto repair shop contains two paint spray booths and an apparent abandoned trench drain system. As part of the Phase I, information available on-line through the SCAQMD's Facility Information Detail (FIND) database was reviewed. The location was listed as having an "active" permit to operate spray booth paint and solvent, drying oven, and catalytic afterburner/oxidizer. During a site inspection of the existing auto repair shop building, hazardous waste was identified at the project site stored in 55-gallon drums located by the paint booth for "Waste Paint Related Material" which is picked up monthly by Pacific Resource Recover Systems. Two drums were observed outside for waste fuels which are picked up once a year. The drums were located within containment tanks in case of leaks or spills. Pooled water was also observed throughout the concrete floor within the collision center work area. Two chemical storage cabinets were identified at the project site which contained cleaning products such as window cleaner, paint, paint thinner, and typical janitorial products.

According to the Phase I, based on the review of historical and present records, site interviews, and site reconnaissance, no controlled recognized environmental conditions (CRECs) have been identified within the project site. As discussed under Response VIII.d, historical recognized environmental conditions (HREC) associated with on- and off-site former light industrial activities, including USTs, were identified. Due to the monitoring, mitigation efforts, and No Further Action letters given to the UST removal and soil mitigation activities, these HRECs do not present a significant environmental concern.

Per the Phase I, potential RECs exist at the project site due to the historical use as an automobile collision repair facility. The observed pooled water within the existing building suggests the potential for wastewater to have entered floor drains and leaking into the subsurface through cracks in the concrete slab. Hazardous substances such as hydraulic fluids, waste oil, solvents, paint and antifreeze exist in the subsurface. As such, a Phase II screening investigation of subsurface soils was recommended to confirm hazardous materials have not entered the subsurface.

To evaluate the current on-site shallow subsurface conditions with respect to past and present historical occupancy of the project site, the Limited Phase II included five borings to maximum depths of five feet below the ground surface within the auto repair shop building and adjacent parking area. The borings were placed near an unused and abandoned subsurface lift; adjacent to the existing paint booth; in the center of the building near a partially exposed trench containing an unused pipe; in a high activity work area utilizing above ground lifts; and the parking lot adjacent to the previously removed UST area; refer to the Limited Phase II for boring locations and test results. Soil samples were analyzed for total petroleum hydrocarbons (TPH), full carbon chain, volatile organic compounds (VOCs), Title 22 metals, and PCBs. The subsurface soils encountered within the upper five feet below the ground surface consisted primarily of approximately three feet of silty sand overlying clayey sand. A chemical of concern detected from the initial soil screening was common chlorinated solvent tetrachloroethene (PCE), which was detected within three borings. The concentrations detected in the samples were all below the Regional Screening Levels (RSL's) for industrial and residential soil signaling a type of leak or leaching through the concrete slab has previously occurred. The Limited Phase II acknowledged that volatile chemicals in the subsurface can migrate upward through the soil and enter into buildings, causing unacceptable chemical exposure for building occupants. The Limited Phase II recommended a Soil Mitigation Plan, along with proper monitoring, to be developed and implemented to aid in

screening exposed soils for high concentrations of PCE to protect worker safety and to determine appropriate handling and disposal of such soils.

Based on the results from the Limited Phase II, a Supplemental Phase II was conducted that included deeper soil sampling, in-situ groundwater sampling, and soil gas sampling, to better define the extent and magnitude of the contamination. Five additional soil borings were installed across the project site to depths ranging from 28 to 35 feet below grade; refer to the Supplemental Phase II for boring locations and test results. Results of soil sampling indicated levels of PCE and a related solvent dichloroethene (DCE) as deep as 25 feet below grade in the soil. The groundwater contained levels of acetone, PCE, trichloroethene (TCE), and DCE, and one sample had dissolved levels that far exceeded the recognized maximum contaminant level (MCL) standards for both TCE and PCE. The sample had 14 microgram per liter (ug/L) TCE and 22 ug/L PCE with the MCL for both compounds being 5 ug/L.

The results of soil gas sampling indicated significant levels of PCE in every soil gas sample, with concentrations ranging from 2.3 to 350 ug/L. The California Human Health Screening Level (CHHSL) guideline for PCE in soil gas is 0.6 ug/L within a commercial setting. In addition, three of the four detections of TCE in soil gas exceeded the CHHSL threshold values. These results suggested a likely vapor intrusion threat that would require mitigation to protect future occupants of the building. To more precisely define the extent of contamination at the project site, the Supplemental Phase II installed five additional soil borings in perimeter locations where soil and gas samples were collected; refer to the Supplemental Phase II for boring locations and test results. In-situ groundwater samples were collected in all but one boring, which encountered refusal conditions at 27 feet below grade and did not accumulate groundwater. Results of the investigation lower levels in these perimeter locations suggest that the extent of contamination is reasonably well-defined to a limited area, possibility emanating from a possible former trench drain system. The Supplemental Phase II recommended further assessment to delineate the extent of VOC contamination.

Prior to preparation of the SSI, the scope of work for the SSI was discussed with the Department of Toxic Substances Control (DTSC) during a meeting at the DTSC Chatsworth office on November 12, 2015. A Draft SSI Work Plan dated March 8, 2016 was prepared by Leighton to address DTSC comments detailed in their January 12, 2016 letter to the project applicant entitled *Further Action Determination of Preliminary Endangerment Assessment Equivalent Documents, ICC Collision Center, 8888 Washington Blvd., Culver City (site code: 301720)*, and in an electronic mail dated February 4, 2016. On April 15, 2016, DTSC accepted the March 8, 2016 Draft SSI Work Plan as final with conditions, which resulted in the following modifications/clarifications in the field and as reported in the SSI report: soil sampling for VOC analysis and field groundwater well construction activities per prescribed DTSC test methods.

As part of the SSI, sampling and analytical testing activities were conducted pursuant to the DTSC approved March 8, 2016 Work Plan to evaluate for the presence of VOCs in soil, soil gas, and groundwater as well as additional hazardous substances and petroleum products identified by the DTSC. The SSI included advancement of 14 soil borings at various depths up to 50 feet below ground surface (bgs) with installation of eight temporary soil gas probes and four groundwater monitoring wells at select borings, collection of soil, soil gas and groundwater samples, and analytical testing. Below is a summary of the results of the SSI:

1. The most elevated VOC detections in soil gas and groundwater appeared primarily near the southern and central portions of the site. This finding correlates with the results of 2015 site investigations performed by Hillman.



2. VOC concentrations detected in the July 2016 SSI groundwater samples were generally similar to or lower than concentrations of VOCs detected in groundwater at the site by Hillman in 2015.
3. In July 2016, concentrations of TCE and cis-1,2-DCE in groundwater samples as part of the SSI from two wells (LMW-1 and LMW-3) exceeded the California MCLs. No other VOC detections in July 2016 SSI groundwater samples exceeded MCLs.
4. VOCs in a groundwater sample collected from the one offsite and hydraulically downgradient monitoring well (LMW-4), were reported to be below the laboratory practical quantitation limits (PQLs), indicating that the VOCs detected in groundwater at the site have not migrated offsite.
5. Soil affected by low concentrations of VOCs was detected in soil samples collected between 0.5 and 15 feet bgs near the south and central portions of the site. Based on the fact that the concentrations of VOCs soil do not exceed 50 milligrams per kilogram (mg/kg), this soil should meet the VOC profiling and acceptability criteria for Chiquita Canyon Landfill located in Castaic, California. Considering that the VOC-affected soils would be excavated, transported and properly disposed offsite, the possibility that the soils could potentially serve as a future source of VOCs for soil gas and groundwater should be considered an incomplete pathway.
6. With the exception of VOCs in soil samples from boring LMW-3, VOC concentrations in soil observed in July 2016 (as part of SSI) were generally similar to or lower than historic concentrations of VOCs in soil at the site.
7. In July 2016, the maximum PCE and TCE concentrations in soil samples collected from the site were 5,700 micrograms per kilogram ( $\mu\text{g/kg}$ ) PCE and 280  $\mu\text{g/kg}$  TCE detected in the soil sample from boring LMW-3 at 15 feet bgs. No PCE or TCE was detected above laboratory PQLs in any of the deepest soil samples collected from depths of 20 and 25 feet bgs across the site in July 2016. Removal of VOC-affected soils near LMW-3 and the other portions of the site would be protective of groundwater and eliminate the potential downward migration and/or diffusion of VOCs from onsite soil into groundwater.
8. Soil samples analyzed for additional hazardous substances and petroleum products identified by the DTSC [TPH, PCBs, semi-volatile organic compounds (SVOCs), Title 22 Metals] did not result in identification of new chemicals of concern (COCs) in soil. PCBs and SVOCs were below the laboratory reporting levels; Title 22 metals were relatively low or consistent with California background metals levels; and TPH was detected in only two samples at relatively low concentrations.
9. For planning and disposal purposes, analytical results for soil samples indicate that soil excavated from the site would likely be characterized as nonhazardous waste.
10. Removal of soil to 28 feet bgs as part of the project would further improve soil, soil gas and groundwater conditions at the site, especially removal of the soil from the vicinity of boring LMW-3 around 15 feet bgs where elevated concentrations of PCE and TCE were observed in soil.

A Human Health Risk Assessment (HHRA) was conducted as part of the SSI investigation for the VOC detections in soil vapor probes in July 2016. As detailed in the SSI, the maximum calculated cumulative cancer risk of  $2.7E-06$  does not exceed the risk management range of  $1E-06$  to  $1E-04$  and is not considered an elevated cancer risk. The SSI concluded that residual VOCs in soil vapor beneath the site do not pose a significant health risk to site occupants (considering indoor vapor intrusion), and future redevelopment plans include construction of an aboveground commercial structure with subgrade parking provided in an automated parking structure.

Based on the above, redevelopment of the site provides potential remedies to remove exposure pathways including, soil removed to 28 feet bgs, and a ventilated subgrade parking garage designed to be impermeable to groundwater. As the parking garage would be automated, it would not be ventilated for occupancy similar to a standard below grade parking structure as only repair/service personnel would enter when services are needed. Excavated soil and any water generated during construction related to site redevelopment would be properly profiled, transported and disposed off-site at a permitted landfill (e.g. Chiquita Canyon Landfill in Castaic, California) in accordance with applicable local, state and/or federal requirements. Waste manifests would be provided after proper disposal of the soil has been completed.

In general, observations would be made during any future site redevelopment for previously unidentified areas of possible contamination such as, but not limited to, the presence of underground facilities, buried debris, waste drums, tanks, pipes, stained soil or odorous soils. Should such hazardous substances and/or petroleum products be encountered that were previously unidentified, further investigation and analysis may be necessary at that time. Steps to address any unforeseen soil conditions or possible contamination would be included in a soil contingency and management plan, as prescribed in Mitigation Measure HAZ-3. The plan would also provide short-term exposure control measures (i.e., equipment requirements) to protect subsurface construction or utility workers in VOC-impacted areas.

In addition, as discussed in Response VIII.a, operation of the project would not create a significant risk of exposure to hazardous materials towards the public or the environment. Types of hazardous materials to be used in association with the project such as small quantities of potentially hazardous materials in the form of cleaning solvents and painting supplies would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The potential for creation of a significant hazard through routine transport of hazardous materials or the release of hazardous materials into the environment is considered less than significant.

Overall, implementation of Mitigation Measures HAZ-1 through HAZ-3 and compliance with applicable standards and regulations would ensure that potentially significant construction-related impacts associated with hazardous materials releases or accident conditions would be reduced to a less than significant level. Operational impacts in this regard would be less than significant.

## **Mitigation Measures**

- HAZ-1:** Prior to the issuance of any permit for the demolition or alteration of the existing on-site building, a comprehensive ACMs survey of the buildings shall be performed. If no ACMs are found, the project applicant shall provide a letter to the Culver City Building Safety Division from a qualified asbestos abatement consultant indicating that no ACMs are present in the on-site buildings. If ACMs are found to be present, they shall be abated in compliance with

the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

**HAZ-2:** Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a comprehensive LBP materials survey shall be performed to the written satisfaction of the Culver City Building Safety Division. Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

**HAZ-3:** Prior to issuance of any permit for the demolition or alteration of the existing structure(s) and upon receipt of No Further Action letter or letter of concurrence by DTSC for site characterization, a Soil Contingency and Management Plan shall be reviewed and approved by the Culver City Building Safety Division and Engineering Division, as applicable. The plan would include measures to remove and/or treat/remediate previously unidentified impacted soils to a level determined acceptable per applicable regulatory standards, under supervision of a certified environmental consultant licensed to oversee such remediation. The plan would also include Personal Protective Equipment (PPE) requirements for contractors.

**c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**Less Than Significant With Mitigation Incorporated.** Park Century School, located at 3939 Landmark Street, is located just over 200 feet east of the project site. Turning Point School, located at 8780 National Boulevard, is located approximately 0.10 miles east of the project site. Construction of the project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions.

As discussed in Response VIII.b, no CRECs have been identified and the HREC relating to a UST removal is not likely to have adversely affected the project site. Further, no significant RECs exist at the project site due to the historical use as an automobile collision repair facility. In the unanticipated event that impacted soils are discovered during construction activities, implementation of Mitigation Measure HAZ-3 would ensure impacts regarding the removal, handling and treatment of such soils are less than significant.

Also, project demolition activities could involve the removal of ACM and LBPs. However, any such removal would occur in adherence with Mitigation Measures HAZ-1 and HAZ-2. The project's demolition activities would be implemented pursuant to strict regulatory requirements, would be localized to the project site, and existing schools are sufficient distance from the project site to preclude impacts from the remediation and demolition activities. Implementation of the prescribed mitigation measures would reduce risks associated with LBPs and ACMs to acceptable levels and associated impacts would be less than significant.

Operation of the project would not create a significant risk of exposure to hazardous materials for the public or the environment, including the schools. Occupancy of the proposed retail, restaurant, and office uses would not cause hazardous substance emissions or generate hazardous waste. Types of hazardous materials to be used in association with the project such as small quantities of potentially hazardous materials in the form of cleaning solvents and painting supplies would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The potential

for creation of a significant hazard through handling or routine transport of hazardous materials or the release of hazardous materials into the environment within a quarter-mile of an existing school is considered less than significant.

## Mitigation Measures

Refer to Mitigation Measures HAZ-1 to HAZ-3. No additional mitigation measures are necessary.

**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?**

**Less Than Significant Impact.** Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Geotracker is the State Water Resources Control Board's (SWRCB's) data management system for managing sites that impact groundwater, especially those that require groundwater cleanup [USTs, Department of Defense, Site Cleanup Program] as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's database includes lists of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) from the State Water Board.

As part of the Phase I, a search was conducted for available Federal, State, and local environmental database records for the project site and where practicable, adjoining properties and nearby properties or surrounding areas within approximate minimum search distances from the project site. The site's property records were also reviewed within the Culver City Building Department, the CCFD, the Los Angeles County Department of Public Health (LADPH), the Los Angeles County Department of Public Works (LADPW), Environmental Programs Division, the LARWQCB, the DTSC, the SCAQMD and the California Department of Oil, Gas and Geothermal Resources (DOGGR). The LADPW revealed multiple files/reports associated with the project site and adjacent properties. The *Underground Storage Tank Removal Report Site Remediation Report for Alpha Motors – 8888 West Washington Boulevard*, prepared by Amnat Environmental and Geotechnical, dated July 1996, detailed the removal of one 3,000 gallon waste oil UST located at the southwestern corner of the parking lot within the project site. The report was submitted to the LADPW and requested closure of the site. The LADPW responded with a position that No Further Action was required at that time in a letter dated August 7, 1996. The *Closure Report for Underground Storage Tank Removal – Culver Suzuki-Subaru, 8850 West Washington Boulevard*, prepared by Ami Adini and Associates, dated June 25, 1997, detailed the removal activities of one steel, single walled, 280-gallon UST used for waste oil storage located in the south central portion of the property located at 8850 Washington. The report was submitted to the LADPW and requested closure of the site. The LADPW responded in a letter dated August 7, 1997 that additional closure requirements were required including defining the vertical and lateral extent of contamination, proposing a remedial action plan to mitigate contamination, and proposing future uses or improvements for the area related

to contamination. The *Subsurface Investigation-Former UST, 8850 West Washington Boulevard*, prepared by Ocean Blue Engineers, Inc., dated June 3, 1998, reported details of an investigation to delineate the extent of the soil plume of contamination in the area of the previously removed 280-gallon UST. The report was submitted to the LADPW and requested closure of the site. The LADPW responded with a position that No Further Action was required at that time in a letter dated December 12, 2011. According to the Phase I, due to No Further Action letters issued, the reported incidents above are not likely to have adversely affected the project site.

A regulatory agency database search report prepared by EDR was reviewed within the Phase I. Under the facility names of Alpha Body and Paint, Alpha Motors, United Car Carrier Inc., and Insurance Collision Center located at 8888 Washington Boulevard, the project site is listed on the EDR Historical Auto Stations database due to the facility operating as an auto collision repair center. The project site is also listed as a Los Angeles County Industrial Waste and Underground Storage Tank Site on the Los Angeles County Hazardous Materials System (HMS). No details were provided regarding specific hazardous materials. The Haznet database, which holds facility manifest data, reported that the project site disposed of 0.01-0.12 tons per year of various oxygenated solvents such as acetone, butanol, and ethyl acetate between 2004 and 2006.

The database search prepared by EDR included listings of off-site facilities located adjacent to the project site. Culver City Subaru, located at 8850 Washington Boulevard, was listed on multiple UST databases due to the historical use as an automobile sales operation. According to the LUST database overseen by the SWRCB, Culver City Subaru discovered a leak of non-petroleum hydrocarbons or other solvent in 1997 during tank closure activities. No specific details regarding any mitigation efforts were given. According to EDR, the status of the case is "Completed-Case Closed" as of April 23, 2003. Rusnak/Buerge Volkswagen, Inc., located at 8855 Washington Boulevard, was listed on multiple UST databases due to the historical use as an automobile sales operation. No leaks or violations were reported. Culver City Nissan, located at 8840 Washington Boulevard, was also listed on multiple UST databases due to the historical use as an automobile sales operation. According to the LUST database, Culver City Nissan discovered a leak of non-petroleum hydrocarbons or other solvent in 1997 during tank closure activities. Mitigation efforts consisting of soil removal took place with associated soil confirmation sampling. According to EDR, a Closure/No Further Action Letter was issued by the LADPW in regards to the site on January 24, 2012. According to the Phase I, the identified facilities are not likely to have adversely affected the project site.

According to the Phase I Geotracker database search, nearby reported cases included the above-mentioned Alpha Body and Paint, Alpha Motors, United Car Carrier Inc., and Insurance Collision Center located at 8888 Washington Boulevard, and Culver City Subaru, located at 8850 Washington Boulevard. The Geotracker database also included the Federal Express Facility located at 3730 Robertson Boulevard. This facility reportedly had one 10,000 gallon gasoline UST, one 500 gallon waste oil tank, and associated fuel dispenser islands removed from the eastern edge of the warehouse building in 2000. On-site sampling revealed TPH, methyl tertiary butyl ether (MTBE), benzene, toluene, ethylbenzene, and xylenes (BTEX) contamination in the soil and groundwater. Groundwater monitoring wells were installed and a soil vapor extraction (SVE) system was used to clean up the vadose zone contamination. According to the Geotracker database, as of 2009, only low concentrations of MTBE below regulatory screening levels were observed in groundwater and the groundwater plume was delineated to be all on-site and stabilized. The site was given a Closure/No Further Action Letter regarding the case on July 23, 2009. According to the Phase I, the identified facilities are not likely to have adversely affected the project site.

Overall, due to Closure/No Further Action letters issued and “Completed-Case Closed” files, a less than significant impact would occur in this regard.

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

**No Impact (e and f).** The project site is not located within an airport land use plan or within two miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately three miles and five miles to the west of the project site, respectively. Therefore, the project would not result in an airport-related safety hazard for people residing or working in the project area, and no impact would occur in this regard.

- g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less Than Significant Impact.** The project site is located in an established urban area that is well served by a roadway network. Venice Boulevard, north of the project site, and Robertson Boulevard west of the site, are transportation facilities that could be utilized during a disaster event.<sup>13,14</sup> While it is expected that the majority of construction activities for the project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In these instances, the project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with Culver City requirements, the project would develop a Preliminary Construction Management Plan and Preliminary Traffic Control Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the project vicinity and would result in some modifications to access (i.e., new curb cuts for project driveways) from the streets that surround the project site. However, emergency access to the project site and surrounding area would continue to be provided similar to existing conditions. Emergency vehicles and fire access for the project site would be provided at grade access from Washington Boulevard. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons and employees. Subject to review and approval of project site access and circulation plans by the Culver City Fire Department (CCFD), the project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. Since the project would not cause significant impediments along any designated emergency evacuation routes, and the proposed mix of uses would not impair implementation of Culver City’s emergency response plan, the project would have a less than significant impact with respect to these issues.

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<sup>13</sup> City of Los Angeles General Plan Safety Element – Critical Facilities and Lifeline Systems, Exhibit H November 26, 1996.

<sup>14</sup> County of Los Angeles Department of Public Works. <http://dpw.lacounty.gov/dsg/disasterroutes/map/culver%20city.pdf>, accessed September 2016.

**h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

**No Impact.** The project site is not located in an area of moderate or very high fire hazard.<sup>15,16</sup> The nearest very high fire hazard severity zone (VHFHSZ) is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately 0.65 miles south of the project site. Further, the project site is surrounded by urban development and is not adjacent to any wildlands. As such, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Thus, no impacts would occur in this regard.

**IX. HYDROLOGY AND WATER QUALITY**

The following hydrology and water quality discussion is based, in part, on the *Low Impact Development Calculation, Washington 8888* (herein referred to as the “LID Report”), prepared by VCA Engineers, Inc., dated March 11, 2016 (provided under separate cover available at the Culver City Planning Division).

*Would the project:*

**a. Violate any water quality standards or waste discharge requirements?**

**Less Than Significant Impact With Mitigation Incorporated.** The project site is at an elevation of approximately 104 feet above sea level and is relatively flat with less than five feet of overall elevation change across the property. Surface drainage flows to Washington Boulevard curb and gutters.

Violations of water quality standards or waste discharge requirements, or degradation of water quality can result in potentially significant impacts to water quality and result in environmental damage or sickness in people. The project would result in a significant impact to water quality if water quality standards, waste discharge requirements, or degradation of water quality occurred.

Point-source pollutants can be traced to their original source. Point-source pollutants are discharged directly from pipes or spills. Raw sewage draining from a pipe directly into a stream is an example of a point-source water pollutant. The project consists of a development of retail, restaurant, and office uses and does not propose any uses that would generate point source pollutants. Therefore, water quality impacts due to point sources would be less than significant.

Non-point-source pollutants (NPS) cannot be traced to a specific original source. NPS pollution is caused by rainfall or snowmelt moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants can include:

- Excess fertilizers, herbicides and insecticides from agricultural lands and residential areas;

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<sup>15</sup> Culver City Fire Department Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012.

<sup>16</sup> The Culver City Very High Fire Hazard Severity Zones in LRA as recommended by CAL FIRE, prepared by CAL FIRE, dated September 2011.

- Oil, grease, and toxic chemicals from urban runoff and energy production;
- Sediment from improperly managed construction sites, crop and forest lands, and eroding stream banks;
- Salt from irrigation practices and acid drainage from abandoned mines;
- Bacteria and nutrients from livestock; pet wastes, and faulty septic systems; and
- Atmospheric deposition and hydro modification.

Impacts associated with water pollution include ecological disruption and injury or death to flora and fauna, increased need and cost for water purification, sickness or injury to people, and degradation or elimination of water bodies as recreational opportunities. Accidents, poor site management or negligence by property owners and tenants can result in accumulation of pollutant substances on parking lots, loading and storage areas, or result in contaminated discharges directly into the storm drain system.

The project would be subject to all existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with the requirements of the NPDES General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented by the project that incorporates Best Management Practices (BMPs) to minimize pollutant runoff during the project's construction period by preventing the off-site movement of potential contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides. As part of the SWPPP, Culver City would require BMPs as listed in the California Stormwater Quality Association's California Storm Water Best Management Practice Handbooks. Compliance with the NPDES permit would be reviewed by the Culver City Department of Public Works during the plan check phase of the project.

As discussed under Response VI.a.iii, above, according to the Supplemental Phase II, groundwater was encountered at approximately 25 to 27 feet below grade in the borings.<sup>17</sup> Historically, the highest groundwater in the project vicinity within Culver City is estimated to be 20 feet below the ground surface. As such, construction activities could encounter groundwater. Typically, groundwater removed from a construction site is disposed of in the storm drain system. However, if any removed groundwater contain contaminants that exceed acceptable water quality regulatory standards of the LARWQCB or other appropriate agencies, this could be a potentially significant impact. Thus, Mitigation Measure WQ-1 is prescribed to address this potential impact, which requires implementation and completion of a dewatering plan that would dispose of contaminated groundwater in compliance with applicable regulatory requirements. Implementation of Mitigation Measure WQ-1 would ensure that potentially significant impacts regarding groundwater contamination during dewatering activities on the project site are reduced to a less than significant level.

Overall, compliance with applicable stormwater requirements and implementation of the prescribed mitigation would ensure that impacts to water quality during the project's construction activities would be less than significant.

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<sup>17</sup> *Supplemental Phase II Investigation Report, 8888 West Washington Boulevard, Culver City, California*, prepared by Hillman Consulting, dated March 11, 2015 (all provided under separate cover available at the Culver City Planning Division).



With regards to long-term water quality impacts, per the applicable requirements of 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, the project would require a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. Stormwater infiltration was considered but determined to be unfeasible due to high historic groundwater levels (~20 feet below ground surface) located at or slightly above the proposed base of the building foundations. Instead, the stormwater collected from roof drains, area drains, and downspouts would be routed through a filtration system (Contech 8-foot by 6-foot StormFilter) that utilizes cartridges for filtration. The stormwater would then be pumped up and released through a 10-inch pipe that connects to a proposed catch basin (to replace existing catch basins) located along Washington Boulevard. As a result, the existing lateral would have to be upsized for the new flow being introduced to the system and extruded as the proposed catch basin would be affected by street widening. Other typical BMPs to address pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and dissemination of educational materials. Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations. The project would not interfere with the implementation of NPDES water quality regulations and standards. Compliance with applicable SUSMP and long-term water quality requirements would be reviewed by the Culver City Department of Public Works during the plan check phase of the project. Compliance with applicable stormwater requirements would ensure that impacts to water quality during the project's operational activities would be less than significant.

## Mitigation Measures

**WQ-1:** If dewatering activities occur on-site during future redevelopment, samples shall be obtained from the water and analyzed for volatile organic compounds (VOCs) and oxygenates to ensure that they do not exceed applicable discharge requirements. Should the samples exceed VOC, oxygenates or any other applicable discharge requirement, a dewatering plan shall be prepared by the project applicant for submittal to the Los Angeles Regional Water Quality Control Board (LARWQCB) and other appropriate agencies determined appropriate in consultation with the LARWQCB for review and approval. The plan shall include but not be limited to sampling of groundwater that may be contaminated; and treatment and disposal of contaminated groundwater in compliance with applicable regulatory requirements. Written verification from the LARWQCB of approval of a dewatering plan completion shall be submitted to the City of Culver City Planning Division and Department of Public Works prior to issuance of grading permit.

- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

**Less Than Significant Impact.** The project site is located in a highly urbanized area of Culver City and is currently developed with a single-story auto repair shop building with an associated asphalt-paved surface parking lot and vehicular storage area. As such, the site does not currently provide a substantial opportunity for recharge of groundwater. Furthermore, the project does not propose the development of long-term groundwater production wells. Given the size of the site at approximately 0.60 acres and the temporary nature of construction activities, while some dewatering could be necessary during construction activities, such dewatering activities would not be to the extent that would substantially alter groundwater supplies. Therefore,

the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, and a less than significant impact would result.

**c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**

**Less Than Significant Impact.** Currently, the site is almost completely developed with impermeable surfaces, however, there are small areas of exposed landscaped and disturbed soils. No streams or rivers occur on site. The project, which would involve the replacement of the impermeable surfaces and small areas of exposed landscaped and disturbed soils, would not substantially change the amount of impervious surface area on the site given the proposed above ground and subterranean structures/facilities. According to the LID Report, the pre-development imperviousness at the project site is currently around 99 percent where most of the site's stormwater is draining to the street. The post-development imperviousness of the new project area is approximately 62 percent where most of the site's stormwater will be mitigated and released through a catch basin. Furthermore, the project would include appropriate drainage improvements on site to direct stormwater flows to the local drainage systems, similar to existing conditions. The current requirement for the City of Culver City's SUSMP follows closely to the Los Angeles County's Low Impact Development (LID) guidelines. The County LID manual states the following:

"All Designated Projects must retain 100 percent of the Stormwater Quality Design Volume (SWQDV) on-site through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof unless it is demonstrated that it is technically infeasible to do so."

Based on the Geotechnical Investigation, the project site is not recommended for infiltration into native soils. Therefore, as discussed under Response IX.a, the stormwater collected from roof drains, area drains, and downspouts would be routed through a filtration system (Contech 8-foot by 6-foot StormFilter) that utilizes cartridges for filtration. The stormwater would then be pumped up and released through a 10-inch pipe that connects to a proposed catch basin (to replace existing catch basins) located along Washington Boulevard. As a result, the existing lateral would have to be upsized for the new flow being introduced to the system and extruded as the proposed catch basin would be affected by street widening. The proposed drainage facilities would capture and treat the design storm for which the SWQDV is calculated, which for the project site is the 1.15 inch for the 85<sup>th</sup> percentile rainfall depth, 24-hour rain event.<sup>18</sup> With the proposed drainage system in place, the existing off-site drainage patterns would be maintained.

With the site entirely developed, paved, or landscaped, the potential for erosion or siltation would be minimal. Additionally, project construction would comply with applicable NPDES and City requirements including those regarding preparation of a SWPPP and long-term storm water mitigation plan, as discussed under Response IX.a. As such, less than significant impacts associated with alterations to existing drainage patterns would occur with project implementation.

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<sup>18</sup> Low Impact Development Calculation, Washington 8888, prepared by VCA Engineers, Inc., dated March 11, 2016.

**d. Substantially alter the existing drainage pattern of the site or area, including through the alternation of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

**Less Than Significant Impact.** While the project site is under construction, the rate and amount of surface runoff generated at the project site would fluctuate because exposed soils could absorb rainfall that currently leaves the project site as surface flow. However, the construction period is temporary and compliance with applicable regulations discussed above would preclude fluctuations that result in flooding.

As discussed in Responses IX.a and IX.c, project implementation would include stormwater collected from roof drains, area drains, and downspouts would be routed through a filtration system (Contech 8-foot by 6-foot StormFilter) that utilizes cartridges for filtration. The stormwater would then be pumped up and released through a 10-inch pipe that connects to a proposed catch basin (to replace existing catch basins) located along Washington Boulevard. As a result, the existing lateral would have to be upsized for the new flow being introduced to the system and extruded as the proposed catch basin would be affected by street widening. With the proposed drainage system in place, the project would not substantially change the amount of impervious surface area on site and, thus, would not result in substantial increases in surface water runoff quantities. Additionally, with implementation of the project, overall existing drainage patterns would be maintained, and the project would include appropriate on site drainage improvements to convey anticipated stormwater flows. Final plan check by the City would ensure that adequate capacity is available in the storm drain system in surrounding streets prior to project approval. The project applicant would be responsible for providing the necessary on-site storm drain infrastructure to serve the project site, as well as any connections to the existing system in the area. It is also acknowledged that there are no known deficiencies in the existing storm drain system. Furthermore, the project would not alter the course of any stream or rivers. Because runoff would not increase over existing conditions, and the filtration system would be implemented to capture and treat runoff, the project would not result in on- or off-site flooding, and impacts would be less than significant.

**e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

**Less Than Significant Impact.** As discussed above in Responses IX.c-d, post-development runoff quantities would not increase measurably, and the project would include appropriate on-site drainage improvements to accommodate anticipated stormwater flows. Operation of the proposed uses would generate pollutant constituents commonly associated with urban uses to surface water runoff. However, the project would comply with all applicable water quality control requirements as discussed under Response IX.a. Further, there are no known deficiencies in the existing storm drain system. Final plan check by the City would ensure that adequate capacity is available in the storm drain system prior to project approval. The project applicant would be responsible for providing the necessary on-site storm drain infrastructure to serve the project site, as well as any connections to the existing system in the area. Therefore, the project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Thus, less than significant impacts would occur in this regard.

**f. Otherwise substantially degrade water quality?**

**Less Than Significant Impact.** As discussed in Response IX.a above, construction and operational BMPs, including the proposed filtration and good housekeeping practices during project construction and operation

would preclude substantial amounts of sediment and stormwater pollutants from entering stormwater flows. Therefore, the project would have a less than significant impact in surface water quality.

- g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**
- h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

**No Impact (g-h).** The project site is mapped by the Federal Emergency Management Agency (FEMA) as located within Zone X, an area determined to be outside the 0.2 percent Annual Change Flood Hazard Zone.<sup>19</sup> The site is not located in a 100-year or 500-year flood zone as delineated by Culver City.<sup>20</sup> Since the project site is not located within a 100-year flood plain, no impact would occur in this regard.

- i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

**Less Than Significant Impact.** As discussed under Responses IX.g-h, the project site would not be located within a mapped 100-year floodplain. Per Culver City's "Natural Hazards – Fire and Flooding" map, the site is not located within a potential inundation zone, including the Stone Canyon Dam Inundation Zone, Silverlake Dam Inundation Zone, and Mulholland Dam Inundation Zone.<sup>21</sup>

However, Los Angeles County's General Plan indicates that a large portion of Culver City, including the project site, is located within the potential inundation area of the Hollywood Reservoir/Mulholland Dam and Franklin Canyon Reservoir Dam.<sup>22</sup> The project site is located approximately 6 miles away from both dams with a variety of development, hills, and terrain that would slow and limit any impacts of dam failures on the site and surrounding area. In addition, the National Dam Safety Act of 2006 authorized a program to reduce the risks to life and property from dam failure by establishing a safety and maintenance program. The program requires regular inspection of dams to reduce the risks associated with dam failures.

Measures to maintain the safety of the dam in accordance with dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams provides periodic review of all dams in the State; and dams and reservoirs are monitored by the City during storms. Measures are instituted in the event of potential overflow. If a breach were to occur at the reservoir, flood water would disperse over a large area where water flows would be redirected by intervening development and changes in topography. Reservoir water, were it to reach the project site, would generally flow along roadways adjacent to or within the vicinity of the project site. Given the low likelihood of a breach and low potential of the project to affect flows, the project would not be expected to result in a significant

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<sup>19</sup> FEMA Mapping Information Platform January 2013. FEMA Flood Insurance Rate Map Number 06037C. FEMA <https://hazards.fema.gov>, accessed September 2016.

<sup>20</sup> Ibid and Culver City, Natural Hazards – Fire and Flooding Map, February 1, 2007. Available on Culver City website at: <http://www.culvercity.org/home/showdocument?id=126>, accessed September 2016.

<sup>21</sup> Ibid

<sup>22</sup> Los Angeles County General Plan, Safety Element, December 6, 1990.

impact with regard to the exposure of people and structures to risk of loss or injury associated with the Hollywood or Franklin Canyon Dam.

**j. Inundation by seiche, tsunami, or mudflow?**

**Less Than Significant Impact.** A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity.

As discussed under Response IX.i, the project site is within the inundation area for the Hollywood Reservoir/Mulholland Dam and the Franklin Canyon Reservoir Dam. However, as discussed under Response IX.i, a breach of the dam facilities is very unlikely. Reservoir water, were it to reach the project site, would generally flow along roadways adjacent to or within the vicinity of the project site. Thus, during the unlikely failure of the dams, impacts regarding flooding hazards associated with seiches would be less than significant.

According to the Tsunami Inundation Map for Emergency Planning, State of California, County of Los Angeles Beverly Hills Quadrangle, the project site is not located within the mapped tsunami inundation boundaries.<sup>23</sup> Therefore, the project would not be subject to flooding hazards associated with tsunamis. The potential for mudflows to affect the proposed uses would be negligible given the distance of the nearest mountains from the project site and amount of intervening development. Furthermore, the gently sloping topography of the project site is not conducive to sustaining mudflows. Lastly, according to the Geotechnical Investigation, due to the distance from the coastline, the project site is not susceptible to the effects of seiches or tsunamis. Thus, impacts associated with inundation by seiche, tsunami, or mudflow would be less than significant.

**X. LAND USE AND PLANNING**

*Would the project:*

**a. Physically divide an established community?**

**Less Than Significant Impact.** The project site is currently developed with a single-story auto repair shop building with an associated asphalt-paved surface parking lot and vehicular storage area. The project vicinity is highly urbanized and generally built out. The local project vicinity is characterized by a blend of commercial, restaurant, office, light industrial, mixed use residential and low- and high-density residential uses, and the Metro Expo Line and Metro Station. The project would provide a mix of retail, restaurant, and office uses. As such, the project would be an infill project providing uses in keeping with the mixed-use and transit-oriented character of the surrounding area. Given the type of uses in the project vicinity, and the infill character of the project, the project would not physically divide an established community.

The project's enhanced streetscape design along Washington Boulevard and close proximity to the Metro Expo Line would promote the movement of people throughout the established community. The location of

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<sup>23</sup> Tsunami Inundation Map for Emergency Planning, State of California, County of Los Angeles, Beverly Hills Quadrangle, dated March 1, 2009, [http://www.conservation.ca.gov/cgs/geologic\\_hazards/Tsunami/Inundation\\_Maps/LosAngeles/Documents/Tsunami\\_Inundation\\_BeverlyHills\\_Quad\\_LosAngeles.pdf](http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/LosAngeles/Documents/Tsunami_Inundation_BeverlyHills_Quad_LosAngeles.pdf).

denser development in the proximity of transit stations would further support the existing Regional Transportation Plan (by SCAG) and Culver City policies that encourage pedestrian and bicycle activity and the use of transit. Because the project would promote and enhance pedestrian, bicycle, and vehicle access and would complement and be consistent with existing land uses in the area, impacts with the respect to the division of an established community would be less than significant.

**b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

**Less Than Significant Impact.**

**General Plan**

The Culver City general plan designation for the project site is General Corridor which allows for a range of small to medium scale commercial uses with an emphasis on community serving retail, office, and service uses along major corridors. The General Corridor designation is intended to support desirable existing and future neighborhood and community serving commercial uses and housing opportunities that are compatible with nearby residential neighborhoods. The project is consistent with the General Corridor designation as it is proposing a mix of retail, restaurant, and office uses within a 4-story building located in the vicinity of the Metro Expo Line and Metro Station. No changes to the site's existing general plan designations are proposed by the project. As such, the project would have a less than significant impact with respect to the General Plan.

**Zoning**

The Culver City zoning code designation for the project site is Commercial General (CG). The Commercial General zone permits small to medium scale commercial uses, emphasizing community-serving retail, office and service uses. The project is consistent with the Commercial General designation as the project is proposing a mix of retail, restaurant, and office uses. No change to the site's existing zoning designation is proposed by the project. As such, the project would have a less than significant impact with respect to the Zoning Code.

Roof buildings heights would not exceed the maximum allowed height of 56 feet. Heights would vary at different points and elevations of the building to provide focal relief and appropriate building scale to surrounding development. Roof-mounted mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts, etc.), would be screened from public view from adjoining public streets and rights of-way. The method of screening would be architecturally compatible with other on-site development in terms of colors, materials, and architectural style as determined by the Planning Manager.<sup>24</sup>

The project seeks to enhance the pedestrian experience. Along Washington Boulevard, a wide public sidewalk would be maintained with a series of building setbacks included ranging from 9'-11" to 14'-10 ½". The streetscape would be enhanced with street trees, landscape planters, tree grates, benches, outdoor seating,

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<sup>24</sup> Roof-mounted ancillary structures would be allowed up to a maximum of 16 above the roof height of a building. Structures for the housing of elevators and stairs would be allowed up to a maximum of 16 feet above the roof line of the building.

trash receptacles, and other street furniture to activate the pedestrian environment. On the upper levels, the project includes balconies, breezeways, roof deck, and green roof for use by office employees.

In addition to the development standards outlined above, every land use and structure as part of the project would comply with applicable requirements of the CCMC, Title 17, Zoning Code, or as amended. This includes parking requirements which are discussed in Section XVI, Transportation and Circulation, below.

### **Other Approvals**

It is noted that the other land use related approvals requested as part of the project include, but are not limited to, the following: Site Plan Review; demolition permits; grading, excavation, foundation, and building permits; and haul route permits. None of these approvals would conflict with an applicable land use plan (i.e., City General Plan), policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. These approvals have been assessed as part of the project throughout this MND evaluation.

### **Conclusion**

Based on the analysis above, the project would be consistent with the applicable General Plan and Zoning provisions of Culver City. As demonstrated in this MND analysis, with implementation of the project's design features and prescribed mitigation measures, all identified potentially significant impacts associated with the proposed uses and land use designations would be reduced to a less than significant level. Therefore, the project would not result in conflicts with the applicable General Plan or Zoning provisions such that significant physical impacts on the environment would occur. Thus, impacts would be less than significant.

### **c. Conflict with any applicable habitat conservation plan or natural community conservation plan?**

**No Impact.** As discussed under Response IV.f, no designated riparian habitat or natural communities exist on the project site or in the surrounding area. Additionally, there is no adopted Habitat HCP, NCCP, or other approved local, regional, or State habitat conservation plan in place for the project site or the City. Thus, no impact to a habitat conservation or community conservation plan is anticipated.

## **XI. MINERAL RESOURCES**

*Would the project:*

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

**No Impact (a-b).** Minerals are defined as any naturally occurring chemical elements or compounds formed from inorganic processes and organic substances. The California Surface Mining and Reclamation Act of 1975 (SMARA) requires that all cities address significant mineral resources, classified by the State Geologist and designated by the State Mining and Geology Board, in their General Plans.

The Inglewood Oil Field (Oil Field) is located within Culver City and the unincorporated area of Los Angeles County known as Baldwin Hills. The current active Oil Field boundary is approximately 1,000 acres of which 100 acres are located within Culver City. The Oil Field is located approximately 0.90 miles south of the project site. The project site is located in a highly urbanized area of Culver City and is currently developed with a single-story auto repair shop building with an associated asphalt-paved surface parking lot and vehicular storage area. As such, the potential of uncovering mineral resources during project construction is considered low. Therefore, the project would not result in the loss of availability of a known mineral resource delineated on a local general plan, specific plan, or other land use plan as there are no known mineral resources or mineral resource recovery sites on or near the project site. No impact would occur in this regard.

## XII. NOISE

The following impact analysis pertaining to noise and vibration impacts is based on information contained in the project's *Noise and Vibration Technical Report* prepared by ESA PCR in February 2017, which is available for review at the Culver City Planning Division.

### a. Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

**Less Than Significant Impact With Mitigation Incorporated.**

#### Applicable Noise Regulations

##### City of Culver City

The City's Noise Standards are developed from those of several Federal and State agencies including the Federal Highway Administration (FHA), the Environmental Protection Agency (EPA), the Department of Housing and Urban Development (HUD), the American National Standards Institute (ANSI), and the State of California Department of Health Services. These standards set limits on the noise exposure level for various land uses. **Table B-9**, *City of Culver City Exterior Noise Standards*, lists exterior noise level standards and the type of occupancy to which they should be applied.

**Table B-9**

**City of Culver City Exterior Noise Standards**

Zone	dBA (CNEL)
Residential	65
Commercial	65

*Source: City of Culver City Noise Element.*

**Table B-10**, *Noise and Land Use Compatibility Matrix – California*, illustrates the State guidelines established by the State Department of Health Services for acceptable noise levels for counties and cities. These



Table B-10

Noise and Land Use Compatibility Matrix – California

Land Use Category	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low density, Single-Family, Duplex, Mobile Homes	50 – 60	55 – 70	70 – 75	75 – 85
Residential – Multiple Family	50 – 65	60 – 70	70 – 75	70 – 85
Transient Lodging – Motel, Hotels	50 – 65	60 – 70	70 – 80	80 – 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 70	60 – 70	70 – 80	80 – 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 – 70	NA	65 – 85
Sports Arenas, Outdoor Spectator Sports	NA	50 – 75	NA	70 – 85
Playgrounds, Neighborhood Parks	50 – 70	NA	67.5 – 75	72.5 – 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 – 70	NA	70 – 80	80 – 85
Office Buildings, Business Commercial and Professional	50 – 70	67.5 – 77.5	75 – 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 – 75	70 – 80	75 – 85	NA

**Normally Acceptable** – Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

**Conditionally Acceptable** – New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

**Normally Unacceptable** – New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

**Clearly Unacceptable** – New construction or development should generally not be undertaken.

**NA:** Not Applicable

Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003.

standards and criteria will be incorporated into the land use planning process to reduce future noise and land use incompatibilities. This table is the primary tool that allows the City to ensure integrated planning for compatibility between land uses and outdoor noise. Community Noise Equivalent Level (CNEL) noise levels for specific land uses are classified into four categories: (1) “normally acceptable” (2) “conditionally acceptable” (3) “normally unacceptable” and (4) “clearly unacceptable”.<sup>25</sup> A CNEL value of 70 dBA is considered the dividing

<sup>25</sup> CNEL is the time average of all A-weighted sound levels for a 24-hour period with a 10 dBA adjustment (upward) added to the sound levels which occur in the night (10:00 P.M. to 7:00 A.M.) and a 5 dBA adjustment (upward) added to the sound levels which occur in the evening (7:00 P.M. to 10:00 P.M.). These penalties attempt to account for increased human sensitivity to noise during the quieter nighttime periods, particularly where sleep is the most probable activity.

line between a “conditionally acceptable” and “normally unacceptable” noise environment for noise sensitive land uses, including residences, transient lodgings, schools, and library.

The City’s General Plan Noise Element includes Policy 2.A, pertaining to stationary noise sources, as follows:

**Policy 2.A** Create a comprehensive ordinance establishing noise regulation criteria, and standards for noise sources and receptors to include but not be limited to the following:

- Noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses, such as schools, hospitals, convalescent homes, and libraries.
- Temporary sound barrier installation at construction site if construction noise is impacting nearby noise sensitive land uses.
- Noise abatement and acoustical design criteria for construction and operation of any new development.

Chapter 9.07 of the CCMC provides specific noise restrictions and exemptions for noise sources within the City. CCMC noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 A.M. and 8:00 P.M. Mondays through Fridays; 9:00 A.M. and 7:00 P.M. Saturdays; 10:00 A.M. and 7:00 P.M. Sundays. It is prohibited for any person to operate any radio, disc player or cassette player or similar device at a construction site in a manner that results in noise levels that are audible beyond the construction site property line.

### Ground-Borne Vibration Guidelines

Culver City has not adopted policies or guidelines relative to ground-borne vibration. However, Caltrans has produced a guidance manual for evaluating potential vibration impacts (“Transportation- and Construction-Induced Vibration Guidance Manual” dated June 2004). The manual gathers data from multiple sources including the Federal Transit Administration (FTA). The manual provides thresholds for potential impacts on human comfort and damage to buildings, as well as guidance for reducing potential vibration impacts and addressing vibration issues. The potential for annoyance from vibration activity is measured in inches per second peak particle velocity (PPV). For example, transient vibration of 0.035 inches per second (in/sec) PPV is identified as a level that is “barely” perceptible, 0.24 is “distinctively” perceptible, 0.9 in/sec PPV is identified “strongly” perceptible, and 2.0 is “severe.”<sup>26</sup> Continuous vibration from traffic at 0.1 in/sec PPV “begins to annoy.”

### Thresholds of Significance

The following significance thresholds evaluate potential noise and vibration impacts of the project based on the regulatory framework described above. The project would result in potentially significant impacts under the following circumstances:

**NOISE 1:** Project construction activities occur between the hours of 8:00 P.M. and 8:00 A.M. Monday through Friday; 7:00 P.M. and 7:00 A.M. Saturdays; 7:00 P.M. and 10:00 A.M. Sundays.

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<sup>26</sup> Transient vibration is defined as a temporarily sustained vibration of a mechanical system.

- NOISE 2:** The project operation would cause ambient noise levels to increase by 5 dBA,  $L_{eq}$  or more.
- NOISE -3:** Potential Building Damage - Project construction activities cause ground-borne vibration levels to exceed 0.2 in/sec PPV at the nearest residential buildings.
- NOISE -4:** Potential Human Perception - Project construction activities cause ground-borne vibration levels to exceed 0.035 in/sec PPV at the nearest residential buildings.

### Existing Conditions

The project site is immediately surrounded by office, commercial, and light industrial uses to the north and east; light industrial and residential uses to the south; and commercial/light industrial uses to the west. **Figure B-3, *Noise Measurement Locations***, presents noise measurement locations utilized in the noise impact analyses below, in addition to identifying surrounding land uses. Existing noise sensitive uses within 500 feet of the project site include:

- Multi-family residential uses adjacent south of the project site along Lindblade Street (identified as R2 on Figure B-3),
- Park Century School located approximately 215 feet east of the project site along Landmark Street (identified as R3),
- Future site of the Ivy Station Mixed-Use Project is located approximately 450 feet northeast of the project site along Washington Boulevard (identified as R4), and
- Single- and multi-family residential uses are located south of the project site along Krueger Street and Poinsettia Court, at varying distances from approximately 250 feet to 400 feet, respectively. Noise measurement location R5 is representative of noise levels along Poinsettia Court.

The results of ambient sound measurements taken to establish the existing environmental setting are summarized in **Table B-11, *Summary of Ambient Noise Measurements***. As shown in Table B-11, noise measurements were also during daytime only since Project-related construction activities which may generate noise would be limited by the City's noise ordinance as discussed above. The measured noise levels range from 61 dBA,  $L_{eq}$  at R2 to 70 dBA at the R1 and R4 off-site sensitive receptor locations. Monitoring demonstrated that the primary source of noise in the immediate area of the project site was traffic on Washington Boulevard.

### Construction Noise

It is anticipated that construction activities would occur over approximately 18 months beginning in mid-2017 through late 2018. The project would comply with the City's allowable construction hours of:

- Monday-Friday: 8:00 AM through 8:00 PM
- Saturdays: 9:00 AM through 7:00 PM
- Sundays: 10:00 AM through 7:00



SOURCE: Google Map, 2015 (Aerial).

Synapse at Platform

**Figure B-3**  
Noise Measurement Locations

**Table B-11**  
**Summary of Short-Term Noise Measurements**

<b>Location</b>	<b>Date and Time Period</b>	<b>Leq dBA</b>	<b>Noise Sources</b>
R1. Northern boundary of the project site along Washington Boulevard	9/16/16 9:23 a.m. – 9:38 a.m.	70	Traffic on Washington Boulevard.
R2. Multi-family residential uses located south of the project site along Lindblade Street	9/16/16 10:19 a.m. – 10:34 a.m.	61	Traffic on Lindblade Street
R3. School uses located east of the project site along Landmark Street	9/16/16 10:42 a.m. – 10:57 a.m.	66	Traffic on Landmark Street
R4. Future Mixed uses located northeast of the project site along Washington Boulevard	9/16/16 9:40 a.m. – 9:55 a.m.	70	Traffic from Washington Boulevard as dominant source
R5. Residential uses located southwest of the project site, along Poinsettia Court	9/16/16 10:03 a.m. – 10:18 a.m.	64	Traffic on Poinsettia Court

*SOURCE: ESA PCR, 2016.*

Any work outside of the above hours would require consultation and approval with pertinent the City departments prior to any works being scheduled. Dirt hauling and construction material deliveries or removal would not be allowed during morning (7:00 AM – 9:00 AM) and afternoon (4:00 PM – 6:00 PM) peak traffic periods. It should be noted that this requirement will have the effect of prolonging overall construction time. The assessments include construction noise impact to the noise sensitive receivers in the vicinity of the project site due to the operation of construction equipment (on-site construction activities) and due to haul truck activities (off-site construction activities).

#### *On-Site Construction Activities*

Noise from construction activities would be generated by vehicles and equipment involved during various stages of construction operations: demolition, grading, excavation, foundation construction, and building construction. The noise levels created by construction equipment would vary depending on factors such as, the type of equipment, the specific model, the operation being performed and the condition of the equipment. Construction noise associated with the Proposed Project was analyzed using a mix of typical construction equipment, estimated durations and construction phasing. **Table B-12, Construction Equipment and Estimated Noise Levels (Leq)** presents the list of construction equipment and approximate quantities per construction phase with reference noise levels.

Table B-12

Construction Equipment and Estimated Noise Levels (Leq)

Construction Equipment	Noise Level at 50 ft (dBA)	Usage Factor (%)	Hourly Quantity	Estimated Hourly Noise Levels at 50 ft (dBA)
Demolition				
Rubber Tired Dozer	82	40	3	82
Excavator	81	40	2	
Dump/Haul Truck	76	20	1	
Site Prep/Grading/Excavation				
Excavator	81	40	1	84
Grader	85	40	1	
Rubber Tired Dozer	82	40	1	
Tractors/Loaders/Backhoes	80	25	3	
Paving				
Cement and Mortar Mixers	79	40	2	86
Paver	77	50	1	
Paving Equipment	90	20	2	
Rollers	80	20	2	
Tractors/Loaders/Backhoes	80	25	1	
Building Construction				
Air Compressors	80	40	1	84
Generator Sets	81	50	1	
Tractors/Loaders/Backhoes	80	25	3	
Cranes	85	16	1	
Forklifts	85	20	3	
Welders	74	40	1	

*Note: Noise Levels at 50 ft and Usage Factor are derived from Federal Highways Administration's Roadway Construction Noise Model User's Guide.*

*Source: ESA PCR, 2016.*

These noise levels account for the Project contractor(s) construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. The estimated noise levels represent a conservative scenario because construction activities are analyzed as if some of them were occurring along the perimeter of the construction area, whereas construction would typically occur throughout the site, further from noise-sensitive receptors.

The multi-family residential building (R2) adjacent to the south is approximately 15 feet from the project site. During the grading and paving, the noise level would be approximately 95 dBA at 15 feet at the multi-family residential building (R2). As it is described in Threshold NOISE 1, project construction would be limited to between 8:00 a.m. and 4:00 p.m. from Monday through Friday and 9:00 a.m. and 4:00 p.m. on Saturdays, which complies with Title 9: General Regulations, Chapter 9.07: Noise Regulations, Section 9.07.035: Construction, of the CCMC.



However, the construction noise level would temporarily increase greater than 5 dBA over ambient condition, as the daytime noise level at R2 is 61 dBA  $L_{eq}$ . Therefore, the construction noise would be considered a potentially significant impact. Incorporation of Mitigation Measures NOISE-1 through NOISE-4 are recommended, which would reduce potentially significant impacts to a less than significant level. Implementation of the prescribed mitigation measures would reduce construction noise levels below the significance threshold.

### *Off-Site Construction Activities*

A haul route would be utilized to remove exported soil and debris materials from the project site during construction activities. During the grading phase, there would be up to approximately 70 haul truck trips per day. Haul trucks would access the project site via I-10 using the Robertson Boulevard exit. From the westbound exit, trucks would proceed left on South Robertson Boulevard which becomes Robertson Place, then turn left onto Exposition Boulevard. From the eastbound exit, trucks would proceed to Exposition Boulevard. From Exposition Boulevard, haul trucks would cross Venice Boulevard and then merge back onto South Robertson Boulevard to Washington Boulevard. Haul trucks would then turn left onto Washington Boulevard and be positioned to enter the project site without crossing oncoming traffic or having to make a U-turn. Haul trucks exiting the project site would proceed northeast on Washington Boulevard and turn left onto the National Boulevard truck route. Haul trucks would proceed on National Boulevard to the I-10 East freeway on-ramp. For access to I-10 West, haul trucks would proceed on National Boulevard and make a left onto Venice Boulevard. From Venice Boulevard, the trucks would make a right onto Robertson Boulevard and continue to the freeway on-ramp.

The project's truck trips would generate noise levels of approximately 53.3 dBA, CNEL at 25 feet distance along Robertson Boulevard, 53.9 dBA along Exposition Boulevard, and 53.1 dBA along Washington Boulevard and National Boulevard. As shown in **Table B-13**, *Off-Site Traffic Noise Impacts*, the existing noise levels along the haul route streets are approximately 71.2 dBA, CNEL at 25 feet distance along Robertson Boulevard, 73.0 dBA, CNEL along Exposition Boulevard, 70.7 dBA, CNEL along Washington Boulevard, and 71.6 dBA, CNEL along National Boulevard.

**Table B-13**

### **Off-Site Traffic Noise Impacts**

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway				
	CNEL (dBA)				
	Existing	Future No Project	Future with Project	Project Increment	Cumulative Increment
<b>Washington Boulevard</b>					
Between Ince Boulevard and Robertson Boulevard	68.6	69.3	69.3	0.0	0.7
Between Robertson Boulevard and Landmark Street	64.3	65.4	65.5	0.1	1.2
Between Landmark Street and National Boulevard	70.7	71.1	71.1	0.0	1.1
Between National Boulevard and Wesley Street	67.9	68.9	68.9	0.0	1.0

**Table B-13 (continued)**

**Off-Site Traffic Noise Impacts**

<b>Roadway Segment</b>	<b>Calculated Traffic Noise Levels at 25 feet from Roadway</b>				
	<b>CNEL (dBA)</b>				<b>Cumulative Increment</b>
	<b>Existing</b>	<b>Future No Project</b>	<b>Future with Project</b>	<b>Project Increment</b>	
Between Wesley Street and Helms Avenue	55.7	57.8	57.8	0.0	2.1
Between Helms Avenue and Cattaraugus Avenue	69.8	70.4	70.4	0.0	0.6
Between Cattaraugus Avenue and La Cienega Avenue	70.2	70.7	70.7	0.0	0.5
Between La Cienega Avenue and La Cienega Boulevard	70.2	70.7	70.7	0.0	0.6
<b>National Boulevard</b>					
Between I-10 EB On Ramp and Venice Boulevard	72.0	72.7	72.7	0.0	0.7
Between Venice Boulevard and Washington Boulevard	71.6	72.0	72.0	0.0	0.4
Between Washington Boulevard and Wesley Street	70.9	71.9	71.9	0.0	1.0
Between Wesley Street and Hayden Avenue	69.5	70.7	70.7	0.0	1.2
Between Hayden Avenue and Jefferson Boulevard	68.1	69.4	69.4	0.0	1.3
<b>Venice Boulevard</b>					
Between National Boulevard and Robertson Boulevard	72.5	73.1	73.1	0.0	0.6
Between Robertson Boulevard and Culver Boulevard	73.2	73.9	73.9	0.0	0.7
<b>Robertson Boulevard</b>					
Between I-10 EB On Ramp and National Boulevard	71.2	71.6	71.7	0.1	0.5
Between National Boulevard and I-10 WB On Ramp	69.9	70.1	70.1	0.0	0.2
East of I-10 WB On Ramp	67.7	67.7	67.7	0.0	0.0
<b>Culver Boulevard</b>					
Between Venice Boulevard and Washington Boulevard	68.5	69.5	69.5	0.0	1.0
Between Washington Boulevard and Main Street	68.8	69.4	69.4	0.0	0.6



**Table B-13 (continued)**

**Off-Site Traffic Noise Impacts**

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway				
	Existing	Future No Project	CNEL (dBA)		Cumulative Increment
			Future with Project	Project Increment	
Exposition Boulevard					
Between Robertson Boulevard and Venice Boulevard	73.0	73.7	73.7	0.0	0.7

<sup>a</sup> Based on noise levels at 25 feet distance from the roadway and residential uses if residential uses are shown along roadways.

Source: ESA PCR, 2016.

Construction traffic noise levels generated by truck trips would increase traffic noise levels along Robertson Boulevard, Exposition Boulevard, Washington Boulevard, and National Boulevard up to 0.1 dBA. This would result in a negligible noise level increase and would not increase noise levels by 5 dBA over the ambient condition. Construction activities would occur only during daytime hours within the allowable hours specified in the CCMC. Therefore, off-site construction traffic noise impacts would be less than significant no mitigation measures are required.

### Operational Noise

The existing noise environment in the project vicinity is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. Long-term operation of the project would have a minimal effect on the noise environment in proximity to the project site. Noise generated by the project would result primarily from off-site traffic, normal operation of the building mechanical equipment, on-site uses which generate noise, parking activities, and loading areas. Each is discussed separately below.

#### Offsite Project Traffic

Vehicle trips attributed to operation of the project would increase traffic volumes along the major thoroughfares within the project vicinity. This increase in roadway traffic volumes was analyzed to determine if any traffic-related noise impacts would result from project development.

Table B-13 shows the change in traffic volumes resulting from project implementation. It should be noted that in order to increase noise level by 3 dBA due to the increase of the traffic, the traffic volumes would need to be doubled (100% increase). Table B-13 compares traffic volumes in the vicinity of the project site. With the project completion, the traffic volume would not be doubled in the vicinity of the project site. Therefore, the operational noise level increase would not be greater than 5 dBA CNEL, the Noise 2 Threshold. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Because the traffic would spread out away from the project site, the roadways further away from the project site would experience less increase than the roadways mentioned in Table B-13. Therefore, those roadways away from the project site were not included for the analysis.

#### *Fixed Mechanical Equipment*

The operation of mechanical equipment such as air conditioning equipment may generate audible noise levels. However, mechanical equipment would be shielded from nearby noise sensitive uses to attenuate noise and avoid conflicts with adjacent uses. In addition, the project's mechanical equipment would need to comply with the City's noise standards, which establish maximum permitted noise levels from mechanical equipment. Project compliance with the City's noise standards would ensure that operational noise impacts are minimal.

#### *Parking Facility*

The project would include 207 vehicular parking spaces distributed within the three levels of subterranean automated parking structure and five additional vehicular parking spaces (1 ADA van accessible space and four temporary loading spaces) located on the Ground Level for a total of 212 vehicular parking spaces.

Sources of noise associated with parking facilities typically include engines accelerating, doors slamming, car alarms, and people talking. Noise levels at these facilities would fluctuate throughout the day with the amount of vehicle and human activity. Noise levels would generally be the highest in the early morning and evening hours when the largest number of people would enter and exit the parking facility.

For the purpose of providing a conservative, quantitative estimate of the noise levels that would be generated from vehicles entering and exiting the project's parking structure, the methodology recommended by FTA for the general assessment of stationary transit noise sources is used. Using the methodology, the project's peak hourly noise level that would be generated by the onsite parking levels was estimated using the following FTA equation for a parking lot:

$$L_{eq}(h) = SEL_{ref} + 10\log(NA/1000) - 35.6, \text{ where}$$

$$L_{eq}(h) = \text{hourly } L_{eq} \text{ noise level at 50 feet}$$

$$SEL_{ref} = \text{reference noise level for stationary noise source represented in sound exposure level (SEL) at 50 feet}$$

$$N_A = \text{number of automobiles per hour}$$

Based on the project's traffic study, the project is forecasted to generate 1,146 net daily vehicle trips, with an anticipated 100 trips and 124 trips during the AM and PM peak hours, respectively.<sup>27</sup> Using the FTA's reference noise level of 92 dBA SEL<sup>28</sup> at 50 feet from the noise source for a parking lot, it was determined that the project's highest peak hour vehicle trips, which would be 124 trips during the PM peak hour, would generate noise levels of approximately 47 dBA,  $L_{eq}$  at 50 feet from the project's parking area. The adjacent multi-family residential uses, R2 is approximately 25 feet from the access driveway to the subterranean

<sup>27</sup> RAJU, *Traffic Study for the 8888 Washington Boulevard Project*, February 2017.

<sup>28</sup> FTA, *Transit Noise and Vibration Impact Assessment*. May 2006.

automated parking structure. Based on this distance, the vehicle related noise levels would be approximately 53 dBA,  $L_{eq}$  at the multi-family residential uses, R2, which would not exceed the ambient noise level of 61 dBA on Table B-11. During other hours of the day when less overall vehicles arrive and depart from the project site, the noise levels at the nearest offsite sensitive land uses would be even lower. Thus, this impact would be less than significant.

### *Loading Areas*

Delivery vehicles would access the site via the entrance/exit driveway along Washington Boulevard. Loading for retail, restaurant, and office uses would occur in the temporary parking spaces located on the Ground Level in the rear of the restaurant portion of the building. Access for deliveries would be from the building's rear office lobby/hall entrance. Delivery vehicles would not block access to the four loading bays/vehicular lifts. The loading area would be located approximately 50 feet and partially shielded from the nearest existing noise sensitive receptors, R2, south of the project site due to the existing buildings south of the project site and the project building. Loading dock-related activities such as truck movements/idling and loading/unloading operations would generate noise levels that have a potential to adversely impact adjacent land uses during long-term Project operations. Based on measured noise levels, delivery trucks (at loading dock) would generate noise levels of approximately 79 dBA ( $L_{eq}$ ) at a 5-foot distance.<sup>29</sup> Based on a noise level source strength of 79 dBA at a reference distance of 5 feet, and accounting for distance attenuation (minimum 20 dBA insertion loss) and barrier insertion loss by the existing buildings south of the project site and the project building (minimum 5 dBA insertion loss), loading dock noise would be reduced to 54 dBA at the nearest residential uses, R2, and would not exceed the ambient noise level of 61 dBA on Table B-11 at the multi-family residential uses, R2. Therefore, loading dock related activity noise would not increase ambient noise levels at the existing sensitive receptor locations, R2 by greater than 5 dBA. Therefore, impacts would be less than significant.

### *Refuse Collection*

A trash and recycling room designated for use by all tenants would be located on the Ground Level behind the bike storage facility located in the western portion of the site. All trash would be collected by on-site maintenance and collectively disposed or recycled. The project would foster recycling of reusable materials (i.e., cardboard, plastics and aluminum) by providing dedicated and easily accessible bins. Trash and recycling bins would be pulled from the trash and recycling room and preliminarily staged in the southwestern portion of the project site near the trash room. The bins would be transported by a Scout/Stinger service truck of the City Waste Department to the final staging area, located curbside on the northwest corner of the project site along Washington Boulevard. Due to limited staging area on the street, the bins would be staged by type and be based on a separate pick up schedule (Trash Bins vs. Recycling Bins). Trash trucks would pick up the binds at this final staging area.

The moving of trash and recycling bins manually would generate noise levels approximately 60 dBA,  $L_{eq}$  at 3 feet distance. The adjacent noise-sensitive uses, the multi-family residential uses (R2) south of the project site, are approximately 45 feet south of the proposed refuse collection areas (preliminary staging area). Based on a noise level source strength of 60 dBA at a reference distance of 3 feet, and accounting for distance attenuation (18 dBA), moving trash bin noise would be 42 dBA at the residential property line, R2, and would not exceed the significance threshold of 66 dBA (daytime ambient noise level of 61 dBA plus 5 dB at R2). Therefore, noise

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<sup>29</sup> ESA PCR conducted noise measurements for reference noise levels of delivery trucks at loading dock areas.

from refuse collection areas at off-site sensitive receptor locations would not exceed the threshold. As such, impacts would be less than significant.

### *Noise/Land Use Compatibility Impacts*

The project is proposing a mix of retail, restaurant, and office uses within a 4-story building. The estimated noise levels along Washington Boulevard would be approximately 71 dBA CNEL as shown in Table B-13. As it is described in Table B-10, the exterior noise limit for commercial uses would be approximately 77.5 dBA CNEL. As it is described in Table B-10, the noise level within 77.5 dBA, CNEL is considered “Conditionally Acceptable”. New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. However, conventional construction, with closed windows and fresh air supply systems or air conditioning, will normally suffice. Therefore, impacts would be less than significant.

### **Mitigation Measures**

- NOISE-1** Noise-generating equipment operated at the project site shall be equipped with the most effective noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.
- NOISE-2** The project applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison’s telephone number(s) shall be prominently displayed at the project site. Signs shall also be posted at the project site that includes permitted construction days and hours.
- NOISE-3** Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.
- NOISE-4** Temporary noise barriers that provide a minimum of 20 dB noise reduction shall be used to block the line-of-site between construction equipment and noise-sensitive receptors (residences) during project construction. Noise barriers shall be a minimum of 20-feet tall along the south boundary adjacent to residential uses.

### **b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

**Less Than Significant Impact With Mitigation Incorporated.** Ground-borne vibration would be generated from the operation of heavy construction equipment at the project site, which could potentially affect the existing sensitive land uses surrounding the site. Implementation of Mitigation Measure NOISE-1 would reduce the impact to less than significant. Once completed the proposed project, there would be no operational sources causing ground-borne vibration.

### **Regulatory Framework**

The City does not address vibration either in their municipal code or in the Noise Element of the General Plan. Instead, Caltrans’ Transportation and Construction Vibration Manual (2013) and FTA’s Transit Noise and

Vibration Impact Assessment (2006) document provide vibration impact criteria for structure damage and human annoyance. This FTA document is used to identify the impacts for this project.

**Table B-14**, *Caltrans Vibration Annoyance Potential Criteria*, and **Table B-15**, *Groundborne Vibration Impact Criteria for Structure Damage*, include the vibration impact criteria for human annoyance and for structure damage.

**Table B-14**

**Caltrans Vibration Annoyance Potential Criteria**

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.1
Severe	2.0	0.4

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans, *Transportation and Construction Vibration Guidance Manual*. September, 2013.

**Table B-15**

**Groundborne Vibration Impact Criteria for Structure Damage**

Building Class	Continuous Source PPV (in/sec)
Class I: buildings in steel or reinforced concrete, such as factories, retaining wall, bridges, steel towers, open channels, underground chambers, and tunnels with and without concrete alignment.	0.5
Class II: buildings with foundation walls and flows in concrete, walls in concrete or masonry, stone masonry retaining walls, underground chambers and tunnels with masonry alignments, conduits in loose material	0.3
Class III: buildings as mentioned above but with wooden ceilings and walls in masonry	0.2
Class IV: construction very sensitive to vibration; objects of historic interest	0.12

Source: *Transit Noise and Vibration Impact Assessment, FTA, 2006*.

**Construction Vibration**

Vibration impacts due to the construction activities could occur when a large machine would be operated near the fragile structures or vibration sensitive uses within a building. The FTA document includes vibration source

levels for typical construction equipment. It should be noted that there would be no pile driving or blasting during the construction. **Table B-16**, *Vibration Source Levels for Construction Equipment* presents typical construction equipment with vibration source levels.

**Table B-16**  
**Vibration Source Levels for Construction Equipment**

Equipment	Approximate PPV (in/sec)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011
Caisson Drilling	0.089	0.031	0.024	0.017	0.011
Loaded Trucks	0.076	0.027	0.020	0.015	0.010
Jackhammer	0.035	0.012	0.009	0.007	0.004
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004

*Source: FTA, 2006. Transit Noise and Vibration Impact Assessment. May.*

### Structure Damage

Structures in the vicinity of the project site would be classified as Class III buildings as shown in Table B-. In order to exceed 0.2 in/sec PPV threshold for Class III buildings, a large bulldozer needs to be at 15 feet or closer to a receiver structure. Because the adjacent buildings to the east, west and south are at the property line, construction equipment would potentially be within 15 feet of a structure. When a large bulldozer is within 15 feet of a structure, a structural damage impact could occur and is considered a potentially significant impact. Therefore, mitigation measures would be required. Implementation of Mitigation Measure NOISE-5 would ensure potentially significant impacts are reduced to a less than significant level.

### Human Annoyance

Construction vibration could annoy people within a nearby building. The vibration impact threshold for human annoyance at a residential structure would be 0.035 in/sec PPV. The residential structures that could be affected by construction activity would be the multi-family residential buildings to the south, which is approximately 15 feet from the project site. A large bulldozer at 15 feet would generate 0.19 in/sec PPV. Therefore, the impact of human annoyance would be potentially significant and Mitigation Measure NOISE-5 would be required. Implementation of Mitigation Measure NOISE-5 would ensure potentially significant impacts are reduced to a less than significant level.

### Operation Vibration

Post-construction on-site activities would be limited to commercial, retail, and restaurant uses that would not generate excessive groundborne noise or vibration. As such, ground-borne vibration and noise levels associated with the long term operation of project would be less than significant.

## Mitigation Measures

**NOISE-5** Contractors would phase in construction activity, use low-impact construction technologies, and avoid the use of heavy vibrating equipment where possible to avoid construction vibration impacts. Especially, contractors shall use smaller and lower impact construction technologies to avoid human annoyance to the adjacent buildings. Contractors shall avoid the use of driving piles and drill piles instead where necessary to avoid structural damage. The construction contractor shall be responsible for implementing this measure during the construction phase.

**c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Less Than Significant Impact.** The existing noise environment in the project area is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. Long-term operation of the project would not have a significant effect on the community noise environment in proximity to the project Site. Noise sources that would have potential noise impacts include: off-site vehicle traffic, mechanical (i.e., air-conditioning) equipment, and parking areas. Motor vehicle travel on local roadways attributable to the proposed project, as discussed in Response XII (a), would have a less than significant impact on community noise levels. Noise levels associated with on-site operations (e.g., parking and mechanical equipment) are also considered less than significant as discussed in Response XII (a). As such, noise impacts would be less than significant.

**d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Less Than Significant with Mitigation Incorporated.** The project would result in a temporary increase in ambient noise near the project site during the construction period. Construction noise impacts are discussed in Response XII (a). Noise generated by on-site construction activities would have a less than significant impact on surrounding uses with incorporation of the prescribed mitigation measures (Mitigation Measures NOISE-1 through NOISE-5). Mitigation Measures NOISE-1 through NOISE-3 would reduce the construction noise levels approximately 5 dBA and Mitigation Measure NOISE-4 would reduce the construction noise levels approximately 20 dBA at the residential building, R2, south of the project site. In addition, Mitigation Measure NOISE-5 would reduce construction noise levels approximately 5 dBA at the residential building, R2. Therefore, construction noise levels would be reduced to below the significance threshold at the receptor location R2. As such, construction noise impacts would be less than significant with implementation of Mitigation Measures NOISE-1 through NOISE-5.

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

**No Impact.** The project site is not located within an airport land use plan area or within two miles of a public airport or public use airport. Therefore, construction or operation of the project would not expose people to excessive airport related noise levels. No impact would occur in this regard.

**f. For a project within the vicinity of a private airstrip, heliport or helistop, would the project expose people residing or working in the project area to excessive noise levels?**

**No Impact.** The project site is not located within the vicinity of a private airstrip, or heliport or helistop. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels from such uses. No impact would occur in this regard.

### **XIII. POPULATION AND HOUSING**

*Would the project:*

**a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

**Less Than Significant Impact.** The project would not generate a new direct residential population as no residential uses are proposed. The project would provide a total of approximately 2,878 SF of retail uses, approximately 3,184 SF of restaurant uses, and 59,325 SF of office uses that could indirectly increase the population by approximately 103 persons.<sup>30</sup> The estimated 103 indirect person increase in the City's population would represent a 0.26 percent increase to the existing population (39,717 persons) in Culver City.<sup>31</sup>

The project would attract new businesses to the area with the proposed retail, restaurant, and office uses. Depending on the specific type of businesses that do locate within the individual spaces, the level of employment may vary. The project is estimated to introduce up to approximately 176 employees.<sup>32</sup> According to SCAG, the forecast of employment growth predicted between 2008 and 2035 for Culver City is 5,000 jobs.<sup>33</sup> Project employment is within the employment growth assumptions of Culver City. Furthermore, the project would be located in an area already served by existing infrastructure and anticipated within applicable Culver City infrastructure plans (i.e., roadways, utility lines, etc.). As such, the project would not induce substantial population growth in the area either directly or indirectly and impacts would be less than significant.

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<sup>30</sup> 2,878 SF of retail uses + 3,184 SF of restaurants uses = 6,062 SF of retail/restaurant X 0.00271 employees per average square foot (per the Neighborhood Shopping Centers factor of the Los Angeles Unified School District 2014 Developer Fee Justification Study, Table 12, dated March 2014) = 16 employees. 16 employees X .25 X 2.36 = 9 indirect residents. Indirect residents are one-quarter of the employees multiplied by 2.36 persons per household. The average household size of 2.36 persons/household for Culver City, U.S. Census Bureau, 2010 Census, <http://quickfacts.census.gov/qfd/states/06/0617568.html>, accessed September 2016.

59,325 square feet of office X 0.00269 employees per average square foot (per the Corporate Offices factor per Table 12 mentioned above) = 160 employees. 160 employees X .25 X 2.36 = 94 indirect residents.

9 + 94 = 103 total indirect residents.

<sup>31</sup> U.S. Census Bureau, 2010 Census, <http://quickfacts.census.gov/qfd/states/06/0617568.html>, accessed September 2016.

<sup>32</sup> 2,878 SF of retail uses + 3,184 SF of restaurants uses = 6,062 SF of retail/restaurant X 0.00271 employees per average square foot (per the Neighborhood Shopping Centers factor in Table 12 mentioned above) = 16 employees.

59,325 square feet of office X 0.00269 employees per average square foot (per the Corporate Offices factor per Table 12 mentioned above) = 160 employees.

16 + 160 = 176 total employees.

<sup>33</sup> 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, Table 18, Proposed 2012-2035 RTP/SCS Growth Forecast, page 36, prepared by Southern California Association of Governments, adopted April 2012, [http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP\\_GrowthForecast.pdf](http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf), accessed September 2016.



- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**
- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

**No Impact (b-c).** Existing uses on the project site include a single-story auto repair shop building with an associated asphalt-paved surface parking lot and vehicular storage area, all of which would be demolished and removed to support development of the project. As such, project implementation would not displace existing housing or people. Therefore, no impact would occur to existing housing or local populations such that construction of replacement housing would be necessary.

#### **XIV. 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?**

**Less Than Significant Impact With Mitigation Incorporated.** Fire protection and emergency medical services for the project site are provided by the Culver City Fire Department (CCFD). In addition, it is acknowledged that the CCFD has a mutual aid agreement with the City of Los Angeles Fire Department (LAFD) to provide fire and emergency medical services on an as needed basis. The CCFD provides fire protection to an existing population of approximately 39,717 persons.<sup>34</sup> The City is divided into three fire districts, two rescue/emergency medical services (EMS) districts, and 15 fire management zones. The fire districts and EMS districts are evenly distributed by population served and centerline miles (i.e., total length of all the roads in the City, excluding the size and number of lanes on each road). The fire management zones are defined by occupancies within a given geographical area that share common risk. The project site is located within Fire District 1, Rescue/EMS District 1, and Fire Management Zone 5. Fire District 1 has a service population of 14,030 persons, 39.59 centerline miles, and a service area of approximately two square miles. Rescue/EMS District 1 has a service population of 20,268 persons, 55.93 centerline miles, and a service area of approximately 2.66 square miles. Fire Management Zone 5 is a general corridor, consisting of 0.24 square miles, located in Downtown Culver City. Zone 5 possesses 33 large businesses, along with some residential properties. The zone holds special risks that includes two movie studios which include a total of 31 stages, a hospital, and two high-rise buildings.<sup>35</sup>

The CCFD provides a broad range of emergency response and specialized services including: fire suppression response; emergency medical services; technical rescue; hazardous materials response; fire prevention; building plan check services; permit approvals; business inspections; fire investigation services; life safety inspections; emergency preparedness; and public education services. The CCFD includes six divisions: Office of the Fire Chief; Fire Suppression; Emergency Medical Services; Fire Prevention; Emergency Preparedness;

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<sup>34</sup> U.S. Census Bureau, 2015 population estimate based on 2010 Census data, <http://quickfacts.census.gov/qfd/states/06/0617568.html>, accessed September 2016.

<sup>35</sup> Chief Dave White, Culver City Fire Department, written correspondence, dated August 9, 2016. Written correspondence is regarding CCFD existing conditions. Community Risk Assessment & Standards of Cover, Culver City Fire Department, Chris Sellers, Fire Chief, 2014.

and Telecommunications.<sup>36</sup> The CCFD consists of 72 members including 61 sworn personnel and 11 civilian personnel, three fire stations, a telecommunications facility/radio shop, a training drill facility, and City Hall, which includes the fire administration office and fire prevention bureau. The CCFD utilizes a three-shift schedule, staffing each shift for a 24-hour period, seven days a week, and 365 days a year. A minimum on-duty staffing level of 18 personnel has been established for continuous delivery of emergency services. During business hours, sworn administrative personnel are available to augment the on-duty shift and recall procedures are in place to facilitate additional staffing when required. There are four primary response unit types that the CCFD employs during emergencies: engine companies, truck companies, paramedic rescues, and battalion chief command vehicles. **Table B-17, CCFD Daily Minimum Staffing Levels**, provides information on the quantity of apparatus, personnel per apparatus, and total personnel. **Table B-18, CCFD Fire Stations Located in the Vicinity of the Project Site**, provides information on the location, type of equipment/staffing, and the approximate distance/direction from the project site. According to the CCFD, there are no planned changes to fire protection facilities. However, the CCFD is exploring the idea of implementation a quick response vehicle. This vehicle would be staffed with two personnel Monday thru Friday, 7AM to 7PM, and would be continuously mobile, roaming into areas that are not covered by other CCFD units. This unit would have some firefighting capability with full paramedic capability. The apparatus would be a type 6 engine, similar to a pick-up truck.<sup>37</sup>

**Table B-17**

**CCFD Daily Minimum Staffing Levels**

Type	Number of Apparatus	Number of Staff Per Apparatus	Total Staff
Engine Company	3	3	9
Truck Company	1	4	4
Paramedic Rescue	2	2	4
Battalion Chief Command	1	1	1
			<b>Total: 18</b>

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Source: Chief Dave White, Culver City Fire Department, written correspondence, dated August 9, 2016. Written correspondence is regarding CCFD existing conditions.

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Construction activities associated with the project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Further, fire suppression equipment specific to construction would be maintained on the project site. As applicable, construction activities would be required to comply with the 2013 CBC, the 2013 California Fire Code (CFD), and Title 9: General Regulations, Chapter 9.02: Fire Prevention, of the CCMC.

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<sup>36</sup> Annual Compliance Report 8<sup>th</sup> Edition, Culver City Fire Department, prepared by Cara Flores, Management Analyst for the Commission on Fire Accreditation International, Inc., dated June 28, 2016.

<sup>37</sup> Chief Dave White, Culver City Fire Department, written correspondence, dated August 9, 2016. Written correspondence is regarding CCFD existing conditions.

**Table B-18**

**CCFD Fire Stations Located in the Vicinity of the Project Site**

<b>Fire Station</b>	<b>Address</b>	<b>Apparatus Equipment/Staffing</b>	<b>Approximate Distance/Direction from project site<sup>a</sup></b>
Fire Station 1 (headquarters)	9600 Culver Boulevard	Engine One (3 personnel), Rescue One (2 personnel), Battalion Chief Command Vehicle (1 personnel), Reserve Engine Four, Reserve Engine Five, Reserve Truck One, Reserve Battalion Two	0.40 miles southwest
Fire Station 2	11252 Washington Boulevard	Engine Two (3 personnel), Truck Two (4 personnel)	2.0 miles southwest
Fire Station 3	6030 Bristol Parkway	Engine Three (3 personnel), Rescue Three (2 personnel), Reserve Engine Six, Reserve Rescue Two	2.75 miles south

<sup>a</sup> Approximate distance/direction from project site in miles is a straight line distance, not a drive distance.

Source: Chief Dave White, Culver City Fire Department, written correspondence, dated August 9, 2016. Written correspondence is regarding CCFD existing conditions. Culver City Website, About the Department, Department Stations and Facilities, <https://www.culvercity.org/Government/PublicSafety/Fire/AbouttheDepartment/Locations.aspx>, accessed September 2016.

Construction activities may involve temporary lane closures for right-of-way frontage improvements and utility construction. Construction-related traffic could result in increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the project site during construction. As such, construction activities could increase response times for emergency vehicles to local business and/or residences within the project vicinity, due to travel time delays to through traffic. However, the impacts of such construction activity would be temporary and on an intermittent basis. Further, a Preliminary Construction Management Plan and Preliminary Traffic Control Plan for the project have been prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the project site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours (Mitigation Measure PS-1). As part of the Plans, the times of day and locations of all temporary lane closures would be coordinated so that they do not occur during peak periods of traffic congestion, to the extent feasible. Such events would be coordinated with neighboring construction projects, as necessary. Truck routes for material and equipment deliveries, as well as for soil export and disposal, would require approval by the Culver City Department of Public Works prior to construction activities. The Final Construction Management Plan and Traffic Control Plan would be prepared for review and approval by the Culver City Building Department and the Department of Public Works, as applicable, prior to commencement of any construction activity. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic (i.e., lights and sirens), are expected to limit the potential for significant delays in emergency response times during project construction. Therefore, impacts regarding emergency response times and emergency access during construction would be less than significant with the incorporation of the project's Final Construction Management Plan and Traffic Control Plan (Mitigation Measure PS-1).

Overall, with compliance to applicable CCFD requirements and implementation of the prescribed mitigation measure, and due to the temporary nature of the necessary construction activities, construction impacts on fire protection and emergency medical services would be less than significant.

Operational activities associated with the project would increase the demand for fire protection and emergency medical services. As discussed under Response XIII.a, the project could result in a total population increase of 103 indirect persons. The estimated 103 indirect person increase in the City's population would represent a 0.26 percent increase to the existing population (39,717 persons) in Culver City.

As mentioned above, up to three CCFD fire stations would provide fire protection and emergency medical services to the project area. According to the CCFD, Fire Station 1 would provide primary fire protection services to the project site. Both Fire Station 2 and Fire Station 3 would provide back-up fire protection services when Fire Station 1 is unavailable (i.e., responding to a separate fire incident) or when the type of service call requires more resources.<sup>38</sup> For 90 percent of all moderate risk structure fires, the CCFD desired response time for the arrival of the first due-unit, staffed with three firefighters, is 8 minutes and 38 seconds. The first-due unit shall be staffed with a minimum of three firefighters, capable of establishing command, evaluating the need for additional specialized resources, and advancing the first line for fire attack. For 90 percent of all moderate risk structure fires, the CCFD desired response time for the arrival of effective response force (ERF) (i.e., total number of personnel necessary to address the emergency situation), staffed with 18 firefighters and officers, is 12 minutes and 20 seconds. The ERF shall be capable of providing 4,500 gallon per minute (gpm) pumping capability and be able to accomplish the necessary tasks to contain a moderate risk fire.<sup>39</sup> **Table B-19, First-Due Unit Fire Incident Counts and Response Times**, provides call processing times, turnout times, travel times, and total response times for Fire Management Zone 5 and Citywide. Call processing time is the time interval between answering the 911 call at the dispatch center and the time the dispatcher activates station and/or company altering devices. Turnout time is the time interval between the activation of station and/or company altering devices and the time when the responding crew is aboard the apparatus and responding to the incident. Travel time is the time interval that begins when units are en-route to the emergency and arrival at the scene. Total response time is comprised of call processing time, turnout time, and travel time. Due to the close proximity of multiple fire stations, including the nearest station at 0.4 miles from the site, service calls are anticipated to be responded to within the fire department's desired response times. Emergency vehicles and fire access for the project site would be provided at grade access from Washington Boulevard. The project would be designed, constructed and maintained in accordance with CCFD's development and construction requirements to minimize the risks associated with fires. Based on the considerations above, the increase in both direct and indirect population from the project would not be substantial enough to significantly impact fire and emergency services on a daily or annual basis. Further, according to the CCFD, no new fire protection facilities would be necessary as a result of project implementation.<sup>40</sup>

The project site is not located in an area of moderate or very high fire hazard.<sup>41,42</sup> The nearest very high fire hazard severity zone (VHFHSZ) is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately 0.65 miles south of the project site. In addition, the project site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required.

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<sup>38</sup> Chief Dave White, Culver City Fire Department, written correspondence, dated August 9, 2016. Written correspondence is regarding CCFD existing conditions.

<sup>39</sup> *Ibid.*

<sup>40</sup> Chief Dave White, Culver City Fire Department, telephone correspondence, January 25, 2017.

<sup>41</sup> Zimas Website, <http://zimas.lacity.org/>, accessed September 2016 and Culver City Fire Department Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012.

<sup>42</sup> The Culver City Very High Fire Hazard Severity Zones in LRA as recommended by CAL FIRE, prepared by CAL FIRE, dated September 2011.

Table B-19

First-Due Unit Fire Incident Counts and Response Times

	Fire Management Zone 5 (2015) <sup>1</sup>	Culver City (2015-2016)
<b>All Emergencies – 90<sup>th</sup> Percentile</b>		
<i>Incident Count</i>	450	5,155
Call Processing Time	2:12	2:13
Turnout Time	2:19	2:18
	3:13	5:20
Total Response Time	6:31	8:41
<b>All Emergencies – 50<sup>th</sup> Percentile</b>		
Call Processing Time	1:03	1:07
Turnout Time	1:21	1:20
Travel Time	1:46	2:49
Total Response Time	4:35	5:42
<b>Structural Fire – 90<sup>th</sup> Percentile</b>		
<i>Incident Count 1<sup>st</sup> Unit</i>	7	67
<i>Incident Count ERF</i>	2	12
Alarm Handling (pick up to dispatch)	1:51	2:11
Turnout Time (1st Unit)	1:56	1:56
Travel Time (1st Unit)	2:35	3:24
Travel Time (ERF)	8:32	7:59
Total Response Time (1st Unit)	6:22	6:34
Total Response Time (ERF)	11:14	10:48
<b>EMS – 90<sup>th</sup> Percentile</b>		
<i>Incident Count</i>	286	4,290
Alarm Handling (pick up to dispatch)	1:52	2:08
Turnout Time (1st Unit)	2:18	2:15
Travel Time (1st Unit)	2:51	5:11
Travel Time (EFR)	6:17	7:20
Total Response Time (1st Unit)	6:03	8:27
Total Response Time (ERF)	8:43	10:33
<b>Technical Rescue – 90<sup>th</sup> Percentile</b>		
<i>Incident Count 1<sup>st</sup> Unit</i>	13	75
<i>Incident Count ERF</i>	0	1
Alarm Handling (pick up to dispatch)	2:18	2:25
Turnout Time (1st Unit)	2:07	1:52
Travel Time (1st Unit)	4:14	4:50
Travel Time (Effective Response Force)	N/A	3:48
Total Response Time (1st Unit)	7:06	4:00
Total Response Time (ERF)	N/A	5:57

**Table B-19 (Continued)**

**First-Due Unit Fire Incident Counts and Response Times**

	<b>Fire Management Zone 5 (2015)<sup>1</sup></b>	<b>Culver City (2015-2016)</b>
<b>Hazardous Materials – 90<sup>th</sup> Percentile</b>		
<i>Incident Count 1<sup>st</sup> Unit</i>	4	90
<i>Incident Count ERF</i>	1	6
Alarm Handling (pick up to dispatch)	1:57	2:40
Turnout Time (1st Unit)	2:17	2:23
Travel Time (1st Unit)	3:47	5:25
Travel Time (ERF)	6:53	7:57
Total Response Time (1st Unit)	7:51	9:10
Total Response Time (ERF)	11:26	11:39

*Notes: Most recent information available.*

*Source: Cara Flores, Management Analysis, Culver City Fire Department, email correspondence dated January 31, 2017. Chief Dave White, Culver City Fire Department, email correspondence, dated August 10, 2016. Email correspondence is regarding CCFD existing conditions.*

The project would be subject to compliance with fire protection design standards, as necessary, per the CBC, CFD, the CCMC, and the CCFD, to ensure adequate fire protection. Culver City's standard conditions of approval generally require that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the CCFD. Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards. The ability of the water service provider to provide water supply to the project site is discussed in Section XVII, *Utilities and Service Systems*. As discussed therein, adequate water supply would be available to serve the project site, including minimum fire flow requirements.

Overall, given the moderate rate of population growth in Culver City, the project's conformance to expected growth scenarios for the City, the existing number of Fire staff, and the project's planned onsite fire protection design features consistent with the applicable regulatory requirements of the CBC, CFD, the CCMC, and the CCFD, the project is not expected to be beyond the scope of available fire services. Accordingly, the CCFD's response times would not be substantially changed such that response time objectives are compromised in any significant manner. Further, according to the CCFD, project implementation would not require the physical expansion of an existing fire station or a new fire station or require additional staffing to the fire protection facilities servicing the project site.<sup>43</sup> Thus, impacts regarding fire services would less than significant.

<sup>43</sup> Chief Dave White, Culver City Fire Department, telephone correspondence, January 25, 2017.

## Mitigation Measures

**PS-1:** Construction Management Plan/Traffic Control Plan – A Final Construction Management Plan and Traffic Control Plan shall be developed by the project contractor in consultation with the project's traffic and/or civil engineer and reviewed and approved by Culver City's Building Official, Engineer and/or Planning Manager, as applicable, prior to issuance of any project demolition, grading or excavation permit. The Final Plans shall also be reviewed and approved by Culver City's Fire and Police Departments. The Culver City Building Official, Engineer and/or Planning Manager, as applicable reserve the right to reject any engineer at any time and to require that the Plan(s) be prepared by a different engineer.

Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector ("Inspectors") of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other surrounding developments that will potentially be under construction at around the same time as the project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another.

The Plans together shall identify, at a minimum, the following to the satisfaction of the City:

- The name and telephone number of a contact person who can be reached 24 hours a day regarding construction traffic complaints or emergency situations.
- An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties.
- Procedures for the training and certification of the flag persons.
- The location, times, and estimated duration of any roadway closures, traffic detours, use of protective devices, warning signs, and staging or queuing areas.
- The location and travel routes of off-site staging and parking locations.
- The location of temporary power, portable toilet and trash and materials storage locations.
- The timing and duration of all street and/or lane closures and shall be made available to the City in digital format for posting on the City's website and distribution via email alerts on the City's "Gov Delivery" system. The Plans shall be updated weekly during the duration of project construction, as determined necessary by the City.
- Prior to approval of the Plan(s), the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community:
  - 1) Construction schedule and hours.
  - 2) Framework for construction phases.
  - 3) Identify traffic diversion plan by phase and activity. (The Traffic Control Plan will be submitted for review and approval by the City for each phase).

- 4) Potential location of construction parking and office trailers.
- 5) Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity).
- 6) Emergency access plan.
- 7) Demolition plan.
- 8) Staging plan for the concrete pours, material loading and removal.
- 9) Crane location(s).
- 10) Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).

## **b. Police protection?**

**Less Than Significant Impact With Mitigation Incorporated.** Police protection for the project site is provided by the Culver City Police Department (CCPD). In addition, it is acknowledged that the CCPD has mutual aid agreements with the Beverly Hills Police Department, Santa Monica Police Department, and Los Angeles County Sheriff's Department on an as needed basis. The CCPD serves a nighttime population of approximately 40,000 persons and a daytime population of approximately 200,000 persons. The CCPD consists of 109 sworn officers, 21 reserve officers and 56 professional staff. In anticipation of the proposed projects, as well as the recently constructed projects, located within the Washington/National TOD and Helms Bakery District area, the City has authorized the CCPD to hire an additional four officers. The nearest CCPD station is located at 4040 Duquesne Avenue, approximately 0.50 miles southwest of the project site. The CCPD is currently divided into four patrol districts. Due to the recent and anticipated growth in the area, the City has further authorized the CCPD to establish a fifth patrol district to ensure the CCPD would meet the Department's goals by maintaining an average emergency response time of three minutes or less for emergency calls and a 20 minute response time for non-emergency calls.<sup>44</sup> The project site is located within Patrol District 1.<sup>45</sup>

During construction, equipment and building materials could be temporarily stored on-site, which could result in theft, graffiti, and vandalism. However, the project site is located in an area with high vehicular activity from Washington Boulevard. In addition, the construction site would be fenced along the perimeter, with the height and fence materials subject to review approval by Culver City's Engineer and Planning Manager, as required by Culver City's standard conditions of approval. As discussed above, temporary lane closures may be required for right-of-way frontage improvements and utility construction. However, these closures would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the project site would be maintained. Emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Further, as discussed above, a Final Construction Management Plan and Traffic Control Plan for the project would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the project site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours (Mitigation Measure PS-1). Given the visibility of the project site from adjacent roadways and surrounding properties, existing police presence in Culver City, maintained emergency access,

<sup>44</sup> Captain Ron Iizuka, Culver City Police Department, written correspondence, dated September 21, 2016. Written correspondence is regarding CCPD existing conditions.

<sup>45</sup> Culver City Police Department Website, Operations Bureau, Culver City Police Car Districts Map, dated September 18, 2014, [http://www.culvercitypd.org/D\\_table\\_images/DistrictMap.jpg](http://www.culvercitypd.org/D_table_images/DistrictMap.jpg), accessed October 2016.



and construction fencing, the project is not expected to increase demand on existing police services to a meaningful extent. Therefore, with the incorporation of the project's Construction Management Plan and Traffic Control Plan (Mitigation Measure PS-1), the project would have a less than significant temporary impact on police protection during the construction phases.

Operational activities associated with the project would increase demand for police protection services. As discussed above, the estimated 103 indirect person increase in the City's population would represent 0.26 percent increase to the existing population in Culver City. Implementation of the project could also indirectly increase the need for police protection by permitting up to 2,878 square feet of retail uses, 3,184 square feet of restaurant uses, and 59,325 square feet of office uses which would increase the daytime population in the project area given the new employees and patrons. As discussed in Attachment A, *Project Description*, site security would include provisions of 24-hour video surveillance and a full-time security guard. Duties of the security personnel would include, but would not be limited to, assisting office employees and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property. The site security would regularly interface and collaborate with the CCPD, as necessary. Site security features would include building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. The project design would include lighting of entry-ways and public areas for site security purposes. The buildings would include controlled access to office uses in order to ensure the safety of office employees.

To ensure that police protection considerations are incorporated into the project design, prior to the issuance of a building permit for the project, the CCPD would be provided the opportunity to review and comment upon building plans in order to facilitate opportunities for improved emergency access and response; ensure the consideration of design strategies that facilitate public safety and police surveillance; and other specific design recommendations to enhance public safety and reduce potential demands upon police protection services. Given the overall moderate rate of population growth in Culver City, the project's conformance to expected growth scenarios for the City, the existing number of police staff and City authorization to hire four additional officers and to establish a fifth patrol district, and the project's planned on-site security measures, the project is not expected to be beyond the scope of available police services. Additionally, the project's onsite security would minimize the need for police services on the project site. Accordingly, the CCPD's response times would not be substantially changed such that response time objectives are compromised in any significant manner. Further, no new or expanded police facilities would need to be constructed as a result of the project.<sup>46</sup> Thus, impacts regarding police services would be less than significant.

## Mitigation Measures

Refer to Mitigation Measure PS-1. No additional mitigation measures are necessary.

### c. Schools?

**Less Than Significant Impact.** The project would be served by the Culver City Unified School District (CCUSD). The CCUSD includes one high school, one continuation high school, one middle school, five elementary schools, and one adult school. The project site is located within the attendance boundaries of the Linwood Howe Elementary School, the Culver City Middle School, and the Culver City High School. The

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<sup>46</sup> Captain Ron Iizuka, Culver City Police Department, telephone correspondence, January 31, 2017.

Linwood Elementary School, kindergarten through fifth grade (K-5), is located at 4100 Irving Place, approximately 0.35 miles southwest of the project site. The Culver City Middle School, (grades 6-8), is located at 4601 Elenda Street, approximately 1.5 miles southwest of the project site. The Culver City High School (grades 9-12), is located at 4401 Elenda Street, approximately 1.5 miles southwest of the project site.

Project operation would incrementally increase demand for school services. The estimated 103 indirect persons increase in the City's population would represent 0.26 percent increase to the existing population in Culver City. If project employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. However, if some employees with school age children choose to move closer to work, or if some new employees with children are hired from the surrounding community or another City, there could be a negligible increase in student population in the nearby schools. The project is estimated to generate one elementary school student, one middle school student, and one high school student for a total of three students.<sup>47</sup>

Project impacts related to schools would be addressed through payment of required Senate Bill 50 (SB 50) development fees pursuant to Section 65995 of the California Government Code. In accordance with SB 50, the payment of these fees are deemed to provide full and complete mitigation for impacts to school facilities. Therefore, impacts to school services and facilities would be less than significant.

#### d. Parks?

**Less Than Significant Impact.** The Culver City Parks, Recreation and Community Services (PRCS) division oversees the maintenance and operations of 11 City parks totaling approximately 79 acres, a community garden, community and recreational facilities, senior centers, swimming pools, and a theater facility. A joint-use partnership between Culver City and CCUSD provides additional open space and park facilities for use by residents of Culver City during non-school hours. The project site is located within the vicinity of 11 park facilities. **Table B-20, *Culver City Park Facilities Located in the Vicinity of the Project Site***, provides information on the park/facility, location, size, park amenities/activities, and the approximate distance/direction from the project site.

Project operation would incrementally increase demand for park services. The project would not generate a new residential population as no residential uses are proposed. As discussed in Response XIII.a, above, the project is expected to result in an indirect population increase of 103 persons to the City's population, which would represent 0.26 percent increase to the existing population in Culver City.

Despite the incremental indirect population increase, most office employees are not expected to use local parks given limited lunch time hours, and to the extent they do use local parks it would likely be for passive recreation (walking or eating lunch) on weekdays when use of these parks is not considered at peak (i.e., peak usage of parks often occurs on weekends when the office uses are not in operation). With a limited amount of

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<sup>47</sup> Student generation rates for residential uses are taken from the Draft School Facilities Needs Analysis 2012, LAUSD, September 2012. Student generation rates for office, retail, and restaurant uses are taken from the 2010 Commercial/Industrial Development School Fee Justification Study, LAUSD, September 27, 2010 – the most recent data available for non-residential uses. For each 1,000 square feet of non-residential space – Elementary = 0.0178; Middle School = 0.0089; High School = 0.0111. Total number of students has been rounded up, in order to provide whole student number counts.

**Table B-20**

**Culver City Park Facilities Located in the Vicinity of the Project Site**

<b>Park/Facility</b>	<b>Location</b>	<b>Size (acres)</b>	<b>Parks Amenities/Activities</b>	<b>Approximate Distance/Direction from Project Site<sup>a</sup></b>
Ivy Substation and Media Park	9070 Venice Boulevard	N/A	99-seat theatre facility, passive grass area	0.20 miles west
Syd Kronenthal Park	3459 McManus Avenue	6.00	Recreation building with restroom facilities, soccer field, two softball fields, two half-court basketball courts, tennis court, picnic areas, barbeques, children's play equipment, passive grass area	0.60 miles east
Linwood E. Howe Playground	4100 Irving Place	N/A	Linwood Elementary Playground	0.35 miles south
Culver City Park	9910 Jefferson Boulevard	41.55	Culver City Skate Park, The Boneyard (Dog Park), recreation hut with restroom facilities, soccer field, three softball fields, two half-court basketball courts, interpretive nature trail, picnic areas, barbeques, children's play equipment, passive grass area	0.65 miles southeast
Blair Hills Park	5950 Wrightcrest Drive	1.62	Recreation hut with restroom facilities, picnic shelter, softball fields, basketball court, barbeques, children's play equipment, passive grass area	0.94 miles southeast
Carlson Park	Braddock Drive at Motor Avenue	2.66	Home of Culver City Public Theater, picnic shelter, restroom facilities, barbeques, fireplaces, passive grass area	0.96 miles southwest

<sup>a</sup> Approximate distance/direction from project site in miles is a straight line distance, not a drive distance.

Source: Parks, Recreation and Community Services (PRCS) Website, Park Sites, <http://www.culvercity.org/Government/PRCS.aspx> and <http://www.culvercity.org/Government/PRCS/Parks/ParkSites.aspx> and Culver City Park & Facility Information Map, [http://www.culvercity.org/~media/Files/PRCS/ccliving/community\\_park.ashx](http://www.culvercity.org/~media/Files/PRCS/ccliving/community_park.ashx), accessed September 2016.

commercial uses, the minimal number of commercial employees would not be substantial so as to adversely impact park facilities or services during anytime of the week. In addition, the proposed project would incorporate passive recreation areas, which would include public open space along Washington Boulevard with a streetscape design that includes wide public sidewalks with street trees, landscape planters, tree grates, ground cover, benches, tables for outdoor seating, bicycle racks, trash receptacles, and street furniture to activate the pedestrian environment. On the upper levels, the project includes balconies, breezeways, roof deck, and green roof for use by office employees. As such, the proposed project is not anticipated to result in substantial adverse physical impacts to parks that would alter existing park facilities or result in the need for new facilities, construction of which could cause significant environmental impacts. Therefore, impacts on parks would be less than significant

**e. Other public facilities?**

**Less Than Significant Impact.** The Los Angeles County Public Library (LACPL) provides library services to Culver City. The project site is served by the LACPL Culver City Julian Dixon Branch Library, which is located at 4975 Overland Avenue, Culver City, approximately 1.55 miles southwest of the project site. Other nearby LACPL branches are the Lloyd Taber-Marina del Rey Library, West Hollywood Library, and View Park Library. The Lloyd Taber-Marina del Rey Library is located at 4533 Admiralty Way, Marina del Rey, approximately 4.3

miles southwest of the project site. The West Hollywood Library is located at 625 North San Vicente Boulevard, West Hollywood, approximately 3.85 miles north of the project site. The View Park Library is located at 3854 West 54<sup>th</sup> Street, Los Angeles, approximately 3.6 miles southeast of the project site. Similar to park services, the introduction of new daytime employees and a nominal indirect population increase would not substantially affect the provision of library services.

The project's employees and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. However, implementation of the project would result in a minimal population increase. Therefore, development of the project would not significantly increase the use of government services beyond current levels. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would not require maintenance beyond normal requirements. The project applicant would need to pay all applicable impact fees of Culver City. Overall, less than significant impacts to governmental services, including roads, would occur.

## **XV. RECREATION**

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- 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?**

**Less Than Significant Impact (a-b).** As discussed under Response XIV.d, the use of existing parks is not expected to substantially increase as a result of the project, given limited lunch time hours, minimal number of commercial employees, and provisions of passive recreation areas. Impacts on parks or recreational facilities would be less than significant.

## **XVI. TRANSPORTATION AND CIRCULATION**

The following discussion is based, in part, on the *Draft Traffic Study for the 8888 Washington Boulevard Project* (herein referred to as the "Traffic Study"), prepared by Raju Associates, Inc., dated February 2017 (provided under separate cover available at the Culver City Planning Division). The Traffic Study was conducted using procedures and criteria adopted by the Los Angeles Department of Transportation (LADOT) and Culver City staff, and addresses the project's trip generation and potential impacts to the surrounding roadway network. The Traffic Impact Analysis evaluates four project scenarios: Existing (2016) Conditions, Existing (2016) Plus Project Conditions, Cumulative (2018) Base Conditions, and Cumulative (2018) Plus Project Conditions. Future conditions take into account the potential development of 33 related projects in the general project vicinity, as identified by the City of Los Angeles and Culver City.

*Would the project:*

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant**

**components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

**Less Than Significant Impact.** Twenty-six (26) study intersections were selected for evaluation in consultation with the City of Los Angeles Department of Transportation (LADOT) and Culver City based on project-related traffic patterns; refer to **Table B-21**, *Study Area Intersections*. Of the 26 study intersections, fourteen (14) intersections are located within Culver City and fourteen (12) intersections are located within the City of Los Angeles. Twenty-two of the 26 analyzed intersections are controlled by traffic signals and four analyzed intersections are unsignalized. An intersection level of service (LOS) analysis was performed at the study intersections to assess significant impacts resulting from the project; refer to **Figure B-4**, *Location of Project and Analyzed Intersections*,.

**Level of Service Methodology**

Level of service (LOS) is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS “A” to overload conditions at LOS “F”. LOS “D” is typically recognized as the minimum acceptable LOS in urban areas. The LOS definitions for signalized and unsignalized intersections are provided in **Table B-22**, *Level of Service Definitions for Signalized Intersections* and **Table B-23**, *Level of Service Definitions for Stop-Controlled Intersections*. As discussed above, 22 of the 26 analyzed intersections are controlled by traffic signals and four analyzed intersections are unsignalized.

The Intersection Capacity Utilization (ICU) method was used to determine the intersection volume to capacity (V/C) ratio and corresponding LOS for Culver City study intersections. Per Culver City Traffic Study Criteria, a capacity of 1,600 vehicles per lane per hour is assumed, a total of 2,880 vehicles per hour for dual left-turn lanes, and a ten percent reduction factor to account for the loss time of the yellow signal clearance periods was utilized in the capacity calculations.

For the City of Los Angeles study locations, the “Critical Movement Analysis-Planning” (CMA), Circular 212 Planning Method, for intersection capacity analysis was used to determine the intersection V/C ratio and corresponding LOS at the signalized intersections.

The 10 study intersections under the City of Los Angeles jurisdiction are currently controlled by the City of Los Angeles’ Automated Traffic Surveillance and Control (ATSAC) System and Adaptive Traffic Control System (ATCS). In accordance with LADOT procedures, a capacity increase of ten percent (0.07 V/C adjustment for ATSAC and 0.03 V/C adjustment for ATCS) was applied to reflect the benefits of ATSAC/ATCS control at these intersections.

The remaining 12 signalized intersections under the jurisdiction of Culver City currently operate under a signal coordination system similar to ATSAC, but have not yet been upgraded with the ATCS-type operations. Therefore, a capacity increase of seven percent (0.07 V/C adjustments) was applied to reflect the benefits of ATSAC-type control at these intersections.

**Table B-21**

**Study Area Intersections**

<b>No.</b>	<b>Intersection</b>
1	Robertson Boulevard & I-10 Westbound Off-Ramp/Kincardine Avenue <sup>a,d</sup>
2	Robertson Boulevard & National Boulevard <sup>a,d</sup>
3	National Boulevard & I-10 Eastbound On-Ramp <sup>a,d</sup>
4	Bagley Avenue & Venice Boulevard <sup>a,d</sup>
5	Culver Boulevard & Venice Boulevard <sup>a,d</sup>
6	Robertson Boulevard & Venice Boulevard <sup>a,d</sup>
7	National Boulevard & Venice Boulevard <sup>a,d</sup>
8	La Cienega Boulevard & Venice Boulevard <sup>a,b,d</sup>
9	Washington Boulevard/Irving Place & Culver Boulevard <sup>c,d</sup>
10	Main Street & Culver Boulevard <sup>c,d</sup>
11	Washington Boulevard/Canfield Avenue & Culver Boulevard <sup>c,d</sup>
12	Ince Boulevard & Washington Boulevard <sup>c,d</sup>
13	Robertson Boulevard/Higuera Street & Washington Boulevard <sup>c,d</sup>
14	Landmark Street & Washington Boulevard <sup>c,d</sup>
15	National Boulevard & Washington Boulevard <sup>c,d</sup>
16	Helms Avenue & Washington Boulevard <sup>c,d</sup>
17	La Cienega Avenue/McManus Avenue & Washington Boulevard <sup>c,d</sup>
18	La Cienega Boulevard & Washington Boulevard <sup>c,d</sup>
19	Wesley Street & National Boulevard <sup>c,d</sup>
20	Hayden Avenue & National Boulevard <sup>c,d</sup>
21	Jefferson Boulevard & National Boulevard <sup>a,d</sup>
22	Jefferson Boulevard & Higuera Street/Rodeo Road <sup>a,d</sup>
23	Robertson Boulevard & I-10 Westbound On-Ramp <sup>a</sup>
24	Robertson Boulevard & Exposition/I-10 Westbound On-Ramp <sup>a</sup>
25	Wesley Street & Washington Boulevard <sup>c,e</sup>
26	Cattaraugus Avenue & Washington Boulevard <sup>c</sup>

<sup>a</sup> Study intersection is located within the City of Los Angeles.

<sup>b</sup> Los Angeles County Congestion Management Program arterial monitoring location.

<sup>c</sup> Study intersection is located within the Culver City.

<sup>d</sup> Signalized intersection.<sup>e</sup> The intersection will be signalized in the future.

Source: Raju Associates, Inc., 2017.



SOURCE: Raju Associates, Inc., 2017

Synapse at Platform

**Figure B-4**  
Location of Project and Analyzed Intersections

**Table B-22**

**Level of Service Definitions for Signalized Intersections**

Level of Service	V/C Ratio	Definition
A	0.000 – 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	>0.600 – 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	>0.700 – 0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	>0.800 – 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	>0.900-1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	>1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

*Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980; Raju Associates, Inc., 2017.*

**Table B-23**

**Level of Service Definitions for Stop-Controlled Intersections**

Level of Service	Average Total Delay (seconds/vehicle)
A	$\leq 10.0$
B	$> 10.0$ and $\leq 15.0$
C	$> 15.0$ and $\leq 25.0$
D	$> 25.0$ and $\leq 35.0$
E	$> 35.0$ and $\leq 50.0$
F	$> 50.0$

*Source: Transportation Research Board, Highway Capacity; Raju Associates, Inc., 2017.*



The Highway Capacity Manual (HCM) 2010 method of unsignalized intersection analysis was used to determine the delay (in seconds) and corresponding level of service at the stop-controlled intersections. The intersection delay is defined as the worst case delay experienced by drivers at the intersection who must stop or yield to unimpeded major street traffic. This method uses a “gap acceptance” technique to predict driver delay and is applicable to unsignalized intersections where there is potential for difficulty for minor street or stopped traffic to cross the traffic on the major or unimpeded street. Table B-23 defines the ranges of delay and corresponding levels of service for unsignalized intersections.

### Culver City Traffic Impact Criteria

The threshold criteria for Culver City considers a project to have a significant impact if the conditions are met within **Table B-24, Culver City Criteria for Significant Traffic Impact**. Using this criteria, a project would not have a significant impact at an intersection if it operates at LOS “D” after the addition of the project traffic and the incremental change in V/C is less than 0.040. However, if the intersection is operating at LOS “F” after the addition of the project traffic and the V/C ratio is 0.020 or greater, the project would be considered to have a significant impact.

**Table B-24**

**Culver City Criteria for Significant Traffic Impact**

Level of Service	V/C Ratio	Project-Related Increase in V/C Ratio
C	0.701-0.800	≥ 0.050
D	0.801 – 0.900	≥ 0.040
E, F	> 0.900	≥ 0.020

*Source: Raju Associates, Inc., 2017.*

### City of Los Angeles Traffic Impact Criteria

The threshold criteria for the City of Los Angeles considers a project to have a significant impact if the conditions are met within **Table B-25, LADOT Criteria for Significant Traffic Impact**.

**Table B-25**

**LADOT Criteria for Significant Traffic Impact**

Level of Service	V/C Ratio	Project-Related Increase in V/C Ratio
C	0.701 – 0.800	≥ 0.040
D	0.801 – 0.900	≥ 0.020
E, F	> 0.900	≥ 0.010

*Source: Raju Associates, Inc., 2017.*

### Existing Traffic Volumes

Weekday morning and evening peak hour traffic counts were compiled from data collected at the analyzed intersections in February, April, September, and October 2015, and March 2016. Additional traffic counts were compiled from data collected in 2014. Traffic counts collected in 2015 were factored upward one percent per year to reflect existing 2016 conditions. Traffic counts collected prior to 2015 were factored upward one percent per year (compounded annually) to reflect existing 2016 conditions. These traffic volumes reflect typical weekday operations during current year 2016 conditions. Refer to Figures 3A and 3B, Existing (2016) Conditions – Peak Hour Traffic Volumes, of the Traffic Study, for existing traffic volumes.

### Existing Level of Service

**Table B-26**, *Existing (2016) Intersection Level of Service Analysis*, summarizes the results of the intersection capacity analysis for existing conditions at each of the study intersections in the study area. Table B-26 indicates the existing V/C ratio during the morning and evening peak hours and the corresponding LOS at the study intersections. As illustrated in Table B-26, 24 of the 26 study intersections are currently operating at LOS “D” or better during the morning peak hour. During the evening peak hour, 23 of the 26 study intersections are operating at LOS “D” or better. The remaining locations are operating at LOS “E” or “F” and include:

- Robertson Boulevard/I-10 Westbound On-Ramp: AM Peak Hour – LOS “F” and PM Peak Hour – LOS “E”
- Wesley Street/Washington Boulevard: PM Peak Hour – LOS “E”
- Cattaraugus Avenue/Washington Boulevard: AM Peak Hour – LOS “F” and PM Peak Hour – LOS “E”

### Project Trip Generation

To determine the project’s impacts on area intersections, the Traffic Study calculated the number of traffic trips generated by the project using the trip generation rates outlined in the Institute of Transportation Engineers (ITE) handbook titled *Trip Generation, 9th Edition*. Trip generation rates and the resulting trips that would be generated by the project are presented in **Table B-27** *Estimated Project Trip Generation*. The project is estimated to generate approximately 1,146 net daily trips of which 100 trips would occur during the morning peak hour and 124 trips during the evening peak hour.

Table B-26

Existing (2016) Intersection Level of Service Analysis

No.	Intersection	Existing (2016) Conditions			
		AM Peak Hour		PM Peak Hour	
		V/C or Delay	LOS	V/C or Delay	LOS
1.	Robertson Boulevard & I-10 WB Off-Ramp/Kincardine Avenue <sup>a</sup>	0.588	A	0.839	D
2.	Robertson Boulevard & National Boulevard <sup>a</sup>	0.892	D	0.817	D
3.	National Boulevard & I-10 Eastbound On-Ramp <sup>a</sup>	0.223	A	0.452	A
4.	Bagley Avenue & Venice Boulevard <sup>a</sup>	0.672	B	0.710	C
5.	Culver Boulevard & Venice Boulevard <sup>a</sup>	0.565	A	0.624	B
6.	Robertson Boulevard & Venice Boulevard <sup>a</sup>	0.728	C	0.721	C
7.	National Boulevard & Venice Boulevard <sup>a</sup>	0.707	C	0.792	C
8.	La Cienega Boulevard & Venice Boulevard <sup>a b</sup>	0.813	D	0.814	D
9.	Washington Boulevard/Irving Place & Culver Boulevard <sup>c</sup>	0.656	B	0.648	B
10.	Main Street & Culver Boulevard <sup>c</sup>	0.684	B	0.602	B
11.	Washington Boulevard/Canfield Avenue & Culver Boulevard <sup>c</sup>	0.697	B	0.622	B
12.	Ince Boulevard & Washington Boulevard <sup>c</sup>	0.858	D	0.813	D
13.	Robertson Boulevard/Higuera Street & Washington Boulevard <sup>c</sup>	0.710	C	0.649	B
14.	Landmark Street & Washington Boulevard <sup>c</sup>	0.442	A	0.444	A
15.	National Boulevard & Washington Boulevard <sup>c</sup>	0.670	B	0.816	D
16.	Helms Avenue & Washington Boulevard <sup>c</sup>	0.540	A	0.510	A
17.	La Cienega Avenue/McManus Avenue & Washington Boulevard <sup>c</sup>	0.573	A	0.521	A
18.	La Cienega Boulevard & Washington Boulevard <sup>c</sup>	0.898	D	0.840	D
19.	Wesley Street & National Boulevard <sup>c</sup>	0.429	A	0.463	A
20.	Hayden Avenue & National Boulevard <sup>c</sup>	0.461	A	0.468	A
21.	Jefferson Boulevard & National Boulevard <sup>a</sup>	0.875	D	0.514	A
22.	Jefferson Boulevard & Higuera Street/Rodeo Road <sup>a</sup>	0.757	C	0.727	C
23.	Robertson Boulevard & I-10 Westbound On-Ramp <sup>a,d</sup>	55.2 s	F	41.8 s	E
24.	Robertson Boulevard & Exposition/I-10 Eastbound Off-Ramp <sup>a,d</sup>	10.4 s	B	14.9 s	B
25.	Wesley Street & Washington Boulevard <sup>c,e</sup>	22.3 s	C	49.7 s	E
26.	Cattaraugus Avenue & Washington Boulevard <sup>c,e</sup>	***	F	41.9 s	E

V/C - Volume to Capacity Ratio

LOS - Level of Service

S - Seconds

<sup>a</sup> Study intersection is located within the City of Los Angeles.

<sup>b</sup> Los Angeles County Congestion Management Program arterial monitoring location.

<sup>c</sup> Study intersection is located within the City of Culver City.

<sup>d</sup> All-way stop-controlled intersection. LOS based on average vehicular delay in seconds (s).

<sup>e</sup> Stop-controlled on minor approach(es). LOS based on worst case approach delay in seconds (s).

\*\*\* - Oversaturated conditions per Highway Capacity Manual 2010 (HCM).

Source: Raju Associates, Inc. 2017.

Table B-27

Estimated Project Trip Generation

Proposed Project	Size	Daily	A.M. Peak Hour IN	A.M. Peak Hour OUT	A.M. Peak Hour TOTAL	P.M. Peak Hour IN	P.M. Peak Hour OUT	P.M. Peak Hour TOTAL
Office	59,325 s.f.	883 (221)	111 (28)	15 (4)	126 (32)	25 (6)	120 (30)	145 (36)
*Internal Capture (10%) Trip Credit		(66)	(8)	(1)	(9)	(2)	(9)	(11)
Retail	2,878 s.f.	677	11	7	18	27	29	56
Internal Capture (10%) Trip Credit		(68)	(1)	(1)	(2)	(3)	(3)	(6)
** Pass-By Trip Reduction (25%)		(152)	(3)	(1)	(4)	(6)	(7)	(13)
High-Turnover Restaurant	3,184 s.f.	405	19	15	34	19	12	31
Internal Capture (10%) Trip Credit		(41)	(2)	(1)	(3)	(2)	(1)	(3)
**Pass-By Trip Reduction (25%)		(91)	(4)	(4)	(8)	(4)	(3)	(7)
Existing Uses (to be removed)								
Auto Repair Shop	9,992 s.f.	200 (20)	15 (2)	7 0	22 (2)	17 (2)	19 (2)	36 (4)
Pass-By Trip Reduction (10%)								
Project Net Trip Generation Total		1,146	82	18	100	33	91	124
Trip Rates [1]								
Office (ITE Land Use 710)	Trips/1,000 s.f.	[2]	88%	12%	[2]	17%	83%	[2]
Retail/Shopping Center (ITE Land Use 820)	Trips/1,000 s.f.	[3]	62%	38%	[3]	48%	52%	[3]
High-Turnover Restaurant (ITE Land Use 932)	Trips/1,000 s.f.	127.15	55%	45%	10.81	60%	40%	9.85
Automobile Care Center (ITE Land Use 942)	Trips/1,000 s.f.	20.00[4]	66%	34%	2.25	48%	52%	[5]

Table B-27 (Continued)

Estimated Project Trip Generation

Proposed Project	Size	Daily	A.M.			A.M.			P.M.			P.M.		
			Peak Hour	Peak Hour	Peak Hour	Peak Hour	Peak Hour	TOTAL	Peak Hour	Peak Hour	Peak Hour	Peak Hour	Peak Hour	TOTAL

\* Internal capture trips determined after reduction of transit trips.

\*\* Pass-by trips determined after reduction of internal capture trip credit.

[1] Trip generation rates from Trip Generation Manual, 9<sup>th</sup> Edition, ITE 2012, unless otherwise noted.

[2] Trip generation for office was calculated using the following equations:

Daily:  $\ln(T) = 0.76 \ln(X) + 3.68$

AM Peak Hour:  $\ln(T) = 0.80 \ln(X) + 1.57$

PM Peak Hour:  $T = 1.12(X) + 78.45$

Where:  $\ln$  = Natural logarithm;  $T$  = Two-way volume of traffic (total trip-ends);  $X$  = Area in 1,000 square feet gross floor area

[3] Trip generation estimates for retail/shopping center was calculated using the following equations:

Daily:  $\ln(T) = 0.65 \ln(X) + 5.83$

AM Peak Hour:  $\ln(T) = 0.61 \ln(X) + 2.24$

PM Peak Hour:  $\ln(T) = 0.67 \ln(X) + 3.31$

Where:  $\ln$  = Natural logarithm;  $T$  = Two-way volume of traffic (total trip-ends);  $X$  = Area in 1,000 square feet gross leasable area.

[4] ITE does not provide a daily trip generation rate for this use. Therefore, the daily trip rate for this use from Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, SANDAG, April 2002 was utilized.

[5] PM trip generation for automobile care center was calculated using the following equation:

PM Peak Hour:  $T = 2.41(X) + 11.79$

Where:  $T$  = Two-way volume of traffic (total trip-ends);  $X$  = 1,000 square feet occupied gross leasable area

Source: Raju Associates, Inc., 2017.

### **Project Trip Distribution**

The geographic distribution for Project trips was assumed to be the following:

- To and From the North: 20%;
- To and From the South: 15%;
- To and From the East: 35%; and
- To and From the West: 30%.

Intersection level trip distribution percentages are shown on Figure 5, Project Trip Distribution, of the Traffic Study. Based on these distribution assumptions, location and points of access of the project driveways, and trip generation estimates from the project, traffic estimates of project-only trips were developed. These project-only trips are presented in Figures 6A and 6B, Project Only – Peak Hour Traffic Volumes, of the Traffic Study.

### **Existing (2016) Plus Project Traffic Volumes**

The existing (2016) traffic volumes were combined with the project-only traffic volumes to obtain the Existing with project traffic volume forecasts. The Existing (2016) Plus Project traffic volumes during both AM and PM peak hours are presented in Figures 7A and 7B, Existing (2016) Plus Project Conditions – Peak Hour Traffic Volumes, of the Traffic Study.

### **Existing (2016) Plus Project Traffic Conditions**

The Existing (2016) Plus Project peak hour traffic volumes were analyzed at each of the study intersections to determine the V/C ratio and corresponding level of service. **Table B-28, Summary of Intersection Level of Service Analysis**, presents the results of the Existing (2016) Plus Project traffic analysis. As illustrated in Table B-28, 23 of the 26 study intersections are currently operating at LOS “D” or better during the morning and evening peak hours. The remaining locations are projected to operate at LOS “E” and include:

- La Cienega Boulevard/Washington Boulevard: AM Peak Hour – LOS “E”
- Robertson Boulevard/I-10 Westbound On-Ramp: AM Peak Hour – LOS “F” and PM Peak Hour – LOS “E”
- Westley Street/Washington Boulevard: PM Peak Hour – LOS “F”
- Cattaraugus Avenue/Washington Boulevard: AM Peak Hour – LOS “F” and PM Peak Hour – LOS “E”

Using the specified significant impact criteria, the project would not cause significant impacts at any of the analyzed intersections under Existing Plus Project conditions.

### **Cumulative (2018) Base Traffic Projections**

The Cumulative (2018) Base traffic projections reflect growth in traffic from two primary sources: (1) the background or ambient growth to reflect the effects of overall area-wide regional growth both within and outside the study area; (2) traffic generated by specified related (cumulative) projects located within, or in the vicinity of, the study area.

Table B-28

Summary of Intersection Level of Service Analysis

No.	Intersection	Jurisdiction	Peak Hour	Existing (2016) Conditions		Existing (2016) Plus Project Conditions		Project Increase in V/C	Significant Project Impact	Cumulative (2018) Conditions		Cumulative (2018) Plus Project Conditions		Project Increase in V/C	Significant Project Impact
				V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS		
1.	Robertson Boulevard & I-10 WB Off-Ramp/Kincardine Avenue	Los Angeles	AM PM	0.588 0.839	A D	0.593 0.839	A D	0.005 0.000	No No	0.708 0.871	C D	0.712 0.871	C D	0.004 0.000	No No
2.	Robertson Boulevard & National Boulevard	Los Angeles	AM PM	0.892 0.817	D D	0.896 0.819	D D	0.004 0.002	No No	0.968 0.915	E E	0.971 0.916	E E	0.003 0.001	No No
3.	National Boulevard & I-10 Eastbound On-Ramp	Los Angeles	AM PM	0.223 0.452	A A	0.224 0.455	A A	0.001 0.003	No No	0.262 0.543	A A	0.263 0.546	A A	0.001 0.003	No No
4.	Bagley Avenue & Venice Boulevard	Los Angeles	AM PM	0.672 0.710	B C	0.672 0.714	B C	0.000 0.004	No No	0.722 0.781	C C	0.723 0.784	C C	0.001 0.003	No No
5.	Culver Boulevard & Venice Boulevard	Los Angeles	AM PM	0.565 0.624	A B	0.568 0.625	A B	0.003 0.001	No No	0.645 0.762	B C	0.648 0.763	B C	0.003 0.001	No No
6.	Robertson Boulevard & Venice Boulevard	Los Angeles	AM PM	0.728 0.721	C C	0.729 0.724	C C	0.001 0.003	No No	0.872 0.861	D D	0.873 0.865	D D	0.001 0.004	No No
7.	National Boulevard & Venice Boulevard	Los Angeles	AM PM	0.707 0.792	C C	0.716 0.796	C C	0.009 0.004	No No	0.869 1.019	D F	0.875 1.023	D F	0.009 0.004	No No
8.	La Cienega Boulevard & Venice Boulevard <sup>a</sup>	Los Angeles	AM PM	0.813 0.814	D D	0.814 0.817	D D	0.001 0.003	No No	0.864 0.882	D D	0.867 0.885	D D	0.003 0.003	No No
9.	Washington Boulevard/Irving Place & Culver Boulevard	Culver City	AM PM	0.656 0.648	B B	0.657 0.649	B B	0.001 0.001	No No	0.716 0.714	C C	0.716 0.716	C C	0.000 0.002	No No
10.	Main Street & Culver Boulevard	Culver City	AM PM	0.684 0.602	B B	0.684 0.606	B B	0.000 0.004	No No	0.786 0.716	C C	0.787 0.720	C C	0.001 0.004	No No
11.	Washington Boulevard/Canfield Avenue & Culver Boulevard	Culver City	AM PM	0.697 0.622	B B	0.698 0.626	B B	0.001 0.004	No No	0.801 0.755	D C	0.802 0.759	D C	0.001 0.004	No No
12.	Ince Boulevard & Washington Boulevard	Culver City	AM PM	0.858 0.813	D D	0.862 0.818	D D	0.004 0.005	No No	1.014 1.028	F F	1.017 1.032	F F	0.003 0.004	No No
13.	Robertson Boulevard/Higuera Street & Washington Boulevard	Culver City	AM PM	0.710 0.649	C B	0.725 0.658	C B	0.015 0.009	No No	0.816 0.785	D C	0.831 0.801	D D	0.015 0.016	No No
14.	Landmark Street & Washington Boulevard	Culver City	AM PM	0.442 0.444	A A	0.458 0.461	A A	0.016 0.017	No No	0.507 0.574	A A	0.522 0.592	A A	0.015 0.018	No No
15.	National Boulevard & Washington Boulevard	Culver City	AM PM	0.670 0.816	B D	0.689 0.825	B D	0.019 0.009	No No	0.817 0.982	D E	0.833 0.992	D E	0.016 0.010	No No
16.	Helms Avenue & Washington Boulevard	Culver City	AM PM	0.540 0.510	A A	0.544 0.515	A A	0.004 0.005	No No	0.600 0.588	A A	0.605 0.593	B A	0.004 0.005	No No
17.	La Cienega Avenue/McManus Avenue & Washington Boulevard	Culver City	AM PM	0.573 0.521	A A	0.578 0.526	A A	0.005 0.005	No No	0.628 0.585	B A	0.633 0.590	B A	0.005 0.005	No No
18.	La Cienega Boulevard & Washington Boulevard	Culver City	AM PM	0.898 0.840	D D	0.901 0.844	E D	0.003 0.004	No No	0.975 0.953	E E	0.979 0.957	E E	0.004 0.004	No No
19.	Wesley Street & National Boulevard	Culver City	AM PM	0.429 0.463	A A	0.434 0.468	A A	0.005 0.005	No No	0.520 0.558	A A	0.525 0.564	A A	0.005 0.006	No No

Table B-28 (Continued)

Summary of Intersection Level of Service Analysis

No.	Intersection	Jurisdiction	Peak Hour	Existing (2016) Conditions		Existing (2016) Plus Project Conditions		Project Increase in V/C	Significant Project Impact	Cumulative (2018) Conditions		Project Increase in V/C	Significant Project Impact
				V/C	LOS	V/C	LOS			V/C	LOS		
20.	Hayden Avenue & National Boulevard	Culver City	AM PM	0.461 0.468	A A	0.464 0.473	A A	0.003 0.005	No No	0.576 0.596	A A	0.002 0.007	No No
21.	Jefferson Boulevard & National Boulevard	Los Angeles	AM PM	0.875 0.514	D A	0.876 0.519	D A	0.001 0.005	No No	1.060 0.733	F C	0.001 0.005	No No
22.	Jefferson Boulevard & Higuera Street/Rodeo Road	Los Angeles	AM PM	0.757 0.727	C C	0.760 0.730	C C	0.003 0.003	No No	0.824 0.841	D D	0.002 0.004	No No
23.	Robertson Boulevard & I-10 Westbound On-Ramp <sup>b</sup>	Los Angeles	AM PM AM PM	55.2 s 41.8 s 0.601 0.628	F E d d	55.2 s 41.9 s 0.603 0.636	F E d d	0.002 0.008 - -	No No - -	54.4 s 44.7 s 0.709 0.803	F E d d	0.002 0.008 - -	No No - -
24.	Robertson Boulevard & Exposition/I-10 Eastbound Off-Ramp <sup>b</sup>	Los Angeles	AM PM AM PM	10.4 s 14.9 s 0.209 0.414	B B d d	10.4 s 14.9 s 0.209 0.414	B B d d	0.000 0.000 - -	No No - -	13.3 s 20.2 s 0.313 0.487	B C d d	0.000 0.000 - -	No No - -
25.	Wesley Street & Washington Boulevard <sup>c,e</sup>	Culver City	AM PM AM PM	22.3 s 49.7 s 0.754 0.686	C E d d	22.5 s 51.4 s 0.760 0.692	C F d d	0.006 0.006 - -	No No - -				
26.	Cattaraugus Avenue & Washington Boulevard <sup>c</sup>	Culver City	AM PM AM PM	*** 41.9 s 0.961 0.763	F E d d	*** 43.4 s 0.968 0.769	F E d d	0.007 0.006 - -	No No - -	*** *** 1.072 0.878	F F d d	0.007 0.007 - -	No No - -

V/C - Volume to Capacity Ratio, LOS - Level of Service, S – seconds

<sup>a</sup> Los Angeles County Congestion Management Program monitoring location.  
<sup>b</sup> All-way stop-controlled intersection. LOS based on average vehicular delay in seconds (s).  
<sup>c</sup> Stop-controlled on minor approach(es). LOS based on worst case approach delay in seconds (s).  
<sup>d</sup> V/C ratio was calculated, based on signalized LOS methodology, to determine project impacts.  
<sup>e</sup> The intersection will be signalized in the future.  
\*\*\* - Oversaturated conditions per Highway Capacity Manual 2010 (HCM).

Source: Raju Associates, Inc. 2017.



### **Area-wide Ambient Traffic Growth**

The traffic in the vicinity of the study area was estimated to increase at a rate of approximately one percent per year. Future increases in background traffic volumes due to regional growth and development are expected to continue at this rate. With the assumed completion date of year 2018, the Existing 2016 traffic volumes were adjusted upward by a factor of two percent to reflect this area-wide regional growth. The resulting Existing Plus Ambient Growth (2018) traffic volumes are illustrated in Figures 8A and 8B, Existing With Ambient Growth (2018) Conditions – Peak Hour Traffic Volumes, of the Traffic Study.

### **Related Projects Traffic Generation and Assignment**

Related or cumulative projects are those developments that are planned and expected to be in place within the same timeframe as the proposed project. Data describing related projects in the area was solicited from Culver City and the City of Los Angeles. Thirty-three (33) related projects were identified within the study area. **Table B-36**, List of Related Projects, and **Figure B-5**, Locations of Related Projects (see subsection XVIII below), provide a description and illustrate the locations of the related projects.

The trip generation estimates for the related projects were based on different sources including trip generation rates contained in the ITE's Trip Generation Manual, 9th Edition, trip generation estimates provided by the recently completed traffic studies for projects in Culver City, and trip generation estimates for the related projects within the City of Los Angeles provided by the LADOT. As summarized in Table 6, of the Traffic Study, the related projects are expected to generate approximately 3,621 trips during the morning peak hour and 4,197 trips during the evening peak hour. The geographic distribution and the traffic assignment of the related projects were performed and the results are shown in Figures 10A and 10B, Related Projects Only – Peak Hour Traffic Volumes, of the Traffic Study.

### **Cumulative (2018) Base Traffic Volumes**

The related projects' traffic estimates were added to the Existing Plus Ambient Growth traffic to obtain the Cumulative (2018) Base traffic volumes. Figures 11A and 11B, Cumulative (2018) Base Conditions – Peak Hour Traffic Volumes, of the Traffic Study, provides the Cumulative (2018) Base traffic volumes at each of the analysis intersections during both AM and PM peak hours. These volumes represent Future (2018) Cumulative Base Without Project conditions.

### **Cumulative (2018) Plus Project Traffic Volumes**

Utilizing the project-only traffic estimates developed for both AM and PM peak hours, traffic forecasts for the Future Year 2018 Plus Project conditions were developed. The Cumulative (2018) Base traffic forecasts were combined with the project-only traffic volumes to obtain the Future with Project traffic volume forecasts. The Future Year 2018 Cumulative Plus Project traffic volumes during both AM and PM peak hours are presented in Figures 12A and 12B, Cumulative (2018) Plus Project Conditions – Peak Hour Traffic Volumes, of the Traffic Study.

### **Cumulative (2018) Base Traffic Conditions**

The Cumulative (2018) Base without proposed project peak hour traffic volumes were analyzed at each of the study intersections to determine the V/C ratio and corresponding level of service. Table B-28 presents the results of the Year 2018 Cumulative Base (without project) traffic analysis. As indicated in Table B-28, 20 of the 26 analyzed intersections are projected to operate at LOS "D" or better during the morning peak hour.

During the evening peak hour, 19 of the 26 analyzed intersections are projected to operate at LOS “D” or better. Eight of the 26 intersections are projected to be operating at LOS “E” or “F” during the morning and/or evening peak hours and include the following:

- Robertson Boulevard/National Boulevard: AM and PM Peak Hour – LOS “E”
- National Boulevard/Venice Boulevard: PM Peak Hour – LOS “F”
- Ince Boulevard/Washington Boulevard: AM and PM Peak Hour – LOS “F”
- National Boulevard/Washington Boulevard: PM Peak Hour – LOS “E”
- La Cienega Boulevard/Washington Boulevard: AM Peak Hour – LOS “E”
- Jefferson Boulevard/National Boulevard: AM Peak Hour – LOS “F”
- Robertson Boulevard/I-10 Westbound On-Ramp: AM Peak Hour – LOS “F” and PM Peak Hour – LOS “E”
- Cattaraugus Avenue/Washington Boulevard: AM and PM Peak Hour – LOS “F”

A traffic signal at the Wesley Street and Washington Boulevard intersection will be installed as part of the 8770 Washington project.

#### **Cumulative (2018) Plus Project Traffic Conditions**

The Cumulative (2018) Plus Project peak hour traffic volumes were analyzed to determine the V/C ratio and corresponding level of service at each of the analyzed intersections. The results of this analysis are also summarized on **Table B-28**. As indicated in Table B-28, both the morning and evening peak hour operating conditions would be similar to those projected for the Cumulative Base conditions. Twenty (20) of the 26 analyzed intersections are projected to operate at LOS “D” or better during the morning peak hour. During the evening peak hour, 19 of the 26 analyzed intersections are projected to operate at LOS “D” or better. Eight of the 26 intersections are projected to be operating at LOS “E” or “F” during the morning and/or evening peak hours and include the following:

- Robertson Boulevard/National Boulevard: AM and PM Peak Hour – LOS “E”
- National Boulevard/Venice Boulevard: PM Peak Hour – LOS “F”
- Ince Boulevard/Washington Boulevard: AM and PM Peak Hour – LOS “F”
- National Boulevard/Washington Boulevard: PM Peak Hour – LOS “E”
- La Cienega Boulevard/Washington Boulevard: AM and PM Peak Hour – LOS “E”
- Jefferson Boulevard/National Boulevard: AM Peak Hour – LOS “F”
- Cattaraugus Avenue/Washington Boulevard: AM and PM Peak Hour – LOS “F”

Table B-28 identifies the individual impacts during both AM and PM peak hours at each of the analysis locations. In summary, the project does not cause significant impacts at any of the analyzed intersections under both existing and future conditions.

### Residential Street Segment Traffic Impact Analysis

In addition to the intersection LOS analysis, a roadway segments analysis was performed to assess potential neighborhood traffic intrusion impacts as a result of the project. Working closely with the Culver City staff, six roadway segment locations were identified for analysis and assessment of conditions with the project. These street segments include the following:

- Higuera Street between Washington Boulevard and Lucerne Avenue
- Higuera Street between Wesley Street and Hayden Avenue
- Wesley Street between National Boulevard and Higuera Street
- Helms Avenue Street between National Boulevard and Higuera Street
- Schaefer Street between National Boulevard and Higuera Street
- Lucerne Avenue between Ince Boulevard and Higuera Street

### Street Segment Impact Criteria

As outlined in the Culver City Traffic Study Criteria, the following specific threshold criteria for project impacts to any street segment detailed below were used in this study:

#### Summary of Intersection Level of Service Analysis

Projected Average Daily Traffic (ADT) with project	Project-Related Increase in Average Daily Traffic (ADT) Volume
999 Less	120 or more
1,000 to 1,999	12% or more of final ADT
2,000 to 2,999	10% or more of final ADT
3,000 or more	8% or more of final ADT

*Source: Culver City Traffic Study Criteria; Raju Associates, Inc., 2017.*

### Existing Street Segment Traffic Volumes

Daily traffic counts were conducted in October 2015 using machine counters. These traffic counts were factored upward one percent per year to reflect existing 2016 conditions. Existing daily traffic volumes are summarized in **Table B-29, Residential Street Traffic Analysis**. As indicated in Table B-29, the existing daily traffic volumes on the analyzed street segments are as follows:

- Higuera Street between Washington Boulevard and Lucerne Avenue – 8,157 ADT
- Higuera Street between Wesley Street and Hayden Avenue – 7,642 ADT
- Wesley Street between National Boulevard and Higuera Street – 951 ADT
- Helms Avenue Street between National Boulevard and Higuera Street – 754 ADT
- Schaefer Street between National Boulevard and Higuera Street – 726 ADT
- Lucerne Avenue between Ince Boulevard and Higuera Street – 5,335 ADT

**Table B-29**

### Residential Street Traffic Analysis

Street Segment	Time Period	Two-Way Traffic Volume			Cumulative (2018) Plus Project	Project % Increase	Significant Impact
		Existing (2016) Conditions	Cumulative (2018) Base Conditions	Project Traffic			
Higuera Street	ADT	8,157	9,203	23	9,226	0.2%	No
between Washington Boulevard and Lucerne Avenue	AM	797	871	2	873	0.2%	No
	PM	704	783	2	785	0.3%	No
Higuera Street	ADT	7,642	8,599	0	8,599	0.0%	No
between Wesley Avenue and Hayden Avenue	AM	776	847	0	847	0.0%	No
	PM	761	834	0	834	0.0%	No
Wesley Street	ADT	951	996	0	996	0.0%	No
between National Boulevard and Higuera Street	AM	85	88	0	88	0.0%	No
	PM	131	136	0	136	0.0%	No
Helms Avenue	ADT	754	769	0	769	0.0%	No
between National Boulevard and Higuera Street	AM	91	93	0	93	0.0%	No
	PM	74	75	0	75	0.0%	No
Schaefer Street	ADT	726	741	0	741	0.0%	No
between National Boulevard and Higuera Street	AM	92	94	0	94	0.0%	No
	PM	44	45	0	45	0.0%	No
Lucerne Avenue	ADT	5,335	5,547	23	5,570	0.4%	No
between Ince Boulevard and Higuera Street	AM	603	619	2	621	0.3%	No
	PM	539	559	2	561	0.4%	No

Source: Raju Associates, Inc. 2017.

### Cumulative (2018) Base – Street Segment Traffic Volumes

With the assumed completion date of 2018, the existing 2016 traffic volumes were adjusted upward by two percent (one percent per year compound annually) to reflect this area-wide regional growth. Traffic generated by specific cumulative projects within, or in the vicinity of, the study area was added to the Existing Plus Ambient Growth traffic to obtain the Cumulative (2018) Base traffic volumes. The resulting Cumulative (2018) Base street segment daily and peak hour traffic volumes are summarized in Table B-29.

### Cumulative (2018) Plus Project – Street Segment Traffic Volumes

Based on the distribution assumptions illustrated on Figure 5, of the Traffic Study, and the daily trip generation estimates of approximately 1,146 daily trips for the project, daily traffic estimates of project-only trips were developed. It was determined the project would add 23 daily trips to Higuera Street between Washington Boulevard and Lucerne Avenue, and Lucerne Avenue between Ince Boulevard and Higuera Street. The Cumulative (2018) Plus Project daily traffic volumes resulting from the addition of trips generated by the project are shown on Table B-29.

In summary, as shown in Table B-29, the project would increase the traffic on the Higuera Street roadway segment between Washington Boulevard and Lucerne Avenue by 0.2 percent on a daily basis and by 0.2 percent and 0.3 percent during the morning and evening peak hours, respectively. On Lucerne Avenue

between Ince Boulevard and Higuera Street, the project would increase traffic by 0.4 percent on a daily basis and by 0.3 percent during the morning peak hour and 0.4 percent during the evening peak hour. On the other four analyzed segments, the project is not expected to increase traffic on those segments. As such, the project would not have a significant impact on the residential streets in the local neighborhood.

### **Parking Evaluation**

The project would include 207 vehicular parking spaces distributed within the three levels of subterranean automated parking structure and 5 additional vehicular parking spaces (1 ADA van accessible space and 4 temporary loading standard spaces) for short-term parking on the Ground Level for a total of 212 vehicular parking spaces.

The following are the parking requirements of Section 17.320.020, Number of Parking Spaces Required, of the CCMC:

- Offices, Administrative, Corporate, Professional, Creative: 1 space per 350 gross square feet;
- Retail and personal service uses, general: 1 space per 350 gross square feet; and
- Restaurant, general (table service) greater than 1,500 gross square feet: 1 space per 100 gross square feet.

Based on the Zoning Code requirements, the required off-street parking for the project would be 211 spaces as shown on the following calculations:

- Office: 59,325 gross square feet X 1 space/350 gross square feet = 170 spaces;
- Retail: 2,878 gross square feet X 1 space/350 gross square feet = 9 spaces; and
- Restaurant: 3,184 gross square feet X 1 space/100 gross square feet = 32 spaces.

In summary, the project would provide a total of 212 parking spaces which is one parking space above the required parking per the CCMC. As such, there would be adequate parking for the project.

**b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

**Less Than Significant Impact.**

### **Congestion Management Program Traffic Impact Analysis**

The congestion management program (CMP) is a State-mandated program enacted by the State legislature to address the impacts that urban congestion has on local communities and the region as a whole. Metro is the local agency responsible for implementing the requirements of the CMP. New projects located in Culver City must comply with the requirements set forth in the Metro's CMP. These requirements include the provision that all freeway segments where a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of all designated CMP intersections where a project could

add 50 or more trips during either peak hour segment. The CMP arterial monitoring intersections within three miles from the Project site including the following:

- La Cienega Boulevard/Venice Boulevard (Study Intersection 8) – City of Los Angeles
- La Cienega Boulevard/Jefferson Boulevard – City of Los Angeles
- Centinela Avenue/Venice Boulevard – City of Los Angeles
- La Cienega Boulevard/Stocker Street – County of Los Angeles
- La Cienega Boulevard/Wilshire Boulevard – City of Beverly Hills
- Santa Monica Boulevard/Wilshire Boulevard – City of Beverly Hills
- Overland Avenue/Venice Boulevard – Culver City

Based on the incremental project trip generation estimates described in Response XVI.a., above, the project is not expected to add 50 or more new trips per hour to any of these locations. Therefore, no further analysis of CMP monitoring intersections would be required. However, one of the CMP arterial monitoring intersections listed above, La Cienega Boulevard/Venice Boulevard has been included in the traffic analysis and it was determined that the project would not have a significant intersection traffic impact at either of these locations.

The CMP mainline freeway monitoring locations within a three-mile radius from the project site includes the following:

- Santa Monica (I-10) Freeway east of Overland Avenue
- Santa Monica (I-10) Freeway east of La Brea Avenue
- San Diego Freeway (I-405) north of Venice Boulevard

Based on the incremental project trip generation estimates, the project would not add 150 or more new trips per hour to any of these locations in either direction. Therefore, no further analysis of CMP freeway monitoring stations is required.

### **Freeway Impact Screening Analysis**

A freeway impact screening analysis was conducted as per LADOT Traffic Study Guidelines. The methodology from the agreement between City of Los Angeles and Caltrans District 7 on freeway impact analysis procedures was used for the freeway impact screening analysis. As per the criteria provided by the agreement, if the project meets any of the following criteria, the applicant will be directed to work with Caltrans to prepare a freeway impact analysis, utilizing Caltrans' "Guide for the Preparation of Traffic Impact Studies":

- The project's peak hour trips would result in a one percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS "E" or "F" (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a two percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS "D" (based on an assumed capacity of 2,000 vehicles per hour per lane); or

- The project's peak hour trips would result in a one percent or more increase to the capacity of a freeway off-ramp operating at LOS "E" or "F" (based on an assumed ramp capacity of 850 vehicles per hour per lane); or
- The project's peak hour trips would result in a two percent or more increase to the capacity of a freeway off-ramp operating at LOS "D" (based on an assumed ramp capacity of 850 vehicles per hour per lane).

The purpose of this analysis is to apply the above screening criteria to determine whether a Freeway Impact Analysis would be required for the project. The methodologies used to conduct the screening analysis for the project, and the results of the screening, are described below.

Project trip generation estimates were prepared in accordance with the latest version of LADOT's Traffic Study Policies and Procedures. The project trip generation estimates as accepted by LADOT are shown in Table B-27. The resulting overall trip distribution for the freeway mainline, on-ramps and off-ramps are shown on Figure 5, of the Traffic Study. As indicated in Figure 5, it was determined that 10 percent of project trips may utilize the I-10 freeway to/from the west and five percent may utilize the I-10 Freeway to/from the east. Based on this distribution, two freeway mainline segments were determined to be utilized by the project and were selected for screening which included I-10 Freeway east of National Boulevard and I-10 Freeway west of Robertson Boulevard. Based on trip distribution, two freeway off-ramps were selected for screening which included I-10 Westbound Off-Ramp at National Boulevard and I-10 Eastbound Off-Ramp at Robertson Boulevard.

#### **Freeway Mainline Analysis**

Project trips on the I-10 Freeway east of National Boulevard and I-10 Freeway west of Robertson Boulevard during the AM and PM peak hours are shown in **Table B-30, Caltrans Freeway Impact Screening Analysis – Freeway Mainline**. The number of lanes and capacity for each freeway segment was determined and a capacity of 2,000 vehicles per hour was assumed. The worst-case LOS screening threshold was used to determine the trigger (i.e., the number of trips) for each freeway segment for exceeding the threshold ( $\geq$  one percent of segment capacity if worst-case LOS is "E" or "F" where the assumed capacity equals 2,000 vehicles per hour per lane multiplied by the number of lanes on the freeway mainline; threshold is 20 vehicles per hour per lane at LOS "E" or "F", multiplied by the number of lanes on the freeway mainline). The project-added trips to each freeway mainline segment were compared to the trigger threshold. As shown on Table B-30, the screening analysis determined that the screening threshold criteria would not be triggered at any of the two freeway mainline segments. Further, as the project traffic did not trigger the screening thresholds at the mainline segments most likely to be used by project traffic, there is no need to look at segments further away. As such, a freeway impact analysis is not required.

#### **Freeway Ramp Analysis**

Project trips on the I-10 Westbound Off-Ramp at National Boulevard and I-10 Eastbound Off-Ramp at Robertson Boulevard during the AM and PM peak hours are shown in **Table B-31, Caltrans Freeway Impact Screening Analysis – Freeway Off-Ramp**. For each ramp, the LOS screening threshold was used to determine the trigger (i.e., the number of trips) for each freeway off-ramp for exceeding the threshold ( $\geq$  two percent of

Table B-30

Caltrans Freeway Impact Screening Analysis – Freeway Mainline

Location	Peak Hour	Project Trips		Freeway Mainline Capacity <sup>a</sup>		Caltrans Criteria for Impact Analysis <sup>b</sup>		Freeway Impact Analysis Required?
		WB	EB	WB	EB	WB	EB	
I-10 Freeway, east of National Boulevard	AM	4	1	8,000	10,000	80	100	NO
	PM	2	5	8,000	10,000	80	100	NO
I-10 Freeway, west of Robertson Boulevard	AM	2	8	8,000	10,000	80	100	NO
	PM	9	3	8,000	10,000	80	100	NO

WB = westbound, EB = eastbound

<sup>a</sup> The freeway capacity is 2,000 vehicles per hour per lane.

<sup>b</sup> A 1% or more increase to the freeway mainline capacity for a freeway segment operating at LOS E or F would require a freeway impact analysis.

Source: Raju Associates, Inc. 2017.

Table B-31

Caltrans Freeway Impact Screening Analysis – Freeway Off-Ramp

Location	Peak Hour	Project Trips	Freeway Off-Ramp Capacity <sup>a</sup>	Caltrans 1% Criteria for Impact Analysis <sup>b</sup>	Caltrans 2% Criteria for Impact Analysis -	Off-Ramp Impact Analysis Required?
I-10 Freeway Westbound	AM	4	1,700	17	34	NO
Off-Ramp at National Boulevard	PM	2	1,700	17	34	NO
I-10 Freeway Eastbound	AM	8	1,700	17	34	NO
Off-Ramp at Robertson Boulevard	PM	3	1,700	17	34	NO

<sup>a</sup> The freeway off-ramp capacity is 850 vehicles per hour per lane.

<sup>b</sup> A 1% or more increase to the capacity of a freeway off-ramp operating at LOS E or F would require a freeway impact analysis.

<sup>c</sup> A 2% or more increase to the capacity of a freeway off-ramp operating at LOS D would require a freeway impact analysis

Source: Raju Associates, Inc. 2017.

assumed ramp capacity if approach LOS is “D” and  $\geq$  one percent of assumed ramp capacity if approach LOS “E” or “F” where the assumed ramp capacity equals 850 vehicles per hour per lane multiplied by the number of approach lanes on the ramp approach to the intersection; threshold is 17 vehicles per hour per lane at LOS “D” and 8.5 vehicles per hour per lane at LOS “E” or “F”, multiplied by the number of lanes on the ramp approach to the intersection). The project-added trips to each off-ramp were compared to the trigger threshold. As shown on Table B-31, the screening analysis determined that the screening threshold criteria would not be triggered at any of the two freeway off-ramps. Further, as the project traffic did not trigger the screening thresholds at the ramps most likely to be used by project traffic, there is no need to look at ramps further away. As such, a freeway ramp impact analysis is not required.



**c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

**No Impact.** As discussed under Responses VIII.e and f, the project site is not located within an airport land use plan or within two miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately three miles and five miles to the west of the project site, respectively. The project would not introduce structures substantial enough to interfere with existing flight paths, or result in a measureable increase in airport traffic that would result in substantial safety risks. As such, no impacts would occur.

**d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**Less Than Significant Impact.** The project would not alter existing street patterns in the vicinity. There are no existing hazardous design features such as sharp curves or dangerous intersections on-site or within the project vicinity. The project would result in some modifications to access (i.e., new curb cuts for the project driveway). Direct vehicular access for all of the proposed uses and to the 3-level subterranean automated parking structure would be provided via a single entrance/exit driveway along Washington Boulevard located in the western portion of the project site. As discussed in Attachment A, *Project Description*, vehicular access to the subterranean automated parking structure would be from four loading bays/vehicular lifts via an automated parking aisle system based on a rack and rail system where the vehicles are stored on a shelving system. All on-site roadway and site access improvements would be designed in compliance with applicable City standards.

A preliminary Parking Operations Plan for the automated parking facility has been prepared. Per the parking facility's automated system specifications, the retrieval rate at the proposed facility would range between 65 seconds per vehicle to 150 seconds per vehicle. The retrieval rate is the speed of the system and does not include the time associated with loading, unloading, etc. that would comprise of the overall processing rate. The processing rate is dependent primarily upon the vertical and horizontal distance a vehicle has to be transported to and from its parking space, whether the space is a tandem space or not, etc. The (non-tandem) spaces closest to the elevator shaft take the least amount of time to process while those spaces farthest from the elevator shaft take the most amount of time to process. A processing rate of 90 seconds per vehicle would be available in the automated parking structure for approximately 50 spaces per level (total of 150 spaces).

As part of the Traffic Study, a queueing analysis of trips inbound to the Project Site during the morning peak hour when maximum number of inbound vehicular traffic is anticipated, was conducted to assess the potential of vehicles queueing in the driveway aisle within the project site beyond the access driveway and spilling over on to the external street system (Washington Boulevard). The queueing analysis is based on a number of factors including but not limited to the following:

- Arrival Volumes - Magnitude of arriving vehicles and peaking characteristics of the morning peak hour inbound traffic when maximum number of these vehicles are anticipated to arrive on site;
- Processing rate of these vehicles on site;
- Length of available storage of vehicles on site; and
- Available temporary parking spaces for loading/unloading and temporary storage of vehicles.

Details of the associated calculations and analysis are enclosed in Appendix E of the Traffic Study.

Based on the queueing analysis, it can be observed that during the peak times of the morning peak hour, a maximum total of 42 vehicles would arrive within a peak 15-minute period. Based on a processing rate of the system (including all-day valet services) of 90 seconds per vehicle, a total of 40 vehicles within the same time period can be processed by the system with all four operating vehicular elevators. A maximum queue of 2 vehicles would remain on site. The maximum available storage on-site, based on the Site Plan, is 10 vehicles in the queue plus four (4) short-term loading spaces and one (1) ADA parking space. Therefore, there would not be any queueing vehicles that would extend beyond the site on to the external roadway system (Washington Boulevard) assuming the maximum peaking characteristics of the arriving vehicles in the morning peak hour. Consequently, the traffic flow along Washington Boulevard would not be affected by inbound vehicles extending out of the Project driveway.

In the case of a total failure of the parking system, the parking operator's onsite manager would immediately begin the protocol for fixing the system. For the time that it is down, the contingency plan would be put into effect. That plan would be managed by Valet Parking Services, a division of LAZ Parking, one of the largest and most experienced parking firms in the country.

Under this scenario, a full valet team would be installed in the drive aisle of 8888 Washington. As cars arrive, the valet attendants would take their keys, do a three-point turn, and drive their cars out of the drive aisle. The cars would be parked at 8850 Washington Boulevard and would be double stacked to create over 100 new parking stalls. Parkers would be given a ticket and would pick their cars up at 8850 Washington when they are ready.

This contingency plan would involve ten employees of Valet Parking Services. The garage at 8850 Washington is owned by the same group that owns 8888 Washington and is located a half block to the east. It is not anticipated that any full garage shutdown would last more than a day, but the contingency plan can remain in operation as long as necessary.

Based on the above, impacts regarding hazardous design features, as well as queuing, would be less than significant in this regard.

#### **e. Result in inadequate emergency access?**

**Less Than Significant Impact.** The project site is located in an established urban area that is well served by the surrounding roadway network. As discussed under Response VIII.g, Venice Boulevard, north of the project site, and Robertson Boulevard, west of the site, are transportation facilities that could be utilized during a disaster event.<sup>48,49</sup> While it is expected that the majority of construction activities for the project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day, including during construction of potential off-site infrastructure upgrades/improvements (i.e., water and sewer lines) (discussed below in Section XVII, *Utilities and Service Systems*). However, through-access for drivers, including emergency personnel, along all roads would still be

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<sup>48</sup> City of Los Angeles General Plan Safety Element – Critical Facilities and Lifeline Systems, Exhibit H November 26, 1996.

<sup>49</sup> County of Los Angeles Department of Public Works. <http://dpw.lacounty.gov/dsg/disasterroutes/map/culver%20city.pdf>, accessed September 2016.

provided. In these instances, the project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with Culver City requirements, as applicable, the project would develop a Final Construction Management Plan and Traffic Control Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the project vicinity and would result in some modifications to access (i.e., new curb cuts for the project driveway). However, emergency access to the project site and surrounding area would continue to be provided similar to existing conditions. Emergency vehicles and fire access for the project site would be provided via at-grade access from Washington Boulevard. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons and employees. Subject to review and approval of project site access and circulation plans by the CCFD, as necessary, the project would not result in inadequate emergency access. Therefore, project operation would result in a less than significant impact in this regard.

**f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

**Less Than Significant Impact.** The project site is within Culver City's Washington/National Transit Oriented Development (TOD) area. The project's proposed mix of uses have been contemplated to be consistent with the TOD goals of bringing shopping, housing and employment together to advance the goals of enhanced regional air quality and multi-modal mobility for Culver City, particularly with the expansion of the nearby Culver City Metro Station and Metro Expo Line. Per Culver City's standard conditions of approval, the project is required to meet the applicable provisions of CCMC Section 7.05.015 – "Transportation Demand and Trip Reduction Measures," which promote the use of public transit, ridesharing and other trip reduction measures. As part of the project, the following features/characteristics would serve to promote alternative transportation goals and strategies:

- Access to multi-modal transit including bike, bus, and train routes. The property is located immediately south of the Culver City Metro Station, which is the approximate center of the Metro Expo Line, connecting Downtown Los Angeles to Santa Monica.
- New bike lane provided along Washington Boulevard that would connect to the bike lane in front of Platform to the east.
- Bike friendly design with bicycle parking for visitors and occupants as well as access to Platform bike-share services.
- Office development/employment area adjacent to public transit.
- The perimeter of the site area will incorporate the City's approved Streetscape plan which will create an attractive and inviting walkable environment.

The project site is located in an area well served by public transportation. In the existing transit system, 16 bus lines currently operate under four different transportation agencies that currently serve the project site. Four bus lines are operated by the Culver City Bus (CC); nine bus lines are operated by the Los Angeles County Metropolitan Transportation Authority (Metro); two bus lines are operated by the Santa Monica Big Blue Bus (SM); and one bus line is operated by LADOT. Metro also operates the light rail Metro Expo Line.

The project would be required to provide 10 long term bicycle parking spaces and 7 short term bicycle parking spaces for a total of 17 bicycle spaces based on the City's Bicycle and Pedestrian Master Plan or 12 long term bicycle parking and 12 short term bicycle parking for a total of 24 bicycle spaces based on applicable CALGreen requirements (i.e., 5 percent of required parking spaces). The project would provide 16 long term bicycle parking spaces and 12 short term bicycle spaces for a total of 28 bicycle parking spaces which would be well above the required number of bicycle spaces per the CCMC and CALGreen.

The Culver City Bicycle Plan and City of Los Angeles 2010 Bicycle Plan documents the existing and planned bicycle facilities within each respective jurisdiction. Class I bikeways (bike path) provide an exclusive paved right-of-way separated from the street or highways. Class II bikeways (bike lane) provide a striped and signed bike lane for one-way travel on a street or highway. Class III bikeways (bike routes) provide for a shared use of the roadway with posted signage for bicycle use which can include sharrows pavement markings. In the study area, bicycle facilities are provided on the following roadways:

- Along Metro Expo Line: La Cienega Boulevard to Washington Boulevard (bike path)
- Ballona Creek: Jefferson Boulevard to Duquesne Avenue (bike path)
- Venice Boulevard: Hughes Avenue to Fairfax Avenue (bike lane)
- Jefferson Boulevard: La Cienega Boulevard to La Brea Avenue (bike lane)
- Jefferson Boulevard: National Boulevard to Duquesne Avenue (bike lane)
- Duquesne Avenue: south of Jefferson Boulevard (bike lane)
- Jefferson Boulevard: National Boulevard to La Cienega Boulevard (bike route/sharrows)
- Wesley Street: Higuera Street to National Boulevard (bike route/sharrows)
- Lucerne Avenue: Higuera Street to Duquesne Avenue (bike route/sharrows)
- Higuera Street: Lucerne Avenue to Wesley Street (bike route/sharrows)
- Irving Place: Lucerne Avenue to Culver Boulevard (bike route/sharrows)
- Van Buren Place: A Street to Lucerne Avenue (bike route/sharrows)
- A Street: Irving Place to Van Buren Place (bike route/sharrows)
- Along Metro Expo Line/National Boulevard: La Cienega Boulevard to Washington Boulevard (bike path)
- North side of Washington Boulevard between Wesley Street and National Boulevard (Bike Lane). Bike lanes will be installed on the south side of Washington Boulevard between Wesley Street and National Boulevard with the development of the 8777 Washington Boulevard project.
- South side of Washington Boulevard between Landmark Street and Expo bridge.
- Bike lanes will be installed on both sides of National Boulevard between Venice Boulevard and Washington Boulevard with the Ivy Station project.

It is also acknowledged that Culver City is currently in the process of planning and designing bicycle and pedestrian infrastructure improvements as part of its Mobility Plan update. The bicycle infrastructure improvements include provisions of bicycle lanes to improve connectivity; bicycle boxes at critical intersections to encourage bicycle mode of travel; bicycle racks for safely parking the bicycles; and bicycle signals to allow for potential improvement of bicycle travel through intersections and associated improved safety. The pedestrian infrastructure improvements include improving connectivity, access, and circulation of the

pedestrian system in the vicinity of the Metro Expo Line and Metro Station. The project would be consistent with these efforts through its mobility features/characteristics identified above which promote alternative transportation goals and strategies.

Overall, the project is not expected to interfere with or degrade the performance or safety of public transit, bicycle, or pedestrian facilities, and a less than significant impact would result.

## **XVII. UTILITIES AND SERVICE SYSTEMS**

*Would the project:*

### **a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

**Less Than Significant Impact.** As discussed in detail in Section IX, *Hydrology and Water Quality*, under the LARWQCB NPDES permit system, all existing and future municipal and industrial discharges to surface waters within Culver City are subject to applicable local, State and/or federal regulations. The project must comply with all provisions of the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the LARWQCB. Therefore, implementation of the project would not result in an exceedance of wastewater treatment requirements.

The Culver City Department of Public Works provides wastewater services for the project site. The project site is within the Hyperion Treatment System, which includes the Hyperion Treatment Plant (HTP), the Tillman Water Reclamation Plant (TWRP), the Los Angeles-Glendale Water Reclamation Plant (LAGWRP), and the Terminal Island Treatment Plant (TITP). Wastewater discharges from the project would be treated at the HTP. Following the secondary treatment of wastewater, the majority of effluent from HTP is discharged into the Santa Monica Bay while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. HTP has two outfalls that presently discharge into the Santa Monica Bay (a one-mile outfall pipeline and a five-mile outfall pipeline). HTP effluent is required to meet the LARWQCB requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's NPDES permit. Accordingly, HTP effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay. Further, the HTP is required to comply with associated WDRs and any updates or new permits issued. WDRs set the levels of pollutants allowable in water discharged from a facility. Compliance with applicable WDRs would ensure that project implementation would not exceed the applicable wastewater treatment requirements of the LARWQCB with respect to discharges to the sewer system. As such, impacts would be less than significant in this regard.

### **b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

The following discussion is based, in part, on the 8888 Washington Utility Memorandum, prepared by Kimley-Horn, dated January 31, 2017 (provided under separate cover available at the Culver City Planning Division).

## Wastewater

**Less Than Significant Impact.** During project construction, a negligible amount of wastewater would be generated by construction workers. It is anticipated that portable toilets would be provided by a private company and the waste disposed off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled collection of the HTP. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

Existing sewer lines within the City are maintained by the Culver City Department of Public Works. Along Washington Boulevard, there is an existing 10" sewer line south of the Washington Boulevard centerline which runs parallel to the westbound Washington Boulevard curb and gutter. In addition, there is an existing 12" sewer line north of the Washington Boulevard centerline which runs parallel to the 10" sewer line. The existing sewer system was proposed to be lined based on City record plans from 1996 (Plan No. 5049-125).

As shown in **Table B-32 Estimated Wastewater Generation**, implementation of the project would generate approximately 15,337 gallons per day (gpd) of wastewater. The project would generate a peak total of 0.059 cubic feet per second (cfs) or a peak 38,342 gpd of additional sewer discharge to the existing 10" sewer line within Washington Boulevard. This does not include potential credit for the existing use and sewer demand on the site, which would help further reduce the proposed sewer demand. As detailed in their Utility Memorandum, based on sewer metering and analysis for the adjacent Washington/Landmark project, Kimley-Horn determined that the existing 10" sewer line would have adequate capacity for the project. The analysis also considered flows from the adjacent Platform project.

**Table B-32**

### Estimated Wastewater Generation

Land Use	Area (SF)	Factor	Average Daily Flow (gpd)
Commercial – Restaurant	3,184	1,000 gpd/1,000 sf	3,184 gpd
Commercial - Office	59,325	200 gpd/1,000 sf	11,865 gpd
Commercial – Store (Retail)	2,878	100 gpd/1,000 sf	288 gpd
<b>Total GPD</b>			<b>15,337</b>
<b>Total CFS</b>			<b>0.024</b>
<b>Total Peak CFS</b>			<b>0.059</b>
<b>Total Peak GPD</b>			<b>38,342</b>

*sf = square feet; gpd = gallons per day; d.u. = dwelling unit; cfs = cubic feet per second*

1. Peak factor of 2.5

Source: Washington 8888 – Utility Memorandum, prepared by Kimley-Horn, dated January 31, 2017.

Thus, construction of the project would include all necessary on and off-site sewer pipe improvements and connections to adequately link the project to the existing City sewer system based on the City requirements. The necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the City. Construction-related impacts would be temporary, on an

intermittent basis, and within the scope of impacts evaluated in this MND. Further, a Final Construction Management Plan and Traffic Control Plan (Mitigation Measure PS-1) for the project would be prepared in order to minimize disruptions to through traffic flow, which would consider any off-site utility improvements, as necessary. See Response XIV.a above, for further discussion of the project's Construction Management Plan and Traffic Control Plan.

In addition, the HTP is designed to treat 450 million gallons per day (mgd) with an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available.<sup>50,51</sup> Given the current capacity of the HTP, project wastewater generation would account for a less than one percent increase in demand at the HTP and there would be ample capacity to treat this increase.

Based on the above, and given existing and anticipated future capacity at the wastewater treatment facilities and wastewater generation expected from the project, impacts regarding wastewater facilities would be less than significant.

### Water

**Less Than Significant Impact.** During construction activities associated with the future development within the project site, there would be a temporary, intermittent demand for water for such activities as soil watering for site preparation, fugitive dust control, concrete preparation, painting, cleanup, and other short-term activities. Construction-related water usage is not expected to have an adverse impact on available water supplies or the existing water distribution system, and impacts would be less than significant.

An existing single 16" water line is located within Washington Boulevard, south of the roadway centerline. The Golden State Water Company (GSWC) provides water and water treatment to Culver City, including the project site. One existing fire hydrant is located just east of the project site frontage along Washington Boulevard. There is one existing water meter located midpoint along the Washington Boulevard frontage. The project would consider reusing the meter and lateral to the extent feasible.

The project's Conceptual Street Utility Plan shows the proposed 4" water and 6" fire service connections for the project at the western end of the site on Washington Boulevard. The proposed connections would need to cross the existing 10" sanitary sewer line to tie into the existing water main located south of the Washington Boulevard centerline. If the existing water meter and lateral is chosen to be utilized, the existing meter would need to be relocated due to road widening.

Kimley-Horn obtained a preliminary fire flow availability from the City of Culver City in coordination with GSWC. The initial fire flow of 65 psi (static) provided by the CCFD was based on the flow rate from the existing hydrant (#406) at 300 feet east of Robertson Boulevard. The test was completed on September 26, 2016. The project's plumbing engineer and/or fire service consultant will need to assess the project water/fire service design

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<sup>50</sup> The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily waste flow of 413 mgd, and peak wastewater flow of 850 mgd.. (Information regarding peak flow is included in the IRP, Facilities Plan, Volume 1, Wastewater Management, July 2004; page 7-3.)

<sup>51</sup> City of Los Angeles Bureau of Sanitation, Wastewater: Facts & Figures. Available at: <http://www.lacitysan.org/wastewater/factsfigures.htm>. Accessed April 2016.

requirements based on the preliminary pressure information provided by the GSWC. The plumbing engineer will also need to assess the need for any booster pump for the project in coordination with GSWC and CCFD.

All connections and water-related infrastructure improvements would be provided by the project in consultation with the GSWC and CCFD. Further, all water line improvements and connections would be provided in consultation with the CCFD to ensure that the minimum fire flow requirements would be provided to serve the proposed development.

GSWC purchases water from the West Basin Municipal Water District (WBMWD). The 2015 WBMWD Urban Water Management Plan (UWMP) provides water demand and water supply projections in five-year increments from 2020 through 2040, which are based on regional demographic data provided by SCAG, as well as billing data for each major customer class, weather, and conservation. Year 2020 WBMWD water demand is 146,105 AFY while projected year 2040 water demand is 151,922 AFY; refer to **Table B-33, Projected West Basin Service Area Water Demand (AFY)**. According to the water supply section of the UWMP, Year 2020 WBMWD water supply is 189,893 AFY while projected 2040 water supply is 206,192 AFY; refer to **Table B-34, Projected West Basin Service Area Water Supply (AFY)**. Year 2020 has a water supply surplus of 43,788 AFY while projected year 2040 has a projected water supply surplus of 54,270 AFY. The WBMWD is projecting to increase current recycled water supplies as well as invest in over 20,000 AFY of ocean-water desalination supply. Coupled with additional conserved water supply through water use efficiency programs, the overall imported water use is expected to be reduced significantly by 2040. According to the UWMP, the water supplies available to the WBMWD in single dry and multiple dry years, will be sufficient to meet all present and future water supply requirements within the WBMWD's service area for at least the next 20 years.

**Table B-33**

**Projected West Basin Service Area Water Demand (AFY)**

<b>Year</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>	<b>2040</b>
Baseline Demand <sup>a</sup>	135,719	136,447	136,466	136,706	136,284
Planned Conservation <sup>a</sup>	32,280	35,190	37,928	40,255	42,773
<b>Final Total Retail Demand</b>	<b>167,999</b>	<b>171,637</b>	<b>174,394</b>	<b>176,961</b>	<b>179,057</b>
Recycled Water Demand <sup>b</sup>	21,894	27,135	27,135	27,135	27,135
<b>Final Potable Demand</b>	<b>146,105</b>	<b>144,502</b>	<b>147,259</b>	<b>149,826</b>	<b>151,922</b>

<sup>a</sup>. Projections based on Metropolitan Demand Forecasting Model.

<sup>b</sup> Projections based on the Capital Improvement Plan, 2015, (excludes replenishment deliveries to the Barrier and deliveries outside service area).

Source: West Basin Municipal Water District, 2015 Urban Water Manage Plan, Table ES-1: Projected West Basin Service Area Retail Demand (AFY), prepared by Arcadis and prepared by Westamerica Communications, dated June 2016.



Table B-34

**Projected West Basin Service Area Water Supply (AFY)**

Year	2020	2025	2030	2035	2040
Groundwater <sup>a</sup>	36,293	36,293	36,293	36,293	36,293
Imported Water <sup>b</sup>	98,426	77,654	77,673	77,913	77,491
Recycled Water <sup>c</sup>	21,894	27,135	27,135	27,135	27,135
Desalination <sup>d</sup>	1,000	22,500	22,500	22,500	22,500
<b>Total</b>	<b>157,613</b>	<b>163,582</b>	<b>163,601</b>	<b>163,841</b>	<b>163,419</b>
Conservation <sup>e</sup>	32,280	35,190	37,928	40,255	42,773
<b>Total</b>	<b>189,893</b>	<b>198,772</b>	<b>201,529</b>	<b>204,096</b>	<b>206,192</b>

<sup>a</sup> Groundwater production within West Basin service area only.

<sup>b</sup> Imported retail use only; does not include replenishment deliveries (i.e. Barrier).

<sup>c</sup> Recycled water does not include replenishment deliveries (i.e. Barrier) and deliveries outside the service area.

<sup>d</sup> Desalination includes both brackish and ocean water.

<sup>e</sup> Conservation consists of Active and Passive savings according to Metropolitan's projected estimates.

Source: West Basin Municipal Water District, 2015 Urban Water Manage Plan, Table ES-3: West Basin's Service Area Projected Retail Water Supplies (AFY), prepared by Arcadis and prepared by Westamerica Communications, dated June 2016.

The project would result in an estimated water demand of 46,010 gpd, or 16,793,650 gallons per year (approximately 51.4 AFY) when fully occupied.<sup>52</sup> The project's estimated water demand does not include potential credit for the existing use and existing water demand on the project site, which would further reduce the demand. The estimated 51.4 AFY water demand generated by the project would constitute less than one percent of the WBMDW year 2020 for both water supply and water demand. Further, the project would comply with Title 5: Public Works, Chapter 5.03: Water Conservation and Water Supply Shortage Program, of the

CCMC. In addition, the project would comply with the Culver City mandatory green building requirements. The project would also comply with the WBMWD UWMP recommendations regarding drought management and water conservation. Based on the above, no additional water treatment facilities are required to meet the water supply demands associated with the project, and the project would not require the construction or expansion of water treatment facilities. Therefore, water infrastructure impacts associated with the project operation would be less than significant.

**c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**Less Than Significant Impact.** As discussed in detail in Section IX, *Hydrology and Water Quality*, the project would include new stormwater drainage facilities that would be constructed in accordance with applicable regulatory requirements. The proposed design would create localized drainage inlets between the proposed

<sup>52</sup> The water demand would be consistent with the estimated wastewater generation of the project per Table B-31, *Estimated Wastewater Generation*. To be conservative, 20 percent was added (to account for outdoor water use).

Proposed: 38,342 gpd X 1.20 = 46,010 gpd. 46,010 gpd X 365 days = 16,793,650 gallons per year = 51.54 AFY estimated project water demand.

buildings to capture the stormwater runoff and relay it to the stormwater treatment system for the project. The proposed condition would capture, treat, and control all on-site stormwater runoff prior to discharging or connecting to the off-site storm drain system. Environmental impacts associated with development of the project, including on-site drainage facilities, have been evaluated throughout this document. As concluded in this document, all potentially significant impacts associated with development of the project, including on-site stormwater drainage facilities, would be less than significant after implementation of the prescribed mitigation measures, where necessary. Therefore, impacts would be less than significant in this regard.

**d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

**Less Than Significant Impact.** As described in Response XVII.b, above, the project would fall within the 2015 WBMWD UWMP available and projected water supplies. According to the UWMP, the water supplies available in single dry and multiple dry years would be sufficient to meet all present and future water supply requirements within the applicable service areas for at least the next 20 years, including the project. As a result, the project is within the capacity of the GSWC to serve the project as well as existing and planned future water demands of its service area.

Sections 10910-10915 of the State Water Code (Senate Bill [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is: 1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 square feet of floor space; 2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 square feet of space, or 3) any mixed-use project that would demand an amount of water equal to or greater than the amount of water needed to serve a 500 dwelling unit subdivision. As discussed under Response XVII.b, the project would generate a water demand of approximately 51.4 AFY (without accounting for water conservation features or subtracting existing on-site water demand). With implementation of water conservation measures per the requirements cited above, the project's actual water demand would be well below the conservative amount stated above. A typical 500 dwelling unit subdivision would have a water demand of approximately 154 AFY.<sup>53</sup> As the project does not meet the established thresholds, no WSA is required for this project.

Thus, for the reasons listed above, the project would have a less than significant impact with respect to water entitlements and supply.

**e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

**Less Than Significant Impact.** As indicated in the Response XVII.b, implementation of the project would generate 38,342 gpd of wastewater. The HTP is designed to treat 450 mgd with an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available. Given the current capacity of the HTP, project wastewater generation would account for a less than one percent increase in

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<sup>53</sup> Based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates, a Residential Single-Family (3-BR) unit generates 230 gallons per day (gpd) of wastewater. Assuming water demand is 20% greater than wastewater, single-family unit would have a water demand of 138,000 gpd or 154 AFY.

demand at the HTP and there would be ample capacity to treat this increase. Therefore, the project would have a less than significant impact with respect to wastewater treatment capacity.

**f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

**Less Than Significant Impact.** The Culver City Environmental Programs and Operations Division collects all solid waste. The division also provides a curbside recycling program including paper, cardboard, cans/aluminum, plastic, and glass. The recyclable materials are hauled to private recyclable material companies. Culver City does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

The remaining disposal capacity for the Los Angeles County's Class III landfills is estimated at approximately 129.2 million tons as of December 31, 2012, the most recent data available.<sup>54</sup> In addition to in-County landfills, out-of County disposal facilities may also be available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the Los Angeles County Integrated Waste Management Plan (ColWMP), the County anticipates that future Class III disposal needs can be adequately met through 2027 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices.

As illustrated in **Table B-35, *Projected Solid Waste Generated During Operation***, and based on solid waste generation factors from the California Integrated Waste Management Board (CIWMB), the project could generate approximately 386 lbs/day (0.193 tons/day or 70.45 tons/year) of solid waste, or approximately 336 lbs/day (0.168 tons/day or 61.33 tons/year) of solid waste beyond existing conditions. The annual amount of solid waste generated by the project would represent a minor amount of the estimated 129.2 million tons of remaining disposal capacity for the County's Class III landfills. As such, the solid waste generated by the project could be accommodated by the County's available regional landfills.

The California Department of Resources and Recycling and Recovery (CalRecycle) is the California State Agency that promotes the importance of reducing waste and oversees California's waste management and recycling efforts. CalRecycle has issued jurisdiction waste diversion rate targets equivalent to 50 percent of the waste stream as expressing in pounds per person per day. Thus, it is important to note that the estimate of solid waste generated by the project is conservative, in that the amount of solid waste that would need to be landfilled would likely be less than this forecast based on the City's implementation of solid waste diversion targets.

Construction of the project would result in generation of solid waste such as scrap, lumber, concrete, residual wastes, packing materials, and plastics which could require disposal of construction associated debris at the landfills. It is anticipated that a large amount of the construction debris would be recycled. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations. Culver City's standard conditions of approval specifically require the following:

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<sup>54</sup> County of Los Angeles Department of Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan: 2012 Annual Report*. August 2013.

Table B-35

Projected Solid Waste Generated During Operation

Land Uses	Quantity	Factor <sup>a</sup>	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
<b>Existing Land Uses</b>					
Commercial	9,992	5 lbs/k.s.f./day	50	0.025	9.125
		<b>Total</b>	<b>50</b>	<b>0.025</b>	<b>9.125</b>
<b>Proposed Land Uses</b>					
Office	59,325 s.f.	6 lbs/k.s.f./day	356	0.178	64.97
Retail & Restaurant	6,062 s.f.	5 lbs/k.s.f./day	30	0.015	5.48
		<b>Total</b>	<b>386</b>	<b>0.193</b>	<b>70.45</b>
<b>Net Increase (Existing/Proposed)</b>			<b>336</b>	<b>0.168</b>	<b>61.33</b>

Notes: d.u. = dwelling unit; s.f. = square feet; k.s.f. = thousand square feet; lbs. = pounds.

<sup>a</sup> Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates. <http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm>, accessed September 2015.

Source: ESA PCR 2016.

- Reasonable efforts shall be used to reuse and recycle construction and demolition debris, to use environmentally friendly materials, and to provide energy efficient buildings, equipment and systems. A Demolition Debris Recycling Plan that indicates where select demolition debris is to be sent shall be provided to the Building Official prior to the issuance of a demolition permit. The Plan shall list the material to be recycled and the name, address, and phone number of the facility or organization accepting the materials.

In addition, the project would comply with Title 5: Public Works, Chapter 5.01: Solid Waste Management, of the CCMC (as required by Culver City's conditions of approval). According to the CCMC, the project applicant would submit a construction and demolition recycling and waste assessment plan prior to issuance of the permit. Monthly reports would be submitted throughout the construction of the project. Further, summary reports with documentation would be submitted prior to final inspection. Therefore, the project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste.

Based on the above, a less than significant impact regarding solid waste would occur.

**g. Comply with federal, state, and local statutes and regulations related to solid waste?**

**Less Than Significant Impact.** All local governments, including the City, are required under Assembly Bill 939 (AB 939), the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the City's target is exceeded, the City would be required to pay fines or penalties from the State for not complying with AB 939. The waste generated by the project would be

incorporated into the waste stream of the City, and diversion rates would not be substantially altered. The project does not include any component that would conflict with state laws governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. Thus, less than significant impacts regarding compliance with AB 939 would occur with project implementation.

## **XVIII. MANDATORY FINDINGS OF SIGNIFICANCE**

- a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

**Less Than Significant Impact With Mitigation Incorporated.** The preceding analysis does not reveal any significant unmitigable impacts to the environment. Based on these findings, the project is not expected to degrade the quality of the environment. The project site is located in a highly urbanized area of Culver City and is currently developed with a single-story auto repair shop building with an associated asphalt-paved surface parking lot and vehicular storage area. The site does not support sensitive plant or animal species. As discussed above in Response V.a, no significant impacts regarding historical resources would occur with project implementation.

The project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section I, and would not result in excessive light or glare. The project site is located within an urbanized area with no natural habitat. The project would not significantly impact any sensitive plants, plant communities, fish, wildlife or habitat for any sensitive species, as discussed in Section IV. Potentially significant impacts to nesting birds would be reduced to a less than significant level with implementation of the prescribed mitigation measure. Adverse impacts to archaeological and paleontological resources could occur. However, construction-phase procedures would be implemented in the event any important archaeological or paleontological resources are discovered during grading and excavation activities, consistent with Mitigation Measures CULT-1 to CULT-7.

This site is not known to have any association with an important example of California's history or prehistory. The environmental analysis provided in Section III and VII concludes that impacts related to emissions of criteria pollutants, other air quality impacts, and impacts related to climate change will be less than significant. Section IX concludes that impacts related to hydrology and water quality will be less than significant after implementation of the prescribed mitigation measures, where applicable. Based on the preceding analysis of potential impacts in the responses to items I thru XVII, no evidence is presented that this project would degrade the quality of the environment. The City hereby finds that impacts related to degradation of the environment, biological resources, and cultural resources will be less than significant with mitigation incorporated, as necessary.

- 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)?**

**Less Than Significant Impact With Mitigation Incorporated.** A description of 33 related projects in the project study area is provided in **Table B-36, List of Related Projects**, below. Related Projects are mapped in **Figure B-5, Locations of Related Projects**. The related projects are utilized to analyze cumulative impacts associated with Project implementation. Below is a discussion of cumulative impacts associated with the Project.

**Table B-36**  
**List of Related Projects**

Map No.	Project Name	Location	Description
<b>City of Culver City</b>			
1	Residential Project	3440 Caroline Avenue	Two detached residential condominium dwelling units (net addition of one unit).
2	Mixed-Use Project	9355 Culver Boulevard	3-story mixed use building consisting of a ground level salon, mezzanine, and office totaling 2,947 s.f., and four residential units on the third floor.
3	The Wende Museum	10808 Culver Boulevard	Tenant Improvements to convert existing 12,596 s.f. armory building into a museum.
4	Chapel/Dormitory Project	10775 Deshore Place	4,740 s.f. addition to existing dormitory and replace existing chapel with a 1,660 s.f. chapel.
5	Residential Project	4109-4111 Duquesne Avenue	Addition of two residential dwelling units to existing duplex.
6	Residential Project	4139-4145 Duquesne Avenue	7-unit condominium with 15 subterranean parking spaces.
7	Residential Project	4058 Madison Avenue	New 4-unit condominium, 7,422 s.f. total.
8	Retail/Restaurant Project	8511 Warner Drive	5-level parking structure with retail/restaurant, 51,520 s.f. of retail/restaurant uses, and a 307,522 s.f. parking structure.
9	Mixed-Use Project	8770 Washington Boulevard	Transit oriented development mixed use with 31,240 s.f. of retail and restaurant uses and 115 residential units (5 story).
10	Platform Project	8810-8850 Washington Boulevard & 3920 Landmark Street	New commercial development (38,732 s.f. of office, 41,745 s.f. of retail and restaurant.
11	Mixed-Use Project	8777 Washington Boulevard	Construct 4,500 s.f. of retail and 128,000 s.f. of office use. Demolish existing 12,485 s.f. of retail use and 4,731 s.f. of restaurant use.
12	Triangle Site –	Corner of Washington	Transit oriented development to include

**Table B-36 (Continued)**

**List of Related Projects**

<b>Map No.</b>	<b>Project Name</b>	<b>Location</b>	<b>Description</b>
	Washington/National TOD	Boulevard/National Boulevard	200 d.u. mid-rise apartments, 148-room hotel, 201,000 s.f. of office, 24,000 s.f. specialty retail, 10,000 s.f. of high-turnover restaurant & 10,000 s.f. quality restaurant.
13	The Culver Studios	9336 Washington Boulevard	Net increase of 138,997 s.f. of office and support facilities.
14	Office & Retail Project	10000 Washington Boulevard	Renovation of existing 9-story office building. Convert ground floor lobby space to office, retail, and restaurant space. New construction includes a new stand-alone 3,115 s.f. 1-story restaurant building and a second floor within the atrium to add 5,500 s.f. of office space.
15	Sony Pictures	10202 Washington Boulevard	New 8-story 218,450 s.f. office building, new 4-story 51,716 s.f. production services support building and expansion of an existing parking structure. Total demolition of 57,642 s.f. Net new s.f. is 212,524 s.f.
16	Sony Pictures	10202 Washington Boulevard	New 22,929 s.f. 4-story office building (net new 9,875 s.f.)
17	Union 76	10638 Culver Boulevard	Gas station and convenience store 2,676 g.s.f.
18	Willows School Comprehensive Plan	8509 Higuera & 8476 Warner	Phase II & III – increase student enrollment by 100 from 475 to 575.
19	Culver Center Shopping Center – New restaurant	10799 Washington Boulevard	New 2,000 s.f. restaurant at existing commercial shopping center.
20	Parcel B	9300 Culver Boulevard	118,000 g.s.f. of office, retail, and restaurant space.
21	Three unit condominium/townhome redevelopment	4241 Duquesne Avenue	New three detached condominium/townhomes, resulting in two net new residential dwelling units
22	Office Building	9919 Jefferson Boulevard	New 3-story, 62,558 s.f. office and research and development (laboratory) building, as well as a 5-level parking structure containing 398 parking spaces and associated site improvements.
23	Lorcan O'Herlihy Architects	3434 Wesley Street	New transit oriented development mixed use project with 15 dwelling units and 14,237 s.f. of office/gallery on a vacant lot.
<b>City of Los Angeles</b>			
24	Apartment	3822 S. Dunn Drive	7-story, 86-unit apartment building over ground floor.
25	Wrapper Office Building Project	5790 W. Jefferson Boulevard	Construct new 10-story 150,761 s.f. office building.

**Table B-36 (Continued)**

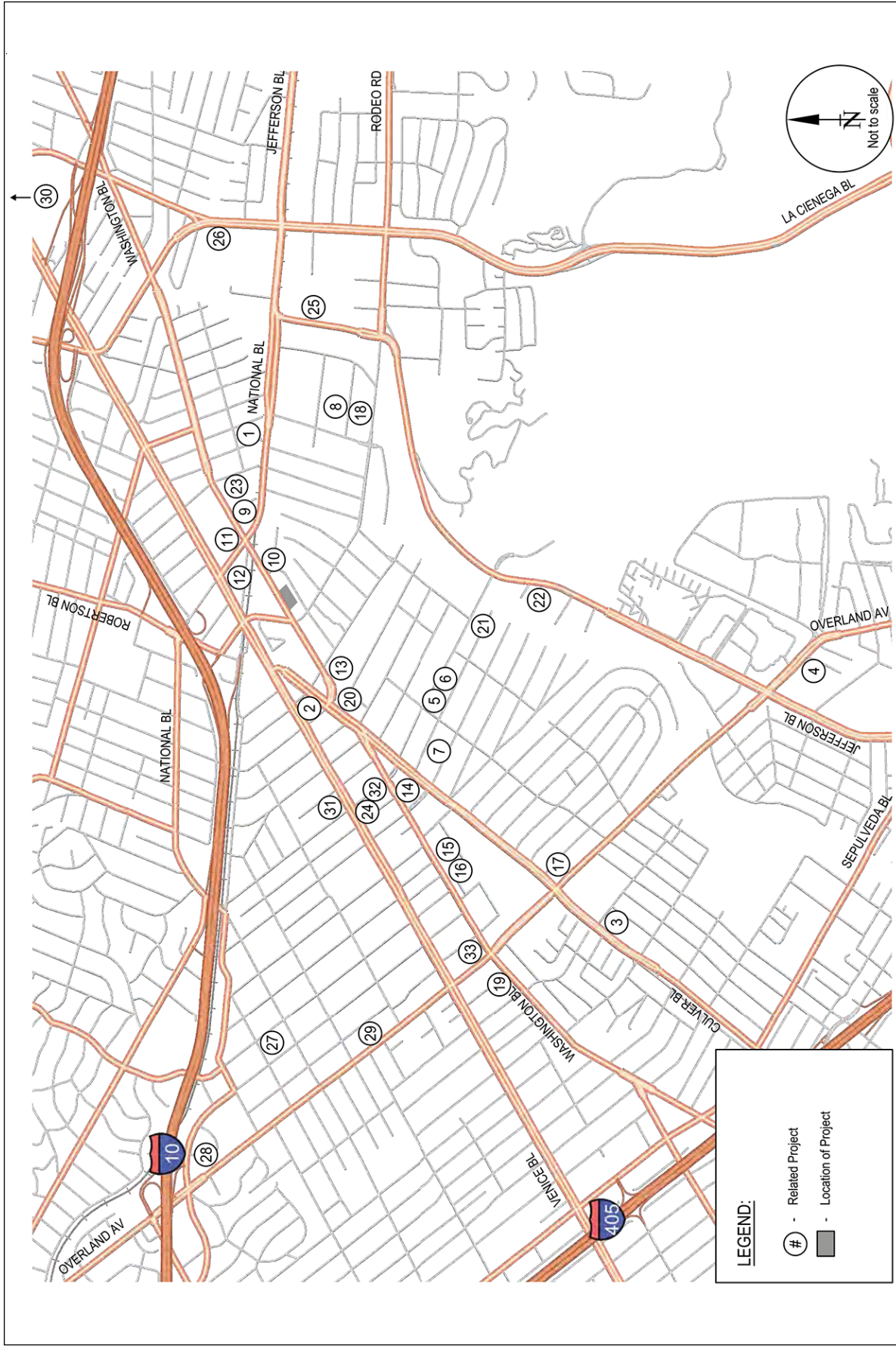
**List of Related Projects**

<b>Map No.</b>	<b>Project Name</b>	<b>Location</b>	<b>Description</b>
26	Jefferson & La Cienega Mixed Use Project	3221 S. La Cienega Boulevard	Converting existing ABC lot to a mixed-use: 1,218-unit apartment, 200,000 s.f. office, 50,000 s.f. grocery store, 30,000 s.f. retail and 20,000 s.f. restaurant project.
27	Mixed-Use Apartment & Retail	3425 Motor Avenue	115-unit apartment and 975 s.f. retail. Existing 15 apartment units, two single family dwellings and 3,300 s.f. office to be demolished.
28	Restaurant & Retail	10612 National Boulevard	1,726 s.f. coffee shop (Coffee Bean) including 250 s.f. outdoor seating. Existing vacant lot.
29	Mixed-Use: Apartment & Restaurant	3644 S. Overland Avenue	New mixed-use: 92-unit apartment & 1,573 s.f. restaurant use (110 spaces).
30	Venice Fairfax Residential Project	5930 W. Sawyer Street	Construct 60 single-family homes.
31	Coffee Shop with Drive Through	9829 W. Venice Boulevard	Coffee Bean & Tea Leaf Coffee Shop with single-lane drive through to replace existing Rally's with dual-lane drive through.
32	Mixed-Use Apartment & Retail	9901 Washington Boulevard	131-unit apartment & 12,000 s.f. retail. Existing 16,900 s.f. retail to be removed.
33	Mixed-Use Apartment, Office, Retail, and Restaurant	10601 Washington Boulevard	126-unit apartment, 23,000 s.f. office, 9,000 s.f. retail, 9,000 s.f. restaurant. Existing 10,000 s.f. office to be removed.

*Notes: s.f. = square feet; g.s.f. = gross square feet; d.u. = dwelling unit.*

*Source: Raju Associates, Inc., 2017.*





Synapse at Platform

SOURCE: Raju Associates, Inc., 2017

**Figure B-5**

Location of Related Projects

## **Cumulative Impacts**

### **Aesthetics**

Development of the project in conjunction with the related projects would result in an incremental intensification of land uses in a heavily urbanized area of Culver City. This project is sited within the vicinity of Culver City's Washington/National TOD area. The driving force behind the district is the new Metro Expo Line connecting Culver City with Santa Monica and downtown Los Angeles. The proposed commercial project has been designed with the goal of bringing retail, restaurant, and office uses within walking distance of the new Culver City Metro Station. New development and concentration of development, particularly in TOD areas, as are some of the related projects, is consistent with the objectives of the TOD areas to enliven the street front, upgrade the quality of development, and to generate more pedestrian activity.

While the project's proposed structures, as well as some of the nearby related projects, would be taller and greater in mass than some of the nearby buildings in the surrounding project vicinity, primarily to the south and west, the project area is in the process of revitalization and transition with recent and new redevelopment projects occurring throughout the project vicinity. For example, the proposed building heights and massing would be compatible with the one- and multi-story building(s) and parking structure (up to 5-stories) constructed as part of the Platform project located just to the east. In addition, along Washington Boulevard and just beyond the Metro Expo Line, the recently constructed 5-story Access Culver City mixed-use project also includes architecturally modern buildings that support a mix of land uses. Further, the conceptually approved six-story Ivy Station mixed-use project is located nearby to the northwest of the project site across Washington Boulevard on the north side of the Metro Expo Line. The proposed project along with these adjacent projects would contribute to the local area's ongoing revitalization and would be compatible in their urban character.

Related projects in combination with the project are located within designated urban lots planned for development and would not encroach upon public views through street corridors. Because the visual character of the City is defined by a range of diverse and architecturally interesting buildings, it is anticipated that new development would introduce more architecturally interesting buildings and would continue to enhance the character of the street front with updated landscaping and design components. In addition, new development, as with the project, would continue to introduce a variety of building heights and styles and, as such, contribute to the urban character of the area. Because new development that is subject to discretionary action must implement and be consistent the City's design standards, it is anticipated that the related projects would be of high quality design and construction. As such, with the implementation of existing guidelines, related projects in combination with the project are not considered to result in the substantial, cumulative degradation of the area's visual character. Further, as the project site does not currently reflect a high level of visual quality, and because the project has been designed at a scale and with a unified architectural aesthetic that would be compatible with existing and planned development in the vicinity, the project would not substantially contribute to cumulatively considerable aesthetics impacts.

Cumulative light and glare effects would be consistent with the existing urban environment, which is characterized by high ambient light levels. Because lighting, including illuminated signage and outdoor lighting would be subject to regulations contained within the CCMC, compliance would ensure that impacts regarding lighting for the project and related projects would not cause a significant cumulative adverse effect on existing uses.

Building plans for new related projects would be reviewed on a case-by-case basis by the City Department of Building and Safety to ensure that new construction would avoid the use of glare-prone materials. For new development projects, the use of high-performance materials such as tinted non-reflective glass or other non-reflective surface materials, cladding, and trim is required. With the implementation of standard city building requirements similar to the project, cumulative glare impacts would be less than significant.

### **Agricultural and Forest Resources**

As with the project, related projects are located within developed, urbanized areas generally zoned for commercial and residential uses and do not support farming, agricultural or forest-related operations. Development of the project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no cumulative impacts on agricultural or forest resources would occur.

### **Air Quality**

There are a number of related projects in the project area that have not yet been built or are currently under construction. Since the applicant has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. The SCAQMD recommends that project-specific construction air quality impacts be used to determine the potential cumulative impacts to regional air quality.

With regard to project operations, SCAQMD's approach for assessing cumulative impacts related to operations or long-term implementation is based on attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. As discussed earlier, the SCAQMD has developed a comprehensive plan, the AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the Los Angeles County portion of the Air Basin is currently in nonattainment for ozone, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, Section 15064(h)(3) of the CEQA *Guidelines* provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

*“A lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency...”*

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the project's incremental contribution to cumulative air quality impacts is determined based on compliance with the

SCAQMD adopted 2012 AQMP. The project would not conflict with or obstruct implementation of AQMP and would be consistent with the growth projections in the AQMP.

Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality.

As displayed in Tables B-1 and B-2, regional burden emissions calculated for project construction and operations are less than the applicable SCAQMD daily significance thresholds, which are designed to assist the region in attaining the applicable State and national ambient air quality standards. These standards apply to both primary (criteria and precursor) and secondary pollutants (ozone). Although the project site is located in a region that is in non-attainment for ozone and PM<sub>10</sub>, the emissions associated with the project would not be cumulatively considerable as the emissions would fall below SCAQMD daily significance thresholds. In addition, the project would be consistent with the AQMP, which is intended to bring the Basin into attainment for all criteria pollutants.

### **Biological Resources**

With regard to cumulative biological resources impacts, the project site is located in an urbanized area and like the project, other related projects would mostly occur on previously disturbed, urbanized land. The project does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and, therefore, could not contribute to a cumulative effect in these regards. The project would fully comply with City ordinances pertaining to tree removal, resulting in no net loss of trees from project implementation. Further, potentially significant impacts to nesting birds would be reduced to a less than significant level with implementation of the prescribed mitigation. Related projects would also be required to comply with the City's street tree replacement requirements and implement mitigation for impacts to nesting birds. Therefore, cumulative impacts to biological resources would be less than significant.

### **Cultural Resources**

Impacts related to cultural resources are site-specific and as such, are assessed on a site-by-site basis. As discussed previously, mitigation measures would ensure the project does not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, that the project does not directly or indirectly destroy a unique paleontological resource and that the project does not adversely affect human remains. It is anticipated that comparable implementation of similar mitigation measures and/or compliance with existing regulations would be incorporated into the approval of each related project. Additionally, as discussed above, the project would not result in direct historic impacts. Further, the historic setting in the area around the project site is already eroded by contemporary development. Based on the above, the project would not contribute to cumulatively considerable cultural resources impacts.

### **Geology and Soils**

Geological and geotechnical impacts are defined by site-specific conditions for the project and related projects and are, therefore, typically confined to contiguous properties or to a localized area in which concurrent construction projects in close proximity could be subject to the same fault rupture system or other geologic hazard, or exacerbate erosion impacts. The project site is not underlain by an active earthquake fault and, thus, would not contribute to cumulative seismic rupture impacts. Although seismic shaking would occur on the

project site as well as related project sites, applicable regulatory requirements require consideration of seismic loads in structural design for all related projects. As such, cumulative impacts associated with ground shaking would be less than significant. The project site is located within a State-designated hazard zone for liquefaction. However, the Geotechnical Investigation concluded that liquefaction should not pose a significant hazard to the project. The project site is not prone to landslide hazards. As such, the project would not cumulatively contribute to liquefaction or landslide impacts. While the loss of topsoil among the project and related projects during construction could result in cumulative erosion impacts, the project and related projects would be required to implement applicable local, regional and State regulations for grading and excavations during construction, including SWPPP requirements. Because the project site contains favorable conditions for foundations and, as with related projects, would be required to comply with approved geotechnical recommendations, the project's contribution to potential cumulative impacts from lateral spreading, subsidence, liquefaction, or collapse would also be less than significant. In addition, the project and related project sites are located in a highly urbanized area and would connect to existing wastewater infrastructure. Thus, the project and related projects would not need to use septic tanks or alternative waste disposal systems and, as such, cumulative impacts relative to waste disposal capacity would be nil. Because the project would not contribute considerably to geology and soils impacts, the project's cumulative geology and soil impacts would be less than significant.

### **Greenhouse Gas Emissions**

GHG emissions impacts are cumulative. As such, the impact discussions included above in Responses VII.a-b, address the project's potential to result in a cumulatively considerable GHG impact. As discussed therein, impacts would be less than significant.

### **Hazards and Hazardous Materials**

Many of the related projects would use, handle, store, and/or transport hazardous materials or require demolition of structures containing such materials. As with the project, related projects would be required to use and store all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with Federal, State, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, disposal, or handling of hazardous materials. Some of the related projects may be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, each related project would be required to comply with existing Federal, State, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators. Cumulative impacts would therefore be less than significant in this regard.

Some of the related projects may also include the use of hazardous materials and, as with the project, be located within one-quarter mile of a school. However, related projects would be subject to environmental review to evaluate potential impacts from hazardous materials releases within one-quarter mile of a school. The project would not have a considerable contribution related to the use or release of hazardous materials. With the implementation of existing regulations, cumulative impacts with respect to impacts on schools would be less than significant.

## **Hydrology and Water Quality**

The related projects would potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff within the local vicinity of the project site. However, as with the project, the related projects are located within the highly urbanized areas, which are largely characterized by existing buildings and paved surfaces with limited landscaped areas. Accordingly, the potential to generate a notable amount of new impermeable surfaces is limited. Pursuant to the City's LID stormwater requirements, related projects would be required to capture and treat runoff flow during storm events similar to the project. Further, the related projects would be subject to State NPDES permit requirements for both construction and operation. Each project greater than one-acre in size would be required to develop a SWPPP and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid or minimize impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the Culver City Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Thus, compliance with applicable regulatory requirements would avoid significant impacts on drainage/flooding conditions and the quality of water reaching the public drainage system. Cumulative impacts to hydrology and water quality would be less than significant.

## **Land Use and Planning**

As with the project, related projects would be located within urbanized areas and would have general access or proximity to transit. Several of the closer related projects would be within walking distance of the Culver City Metro Station and other related projects are in proximity to other transit stations. The intensification of development within this area would be consistent with the intent of the TOD area to upgrade the quality of development in the area and to provide a variety of commercial and residential uses with access to transit. Many related projects feature mixed-use components that provide housing and street-oriented commercial uses that would enliven the street front and enhance pedestrian activity in accordance with adopted plans. Related projects, which would accommodate a broad range of uses that provide job opportunities and enhance urban lifestyles, would be consistent with the General Plan and City growth objectives. Because it is anticipated that development of the related projects would be consistent with the objectives of the General Plan and other plans that support intensification and redevelopment, cumulative land use impacts would be less than significant.

## **Mineral Resources**

As discussed above, the project would have no impact on mineral resources. Because of the large number and broad extent of oil drilling districts and State-designated oil fields in the greater area, some of the related projects may be located within these designated areas. However, with implementation of new methodologies, such as slant drilling, related projects would not substantially reduce extraction capabilities, impede exploratory operations, or would cumulatively result in the significant loss of availability of oil resources. Regardless, because the project would have no incremental contribution to the potential cumulative impact on mineral resources, the project would have no cumulative impact on such resources.

## **Noise**

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and sound reduces significantly in magnitude as the distance

from the source increases. As such, only projects expected to occur in the immediate project area likely would contribute to cumulative noise impacts.

### **Construction Noise**

Noise from construction of the project and related projects would be localized, thereby potentially affecting areas immediately within 500 feet from either/both construction sites. There are two related projects in the surrounding area within approximately 500 feet of the project site (Related Projects Nos. 10 and 12, although Related Project No. 12 is mostly constructed) that could have construction concurrent with the project. All other related projects with future potential concurrent construction are greater than 500 feet from the project site and would not contribute substantially to cumulative construction noise impacts. Because the timing of the construction activities for all cumulative projects cannot be defined and are beyond the control of the City and the applicant, quantitative analysis that assumes multiple, concurrent construction projects would be speculative. The cumulative noise levels would be intermittent, temporary and would cease at the end of the respective construction periods. It is not likely that maximum construction noise impacts from the cumulative projects would occur simultaneously, as sound levels vary from day to day depending on the construction activity performed that day and its location on the development site. Due to distance attenuation and intervening structures, construction noise from one site would not result in a noticeable increase in noise at sensitive receptors near the project site, which would preclude a cumulative noise impact. Furthermore, related projects would be required to comply with City noise standards and implement mitigation measures for identified significant impacts, as required under CEQA, similar to the project. As such, cumulative impacts associated with construction noise would be less than significant.

### **Operational Noise**

Cumulative operational noise impacts would occur primarily as a result of increased traffic on local roadways due to the project and other projects in the project vicinity. Therefore, cumulative traffic-generated noise impacts have been assessed in the analysis above based on the contribution of the project to the future cumulative base traffic volumes in the project vicinity. Per Table B-13, because cumulative traffic volumes would not double, the noise level increase would be well below a 5 dBA CNEL. As such, with respect to roadway noise, there is no potential for the project to result in a cumulatively considerable contribution when considered together with related project traffic volumes.

The project's fixed mechanical equipment and other project features (i.e., loading areas) would be shielded from adjacent uses and/or located within the interior of the building such that noise levels would be less than significant at the property line. Noise levels for similar equipment and facilities for each related project would be subject to City noise ordinance requirements. For this reason, on-site noise produced by any related project would not result in a substantial or noticeable additive increase to project-related noise levels. As the project's composite stationary-source and operational impacts would be less than significant, composite stationary-source and operational noise impacts attributable to cumulative development would also be less than significant.

### **Vibration**

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the project site, there is no potential for the project to result in a cumulatively considerable contribution, when

considered together with the related projects, to cumulatively significant construction-related or operational impacts.

## **Population and Housing**

The project would not generate a new residential population as no residential uses are proposed. The increase in area population and employment resulting from the project and the related projects would have a less than significant cumulative impact as these increases are anticipated to be within SCAG, Culver City, and City of Los Angeles Subregion growth forecasts. Related projects in combination with the project would not result in the cumulative loss or reduction of housing. Therefore, cumulative impacts with respect to population and housing are considered to be less than significant.

## **Public Services**

### **Fire Protection Services**

The related projects would cumulatively generate, in conjunction with the project, the need for additional fire protection and emergency medical services. Although there would be cumulative demand on fire protection services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site specific design and safety requirements, similar to the project. All related projects would be subject to review by the LAFD and/or CCFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety. Further, project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD and CCFD are expected to help support adequate response times. Even in consideration of the related projects, if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted, and was foreseeable, the project study area is highly developed, and the site of a fire station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government, and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the project is required to mitigate.

Based on the above considerations, the project would not result in a cumulatively considerable contribution to cumulative impacts associated with the construction of new fire facilities.

### **Police Protection Services**

The related projects would cumulatively generate, in conjunction with the project, the need for additional police protection services. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the LAPD or CCPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. Even in consideration of the



related projects, if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted, and was foreseeable, the project study area is highly developed, and the site of a police station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government, and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the project is required to mitigate.

Based on the above considerations, the project would not make a cumulatively considerable contribution to cumulative impacts associated with the construction of new police facilities.

### **Schools**

Pursuant to California Government Code Section 65995, the payment of developer fees under the provisions of SB 50 address the impacts of new development on school facilities serving that development. Compliance with the provisions of Section 65995 is deemed to provide full and complete mitigation of school facilities impacts. The related projects would be required to pay these fees as applicable. Therefore, the full payment of all applicable school fees would reduce potential cumulative impacts to schools to less than significant levels.

### **Parks**

The project would not generate a new residential population as no residential uses are proposed. New related residential projects are anticipated to provide on-site open space and recreational amenities to meet the needs of projected residents. In addition to the provision of on-site recreational amenities for related residential uses of related projects, the implementation of required developer paid parks and recreational fees would allow for land purchase and expansion of existing facilities. As such, related projects are not anticipated to result in substantial physical deterioration or accelerated deterioration of recreational and parks facilities. Cumulative impacts to parks would be less than significant.

### **Other governmental services**

The related projects would cumulatively generate, in conjunction with the project, the need for additional library services. The related projects would generate revenue to the City's general funds that could be used to fund library expenditures as necessary to offset the cumulative incremental impact on library services. The related projects would pay applicable development fees based upon the projected population of the individual developments. The full payment of all applicable library fees would reduce potential cumulative impacts to libraries to less than significant levels.

The related projects' employees and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would be typical of that experienced for the highly urbanized project vicinity. Similar to the project, the related projects would need to pay applicable development

impact fees of the City of Los Angeles or Culver City. The full payment of all applicable fees would reduce potential cumulative impacts to other governmental services/facilities to less than significant levels.

## **Recreation**

Refer to discussion under Parks, above.

## **Transportation and Circulation**

Cumulative impacts on traffic associated with construction (e.g., an intermittent reduction in street and intersection operating capacity) are typically considered short-term adverse, but not significant, impacts. The project would result in a less than significant traffic impact during construction with the implementation of a Construction Management Plan and Traffic Control Plan that would incorporate notification and safety procedures and controls. Each related project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures as part of a Construction Management Plan and Traffic Control Plan, to reduce potential traffic impacts during construction.

The cumulative (2018) service level conditions presented in Table B-28 represent a combination of estimated trips from all related projects, as well as incremental annual growth, and are cumulative in nature. As shown in Table B-28, cumulative traffic impacts would be less than significant.

The regional transportation analysis, including public transit, is based on CMP procedures that have been developed to address countywide cumulative growth impacts on regional transportation facilities. The CMP Guidelines contain procedures for monitoring land use development levels and transit system performance by local jurisdictions and Metro, and are used to inform planning of infrastructure improvements to meet future needs. As indicated in the discussion of project impacts above, the project would not have a significant impact on public transit and the incremental impacts on the regional public transit system would not be cumulatively considerable. Also, while the project would contribute trips to the freeway system, project traffic did not trigger the screening thresholds at the ramps or freeway segments most likely to be used by project traffic. As such, the project would not contribute cumulatively considerable traffic to the freeway system.

With regard to access, pedestrian and bicycle access and facilities, and parking, the project would not result in a significant impact. Each project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian and cyclists. Access to each site would be assessed during the City's review process to ensure compliance with the City's requirements, which are established to minimize potential impacts. With regard to parking, the related projects would be subject to the applicable City parking requirements for vehicle and bicycle parking. Therefore, cumulative impacts on parking would be less than significant. Therefore, the project would not contribute to a significant cumulative impact with regard to these issues.

## Utilities and Service Systems

### Water Supply

Development of the project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. However, each related project would be subject to City review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. Furthermore, LADWP as well as GSWC and WBMWD conduct ongoing evaluations to ensure facilities are adequate, and require infrastructure system improvements. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

### Wastewater

Implementation of the project in combination with the related projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. The HTP currently treats an average of 362 mgd, with a capacity to treat 450 mgd. The City of Los Angeles has adopted an Integrated Resources Plan (IRP) that shows that the HTP will be able to accommodate growth within its service area to the year 2030. In addition, the potential need for the related projects to upgrade sewer lines to accommodate their wastewater needs is site-specific and there is minimal, if any, direct cumulative relationship between the development of the project and the related projects. Therefore, no significant cumulative sewer infrastructure impacts are anticipated from the development of the project and the related projects. Therefore, cumulative impacts on sewer service would be less than significant.

### Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The remaining disposal capacity for the County's Class III landfills is estimated at approximately 129.2 million tons as of December 31, 2012, the most recent data available. Thus, sufficient capacity would be available to meet the demand created by related projects. As discussed above, the project impacts on solid waste disposal would be less than significant. In addition, similar to the project, related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to checklist items in the City's Green Building Code, as applicable. As such, impacts to the solid waste system from cumulative development would be less than significant and thus, the project would not contribute to a cumulatively significant solid waste impact.

### **c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

**Less Than Significant Impact With Mitigation Incorporated.** Based on the analysis of the project's impacts in the Responses I thru XVII, there is no indication that this project could result in substantial adverse effects on human beings. While there would be a variety of effects during construction related to traffic, noise and air quality, these impacts would be less than significant based on compliance with applicable regulatory requirements and established impact thresholds, as well as the prescribed mitigation measures, where applicable. Long-term effects would include increased vehicular traffic, traffic-related noise, periodic on-site operational noise, minor changes to on-site drainage, and changing of the visual character of the site, with a

majority of these impacts affecting nearby roadway segments and intersections. The analysis herein concludes that direct and indirect environmental effects will at most require mitigation to reduce to less than significant levels. Generally, environmental effects will result in less than significant impacts. Based on the analysis in this Initial Study, the City finds that direct and indirect impacts to human beings will be less than significant with mitigation incorporated, as necessary.

## **XIX. EARLIER ANALYSIS**

None.

## **REFERENCES**

1. *8888 Washington – Utility Memorandum*, prepared by Kimley-Horn and Associates, Inc., dated January 31, 2017.
2. *Annual Compliance Report 8<sup>th</sup> Edition, Culver City Fire Department*, prepared by Cara Flores, Management Analyst for the Commission on Fire Accreditation International, Inc., dated June 28, 2016.
3. Captain Ron Iizuka, Culver City Police Department, written correspondence (written correspondence is regarding CCPD existing conditions), dated September 21, 2016 and telephone correspondence on January 31, 2017.
4. Chief Dave White, Culver City Fire Department, written correspondence (written correspondence is regarding CCFD existing conditions), dated August 9, 2016 and telephone correspondence on January 25, 2017.
5. *Community Risk Assessment & Standards of Cover*, Culver City Fire Department, Chris Sellers, Fire Chief, 2014.
6. *Cultural Resources Assessment of the 0.5-Acre Culver Arts Building Project Site Located at 8888 Washington Boulevard, Culver City, Los Angeles County*, prepared by John Minch and Associates, Inc., dated September 2016.
7. *“Discussion of Groundwater” Memo*, a supplemental discussion of groundwater depths conducted by Feffer Geological Consulting, dated September 29, 2016.
8. *Draft Traffic Study for the 8888 Washington Boulevard Project*, prepared by Raju Associates, Inc., dated February 2017.
9. *Geotechnical Investigation, Proposed Four-Story Mixed Use Building Over One Subterranean Level, 8888 W Washington Boulevard, Culver City, CA 90232*, prepared by Feffer Geological Consulting, dated November 11, 2015.
10. *Greenhouse Gas Assessment Synapse at Platform Project*, prepared by Michael Baker International, dated January 31, 2017.
11. *Limited Phase II Investigation – Soil Sampling, 8888 Washington Boulevard, Culver City, California 90232*, prepared by Citadel Environmental Services, Inc., dated August 27, 2014.
12. *Low Impact Development Calculation, Washington 8888, 8888 Washington Boulevard, Culver City, CA 90232*, prepared by VCA Engineers, Inc., dated March 11, 2016.
13. Management Analyst, Cara Flores, Culver City Fire Department, written correspondence, dated January 31, 2017.

14. *Noise and Vibration Technical Report*, prepared by ESA PCR, dated February 2017.
15. *Paleontological Survey of the ½ Acre Multi-Use Commercial Development Building Site, 8888 Washington Boulevard, Culver City, Los Angeles County, California*, prepared by John Minch and Associates, Inc, dated April 2016.
16. *Parking Operational Plan*, prepared by CityLift, 2017.
17. *Phase I Environmental Site Assessment Report – Final 8888 Washington Boulevard, 8919-8921 Lindblade Street Culver City, California 90232*, prepared by Citadel Environmental Services, Inc., dated July 17, 2014.
18. *Preliminary Platform III Traffic Control Plan*, prepared by Millie and Severson General Contractors, 2017.
19. *Preliminary Construction Management Plan, 8888 Washington Boulevard*, prepared by Millie and Severson General Contractors, 2016.
20. *Shade/Shadow Report*, prepared by ESA PCR, dated January 2017.
21. *Supplemental Phase II Investigation Report, 8888 West Washington Boulevard, Culver City, California*, prepared by Hillmann Consulting, dated March 11, 2015.
22. *Supplemental Site Investigation Report ICC Collision Center 8888 Washington Boulevard, Culver City, California 90232 DTSC Docket No. HAS-VCA 15/16-043 (“SSI Report”)*, prepared by Leighton Consulting, Inc., dated October 10, 2016.
23. *Synapse at Platform Project – Air Quality Technical Memorandum*, prepared by Michael Baker International, dated January 31, 2017.



# Attachment C – Mitigation Monitoring Program

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## ATTACHMENT C MITIGATION MONITORING PROGRAM

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

MITIGATION MONITORING PROGRAM				
P2016-0050-SPR, P2016-0050-MND				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<b><u>AIR QUALITY</u></b>				
<b>AQ-1:</b> Prior to issuance of a grading permit or demolition permit (whichever occurs first), the City Engineer shall confirm that the project plans and specifications stipulate that, in compliance with SCAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD's Rules and Regulations. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors: <ul style="list-style-type: none"><li>• All active portions of the construction site shall be watered every three hours during daily construction activities and when dust is observed migrating from the project site to prevent excessive amounts of dust;</li><li>• Pave or apply water every three hours during daily construction activities or apply non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas. More frequent watering shall occur if dust is observed migrating from the site during site disturbance.</li><li>• Any on-site stockpiles of debris, dirt, or other dusty material shall be enclosed, covered, or watered twice daily, or non-toxic soil binders shall be applied;</li><li>• All grading and excavation operations shall</li></ul>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits and On-Going during Construction	Culver City Building Safety Division, Public Works, and Planning Division

MITIGATION MONITORING PROGRAM				
P2016-0050-SPR, P2016-0050-MND				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>be suspended when wind speeds exceed 25 miles per hour;</p> <ul style="list-style-type: none"> <li>Disturbed areas shall be replaced with ground cover or paved immediately after construction is completed in the affected area;</li> <li>On-site vehicle speed shall be limited to 15 miles per hour;</li> <li>Visible dust beyond the project limits which emanates from the project shall be prevented to the maximum extent feasible;</li> <li>All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust prior to departing the job site; and</li> <li>Reroute construction trucks away from congested streets or sensitive receptor areas to the extent feasible.</li> </ul>				
<p><b><u>BIOLOGICAL RESOURCES</u></b></p> <p><b>BIO-1:</b> The Applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would insure that no active nests are disturbed.</p> <p>If avoidance of the avian breeding season (February 15 through August 31) is not feasible, then a qualified biologist shall conduct a preconstruction nesting bird survey within 15 days and again within 72 hours prior to any ground disturbing activities (staging, grading, vegetation removal or clearing, grubbing, etc.). The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code are avoided. Survey areas shall include suitable nesting habitat within 200 feet of construction site boundaries. This two-tiered survey method is intended to provide the project applicant with time to understand the potential issue and evaluate solutions if nests are present, prior to mobilizing resources. If active nests are not identified, no further action is necessary.</p> <p>If active nests are identified during pre-construction surveys, an avoidance buffer shall</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits	Culver City Planning

MITIGATION MONITORING PROGRAM				
P2016-0050-SPR, P2016-0050-MND				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>be demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Given the high disturbance level, general avoidance buffers include a minimum 100-foot avoidance (for smaller birds more tolerant of human disturbance) to a 250-foot avoidance buffer for passerine and a 500-foot avoidance buffer from active raptor nests, or reduced buffer distances determined at the discretion of a qualified biologist familiar with local nesting birds and breeding bird behavior within the project area.</p> <p>Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the Culver City Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.</p>				
<p><b><u>CULTURAL RESOURCES</u></b></p> <p><b>CULT-1:</b> Prior to issuance of demolition permit, the applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

MITIGATION MONITORING PROGRAM				
P2016-0050-SPR, P2016-0050-MND				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist). Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the Qualified Archaeologist and Gabrielino Tribe and shall focus on how to identify archaeological and cultural resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.</p> <p><b>CULT-2:</b> Prior to issuance of demolition permit, the applicant shall retain a Native American tribal monitor from a Gabrieleno Tribe who shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall take into account the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrieleno Tribe.</p> <p><b>CULT-3:</b> In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and the Gabrielino</p>				

MITIGATION MONITORING PROGRAM				
P2016-0050-SPR, P2016-0050-MND				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>Tribe. If the resources are Native American in origin, the Gabrieleno Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall incorporate the Gabrielino Tribe's treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area for educational purposes.</p> <p><b>CULT-4:</b> Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the applicant to the</p>				

MITIGATION MONITORING PROGRAM				
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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.</p> <p><b>CULT-5:</b> A qualified Paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter older Quaternary sediments. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older Quaternary sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Paleontologist.</p> <p><b>CULT-6:</b> If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the paleontologist shall implement a paleontological salvage program to remove the resources from</p>				

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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.</p> <p><b>CULT-7:</b> The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the project Applicant to the City and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.</p> <p><b>CULT-8:</b> If human remains are encountered unexpectedly during implementation of the project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated</p>				

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<p>with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.</p> <p>Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.</p>				
<p><b><u>Geology and Soils</u></b></p> <p><b>GEO-1:</b> Site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation shall be implemented per the project's Final Geotechnical Engineering Investigation, subject to review and approval by the Culver City Building Safety Division.</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading and Building Permits and a Foundation Plan	Culver City Building Safety Division and Building Safety Inspector
<p><b><u>Hazards and Hazardous Materials</u></b></p> <p><b>HAZ-1:</b> Prior to the issuance of any permit for the demolition or alteration of the existing on-site building, a comprehensive ACMs survey of the buildings shall be performed. If no ACMs are found, the project applicant shall provide a letter to the Culver City Building Safety Division from a qualified asbestos abatement consultant indicating that no ACMs are present in the on-site</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits and On-Going during Construction	Culver City Building Safety Division; Building Safety Inspector; Fire Prevention; Fire Inspector; Planning



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<p>buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.</p> <p><b>HAZ-2:</b> Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a comprehensive LBP materials survey shall be performed to the written satisfaction of the Culver City Building Safety Division. Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.</p> <p><b>HAZ-3:</b> Prior to issuance of any permit for the demolition or alteration of the existing structure(s) and upon receipt of No Further Action letter or letter of concurrence by DTSC for site characterization, a Soil Contingency and Management Plan shall be reviewed and approved by the Culver City Building Safety Division and Engineering Division, as applicable. The plan would include measures to remove and/or treat/remediate previously unidentified impacted soils to a level determined acceptable per applicable regulatory standards, under supervision of a certified environmental consultant licensed to oversee such remediation. The plan would also include Personal Protective Equipment (PPE) requirements for contractors.</p>				Division
<p><b><u>Hydrology and Water Quality</u></b></p> <p><b>WQ-1:</b> If dewatering activities occur on-site during future redevelopment, samples shall be obtained from the water and analyzed for volatile organic compounds (VOCs) and oxygenates to ensure that they do not exceed applicable discharge requirements. Should the samples exceed VOC, oxygenates or any other applicable discharge requirement, a dewatering plan shall be prepared by the project applicant for submittal to the Los Angeles Regional Water Quality Control Board (LARWQCB) and other appropriate agencies determined appropriate in consultation with the LARWQCB for review and approval. The plan shall include but not be limited to sampling of groundwater that may be contaminated; and treatment and disposal of contaminated groundwater in compliance with applicable regulatory requirements. Written verification from</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	On-Going During Construction	Culver City Planning, Public Works, and Building Safety Division

MITIGATION MONITORING PROGRAM				
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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
the LARWQCB of approval of a dewatering plan completion shall be submitted to the City of Culver City Planning Division and Department of Public Works prior to issuance of grading permit.				
<p><b>Noise</b></p> <p><b>NOISE-1:</b> Noise-generating equipment operated at the project site shall be equipped with the most effective noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.</p> <p><b>NOISE-2:</b> The project applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at the project site. Signs shall also be posted at the project site that includes permitted construction days and hours.</p> <p><b>NOISE-3:</b> Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.</p> <p><b>NOISE-4:</b> Temporary noise barriers that provide a minimum of 20 dB noise reduction shall be used to block the line-of-site between construction equipment and noise-sensitive receptors (residences) during project construction. Noise barriers shall be a minimum of 20-feet tall along the south boundary adjacent to residential uses.</p> <p><b>NOISE-5:</b> Contractors would phase in construction activity, use low-impact construction technologies, and avoid the use of heavy vibrating equipment where possible to avoid construction vibration impacts. Especially, contractors shall use smaller and lower impact construction technologies to avoid human annoyance to the adjacent buildings. Contractors shall avoid the use of driving piles and drill piles instead where necessary to avoid structural damage. The construction contractor shall be responsible for implementing this measure during the construction phase.</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits and On-Going during Construction	Culver City Building Safety Division; Building Safety Inspector; Planning Division

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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p><b><u>Public Services</u></b></p> <p><b>PS-1:</b> Construction Management Plan/Traffic Control Plan - A Final Construction Management Plan and Traffic Control Plan shall be developed by the project contractor in consultation with the project's traffic and/or civil engineer and reviewed and approved by Culver City's Building Official, Engineer and/or Planning Manager, as applicable, prior to issuance of any project demolition, grading or excavation permit. The Final Plans shall also be reviewed and approved by Culver City's Fire and Police Departments. The Culver City Building Official, Engineer and/or Planning Manager, as applicable reserve the right to reject any engineer at any time and to require that the Plan(s) be prepared by a different engineer.</p> <p>Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector ("Inspectors") of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other surrounding developments that will potentially be under construction at around the same time as the project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another.</p> <ul style="list-style-type: none"> <li>▪ The Plans together shall identify, at a minimum, the following to the satisfaction of the City:</li> <li>▪ The name and telephone number of a contact person who can be reached 24 hours a day regarding construction traffic complaints or emergency situations.</li> <li>▪ An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent</li> </ul>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits and On-Going during Construction	Culver City Planning, Public Works, Fire and Police Departments

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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>properties.</p> <ul style="list-style-type: none"> <li>▪ Procedures for the training and certification of the flag persons.</li> <li>▪ The location, times, and estimated duration of any roadway closures, traffic detours, use of protective devices, warning signs, and staging or queuing areas.</li> <li>▪ The location and travel routes of off-site staging and parking locations.</li> <li>▪ The location of temporary power, portable toilet and trash and materials storage locations.</li> <li>▪ The timing and duration of all street and/or lane closures and shall be made available to the City in digital format for posting on the City's website and distribution via email alerts on the City's "Gov Delivery" system. The Plans shall be updated weekly during the duration of project construction, as determined necessary by the City.</li> <li>▪ Prior to approval of the Plan(s), the Applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community: <ol style="list-style-type: none"> <li>1) Construction schedule and hours.</li> <li>2) Framework for construction phases.</li> <li>3) Identify traffic diversion plan by phase and activity. (The Traffic Control Plan will be submitted for review and approval by the City for each phase).</li> <li>4) Potential location of construction parking and office trailers.</li> <li>5) Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity).</li> <li>6) Emergency access plan.</li> <li>7) Demolition plan.</li> <li>8) Staging plan for the concrete pours, material loading and removal.</li> </ol> </li> </ul>				

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Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
9) Crane location(s). 10) Accessible Applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).				

