

RESOLUTION NO. 2017-__

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CULVER CITY, CALIFORNIA, ADOPTING MITIGATED NEGATIVE DECLARATION (MND) P2016-0049-MND, INCLUSIVE OF A MITIGATION MONITORING AND REPORTING PROGRAM (MMRP) FOR ZONING CODE MAP AMENDMENT P2016-0049-ZCMA AND COMPREHENSIVE PLAN P2016-0049-CP FOR PLANNED DEVELOPMENT ZONING DISTRICT NO. 13 CONSISTING OF AN OFFICE/RETAIL COMMERCIAL DEVELOPMENT OF APPROXIMATELY 132,500 SQUARE FEET ON A .98-ACRE SITE, LOCATED AT 8777 WASHINGTON BOULEVARD.

(P2016-0049-MND)

WHEREAS, on March 25, 2016, an application by Vitruvian Culver City LLC (the "Applicant") was submitted for the property located at 8777 Washington Boulevard. The application includes two requests: Zoning Code Map Amendment for Planned Development District No. 13 (P2016-0049-ZCMA), and a Comprehensive Plan (P2016-0049-CP) for an office/retail commercial development of approximately 132,500 square feet and structured parking providing a total of 392 spaces (the "Project"). The Project site is described more fully as those portions of Lots 11 and 12 of Tract 1778 and that portion of Lot B of Frank Partenico Place in the City of Culver City, County of Los Angeles, State of California; and

WHEREAS, in order to implement the proposed Project, approval of the following applications are required:

1. Zoning Code Map Amendment: For consistency between land use designation and zoning, specifically the zone change of the Project site from the Commercial General (CG) Zone and East Washington Boulevard Overlay Zone (EW) to Planned Development (PD) Zoning District No. 13, and

1 2. Comprehensive Plan: To establish permitted uses and development standards
2 for the PD zoning, to ensure the Project is in compliance with all City ordinances and
3 conditions of approval, and to reflect the site features and compatibility of the proposed
4 Project with the uses on adjoining properties in compliance with Section 17.240.015
5 ("Planned Development (PD) Zoning Districts") of the Zoning Code; and
6

7 WHEREAS, on May 10, 2017, after conducting a duly noticed public hearing
8 on the subject applications, including full consideration of the applications, plans, staff
9 report, environmental information and all testimony presented, the Planning Commission
10 (i) by a vote of 3 to 0, recommended to the City Council adoption of a Mitigated Negative
11 Declaration, in accordance with the California Environmental Quality Act (CEQA), finding
12 the Project, will not result in significant adverse environmental impacts; (ii) by a vote of 3
13 to 0, recommended to the City Council adoption of a Mitigation Monitoring and Reporting
14 Program (MMRP), which prescribes mitigation measures that will reduce the Project's
15 potentially significant impacts to a less than significant levels; and (iii) by a vote of 3 to 0,
16 recommended to the City Council approval of Zoning Code Map Amendment P2016-
17 0049-ZCMA and Comprehensive Plan P2016-0049-CP for Planned Development District
18 No. 13, as set forth herein below; and
19
20
21

22 WHEREAS, on June 12, 2017, after conducting a duly noticed public
23 hearing on the aforementioned ZCMA and CP requests, including full consideration of the
24 applications, plans, staff reports, environmental finding, Planning Commission
25 recommendation, and all testimony presented; the City Council (i) by a vote of 5 to 0,
26 determined that no new information has become available and no changes in the
27 proposed Project have been made since the Planning Commission recommended
28 approval of the Mitigated Negative Declaration and, therefore, no additional

1 environmental analysis is required and (ii) by a vote of 5 to 0, introduced by first reading
2 Zoning Code Map Amendment, P2016-0049-ZCMA, and Comprehensive Plan P2016-
3 0049-CP, subject to Conditions of Approval referenced herein below.

4 WHEREAS, on June 26, 2017, prior to the adoption of an Ordinance
5 approving Zoning Code Map Amendment, P2016-0049-ZCMA, and Comprehensive Plan
6 P2016-0049-CP, the City Council, in accordance with the California Environmental
7 Quality Act (CEQA), by a vote of ____ to ____, adopted Mitigated Negative Declaration
8 (MND) P2016-0049-MND, inclusive of a Mitigation Monitoring and Reporting Program
9 (prescribing mitigation measures that will reduce the Project's potentially significant
10 impacts to less than significant levels), finding the Project as mitigated, will not result in
11 significant adverse environmental impacts.
12

13
14 NOW, THEREFORE, the City Council of the City of Culver City, California,
15 DOES HEREBY RESOLVE as follows:
16

17 SECTION 1. Pursuant to the foregoing recitations and findings, the City
18 Council of the City of Culver City, California, hereby adopts Mitigated Negative
19 Declaration (MND) P2016-0049-MND, attached hereto as Exhibit A and incorporated
20 herein by reference.
21

22 APPROVED and ADOPTED this ____ day of _____, 2017.
23
24

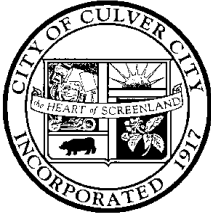
25 _____
JEFFREY COOPER, Mayor
City of Culver City, California

26
27 ATTESTED BY:

APPROVED AS TO FORM:

28 _____
JEREMY GREEN, City Clerk
A17-00394

CAROL A. SCHWAB, City Attorney



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.: 8777 Washington Project
 P2016-0049-CP - Comprehensive Plan
 P2016-0049-ZCMA – Zone Change

Project Location: 8777 Washington Boulevard, Culver City, CA 90232

Project Sponsor: Vitruvian Culver City LLC

Project Description: The Project would redevelop a 42,660 SF (0.98-acre) property located north of the intersection at Washington Boulevard and National Boulevard within Culver City's Transit Oriented Development (TOD) area. The existing single-story commercial (retail/warehouse) building, a café addition, detached storage garage building, and associated asphalt-paved surface parking lot would be removed as part of the Project. The Project includes a 132,500 square foot (SF) commercial development composed primarily of "Class A" office uses within a four-story building (up to 56 feet in height) located over three levels of subterranean parking and surrounded by landscaped areas located on site and within the public right of way. In addition to the office use, the Project would incorporate approximately 4,500 SF of tenant- and commuter-serving retail and food retail uses that open to Washington Boulevard on the Ground Level. The office uses would be located on Levels 2 through 4, including a supporting media screening room that connects the ground and second levels. The Ground Level would have a floor to floor height of 15'-6", levels two through four would have a floor to floor height of 13'-6", with a double-height lobby accessed from the southwest corner of the Project Site. Combined, the office levels would include approximately 128,000 SF of office space. For purposes of this CEQA analysis, it is assumed the Project would include 128,000 SF of office space, 4,500 SF of retail / food retail, and a total of 132,500 SF of space to analyze a "worse-case: scenario" of environmental impacts. Parking for the proposed uses would be provided on site on the Ground Level and within a 3-level subterranean parking structure that accommodates 392 parking spaces.

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

Contact: Michael Allen, Contract Planning Manager (310) 253-5713 or michael.allen@culvercity.org

The public is invited to comment on the proposed MITIGATED NEGATIVE DECLARATION during the review period, which ends **May 10, 2017.**



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ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL DETERMINATION



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INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title:	8777 Washington Project		
City of Culver City Case Nos:	P2016-0049-CP - Comprehensive Plan P2016-0049-ZCMA – Zone Change		
Lead Agency Name & Address:	City of Culver City, Planning Division 9770 Culver Boulevard, Culver City, CA 90232		
Contact Person & Phone No.:	Michael Allen, Contract Planning Manager (310) 253-5713		
Project Location/Address:	8777 Washington Boulevard, Culver City, CA 90232		
Nearest Cross Street:	National Boulevard and Washington Boulevard	APN:	4312-015-007 4312-015-008
Project Sponsor's Name & Address:	Vitruvian Culver City LLC (the Applicant) 5822 West Washington Boulevard Culver City, California 90232		
General Plan Designation:	General Corridor	Zoning:	Commercial General (CG)
Overlay Zone/Special District:	East Washington Overlay (EW)		

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

The Project would redevelop a 42,660 SF (0.98-acre) property located north of the intersection at Washington Boulevard and National Boulevard within Culver City's Transit Oriented Development (TOD) area. The existing single-story commercial (retail/warehouse) building, a café addition, detached storage garage building, and associated asphalt-paved surface parking lot would be removed as part of the Project. The Project includes a 132,500 square foot (SF) commercial development composed primarily of "Class A" office uses within a four-story building (up to 56 feet in height) located over three levels of subterranean parking and surrounded by landscaped areas located on site and within the public right of way. In addition to the office use, the Project would incorporate approximately 4,500 SF of tenant- and commuter-serving retail and food retail uses that open to Washington Boulevard on the Ground Level. The office uses would be located on Levels 2 through 4, including a supporting media screening room that connects the ground and second levels. The Ground Level would have a floor to floor height of 15'-6", levels two through four would have a floor to floor height of 13'-6", with a double-height lobby accessed from the southwest corner of the site. Combined, the office levels would include approximately 128,000 SF of office space. Overall, the Project would include approximately 128,000 SF of office space, 4,500 SF of retail / food retail, and a total of 132,500 SF of space to analyze a "worse-case: scenario" of environmental impacts. Parking for the proposed uses will be managed with valet assistance and includes 392 spaces on the Ground Level and three subterranean levels.

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

Existing Conditions of the Project Site:

The Project Site is currently improved with an approximately 12,485 SF main single-story commercial (retail/warehouse) building occupied by "Surfas Restaurant Supply" used for restaurant supply sales, with an attached approximately 4,731 SF café. Included in the café square footage is an approximately 1,020 SF detached storage building. The majority of the main retail/warehouse building is located on the western third of the site near the intersection of Washington and National Boulevards. The detached storage garage building is located in the northeast corner of the site, with remainder of the site consisting of an asphalt-paved surface parking lot and ornamental landscaped areas. Ingress/egress to the Project Site is available via a curb cut at the eastern end of the site along Washington Boulevard.

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

Locally, the Project Site is within the City's TOD area with Downtown Culver City located approximately 0.5 miles to the west, with the Helms Bakery Complex and the Arts District to the east, and the Hayden Tract to the south. Downtown Los Angeles is approximately seven (7) miles east of the Project Site. The Project Site is bounded by the intersection at Washington Boulevard and National Boulevard followed by vacant land and the Metro Expo Line to the south; the Access Culver City Mixed-Use Development and commercial uses to the east; a surface parking lot for the Metro Culver City Station to the west (future site of the Ivy Station Mixed-Use project); and commercial uses to the north. Interstate 10 (I-10) is located approximately 0.3 miles northwest of the Project Site.

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
- California Department of Transportation (Caltrans)
- 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 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.

Michael Allen

Michael Allen, Contract Planning Manager, Culver City

April 19, 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	Less Than Significant Impact	No Impact
		With Mitigation Incorporated		

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
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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	Less Than Significant Impact	No Impact
		With Mitigation Incorporated		
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
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VII. GREENHOUSE GAS EMISSIONS – 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input 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 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 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
<u>IX. HYDROLOGY AND WATER QUALITY</u> – Would the project:				
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	Less Than Significant Impact	No Impact
		With Mitigation Incorporated		
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
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XIV. PUBLIC SERVICES

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

Fire protection?	<input type="checkbox"/>	<input 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"/>

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? ☐ ☐ ☒ ☐

XVI. TRANSPORTATION/TRAFFIC – 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? ☐ ☐ ☒ ☐
- b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? ☐ ☐ ☒ ☐
- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? ☐ ☐ ☐ ☒
- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ☐ ☐ ☒ ☐
- e) Result in inadequate emergency access? ☐ ☐ ☒ ☐

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"/>

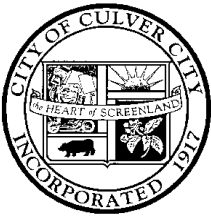
XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:

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



ATTACHMENT A PROJECT DESCRIPTION

A. INTRODUCTION

Vitruvian Culver City, LLC (the Applicant) proposes to redevelop an approximately 42,660 SF (0.98-acre) property located at 8777 Washington Boulevard north of the intersection at Washington Boulevard and National Boulevard in Culver City. The proposed commercial development (8777 Washington or the Project) would include a mix of office, commercial and pedestrian serving retail. The Project Site is currently developed with a main single-story commercial (retail/warehouse) building occupied by the “Surfas Restaurant Supply” for restaurant supply sales and a detached storage garage building, with an associated asphalt-paved surface parking lot. Also, the east portion of the main building includes a café addition. All existing site uses would be demolished and removed to support development of the Project.

The Project has been designed to embrace its location at the intersection of Washington and National Boulevards and within the City’s Transit Oriented Development (TOD) area, placing a 132,500 square foot (SF) commercial development composed primarily of “Class A” office uses within a four-story building (up to 56 feet in height) located over three levels of subterranean parking and surrounded by landscaped areas on site and within the public right of way. In addition to the office use, the Project would incorporate approximately 4,500 SF of tenant- and commuter-serving retail and food retail uses that open to Washington Boulevard on the Ground Level. The office uses would be located on Levels 2 through 4, including a supporting screening room that connects the ground and second levels. Combined, the office levels would include approximately 128,000 SF of office space. Overall, the Project would include approximately 128,000 SF of office space, 4,500 SF of retail / food retail, and a total of 132,500 SF of space to analyze a “worse-case: scenario” of environmental impacts. Parking for the proposed uses will be managed with valet assistance and includes 392 spaces on the Ground Level and three subterranean levels.

The Project’s proposed mix of uses are consistent with the City’s TOD goals of bringing pedestrian and community serving retail and employment together to advance the goals of enhanced regional air quality and multi-modal mobility for Culver City, particularly with the close proximity the Metropolitan Transportation Authority (Metro) Exposition Light Rail Transit (Expo) Line and station. A detailed discussion of the Project is provided below.

B. PROJECT LOCATION AND SURROUNDING USES

Locally, the Project Site is within Culver City’s TOD area, with Downtown Culver City located approximately 0.5 miles to the west, the Helms Bakery Complex and the Arts District to the east, and the Hayden Tract to the south. Downtown Los Angeles is approximately seven (7) miles east 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 bounded by the intersection at Washington Boulevard and National Boulevard followed by vacant land and the Metro Expo Line to the south; the Access Culver City Mixed-Use Development and commercial uses to the east; a surface parking lot for the Metro Culver City Station to the west (future site of the Ivy Station Mixed-Use Project); commercial uses and the boundary line between the City of Culver City and

City of Los Angeles directly to the north. Interstate 10 (I-10) is located approximately 0.3 miles northwest of the Project Site. **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 changes to the site's existing General Plan designations are proposed by the Project.

The site's existing Zoning designations are Commercial General (CG) and East Washington Overlay (EW). The Project is proposing to change the zoning designations for the Project Site to Planned Development with adoption of the Comprehensive Plan. The PD zoning district is applied to areas of existing large scale, multiple family residential and commercial complexes developed as a PD zoning district, and sites suitable for similar large scale development. The PD zoning district is consistent with the General Corridor land use designation of the General Plan.

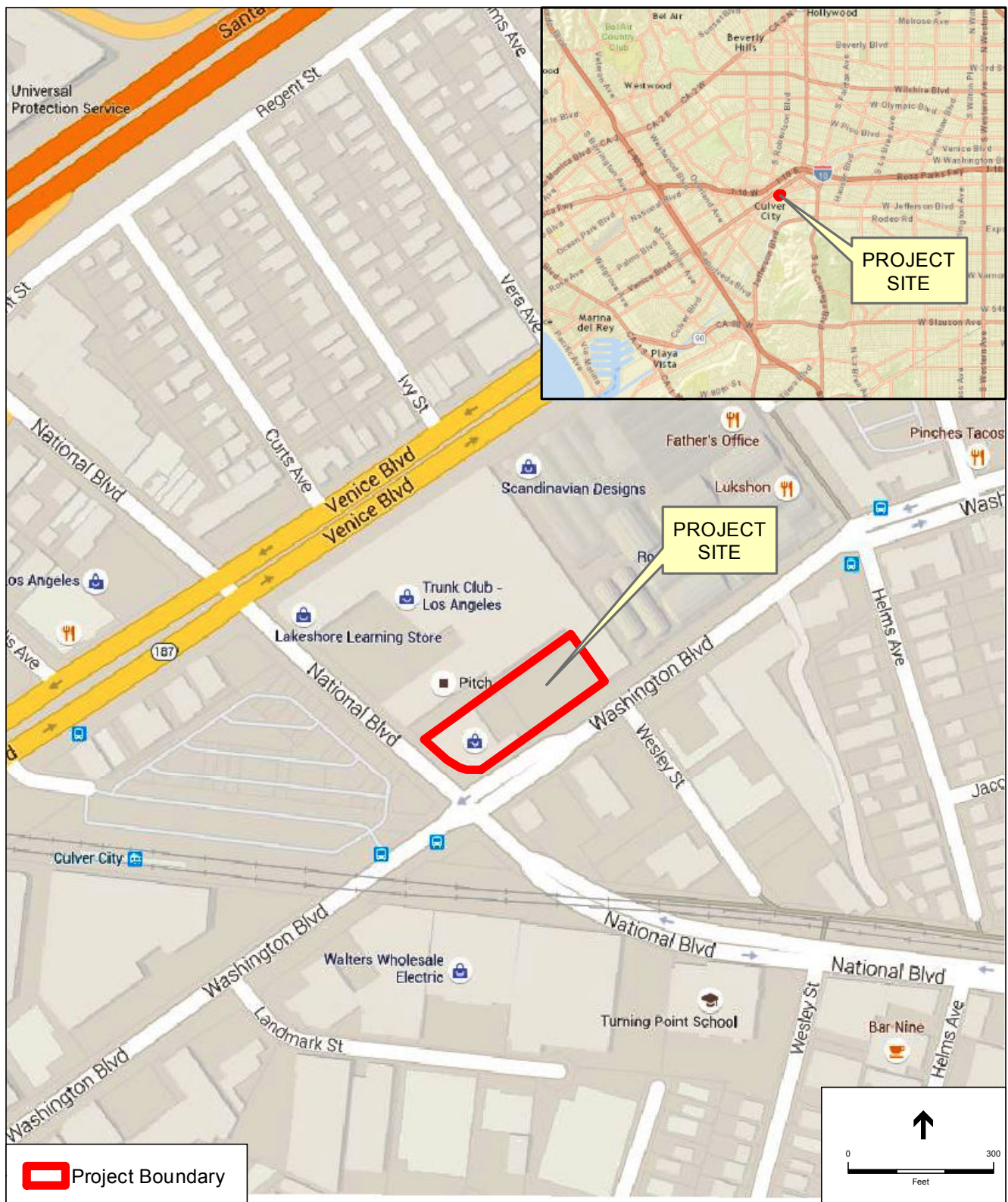
D. EXISTING CONDITIONS

The Project Site is currently improved with an approximately 12,485 SF main single-story commercial (retail/warehouse) building occupied by "Surfas Restaurant Supply" used for restaurant supply sales, with an attached approximately 4,731 SF café. Included in the café square footage is an approximately 1,020 SF detached storage building. The majority of the main retail/warehouse building is located on the western third of the site near the intersection of Washington and National Boulevards. The detached storage garage building is located in the northeast corner of the site, with remainder of the site consisting of an asphalt-paved surface parking lot and ornamental landscaped areas. Ingress/egress to the Project Site is available via a curb cut at the eastern end of the site along Washington Boulevard.

E. DESCRIPTION OF PROPOSED PROJECT

1. Project Uses

The Project is proposing a mix of office and pedestrian and community serving commercial retail uses within a four-story building (up to 56 feet in height). The commercial retail uses would be located on the Ground Level, oriented to a widened pedestrian sidewalk at the Washington Boulevard and the Washington Boulevard and National Boulevard intersection. On Levels two through four, the building would include Class "A" commercial office uses designed to be either a single tenant "headquarter" type space or demisable into several multi-tenant spaces. A tenant-serving media screening room would be located behind the double-height lobby. Parking for the proposed uses will be managed with valet assistance and would be provided on site within a three-level subterranean parking structure, accessed and controlled from the Ground Level entrance that has been designed to accommodate ingress and egress queues. The Project includes landscaped and hardscaped open space areas, and building setbacks at the Ground and upper levels and on all four sides of the Project Site. **Figure A-3, Ground Level Plan**, illustrates the Ground Level for the proposed 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 128,000 square feet of office use, and approximately 4,500 SF of ground floor commercial retail uses.

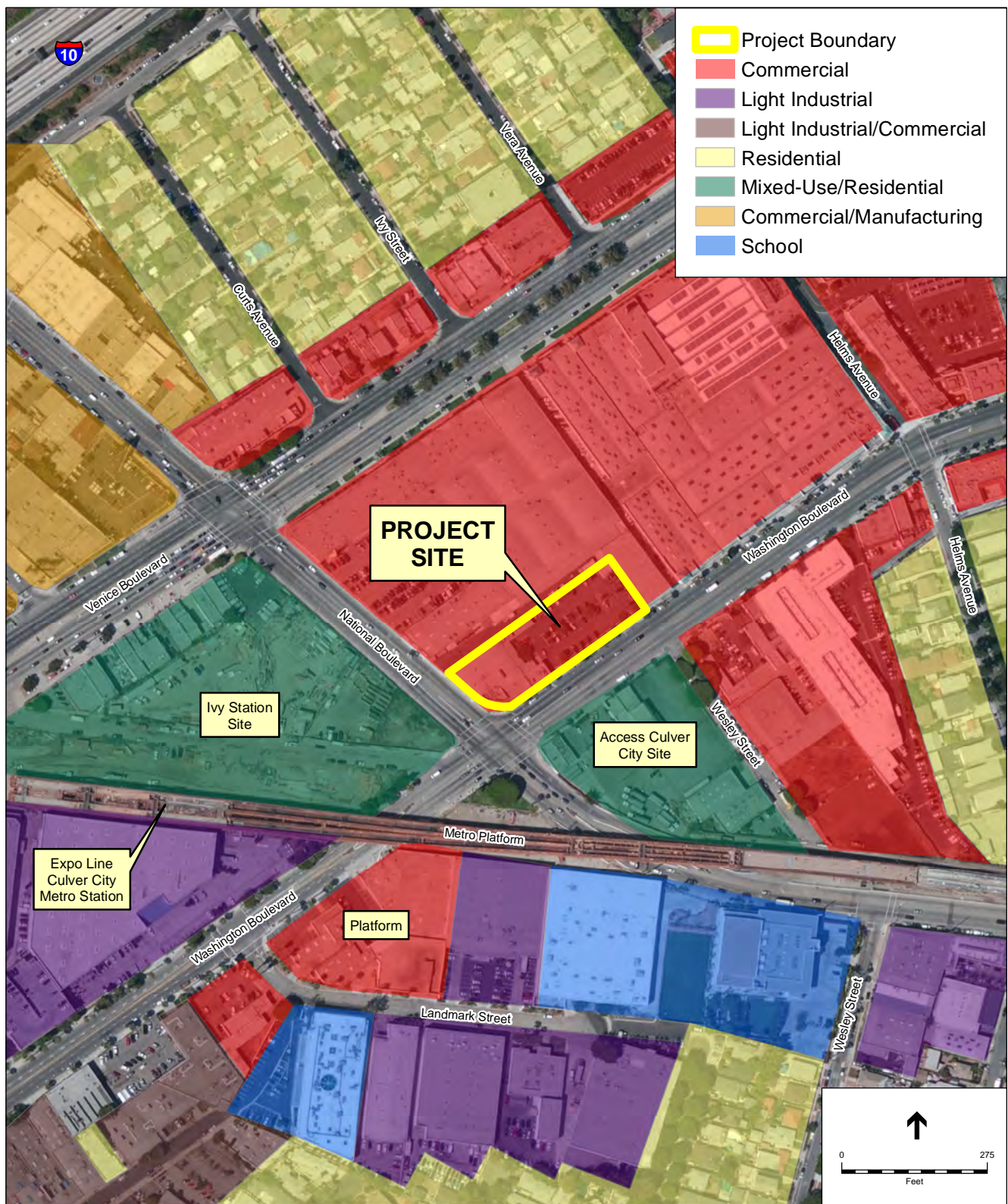


SOURCE: Google Maps, 2015.

8777 Washington

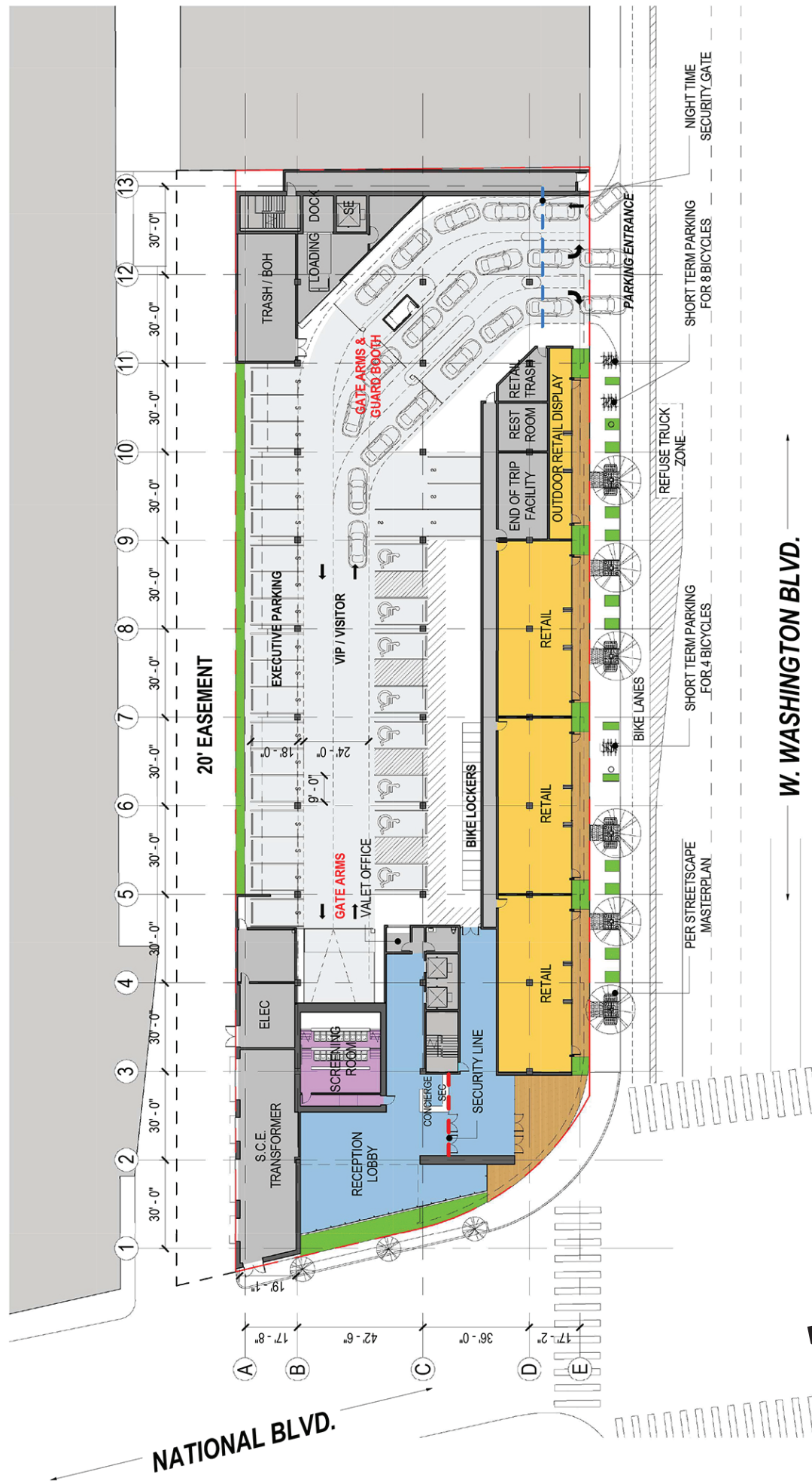
Figure A-1

Regional and Project Vicinity Locations



SOURCE: Google Map, 2015 (Aerial).

Figure A-2
Aerial Photograph with Surrounding Land Uses



SOURCE: Gensler, 2017

8777 Washington
Figure A-3
 Ground Level Plan

Table A-1

Proposed Project Land Use Summary

Office	128,000 SF
Retail (3 @ 1,500 SF/each)	4,500 SF
Total Project SF	132,500 SF
Site Area	42,660 SF

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: 8777 Washington, Comprehensive Plan, Planned Development Zone No. 13, Gensler, 2017.

(a) Ground Level Commercial Component

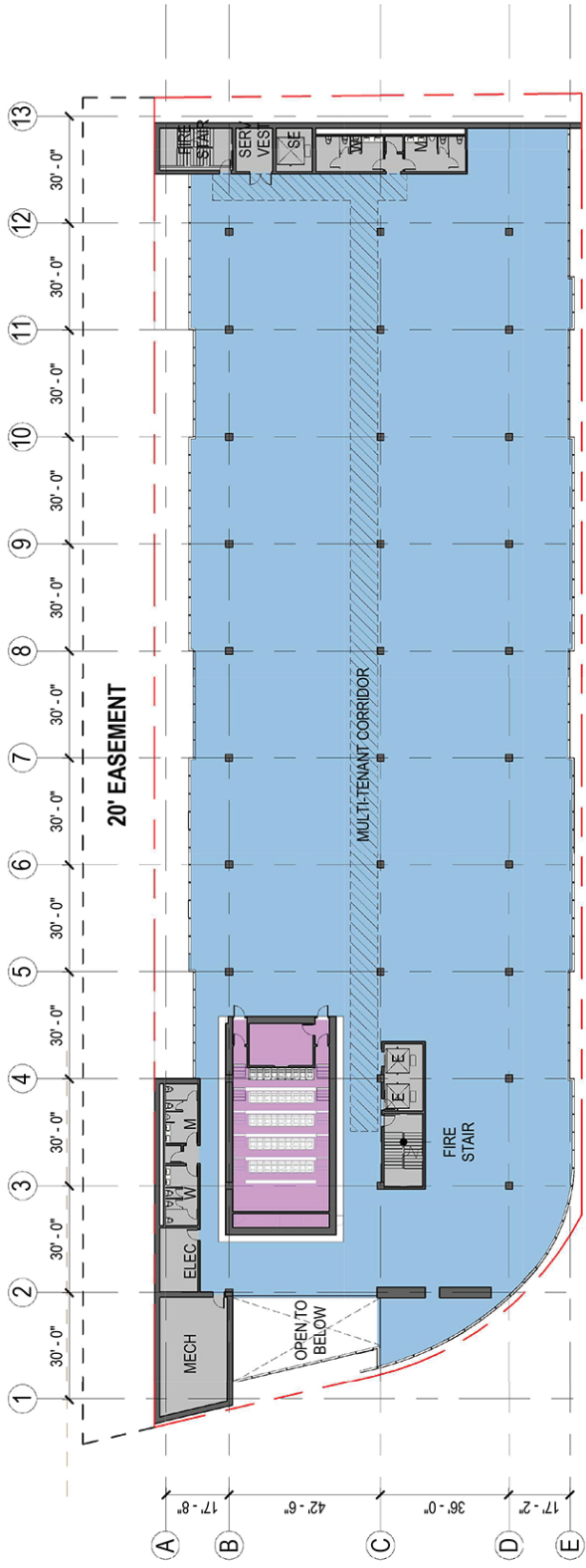
The Ground Level would consist of approximately 4,500 SF of retail and food retail uses oriented toward Washington Boulevard. Retail spaces would be approximately 1,500 SF or less in order to support retail and food retail tenants offering goods and services such as “grab and go” food and beverage, coffee and custom beverages, newspapers and magazines, gifts and flowers, outdoor sales and display, and services such as bicycle rental and repair. Located along the Washington Boulevard frontage and visible from National Boulevard, the retail and food retail tenants would serve Metro commuters to and from the TOD area, pedestrians and bicycle commuters and those working in and visitors to the Project. Figure A-3 illustrates the Project’s proposed commercial uses on the Ground Level.

(b) Office Component

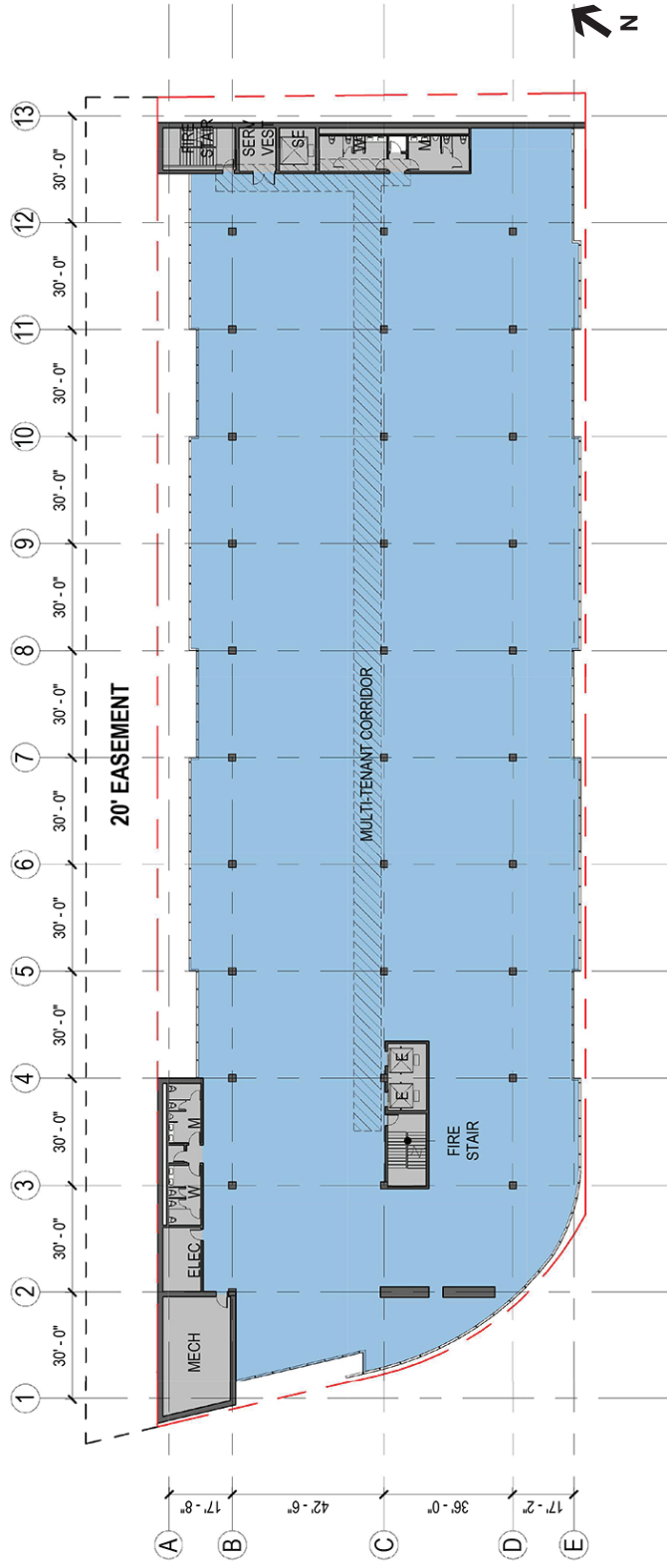
The office component would include three-levels of office uses above the Ground Level. The office level would be served by a double height lobby at the Ground Level that creates visual transparency and engagement with the building program for pedestrians, motorists and rail commuters at the intersection of Washington and National Boulevards. The double height lobby has been designed to integrate with a 49-person screening room that serves the office tenants. The lobby would be accessible from the corner of Washington and National Boulevards and from the ground floor entrance to the Project’s managed parking area. **Figure A-4, Level 2 and Level 3, and Figure A-5, Level 4 and Roof Level Plan**, illustrates the Project’s 3-levels of proposed office uses and the roof.

2. Building Heights and Elevations

The Project has been designed with setbacks along each frontage. The south elevation would introduce a variegated façade that wraps the corner and terminates at the double-height lobby, which would be set back from the National and Washington Boulevards intersection to create a covered entry sequence to welcome visitors to the Project. The west elevation would be composed of a building core element that anchors the northwest corner and contrasts with the clear glazing and transparency of the adjacent double-height lobby. Located on Level four facing west towards National Boulevard, an active outdoor terrace would provide approximately 630 SF of open space. The north side of the Project features two building core elements, one approximately 100 feet long on the west side and one less than 15 feet long on the east side.



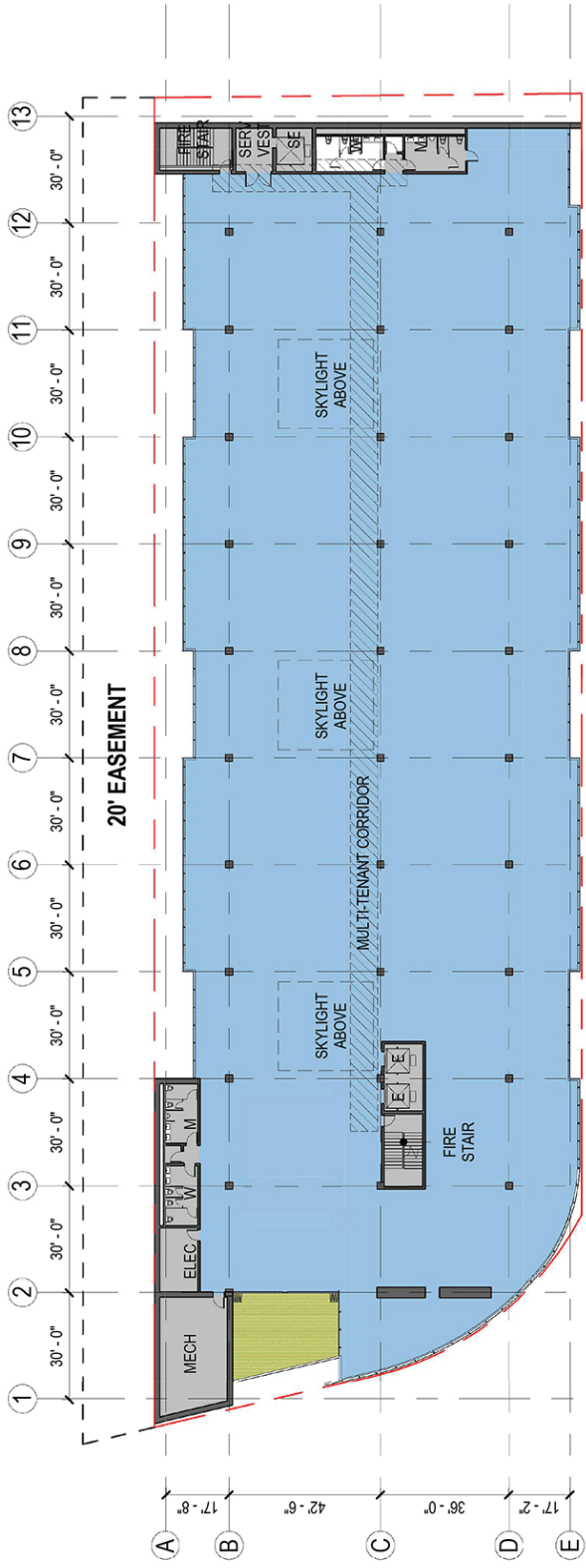
Level 2



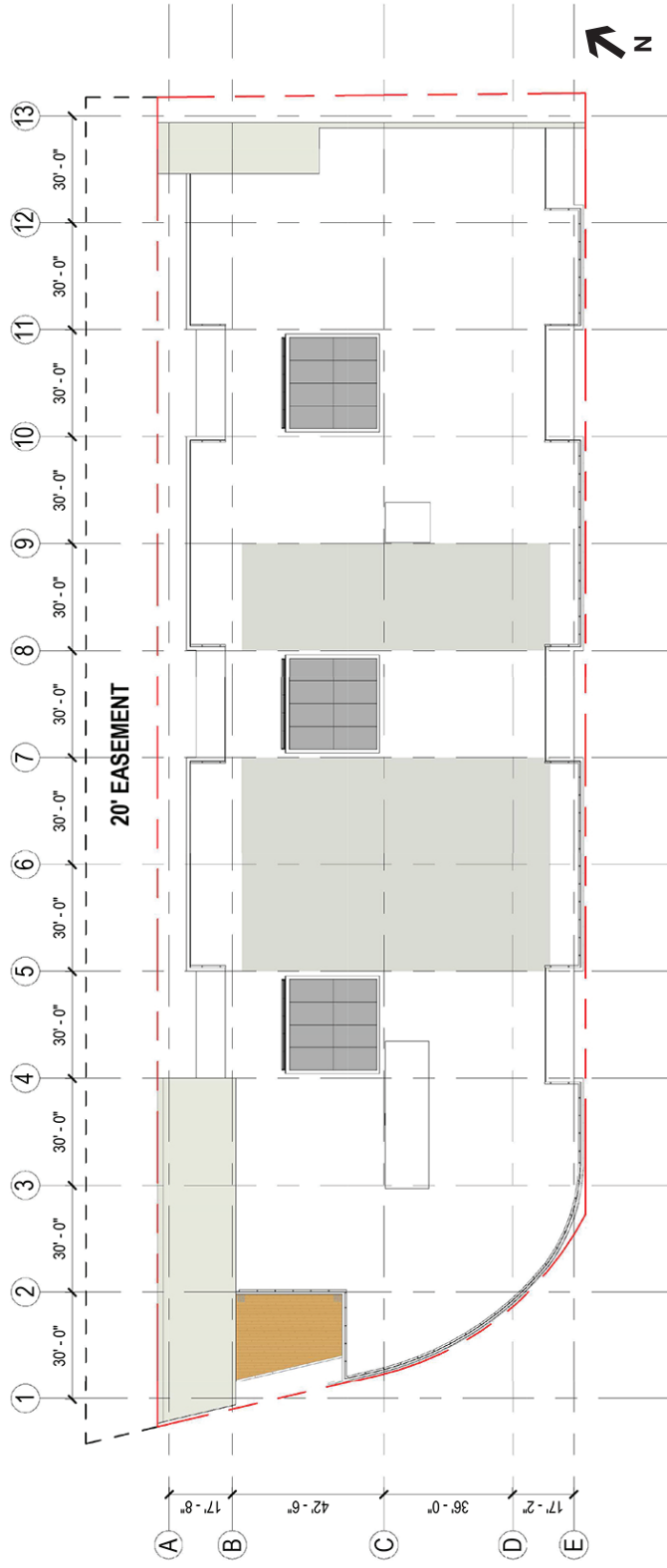
Level 3

SOURCE: Gensler, 2017

8777 Washington
Figure A-4
 Level 2 and Level 3



Level 4



Roof Level



SOURCE: Gensler, 2017

8777 Washington

Figure A-5
Level 4 and Roof Level Plan

The core elements frame three floors of glazing at the office floors situated above an open air portion of the parking below screened from the adjoining property and secured with green-screen fencing. The east elevation would step back at the north corner of the site and expand toward an adjacent two-story structure, terminating in the entrance to the Project's managed parking area with identifying/wayfinding signage.

Building heights would not exceed the maximum allowed height for the site of 56 feet. The Roof Level would feature solar panel utility appurtenances with infilled glazing below to allow natural light to filter into the interior uses and reduce the demand for artificial light sources. The building core elements would rise above the roof plane at the northwestern and eastern ends of the building to anchor the limits of the building. The balance of the structure would contain a glass parapet that protrudes from the roof level to provide a continuous datum line above the variegated façade below. 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's Planning Manager.

Building elevations for the Project are illustrated in **Figure A-6, North and South Elevations**, and **Figure A-7, East and West Elevations**. Building elevations identified in Figures A-6 and A-7 are illustrated in **Figure A-8, Longitudinal Section** and **Figure A-9, Lateral Section**.

3. Parking and Access

(a) Parking

The total number of parking spaces required per the Culver City Municipal Code (CCMC) is 379 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 include 392 vehicular parking spaces within a valet assisted managed parking area distributed over the Ground Level and three levels of subterranean parking.

The parking structure would offer ample parking for low emission vehicles (i.e., hybrid, alternative fuel and electrical automobiles) and carpool vehicles as required by the California Green Building Code (CGBC) (Section 5.106.5.3.3, EV charging space calculation) and including electrical charging stations on each parking level. The Project would provide 8 required handicapped accessible spaces (6 commercial spaces, 2 commercial van spaces).

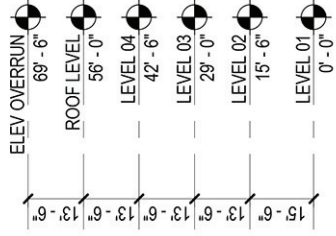
As shown in Figure A-3, direct vehicular access to the parking area would be provided from Washington Boulevard. A traffic signal at the Project driveway along Washington Boulevard at Wesley Street is proposed as part of the Project. Vehicles would enter and exit on the Ground Level via an automatic entry system that would be activated by either a ticket and/or key card system.

(b) Bicycle Parking

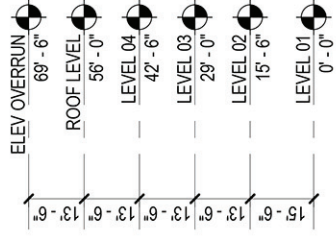
As shown in **Table A-3, Project Bicycle Parking Requirements**, the Project would be required to provide a total of 25 bicycle spaces based on the City's Bicycle and Pedestrian Master Plan (BPMP) requirements. The Project would provide 20 long-term secure indoor bicycle parking spaces within the Ground Level parking area for office and visitor use. To facilitate bicycle commuting, end of trip facilities (i.e., bathroom and showers) would be located on the Ground Level near the indoor bicycle storage area for use by office tenants after arriving by bicycle or walking. In addition, 12 short-term bicycle parking spaces would be located along the public sidewalk on Washington Boulevard adjacent to the public open space and retail/restaurant uses.



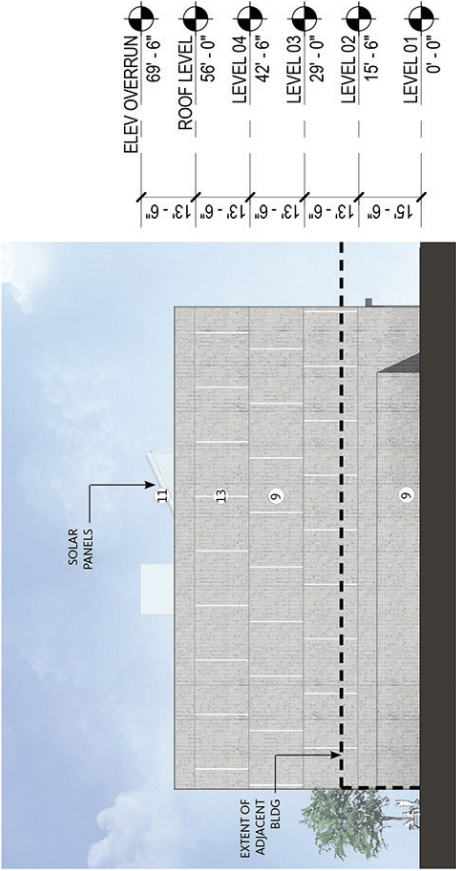
North



South



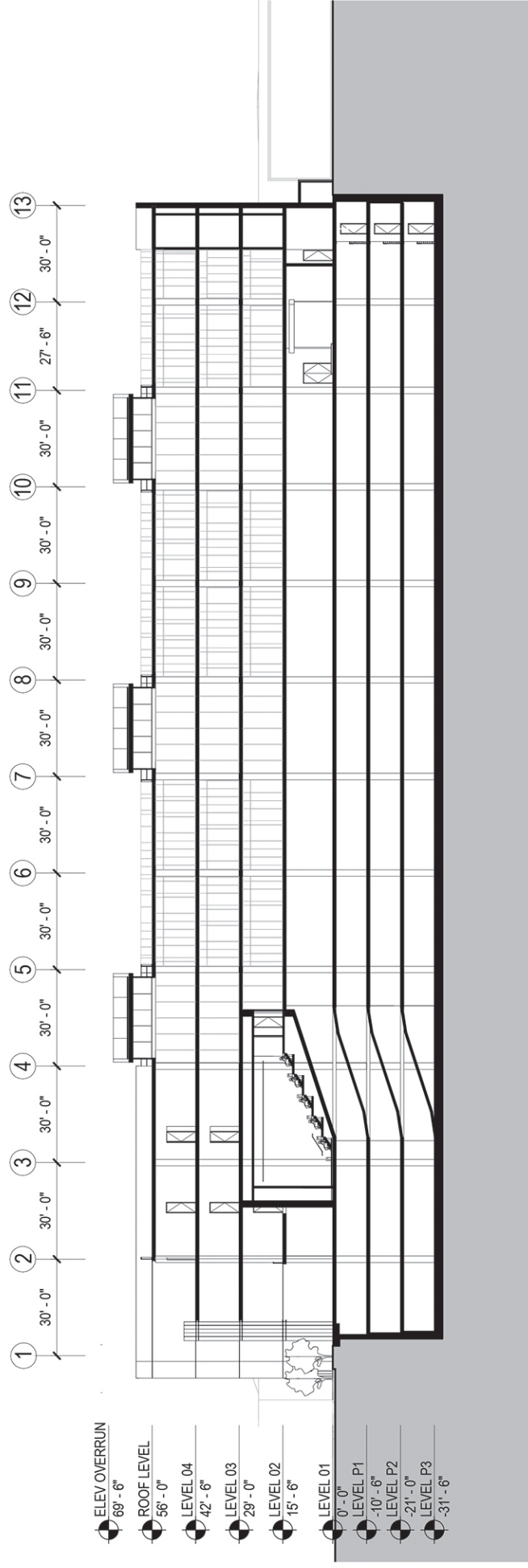
SOURCE: Gensler, 2017



West



East



8777 Washington
Figure A-8
 Longitudinal Section

SOURCE: Gensler, 2017

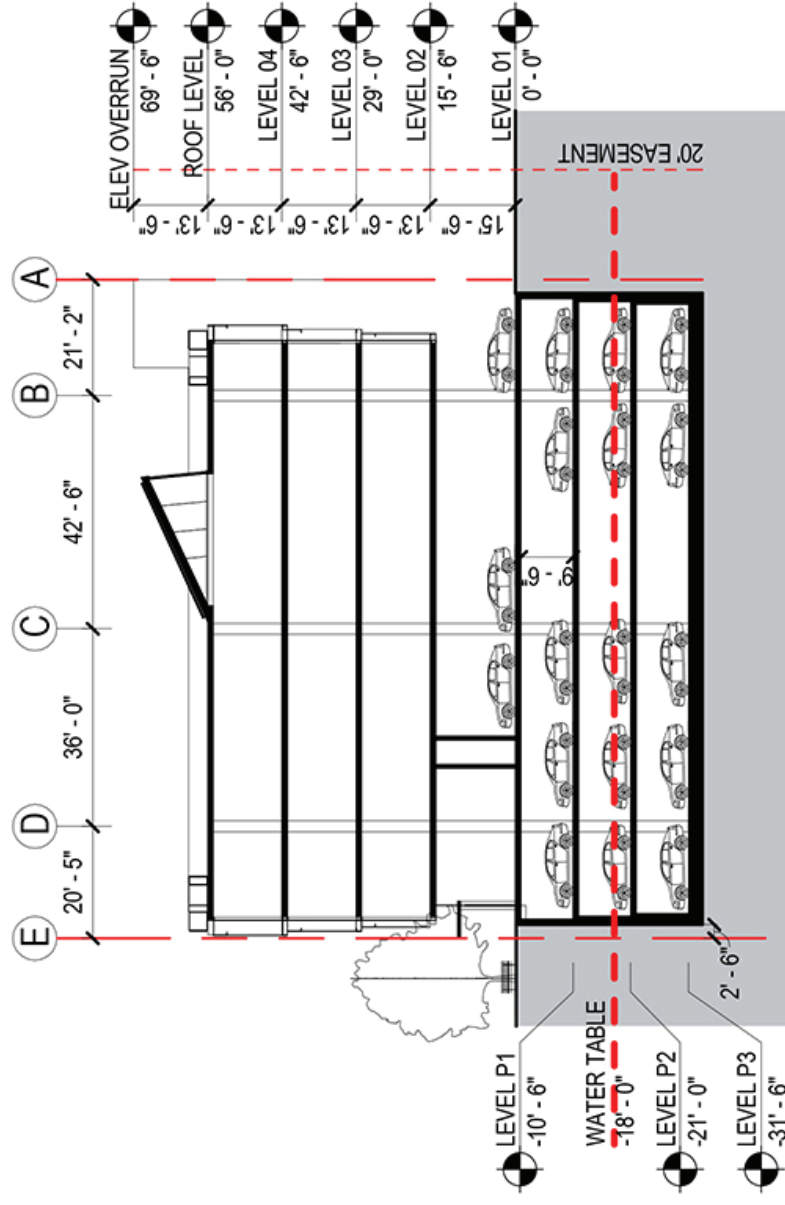


Table A-2
Project Vehicular Parking Code Requirements

	Area (SF) ^b	Required/ Factor ^a	Required	Provided
Office Space ^d	128,000	1/350 SF	366	379
Retail	4,500	1/350 SF	13	13
Total Project Parking			379	392

Notes: SF = square feet

^a Parking requirements based on CCMC, Chapter 17.320: Off-Street Parking and Loading, Section 17.320.020 – Number of Parking Spaces Required.

^b The floor area provided herein includes only the floor space counted towards parking requirements as defined by the CCMC. For example, storage rooms, janitor's closets, trash rooms, and IT rooms are not counted toward the applicable square footage.

Source: 8777 Washington, Comprehensive Plan, Planned Development Zone No. 13, Gensler, 2017.

Table A-3
Project Bicycle Parking Requirements

Bicycle Parking Type	Location	Required	Provided
Retail/Office Long Term	Ground Floor	19	20
Retail/Office Short Term	Sidewalk	6	12
Total		25	32

Source: 8777 Washington, Comprehensive Plan, Planned Development Zone No. 13, Gensler, 2017.

(c) Pedestrian Access

As shown on Figure A-3, pedestrian access to the retail uses would be provided from at-grade sidewalks along Washington Boulevard, and to the office lobby at the corner of Washington and National. The lobby would be accessible to those arriving by car from the parking garage. Office employees would utilize an electronic key system.

4. Open Space, Landscaping and Amenities

The Project would include a total of approximately 3,305 square feet of outdoor open spaces, including 2,675 SF of landscape and hardscape areas along each of the building frontages (Ground Level), and an approximate 630 SF terrace located on Level 4. The Ground Level open space areas would be accessible to the public, including the Washington frontage where the building has been set back six feet to encourage commuter and pedestrian access to Ground Level retail. The Ground Level public open space along National Boulevard and Washington Boulevard would include a streetscape design that includes wide public sidewalks with street trees, landscape planters, tree grates, benches, bicycle racks, trash receptacles, and street furniture to activate the pedestrian environment.

5. Lighting and Signage

Site signage would be used for Project identity, building identification, office and retail tenant identification, 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 a Master Sign Program pursuant to zoning code section 17.330.050.D.2.

Pedestrian areas would be well lit for security. The proposed buildings would include accent lighting to complement the building architecture. Lensed light-emitting diode (LED) downlights would be integrated into the architectural canopies to provide appropriate light levels. 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 planters. In grade LED fixtures would provide focused uplight on the site trees along the perimeter of the site.

6. Sustainability Features

Energy saving and sustainable design would be incorporated throughout the Project. 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 non-wood alternatives for exposed wood products such as Nichiha (simulated wood manufactures from fiber cement) on the wood siding and Resysta (simulated wood manufactures from rice husks) in the wood decks.
3. Using local manufactures and recycled products where possible.
4. Stormwater filtration and capture systems.
5. Permeable exterior paving surfaces to reduce stormwater runoff.
6. Installation of a photovoltaic system, which meets or exceeds the Culver City requirements.
7. Water saving fixtures in all locations including waterless urinals in public restrooms and water saving landscaping.
8. Water meter installation for irrigation as well as monitoring for tenants, retail food service, and other occupants that consume more than 1,000 gallons of water per day.
9. Incorporation of low-water and drought tolerant plants in the landscape plan.
10. Irrigation using captured stormwater.
11. Irrigation timers with rain sensors.
12. Dual and triple low emissivity glazing.
13. High reflective roof material.
14. High efficiency heating and air conditioning systems.
15. Occupancy sensor lighting in all common areas.

16. 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;
17. Natural ventilation and lighting.
18. On-site recycling collection facilities

Carbon Emission Reduction

1. Bicycle racks spread along the Washington Boulevard portion of the site for public use.
2. Other bicycle oriented facilities include safe lockable storage areas for office use.
3. Secured-access end-of-trip amenities such as bathrooms and showers for use by office tenants in order to promote riding to work.
4. Commercial office development adjacent to public transit.
5. Participation in a public transportation pass program for tenants in order to promote use of public transportation.

7. Mobility Features

The Project's strategic location near multi-modal facilities including Metro's Expo Line and Culver City Station, local and regional bus transit stops, and bike lanes or facilities presents an exceptional opportunity to use alternative modes of travel and enhance mobility. Some specific initiatives include:

1. Access to multi-modal transportation including bike, bus, and light rail transit routes. The property is located northeast of the Culver City Metro Station, which is the approximate center of the Expo line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to numerous local and regional bus routes and bicycle lanes/facilities.
2. Bike friendly design with bicycle parking for visitors and occupants. Also, the City of Culver City is studying the adoption of a bike share program as part of its mobility planning. When an operator is selected for a future bike share program, the Project would subsidize bike share participation for employees of tenant businesses via integration with the transit TAP card or other similar mechanism.
3. Designated parking for low-emission/zero-emission vehicles, carpools and loading areas for shared-ride vehicles to allow for convenient pick up and drop off for visitors and occupants utilizing Uber, Lyft, and other similar rideshare companies.
4. Site planning to allow bicycle connections to the Expo Line bike path and Culver City and City of Los Angeles bike paths. Regarding the Expo Line bicycle path, this path has been constructed along most of the Expo Light Rail alignment, but not in the vicinity of the Project. The City of Culver City is undertaking a study regarding options to complete the bicycle path. The Project's setbacks have been designed to accommodate a future bicycle and parking lane along the Washington Boulevard right-of-way should the City determine that alignment best meets its mobility objectives.
5. Promotion of walking through a "walk to work" program in coordination with the on-site office employees and a posted neighborhood map with approximate walking distances and times to local neighborhood amenities.
6. The perimeter of the site area will incorporate the City's TOD Streetscape Plan which will create an attractive and inviting walkable environment.

7. Office tenants provided with end-of-trip facilities that include shower(s) and changing room.

8. Site Security

The Project would incorporate a 24-hour/seven-day video surveillance security program to ensure the safety of its office, retail and site visitors. 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 site tenants and visitors.

9. Loading and Trash Removal

Loading for large deliveries for office and retail uses would occur in a designated loading area located on site on the Ground Level upon entering the parking structure, as shown Figure A-3. These loading areas would be accessed from Washington Boulevard and designed to allow for box trucks and smaller vans to head into the space fronting the entry driveway and then reverse into the loading areas. Delivery drivers would access the retail uses on the Ground Level from the loading area through appropriate corridors. Access for deliveries would be from either loading area or the secured parking areas by use of elevators accessible on all parking levels. Delivery vehicles would not block access to the retail parking areas.

A scout service, or an employee of the City's Environmental Programs and Operation (EPO) Division, would collect all trash bins serving the Project from the dedicated trash rooms and move the bins to a curbside collection area where the refuse would be collected by the City's EPO truck(s). The trash bins would then be returned to the dedicated trash rooms by the scout service.

10. Construction Schedule/Activities

A Preliminary Construction Traffic Management Plan has been prepared for the Project.¹ This plan 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 the plan is to describe the scope and anticipated scheduling and 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. The plan describes 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. A Final Construction Traffic Management Plan will ultimately be required to be reviewed and approved by the City.

As discussed within the Plan, the Project would comply with Culver City's allowable construction hours of (Chapter 9.07: Noise Regulations, Section 9.07.035 Construction):

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

¹ Preliminary Construction Traffic Management Plan, 8777 Washington Boulevard, prepared by Morley Builders, 2017, which is available for review at the Culver City Planning Division.

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 Traffic Management Plan; Erosion and Sediment Control Plan; and Shoring and Excavation Plan. The Final Construction Traffic 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: Traffic Control Plan including, but not limited to vehicular, bicycle, and pedestrian traffic routing; Off-site Civil work including lighting, signage, landscape, paving, and striping; and After Hours Application.

It is anticipated that construction activities would commence as early as Summer 2017 with full build-out and occupancy occurring in Fall/Winter 2019.

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:

- Zone Change from General Commercial (GC) and East Washington Overlay (EW) to Planned Development 13 (PD-13) (CCMC section 17.240 et seq).
- Comprehensive Plan pursuant to CCMC section 17.560.020.
- 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



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, light manufacturing, residential buildings and the Metro Expo Line and Metro Culver City 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 in height) and skylight/photovoltaic projections, the immediate surrounding area consists of a range of one- to five-story buildings, including the recently constructed Access Culver City and Platform projects. Further, the future two to six-story Ivy Station mixed-use project is located immediately to the west of the Project Site. 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 Culver City Station is an elevated railway that provides public views. Long-range views would be mostly obstructed by the adjacent Access Culver City development and the structures of the Ivy Station mixed-use 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 main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot.

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 ornamental landscaped trees, 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 Department of Public Works based on what is appropriate for the particular Street Right-of-Way or Parkway. The Project would result in an increase in landscaping compared to existing conditions.

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 main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot. 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 and ornamental landscaping within the site.

Upon Project completion, the Project would support office uses with pedestrian serving retail/food retail uses within a four-story building (up to 56 in height). The pedestrian and community serving retail uses would be located on the Ground Level and would be set back from the property line by approximately six feet allowing for a more generous outdoor experience. The large opening to the retail areas would enhance the indoor/outdoor feature of the retail space. On Levels 2 through 4, the building would contain office space designed for Class “A” office tenants. The office space would run the length of the site with a lobby entrance located at the corner of Washington Boulevard and National Boulevard. The double height lobby also accommodates a tenant-serving media screening room with primary access from Level 2 and secondary access from the lobby. Parking for the proposed uses would be provided on site within a 3-level subterranean parking structure and on the Ground Level.

This Project is sited within Culver City’s TOD area. Centrally located with the Helms Bakery Complex and Arts District to the east, Hayden Tract to the south, and downtown Culver City just to the west, the Project would be one part of a larger scheme that places the Washington/National area at the fulcrum of Culver City activity. A driving force behind the revitalization of the TOD area is the Expo Line connecting downtown Los Angeles with Culver City. The proposed Project has been designed with the goal of bringing office and retail uses within walking distance of the Culver City Expo Line station.

The Project’s design evolved from the study of the revival and repurposing of both the Helms Bakery Complex and the Hayden Tract that have become home to successful retail venues and hubs of creative technology and media businesses. **Figure B-1, Map of View Locations**, illustrates representative locations that have views of the Project Site. **Figure B-2, View Locations 1 and 2**, provides a visual perspective of the Project from the corner of Washington Boulevard and National Boulevard (View Location 1) and from National Boulevard (View Location 2).



SOURCE: Google Map, 2015 (Aerial).

8777 Washington
Figure B-1
 Map of View Locations



VIEW LOCATION 1: Northerly view of project from corner of Washington Boulevard and National Boulevard.



VIEW LOCATION 2: View of project from National Boulevard.

SOURCE: Vitruvian Culver City LLC, American General Design, 2017

8777 Washington
Figure B-2
 View Locations 1 and 2

The Ground Level would include a floor-to-ceiling clear glass within a natural aluminum storefront system. As illustrated from View Location 1, the office component has been designed as varied façade with stepped floor plates to create visual interest as it curves along the Washington Boulevard and National Boulevard intersection. Sections of the stepped back flat window wall along Washington Boulevard serve to break down the massing of the building along the street. The base of the building is stepped back at the Ground Level along Washington Boulevard and at the intersection to allow more generous pedestrian and visual experience.

The office levels would be in a concrete frame with high efficiency clear glass and aluminum window walls from floor-to-ceiling, which would allow natural light to filter through the interior spaces. Portions of this window system may be operable with the intention of featuring natural ventilation, while also providing visual breaks along the window shell. Further, some of the window wall sections may be solid insulated panels to allow for privacy and meeting sustainable and efficiency standards. The west façade at the double height lobby would step back approximately six feet from the sidewalk. Additionally, on Level 4, an open air terrace would be set back from the building edge. The north façade, at the window wall areas, would be set back in order to provide natural light and air into the Ground Level parking area. The north façade would be bookended by building cores on the eastern and western portions of the site. The building cores would be concrete with punctuated by vertical lighting accents and horizontal regulating lines to break down the scale and create visual interest. The Roof Level would be visible from View Location 2. The Roof Level would include the solar panel utility appurtenances and skylight architectural elements with infilled glazing below and roof mounted 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, and conform to City height limits.

Figure B-3, *View Locations 3 and 4*, provide a view of the Project from Washington Boulevard (i.e., View Location 3) and a southwesterly view of the Project from Washington Boulevard towards National Boulevard (i.e., View Location 4). View Locations 3 and 4 illustrates Ground Level retail uses and parking structure entrance. This portion of the building would include clear glazed retail openings and large operable glazing units to allow for indoor/outdoor retail uses. The commercial office floors would step out approximately nine inches from floor to floor, allowing for a shadow pattern along the south façade.

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 north, the TOD area is in the process of revitalization and transition with recent development projects occurring throughout the Project vicinity. For example, the proposed building heights and massing would be compatible with the adjacent five-story Access Culver City mixed-use project to the east and the one- and multi-story building(s) and parking structure (up to 5-stories) constructed as part of the Platform project located to the southeast, both of which also include architecturally modern buildings that support a mix of land uses. Further, the future two to six-story Ivy Station mixed-use project will be located immediately to the west of the Project Site. 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).



VIEW LOCATION 3: View of project from Washington Boulevard.



VIEW LOCATION 4: Southwesterly view of project from Washington Boulevard towards National Boulevard.

SOURCE: Vitruvian Culver City LLC, American General Design, 2017

8777 Washington
Figure B-3
 View Locations 3 and 4

The Project's Ground Level would include a streetscape design, consistent with the TOD Streetscape Plan, that includes wide public sidewalks with street trees, landscape planters, tree grates, benches, bicycle racks, trash receptacles, and street furniture to activate the pedestrian environment and to improve the street-level visual corridor of National Boulevard and Washington Boulevard. The Ground Level pedestrian and community serving retail would be set back from the property line by six feet allowing for a more generous pedestrian experience at the Washington Boulevard façade and the Washington Boulevard and National Boulevard corner. 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.

As 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, bicycle racks, 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 currently developed with a main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot. The Project Site is located in a highly urbanized area, with a mix of commercial, light manufacturing, residential buildings and the Metro Expo Line and Metro Culver City Station, characterized by buildings of varying heights. The Project Site is bounded by the intersection at Washington Boulevard and National Boulevard followed by vacant land and the Metro Expo Line and Metro Culver City Station to the south; the Access Culver City mixed-use development and commercial uses to the east; a surface parking lot for the Metro Station to the west (future site of the Ivy Station mixed-use project); and commercial uses to the north. There would be windows/balconies as part of the Access Culver City and Ivy Station buildings that face the Project Site.

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 including the Metro Culver City Station. 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 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 the Project's *Shade/Shadow Report* prepared by ESA-PCR in February 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. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October.¹ **Figure B-4, *Project Shadows***, illustrates the shadows cast by the Project on nearby surrounding uses to the north, northwest, and northeast, in 2-hour increments from 10:00 AM and 4:00 PM during the winter solstice, the worst case scenario, as well as the summer solstice, spring equinox, and fall equinox.

Shade sensitive uses in the Project vicinity are limited to the routinely usable outdoor spaces within the future Ivy Station mixed-use project (to the west) and the Access Culver City project (to the south and southeast).

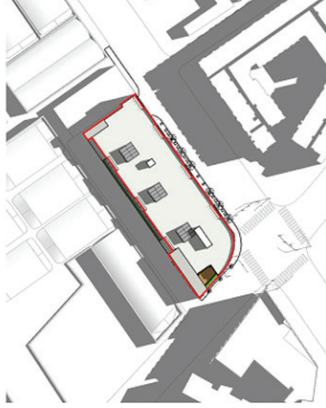
The longest shadows cast at 9:00 A.M. to the northwest and 3:00 P.M. to the northeast, occurring during winter solstice (December 21st) at a bearing of 45 degrees and extend for a distance of roughly 3 times the height of the source. At this time of year, the proposed buildings would cast shadows approximately around 170 feet in length to the northwest at 3:00 P.M. and to the northeast at 3:00 P.M. Thus, the Project building's shadow would not reach the residences to the west or south as they don't cross National and Washington Boulevards.

¹ *Shadow impacts thresholds based on criteria set forth in the City of LA CEQA Thresholds Guide (2006).*

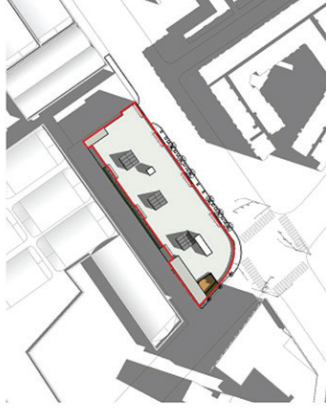
WINTER SOLSTICE



10:00am



12:00pm

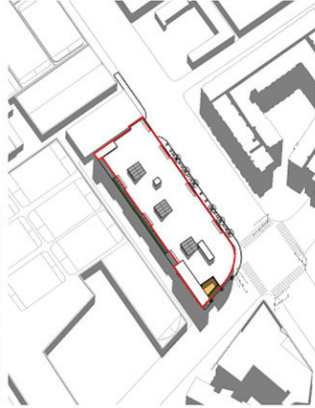


2:00pm

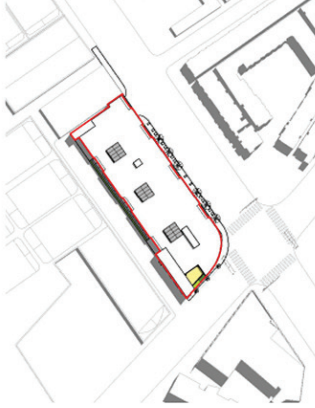


4:00pm

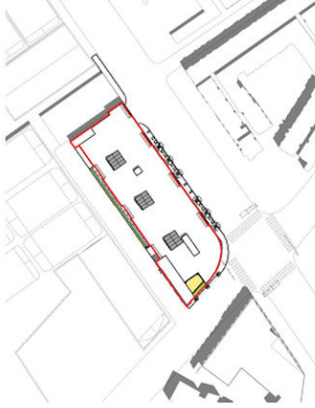
SUMMER SOLSTICE



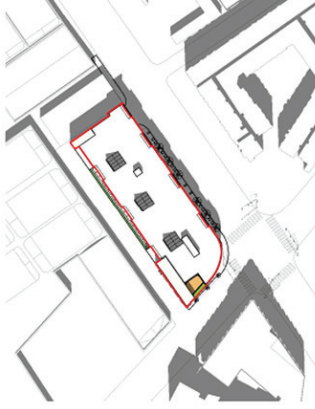
10:00am



12:00pm

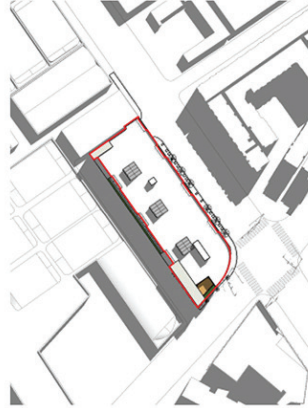


2:00pm

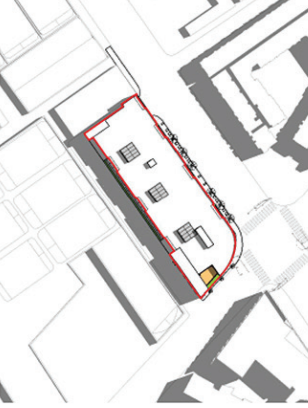


4:00pm

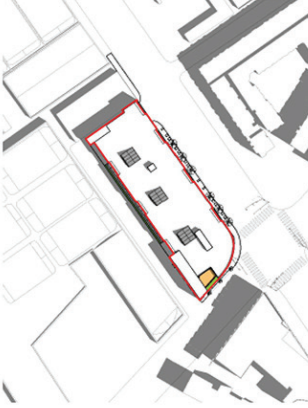
SPRING / FALL EQUINOX



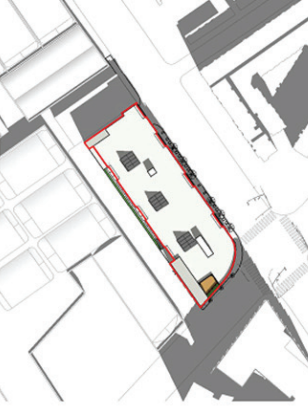
10:00am



12:00pm



2:00pm



4:00pm

SOURCE: Gensler, 2017

8777 Washington

Figure B-4
Project Shadows

The multi-family residential uses as part of the Ivy Station project to the west would be located over 100 feet from the Project Site and thus well beyond any potential shadows that could be cast by the Project. Summer Solstice and the Spring and Fall Equinox morning shadows would be cast directly to the west, but their reach would only be 75 feet in maximum length, so they would not reach the future Ivy Station site and its residential uses.²

The only other shadow sensitive uses near the site that could be subject to Project shadows are the residential uses and associated routinely usable outdoor spaces within the Access Culver City project to the east and southeast of the Project Site. The Access Culver City project is a mixed-use development that includes multi-family uses to the east and southeast of the Project Site (over 100 feet away) across the intersection of National Boulevard and Washington Boulevard. However, only Summer Solstice and Fall Equinox's afternoon shadows prior to 5:00 P.M. PDT would be cast toward the east of the proposed Project Site. Those shadows would have a maximum length of 75 feet and therefore not cross Washington Boulevard and impact the Access Culver City Access residential uses. Both the Access Culver City and Ivy Station projects sites are shown as a "shade/shadow-sensitive residential uses" in Figure B-4.

In conclusion, no shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM between late October and early April, or for more than four hours between the hours of 9:00 AM and 5:00 PM between early April and late October. As a result, the addition of the Project would not significantly increase the shading of adjacent 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 main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot. 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

² Maximum morning shadow lengths to the west of the project site at Los Angeles's geo-location occur during the summer solstice (June 21st) at a bearing of 85 degrees at this time of the year. The project would cast shadows approximately 75 feet in length to the west. Thus, the proposed building's shadow would not reach the off-site residences to the west.

Program.³ 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 designations are Commercial General (CG) and East Washington Overlay (EW). The Project is proposing to change the Zoning designations for the Project Site to PD-13 District with adoption of the Comprehensive Plan. 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.

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 designations are Commercial General (CG) and East Washington Overlay (EW). 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.

³ State of California Department of Conservation, California Important Farmland Finder, <http://maps.conservation.ca.gov/ciff/ciff.html>, accessed June 2016.

III. AIR QUALITY

The following impact analysis pertaining to air quality impacts is based on information contained in the Project's *Air Quality Technical Report* prepared by ESA-PCR in February 2017, which is available for review 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. The Project Site is located within the 6,745-square-mile South Coast Air Basin (SoCAB). Air quality planning for the SoCAB is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Project would be subject to the SCAQMD's Air Quality Management Plan (AQMP), which contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

Project construction would result in an increase in short-term or temporary employment compared to existing conditions. Being generally small in number and temporary in nature, construction jobs under the Project would not conflict with the long-term employment projections upon which the AQMP are based. Control strategies in the AQMP with potential applicability to temporary emissions from construction activities include strategies denoted in the AQMP as ONRD-04 and OFFRD-01, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. In accordance to such strategies, the Project would use a portion of the construction off-road heavy-duty equipment fleet that meets or exceeds stringent U.S. Environmental Protection Agency (USEPA) Tier 3 emissions standards and a portion of the truck fleet would utilize long-haul trucks that meet or exceed USEPA model year 2010 emissions standards. Additionally, the Project would comply with California Air Resources Board (CARB) requirements to minimize idling emissions from diesel-fueled vehicles. The Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403. Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

As discussed under Response X.b, below, the Project would be consistent with applicable City policies for transit-oriented development and Southern California Association of Governments Regional Transportation Plan which support establishing a land use pattern that reduces vehicle trips and air pollution by locating employment opportunities (office and retail) uses within an area that has public transit (with access to rail lines), restaurants and entertainment all within walking distance.

As discussed under Response XIII.a, below, the Project could result in a total employment increase of approximately 165 employees. Project-related employment growth is within the SCAG 2012 Regional Transportation Plan (RTP) projections which forms the basis of the 2012 AQMP growth projections. Thus, operation of the Project would have no significant impacts related to consistency with the AQMP.

In addition to the AQMP, there are Metro air quality programs relevant to the Project. The Congestion Management Program (“CMP”) was enacted by Metro to address traffic congestion issues that could impact quality of life and economic vitality. The intent of the program is to provide an analytical basis for transportation decisions throughout the state. An analysis is required at all CMP monitoring intersections for which a project is projected to add 50 or more net trips at any CMP intersection during any peak hour. In addition, analysis is required for all freeway segments for which a project is projected to add 150 or more hourly trips, in each direction, during the peak hours analyzed.

The Project is not expected to generate 50 trips at any CMP intersection during any peak hour during construction or operational phases (refer to Response XVI.b below). As a result, the Project would not exceed any CMP thresholds, and no impact to the CMP network would occur. Thus, the Project would not conflict with or obstruct implementation of the CMP.

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. As indicated above, the Project Site is located within the SoCAB, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the SoCAB, including those monitoring stations nearest to the Project location. The Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and Project occupancy (long-term). However, based on the following analysis, construction and operation of the Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases.

Construction Impacts

Construction has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from the Project Site. In addition, fugitive dust emissions would result from construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials would release VOCs. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for volatile organic compounds (“VOCs”), (2) 100 pounds per day for nitrogen oxides (“NOx”), (3) 550 pounds per day for carbon monoxide (“CO”), (4) 150 pounds per day for sulfur oxides (“SOx”), (5) 150 pounds per day for PM10, and (6) 55 pounds per day for PM2.5.⁴

⁴ South Coast Air Quality Management District, *Air Quality Significance Thresholds*, (March 2011), <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>, accessed September 2015.

The Project would involve demolition of existing uses (i.e., surface parking lot and a single story commercial building near the intersection of Washington and National Boulevards) and construction of an office building with pedestrian serving retail and food retail uses, in addition to potential off-site infrastructure upgrades/improvements (i.e., water and sewer lines) (discussed below in Section XVII, *Utilities and Service Systems*). Construction activities would include demolition, excavation, building construction, architectural coatings and paving. Construction would take place over approximately 2.25 years, anticipated to begin in mid-2017. Full build-out and occupancy would occur in 2019. During construction, a variety of heavy-duty diesel powered equipment will be used on site. Building construction and finishing activities will require equipment such as excavators, drill rigs, cranes, concrete pumps, and air compressors. Regional construction-related emissions associated with construction equipment were calculated using the SCAQMD-recommended California Emissions Estimator Model (“CalEEMod”).

This analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of maximum daily regional emissions resulting from construction of the Project is presented in **Table B-1, Maximum Regional Construction Emissions**, along with the regional significance thresholds for each air pollutant. As shown therein, maximum regional emissions would not exceed the thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Therefore, regional construction impacts would be less than significant, and mitigation measures would not be required.

Table B-1

Maximum Regional Construction Emissions (pounds per day) ^a

Regional Emissions	VOC	NO_x	CO	SO₂	PM₁₀ ^b	PM_{2.5} ^b
Demolition- 2017	2	15	12	0.0	2	1
Mass Grading/Excavation and Drainage/Utilities/Sub-Grade - 2017	6	67	47	0.1	5	3
Drainage/Utilities/Sub-Grade and Building Construction - 2017	7	53	51	0.1	5	4
Building Construction - 2018	6	43	47	0.1	5	3
Building Construction, Paving, Architectural Coating - 2019	43	44	54	0.1	5	3
Maximum Regional (On-Site and Off- Site) Emissions	43	67	54	<1	5	4
SCAQMD Numeric Indicators	75	100	550	150	150	55
Over/(Under)	(32)	(33)	(496)	(150)	(145)	(51)
Exceed Threshold?	No	No	No	No	No	No

^a The emissions shown in table include emissions reductions from SCAQMD Rule 403 requirements. Totals may not add up exactly due to rounding in the modeling calculations

Source: ESA, 2016.

Operational Impacts

The SCAQMD has separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term Project operations. Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard

to operational emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOCs, (2) 55 pounds per day for NO_x, (3) 550 pounds per day for CO, (4) 150 pounds per day for SO_x, (5) 150 pounds per day for PM₁₀, and (6) 55 pounds per day PM_{2.5}.⁵ Regional air pollutant emissions associated with Project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., electricity generation and natural gas consumption) are classified by the SCAQMD as regional stationary source emissions.

The Project would be designed to meet the standards for Leadership in Energy and Environmental Design (LEED) Silver level by the U.S. Green Building Council (USGBC) through the incorporation of green building techniques and other sustainability features. The Project also would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the Culver City Green Building Program (as required by Culver City's standard conditions of approval). Some of the Project's "green building measures" as part of its design to reduce Project-related criteria pollutant emissions would include, but are not limited to the following:

- Installation of a 14 kilowatt photovoltaic system, as required by the City's standard conditions of approval.
- 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.
- Installation of dual-flush toilets and waterless urinals to reduce indoor water usage and wastewater generation.

Regional operational emissions for the Project were calculated using CalEEMod, and model results are provided under separate cover available at the Culver City Planning Division. Inputs into the CalEEMod model include Project-related vehicle trips and square footage to determine energy and water usage as well as waste generation. The Project would result in a net increase of 30 average daily vehicle trips to the site during its first operational year (2019) (as discussed in Response XVI.a, below) which were input into the CalEEMod model.

A summary of maximum daily regional emissions resulting from Project operation is presented in **Table B-2, Maximum Regional Operational Emissions**, along with the regional significance thresholds. As shown in Table B-2, the Project would not generate air pollutant emissions exceeding the SCAQMD thresholds of significance listed above. Therefore, the Project would have a less than significant impact on air quality resulting from long-term operational emissions, and no mitigation measures would be necessary.

⁵ South Coast Air Quality Management District, *Air Quality Significance Thresholds*, (March 2015), <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed October 2015.

Table B-2

Maximum Regional Operational Emissions (pounds per day) ^a

Source	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Existing Project Emissions						
Area (Coating, Consumer Products, Landscaping)	1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile Sources	5	8	35	<1	5	1
Subtotal Existing Emissions	6	8	35	<1	5	1
Proposed Project Emissions						
Area (Coating, Consumer Products, Landscaping)	3	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile Sources	5	14	55	<1	11	3
Subtotal Proposed Emissions	8	14	55	<1	11	3
Net Regional (On-Site and Off-Site) Emissions	2	6	20	<1	6	2
SCAQMD Numeric Indicators	55	55	550	150	150	55
Over/(Under)	(53)	(49)	(530)	(150)	(144)	(53)
Exceeds Thresholds?	No	No	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations.
 Source: ESA, 2016.

- 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. The SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the Federal Clean Air Act and California Clean Air Acts. The Federal and California Clean Air Acts establish the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) respectively. In order to meet the CAAQS and NAAQS in the basin, the SCAQMD has adopted a series of AQMPs. As discussed earlier, the SCAQMD has developed a comprehensive plan, the 2012 AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a Project were to add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the SoCAB is currently in nonattainment for ozone, PM₁₀ and PM_{2.5}, related projects could cause ambient concentrations to exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated using thresholds for CEQA and the SCAQMD. In particular, CEQA Guidelines Sections 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

“A lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency...”

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project’s incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2012 AQMP. Projects which are consistent with the AQMP would also be consistent with the AQMD’s goals for meeting ambient air quality standards. As discussed under Response II.a, the Project would be consistent with the 2012 AQMP.

The AQMP also implements a number of emissions control programs targeting specific sectors such as climate change, energy efficiency and mobile sources. These programs would help reduce emissions and attaining ambient air quality standards. As the Project is not part of an ongoing regulatory program, the SCAQMD also recommends that Project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed above, peak daily emissions of operation-related pollutants would be well below the SCAQMD regional significance thresholds. By applying SCAQMD’s cumulative air quality impact methodology, implementation of the Project would not result in an addition of criteria pollutants such that cumulative impacts would occur, in conjunction with related projects in the region. In addition, as discussed in Response III.d, below, construction of the Project is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SCAQMD has established a localized impact threshold. Therefore, the emissions of non-attainment pollutants and precursors generated by the Project in excess of the SCAQMD project-level thresholds would be less than significant.

d. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools; (7) parks and playgrounds; (8) child care centers; and (9) athletic fields.

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD’s localized daily significance threshold (“LST”) methodology. Daily localized emissions caused by the Project were compared to the LSTs in the SCAQMD’s look-up tables to determine whether the emissions would cause violations of ambient air quality standards.⁶ The current closest existing sensitive receptors to the Project are the mixed-use Access Culver City project approximately 100 feet to the east across Washington Boulevard and single- and multi-family residential uses east of the Project Site off of Washington Boulevard onto Helms Ave. Also, school uses as part of the Turning Point School and Park Century School are located to the south of the Project Site. The closest future sensitive receptors to the Project will be the Ivy Station mixed-use project that will place multi-family and open space

⁶ LSTs are only applicable to the following criteria pollutants: NO_x, carbon monoxide (“CO”), PM₁₀, and PM_{2.5}.

uses 80 feet to the southwest across National Boulevard. Therefore, thresholds used for the LST analysis were based on a one-acre site within 25 meters of the nearest sensitive receptor in Source Receptor Area 2, Northwest Coastal Los Angeles County. As shown in **Table B-3**, *Maximum Localized Construction Emissions*, maximum daily localized emissions would not exceed the thresholds for NOX, CO, PM10 or PM2.5.

Table B-3

Maximum Localized Construction Emissions (pounds per day) ^a

Regional Emissions	NO_x	CO	PM₁₀ ^b	PM_{2.5} ^b
Demolition - 2017	12	10	1	1
Mass Grading/Excavation and Drainage/Utilities/ Sub-Grade - 2017	38	27	2	2
Drainage/Utilities/Sub-Grade and Building Construction - 2017	48	38	3	2.2
Building Construction - 2018	39	34	3	2.0
Building Construction, Paving, Architectural Coating - 2019	40	41	3	2.6
Maximum Localized Emissions	48	41	3	2.6
SCAQMD Localized Significance Thresholds ^c	103	562	4	3.0
Over (Under)	(55)	(521)	(0.8)	(0.4)
Exceed Threshold?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling

^b PM10 and PM2.5 emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

^c The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Coastal Los Angeles County) for a 1-acre site within a 25-meter receptor distance.

Source: ESA, 2016.

Construction Impacts

The greatest potential for toxic air contaminants (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. In addition, incidental amounts of toxic substances such as oils, solvents, and paints would be used.

Such substances would comply with all applicable SCAQMD rules for their manufacture and use. Construction activities associated with the Project would be sporadic, transitory, and temporary in nature. Given the temporary duration of the construction phases of the Project, construction impacts associated with TACs are addressed qualitatively based on consistency with strategies and measures that limit, minimize, or reduce diesel emissions.

According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. The Project would be subject to SCAQMD rules designed to limit exposure to TACs during construction activities. The Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation. The Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the renovation and construction activities.

Further, the City, as part of its conditions of approval, would require that during construction, dust shall be controlled by regular watering or other methods as determined by the Building Inspector. Also, the City's standard conditions of approval require that during construction, trucks and other vehicles in loading and unloading queues must be parked with their engines off to reduce vehicle emissions. Construction deliveries must also be phased and scheduled to avoid emissions peaks as determined by the Building Official and discontinued during second-stage smog alerts.

Compliance with the above regulatory requirements and standard conditions of approval would minimize emissions of TACs during construction and would not result in long-term health risks to existing off-site sensitive populations.

Based on the above, SCAQMD, CARB, and City regulations, impacts to off-site sensitive receptors from criteria pollutants and TACs would be less than significant and no mitigation measures would be necessary.

Operational Impacts

Within an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations are generally found within close proximity to congested intersection locations. Under typical meteorological conditions, CO concentrations tend to decrease as distance from the emissions source (i.e., congested intersection) increase. For purposes of providing a conservative, worst-case impact analysis, CO concentrations are typically analyzed at congested intersection locations, because if impacts are less than significant in close proximity to the congested intersections, impacts will also be less than significant at more distant sensitive receptor locations.

Project traffic during the operational phase of the Project could have the potential to create local area CO impacts. Existing CO levels in the Project area are substantially below the federal and state standards.⁷ Carbon monoxide decreased dramatically in the SoCAB with the introduction of the catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the SoCAB for some time and the Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Air quality data from local monitoring station between 2000-2014 indicate that the maximum CO levels in recent years are 3 ppm (1-hour average) and 2.2 ppm (8-hour average) compared to the thresholds of 20 ppm (1-hour average) and 9.0 (8-hour average). Thus, it is not expected that CO levels at Project-impacted intersections would rise to such a degree as to cause an exceedance of these standards.

Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. The potential for the Project to cause or contribute to CO hotspots is evaluated by comparing impacted Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs. As discussed below, this comparison provides evidence that the Project would not cause or contribute to the formation of CO hotspots, that CO concentrations at Project impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

⁷ See Table 3, *Pollutant Standards and Ambient Air Quality Data from Representative Monitoring Stations, in the Air Quality Technical Report.*

The SCAQMD recommends a hot-spot evaluation of potential localized CO impacts when vehicle to capacity (“V/C”) ratios are increased by two percent or more at intersections with a level of service (“LOS”) of D or worse. Based on the traffic impact analysis prepared for the Project (refer to Response XVI.a, below), no study intersections within the Project vicinity meet this criteria. Therefore, additional analysis was performed qualitatively.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the SoCAB. These include: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day.⁸ This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue.⁹ When added to the existing background CO concentrations, the screening values would be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average) and are, therefore, below the respective thresholds for one- and eight-hour averages.

Based on the Project Traffic Study, of the studied intersections that are predicted to operate at a Level of Service (“LOS”) of D, E, or F under future year 2019 plus Project conditions, one intersection at La Cienega Boulevard and Venice Boulevard would potentially have peak traffic volumes of about 70,070 per day.¹⁰ As this intersection would result in less than 100,000 vehicles per day, CO concentrations are not expected to exceed SCAQMD significance thresholds. Thus, the Project’s expected peak daily traffic volumes would not contribute to the formation of CO hotspots and no further CO analysis is required. Therefore, the Project would result in less than significant impacts with respect to CO hotspots.

With regard to on-site sources of emissions, the Project would generate emissions resulting from sources such as natural gas heaters, landscaping equipment, and consumer products. As the building footprint of the Project is less than 1-acre, SCAQMD LST lookup tables were used to assess localized operational impacts. As shown in **Table B-4, Maximum Localized Operational Emissions**, on-site sources of emissions would remain below SCAQMD LST thresholds.

The on-site parking structure would be designed in accordance with the Culver City Fire Department (CCFD), the City’s Building Safety Division, and consistent with the California Mechanical Code Section 403.9 which specifies a minimum ventilation flow rate.¹¹ Compliance with this code would ensure that vehicles operating within the parking structure would not emit CO at levels which would result in significant adverse health impacts. Measures to comply with this code may include automatic CO sensing devices, intermittent (motion sensing) ventilation systems, or a minimum ventilation flow rate.

Overall, based on the above, localized operational impacts would be less than significant.

⁸ South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24.

⁹ The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

¹⁰ Raju Associates, Inc, Draft Traffic Study for the 8777 Washington Boulevard Project, (2017).

¹¹ California Mechanical Code. California Code of Regulations Title 24, Part 4.

Table B-4

Maximum Localized Operational Emissions (pounds per day) ^{a,b}

Source	NO _x	CO	PM ₁₀	PM _{2.5}
Existing Project Emissions				
Area (Coating, Consumer Products, Landscaping)	<1	<1	<1	<1
Energy	<1	<1	<1	<1
Subtotal Existing Emissions	<1	<1	<1	<1
Proposed Project Emissions				
Area (Coating, Consumer Products, Landscaping)	1	<1	<1	<1
Energy	<1	<1	<1	<1
Subtotal Proposed Emissions	1	<1	<1	<1
Net Localized (On-Site) Emissions	<1	<1	<1	<1
SCAQMD Numeric Indicators	103	562	1	1
Over/(Under)	(103)	(562)	(1)	(1)
Exceeds Thresholds?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations

^b The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Coastal Los Angeles County) for a 1-acre site within a 25-meter receptor distance.

Source: ESA, 2016.

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

Less Than Significant Impact. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. Through adherence with mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create objectionable odors. The nearest existing sensitive receptors are the Access Culver City mixed-use development to the east across Washington Boulevard and school uses (Turning Point School and Park Century School), and the nearest future receptors would be located across Washington and National Boulevards in the forthcoming Ivy Station mixed use development. However, the Project's proposed uses would not typically generate nuisance odors at nearby sensitive receptors.

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 would not involve elements related to these types of uses.

On-site trash receptacles used by the Project would be covered and properly maintained to prevent adverse odors. With proper housekeeping practices, trash receptacles would be maintained in a manner that promotes

odor control, no adverse odor impacts are anticipated from these types of land uses. While there is a potential for odors to occur, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts to a less than significant level.

IV. BIOLOGICAL RESOURCES

The following impact analysis pertaining to the site's biological resources is based, in part, on information contained in the *Nesting Bird Habitat Assessment Report for the 8777 Washington Boulevard Project* (herein referred to as the "Nesting Bird Habitat Assessment"), prepared by Dudek, dated April 2015 (provided under separate cover available at the Culver City Planning Division).

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 main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot. 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. The Project Site is paved with ornamental landscaped trees including Brisbane box, Jerusalem thorn (*Parkinsonia aculeate*), redbox, African coral tree, olive tree (*Olea* sp.), and Mexican fan palm and landscaped trees dominated by Mexican fan palms within the areas surrounding the Project Site. 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, the Project Site is paved with ornamental landscaped trees including Brisbane box, Jerusalem thorn, redbox, African coral tree, olive tree, and Mexican fan palm and landscaped trees dominated by Mexican fan palms within the areas surrounding the Project Site. Washington Boulevard and National Boulevard are highly utilized streets 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 ornamental trees or shrubs contained within or adjacent to the Project Site.

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.

According to the Nesting Bird Habitat Assessment, bird activity was minimal during the nesting bird survey. A total of seven bird species were recorded within the survey area (i.e., the Project Site and all accessible suitable nesting vegetation within 300 feet) including house finch (*Carpodacus mexicanus*), Anna's hummingbird (*Calypte anna*), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottos*), European starling (*Sturnus vulgaris*), western gull (*Larus occidentalis*), and yellow-rumped warbler (*Setophaga coronata*). Species potentially occurring in the Project area based on their tolerance to human disturbance, but not recorded during the nesting bird survey, include black phoebe (*Sayornis nigricans*), brewer's blackbird (*Euphagus cyanocephalus*), Cooper's hawk (*Accipiter cooperii*), house sparrow (*Passer domesticus*), mourning dove (*Zenaida macroura*), and naturalized parrots (*Amazonia* spp.). All of the bird species detected during the nesting bird survey are common species. No raptor species or special-status bird species were observed within the survey area. Of the seven bird species recorded based on visual observation or vocalizations, suitable nesting habitat is present for five of these species including American crow, Anna's

hummingbird, house finch, northern mockingbird, and rock pigeon. However, only four of the species with suitable nesting habitat within the Project area are protected under the MBTA or California Fish and Game Code, which include American crow, Anna's hummingbird, house finch, and northern mockingbird. The rock pigeon is a non-native species, not protected by the MBTA or California Fish and Game Code. The majority of the species with potential to nest within the survey area prefer to nest within medium to large trees or shrubs. Suitable medium to large trees or shrubs are sparsely scattered throughout the survey area. The house finch and rock pigeon could nest within the existing structures and vegetation located within the survey area as they are known to commonly nest within vents, rain gutters, ledges, street lamps, ivy, and hanging planters of buildings. However, given the high noise levels and regular pedestrian and vehicular traffic within the Project area, the likelihood for birds to nest on the Project Site is low. Additionally, breeding behavior and nests (both active and inactive) were not exhibited by any of the species detected within the survey area.

No potential raptor nests were observed within the survey area. Developed areas are generally poor quality habitat for raptors and many of the trees within the Project area are of size class and structure that would not typically be suitable for nesting by Cooper's hawks. Although suitable hunting perches exist within the Project area, these areas require adjacent foraging habitat to be suitable for nesting raptors. The foraging potential for raptors within the survey area is extremely limited. Further, the high disturbance level of the Project area greatly limits its value as raptor nesting habitat.

The urbanized nature of the Project area limits the potential for native resident or migratory wildlife species movement through the site, and mitigation provided below would further reduce potential impacts to protected nesting birds ensure such impacts are of 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. Either:

(1) 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; or

(2) If avoidance of the avian breeding season (February 15 through August 31) is not feasible, then:

(a) 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.

(b) 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 largely confined to ornamental landscaped trees including Brisbane box, Jerusalem thorn, redbox, African coral tree, olive tree, and Mexican fan palm and landscaped trees dominated by Mexican fan palms within the areas surrounding the Project Site, all of which would be removed as part of the Project. The Project would comply with the City's TOD Streetscape Plan and 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 TOD Streetscape Plan and by the 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, Natural Community Conservation Plan, 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 and Paleontological Resources Inventory for the 8777 Washington Boulevard, Culver City Project, Los Angeles County, California* (herein referred to as the "Cultural and Paleontological Inventory"), prepared by Dudek, dated February 17, 2017 (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.¹² 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.

A South Central Coastal Information Center (SCCIC) records search of the Project Site and vicinity (approximately one-mile radius) was performed to determine potential impacts of the Project on historical resources. The SCCIC records search included review of the collection of mapped prehistoric, historical and built-environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, archival resources, and ethnographic references. Additional consulted sources included the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR) and listed Office of Historic Preservation (OHP) Archaeological Determinations of Eligibility, California Points of Historical Interest, California Historical Landmarks, and Caltrans Bridge Survey information. In addition to the SCCIC records search, an archival research was performed to develop a site-specific history for the Project Site. The research was conducted through the Culver City Building and Safety Division, the Los Angeles Public Library, as well as the County Assessor's Office. Primary and secondary sources included building permits, newspaper accounts, a review of past owners/occupants and any persons associated with the Project Site, and a general history of the site and the City. Historic maps, aerial photographs, and Sanborn Fire Insurance Maps were reviewed. Other sources consulted included the Culver City Historical Society and the County Assessor's West District Office in Culver City. Lastly, a pedestrian survey of the exterior of the current building was conducted.

¹². California Code of Regulations, Title 14, Chapter 3, Article 5, Section 15064.5 (b) (1)

The SCCIC record search indicated that 43 previous cultural resources technical investigations have been conducted within one-mile of the Project Site.¹³ None of these studies are known to have directly included the Project Site. No cultural resources have been previously identified within the Project area. However, 32 sites (including prehistoric and historical-era resources) and historic addresses have been recorded within the surrounding one-mile records search area. According to the Cultural and Paleontological Inventory, the nearest recorded prehistoric site is more than 0.75 miles from the Project Site.

Sanborn Fire Insurance Maps (1929) of the Project Site and vicinity provide information on the Project Site prior to the development of the current building located at 8777 Washington Boulevard. Prior to the construction of the current building, the Project Site contained a large two-story structure that operated as Zucca's Opera House. Originally known as the Green Mill, the venue changed names regularly and was also known as the Cotton Club, Casa Manana, Meadowbrook, and Mardi Gras. The building operated as a local venue for 25 years and featured some of the finest local bands including Louis Armstrong, Fats Waller, and Lionel Hampton. The building was destroyed in a fire on February 20, 1950.

Historical aerial photographs of the current building were available for the years 1948, 1952, 1953, 1964, 1972, 1980, 1994, 2003-2005, and 2012. The photographs suggest the current building was constructed in 1951. The photographs also suggest the surrounding area was fully developed by 1948. Commercial developments were evident to the east, south, and west of the current building, while residential developments appeared to the north. These photographs confirmed that at least three major additions were made to the current building since the original date of construction. Two additions, one on the southeast and one on the northeast section of the current building, took place between 1953 and 1964. A separate structure was erected after 1972 towards the northeastern portion of the Project Site, detached from the current building. The separate structure was demolished between 2004 and 2005. Historic photographs also suggest the outdoor patio of the current building was built in 2005. Also in 2005, a new structure was constructed on the northernmost corner of the lot.

Other significant exterior alterations include application of various materials on the current building's exterior, as evidenced by different types of bricks (clay and concrete) around the roll-up door on the west elevation as well as on the north elevation. The primary façade, at the corner of Washington Boulevard and National Boulevard is perhaps the most altered, featuring smooth stucco panels, concrete block pillars, and replaced windows, all of which appear to have been added in recent years. A triangular-shaped section was also added to the southwest corner of the roof between 2005 and 2006, which includes a metal parapet wall that displays the Surfas signage. A building permit suggests various alterations occurred on the interior of the building, including the addition of a gas system in 1971, an HVAC unit in 1976, an unknown alteration in 2005, and a remodel of the current cheese case area of the café in 2008.

Building permits suggest the current building was owned by Robert Gordow in 1955. Danny McGroos then owned the current building from 1955 to 1959. Archival research failed to reveal any additional information on the two individuals and the type of business they operated. In 1964, Ogner Motors occupied the building, followed by Culver City Chrysler in 1970. The current building was owned by Mike Miller of Mike Miller Toyota from approximately 1970 until 1986, although building permits also indicate that the building was owned by Fred Sutton in 1971. The current building is presently occupied by Surfas Culinary District. The original

¹³ The SCCIC report list is provided in Appendix B (Confidential) South Central Coastal Information Center Records Search Result of the Cultural and Paleontological Inventory.

southwest section of the current building has been occupied by Surface Culinary District since 1989. In 2006, Café Surfas began operations in the southeast section of the current building.

The current building appears to have lost its physical integrity as a result of multiple exterior alterations and additions that occurred since its initial construction in 1951. The most significant alterations to the building appear to be fairly recent, and have compromised the integrity of the building's most prominent façade at the corner of Washington Boulevard and National Boulevard. The current building at 8777 Washington Boulevard was recorded and evaluated for CRHR, NRHP, and local-level eligibility. As a result of the evaluation, the current building was found not eligible under all national, state, and local level eligibility criteria due to a lack of significant historical association and compromised integrity resulting from numerous alteration and additions.¹⁴ Because the current building on the Project Site is not a historical resource, the Project would have no direct impact on historical resources. Furthermore, the Project would result in no indirect impacts to historical resources in the vicinity of the Project Site as the historic setting in the area around the Project Site is already eroded by contemporary development. Pursuant to CEQA, the Project would not result in direct or indirect impacts to historical resources.

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

Less Than Significant Impact With Mitigation Incorporated. As noted in the historical resources analysis above, no cultural resources (including archaeological resources) have been previously identified within the Project area. During the archaeological survey, no archeological resources were identified. The Project Site is currently developed with a main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot, which allowed for no direct observation of the native ground surfaces. Eight known archaeological resources (historic and prehistoric) have been recorded within 1.25-mile radius of the Project Site.¹⁵ 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 0.75 miles southeast of the Project Site.

According to the Cultural and Paleontological Inventory, there is some potential that historic archaeological resources associated with the former uses of the Project Site between 1913 and 1952 may be present below the paved asphalt surface. Moreover, 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 east 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. A Sacred Lands File search through Native American Heritage Commission (NAHC) did not indicate the presence of known Native American traditional cultural place within the Project Site, or vicinity. Mr. John Tommy Rosas, of the Tongva Ancestral Territorial Tribal Nation, noted that there are

¹⁴ The evaluation of the current building's potential for historical significance at the national (NRHP), state (CRHR), and local (Culver City) levels of eligibility is provided in the Cultural and Paleontological Inventory.

¹⁵ Cultural Resources Assessment of the 0.5-acre Culver Arts Building Project Site Located at 8888 Washington Boulevard, Culver City, Los Angeles Count, prepared by John Minch and Associates, Inc., dated September 2016.

a number of known cultural resources within the Project vicinity and recommended that a tribal monitor be included during excavation activities. In consideration of the above, the potential to encounter buried historic (e.g. privies, bottle dumps, refuse deposits, building foundations, etc.) and prehistoric (e.g., Native American artifacts and features) archaeological resources 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 might be 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 Gabrieleno 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 Gabrieleno 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. A paleontological records search was commissioned through the Natural History of Museum of Los Angeles to determine potential impacts of the Project on paleontological resources. Results of the records search indicated that the museum does not have any vertebrate fossil localities recorded within the Project Site, but localities have been recorded in the vicinity in the same sedimentary deposits that underlie the Project Site. The entire Project Site contains surface deposits of younger Quaternary Alluvium, derived primarily as fluvial deposits from Ballona Creek that flows just to the east. These deposits typically do not contain significant vertebrate fossils, as least in the uppermost layers, but at relatively shallow depth in this area there are older Quaternary sediments that do contain significant fossil vertebrate remains. Fossil vertebrates previously recorded in sediments around the Ballona Creek area include two specimens of fossil horse, *Equus*, one at a depth of six feet below the surface; remains of fossil mammoth, *Mammuthus*, at unknown depth; remains of fossil human at two localities, *Homo sapiens*, recovered from a depth of 12-23 feet below the surface; remains of fossil camel, *Camelops*, at unknown depth; fossil mastodon, *Mammut*, at unknown depth; and fossil remains of sabretooth cat, *Smilodon*, at unknown depth. 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 sediments), 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 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 and Paleontological Inventory, the NAHC SLF search did not indicate the presence of Native American traditional cultural places within the Project Site or the surrounding vicinity. The NAHC noted; however, that "the absence of specific site information in the sacred lands file does not indicate the absence of cultural resources in any project area". One prehistoric human remain resource, CA-LAN-172 (also designated as paleontological locality LACM 4232), is recorded within a 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. 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 developed nature of the Project Site does not preclude the existence of buried human remains that may be encountered during construction. Since the general area has yielded buried human remains in the past, the sensitivity of the Project Site with respect to human remains is considered to be moderate to high. As a result, in the event that previously unknown human remains may be encountered during construction excavations, Mitigation Measure CULT-8 is prescribed to ensure that potentially significant impacts to them 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 §21074?

No Impact. The analysis of tribal cultural resources is based on Project notification and request to consult letters that the City submitted to six Native American individuals and organizations on the City's AB 52 Notification List in August 2016. As of February 3, 2017, the City has not received any responses to these notification letters. The City's AB 52 Project notification and request to consult letters are provided under separate cover available at the Culver City Planning Division. As a result of the 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 *Preliminary Geotechnical Assessment, Proposed Office Development 8777 Washington Boulevard, Culver City, California* (herein referred to as the "Geotechnical Assessment"), prepared by Geotechnologies, Inc., dated February 14, 2017 (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 Assessment 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.¹⁶ The nearest fault zone to the Project Site is the Newport Inglewood Fault Zone, located approximately 700 feet southeast of the site. In addition, the Overland Avenue Fault is located approximately 1.5 miles southwest of the site, along Overland Avenue. It should be noted that no Special Studies Zones have been delineated by the State of California along any portion of the Overland Avenue Fault. As such, the potential for surface rupture due to faulting occurring on the Project Site during the design life of the Project is considered 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.

¹⁶ The nearest Alquist-Priolo Earthquake Fault Zone is illustrated on the Earthquake Fault Zone map of the Geotechnical Assessment.

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**, the following chart 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	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, accessed April 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 Overland Avenue Fault, as well as on the other large active faults in the Southern California region. According to the Geotechnical Assessment, the maximum probable event could produce a PGA value at the Project Site of 0.69g with a modal magnitude of 6.6. This is a relatively high acceleration due to the proximity of the Newport Inglewood Fault and the Overland Avenue 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.

The 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 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provides guidance for evaluation and mitigation of earthquake-related hazards. The Project would be required

to comply with applicable seismic-related regulatory requirements. In addition, 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 Zone Map of the Beverly Hills Quadrangle, the Project Site is located within a liquefaction hazard zone.¹⁷ This determination is based on groundwater depth records, soil types, and distance to faults capable of producing a substantial earthquake. According to the Geotechnical Assessment, groundwater was encountered during exploration at depths between 30 and 35 feet below the ground surface. During a previous site exploration performed by a previous geotechnical consultant, groundwater was encountered at the site to depths ranging between 20 and 27 feet below the existing site grade. According to the Seismic Hazard Zone Map of the Beverly Hills Quadrangle, the historic high groundwater level for the Project Site was approximately 18 feet below the surface.¹⁸ To further evaluate the potential for liquefaction hazards, a site-specific liquefaction analysis was conducted which considered groundwater depths and soil conditions and indicated the site soils would not be prone to liquefaction during the during the ground motion expected during the design-based seismic event. The Project would be required to comply with applicable seismic-related regulatory requirements of the Culver City Building Code and the 2013 CBC, and 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 further ensure that seismic-related ground failure impacts, including liquefaction, would be less than significant.

¹⁷ The liquefaction areas located within the project site and project vicinity are illustrated on the Seismic Hazard Zone Map in of Geotechnical Assessment.

¹⁸ The groundwater levels within the project site and project vicinity are illustrated on the Historically Highest Groundwater Levels Map of the Geotechnical Assessment.

Mitigation Measures

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

iv. Landslides?

No Impact. The Project Site is relatively flat ranging from approximately 100 feet above sea level to 105 feet above sea level for a total grade change of approximately five feet across the property. The site is located in a highly urbanized area of Culver City and is currently developed with a main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot. According to the Geological Assessment, the probability of seismically induced landslide affecting the Project Site is considered to be remote, due to the lack of significant slopes on the site and surrounding areas. 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 main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot. 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 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 with 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 a previous geotechnical engineering investigation, the Project Site is underlain by artificial fill and Quaternary (Q) earth materials. Artificial fill materials with a thickness of approximately 2-½ feet were presumably placed during pad grading and construction of the existing buildings and surface parking lot. No evidence of engineered keys or benches were observed. The fill generally consists of clayey sand with gravels up to 1-½ inches in length. The alluvial deposits encountered primarily consist of medium brown clayey sand to bluish gray silty sand. These deposits ranged from 31 to 34 feet in thickness. Older alluvial material which underlie these deposits were encountered within the Project Site. Based upon field observations, laboratory testing and analysis, the gravelly sand alluvium found in the explorations should possess sufficient strength to support the Project.

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 Assessment, 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.

The Project construction and design would be required to comply with the 2013 CBC, which is designed to assure safe construction, and implementation of the site-specific design measures including foundation design recommendations of the Final Geotechnical Engineering Investigation per Mitigation Measure GEO-1 would further 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. Low expansive soils were encountered on the Project Site. These low 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 Project's *Greenhouse Gas Technical Report* prepared by ESA PCR in February 2017, which is available for review 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. State regulated GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). CO₂ is the most abundant GHG in the atmosphere. Not all GHGs exhibit the same ability to induce climate change; as a result, GHG contributions are commonly quantified in equivalent mass of CO₂, denoted as CO₂e. Mass emissions are calculated by converting pollutant specific emissions to CO₂e emissions by applying the proper global warming potential (GWP) value. These GWP ratios are available from the U.S. Environmental Protection Agency (USEPA) and are published in the California Climate Action Registry (CCAR) General Reporting Protocol. By applying the GWP ratios, project related CO₂e emissions can be tabulated in metric tons per year.

The City has not yet adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emission. When no guidance exists under CEQA, the lead agency may look to and assess general compliance with comparable regulatory schemes.¹⁹ In its January 2008 CEQA and Climate Change white paper, the California Air Pollution Control Officer's Association (CAPCOA) identified a number of potential approaches for determining the significance of

¹⁹ See *Protect Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107 [“[A] lead agency’s use of existing environmental standards in determining the significance of a project’s environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution.”]. Lead agencies can, and often do, use regulatory agencies’ performance standards. A project’s compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 99 (upholding use of regulatory agency performance standard).

GHG emissions in CEQA documents. In its white paper, CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency.

The Office of Planning and Research released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that “lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice,” and that while “climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment.”²⁰ Furthermore, the technical advisory states that “CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project.”²¹

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.²² The Working Group released draft guidance regarding interim CEQA GHG indicators of significance in October 2008, proposing a tiered approach whereby the level of detail and refinement needed to determine significance increases with a project’s total GHG emissions. Under Tier 1, Projects that are exempt from CEQA would be less than significant. Under Tier 2, projects that are consistent with an adopted GHG reduction plan would be less than significant. Under Tier 3, non-industrial projects with 3,000 metric tons of CO₂e per year or less would be less than significant. Tier 4 uses performance standards, which requires projects to demonstrate a percent emission reduction target below an identified baseline level or an efficiency-based threshold such as GHG emissions on a per service population basis. The aforementioned Working Group was inactive in 2011 through 2015 and did not formally submit the thresholds to the Governing Board for approval.

“Tier 3,” the primary tier by which SCAQMD currently determines the significance of stationary emission sources, relies on Executive Order S-3-05 as the basis for a screening level, and was established at a level that captures 90 percent of SoCAB -wide land use GHG emissions. The SCAQMD proposed a screening level of 3,000 metric tons of carbon dioxide equivalents (MTCO₂e) per year for commercial or mixed-use residential projects under which project impacts are considered less than significant, “to achieve the same policy objective of capturing 90 percent of the GHG emissions from new development projects in the residential/commercial sectors.”²³ In CAPCOA’s January 2008 CEQA and Climate Change white paper, CAPCOA suggested a possible quantitative threshold option that would capture 90 percent of GHG emissions from future discretionary development projects. According to CAPCOA, the “objective was to set the emission threshold low enough to capture a substantial fraction of future residential and nonresidential development that will be constructed to accommodate future statewide population and job growth, while setting the emission threshold

²⁰ Governor’s Office of Planning and Research, *Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, (2008).

²¹ *Ibid.*

²² California Air Resources Board, *Greenhouse Gases CEQA Significance Thresholds*, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>, accessed November 2015.

²³ South Coast Air Quality Management District, *Board Meeting, December 5, 2008, Agenda No. 31, Interim GHG Significance Threshold Proposal – Key Issues/Comments Attachment D*.

high enough to exclude small development projects that will contribute a relatively small fraction of the cumulative statewide GHG emissions.”²⁴ A 90 percent capture rate would “exclude the smallest proposed developments from potentially burdensome requirements ... to mitigate GHG emissions.”²⁵ The SCAQMD’s proposed screening level of 3,000 MTCO₂e per year is a South Coast Air Basin-specific level that would meet CAPCOA’s intent for the suggested quantitative threshold option. It should be noted that the SCAQMD has formally adopted a GHG significance thresholds of 10,000 MTCO₂e per year for industrial/stationary source projects where the SCAQMD is the lead agency based on a 90 percent capture rate for the industrial/stationary source sector. Given the lack of a formally adopted numerical significance threshold applicable to this Project, the significance of the Project is evaluated based on the SCAQMD’s proposed screening level of 3,000 MTCO₂e.

For purposes of this analysis, it is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions resulting from Project-related incremental (net) increase in the use of on-road mobile vehicles, electricity, and natural gas compared to existing conditions. This includes Project construction activities such as demolition, hauling, and construction worker trips. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis.

The Project’s net increase in GHG emissions is estimated using the California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.²⁶

Construction of the Project has the potential to generate temporary GHG emissions through the use of heavy-duty construction equipment and through vehicle trips generated from export and import of materials and from visitors and workers traveling to and from the Project Site. Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. The emissions estimated from the CalEEMod (Version 2013.2.2) software is based on outputs from the OFFROAD and EMFAC models, which are emissions estimation models developed by the California Air Resources Board (CARB) and used to calculate emissions from construction activities, including on- and off-road vehicles and equipment. The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. Construction would take place over 2.25 years (27 months), anticipated to begin in mid-2017. Because the Project is anticipated to start construction in mid-2017 and end in late 2019, there would be construction 3 calendar years although actual construction would take place over a 2.25 year duration. Full build-out and occupancy would occur in 2019. The emissions of GHGs associated with construction of the Project were

²⁴ California Air Pollution Control Officer’s Association, *CEQA and Climate Change*, (2008) 42-43.

²⁵ California Air Pollution Control Officer’s Association, *CEQA and Climate Change*, (2008) 43-44.

²⁶ See <http://www.caleemod.com>.

calculated for each year of construction activity. The results are shown in **Table B-6, Construction Greenhouse Gas Emissions**. It should be noted that the GHG emissions shown in Table B-6 are based on construction equipment operating continuously throughout the work day. In reality, construction equipment tends to operate periodically or cyclically throughout the work day. Therefore, the GHG emissions shown reflect a conservative estimate. A complete listing of the equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets that are provided in the *Greenhouse Gas Technical Report* under separate cover available at the Culver City Planning Division.

Table B-6

Construction Greenhouse Gas Emissions

Emission Source	CO₂e (Metric Tons) ^a
Construction Year 1	817
Construction Year 2	1,127
Construction Year 3	702
Total	2,646
Annual (Amortized over 30 years)	88

^a Totals may not add up exactly due to rounding in the modeling calculations

Source: ESA PCR, 2016.

The SCAQMD recommends that construction-related GHG emissions be amortized over a project's 30-year lifetime in order to include these emissions as part of a project's annualized lifetime total emissions, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. In accordance with this methodology, the estimated Project's construction GHG emissions have been amortized over a 30-year period and are included in the annualized operational GHG emissions.

As shown, the annual amortized Project GHG emissions would not exceed the SCAQMD Tier 3 threshold of 3,000 MTCO₂e. As a result, Project construction would have a less than significant impact with respect to GHG emissions.

Operational emissions were estimated using CalEEMod for the existing site uses and the Project in order to determine the net incremental change in GHG emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the trip length values for the existing and Project land uses in CalEEMod, which are South Coast Air Basin-wide average trip distance values. To estimate the total vehicle miles traveled (VMT) generated by existing site and Project trips, trip generation rates provided in the Project Traffic Study were used.²⁷ The trips take into account trip reductions from internal capture from co-locating different land uses on the site and from nearby access to public transportation. Reductions in VMT are calculated based on-site-specific characteristics, such as increased job and housing density on the site and proximity to regional job centers, using the equations and methods prescribed in the CAPCOA guidance document, *Quantifying*

²⁷ Raju Associates, Inc, Draft Traffic Study for the 8777 Washington Boulevard Project, (2017).

Greenhouse Gas Mitigation Measures, which provides emission reduction values for transportation characteristics and measures.²⁸

The estimated reduction in VMT for the existing site uses and Project uses is credible as the site is considered a transit oriented development (TOD) and is located in a transit priority area, which is defined in Senate Bill (SB) 743 as an area located within one-half mile of a major existing or planned transit stop, or which are identified in regional transportation plans. The site meets this criterion as it is located immediately adjacent to the Metro Exposition Expo Line and Culver City Metro Station. The Project would be developed with a bicycle friendly design with bicycle parking for visitors and occupants as well as bike share participation for employees of tenant businesses via integration with the transit access pass (TAP) card or other similar mechanism. The Project's setbacks have been designed to accommodate a future bicycle and parking lane along the Washington Boulevard right-of-way should the City determine that alignment best meets its mobility objectives. The Project would provide designated parking for low-emission/zero-emission vehicles, carpools and loading areas for shared-ride vehicles to allow for convenient pick up and drop off for visitors and occupants utilizing Uber, Lyft, and other similar rideshare companies. Also, secured-access end-of-trip amenities such as bathrooms and showers for use by office tenants in order to promote riding to work would be provided by the Project. The Project's urban infill location close to jobs, shopping and entertainment uses and in close proximity to existing and future public transit stops would result in reduced vehicle trips and VMT, as compared to the South Coast Air Basin-wide average. As such, the Project would result in a corresponding reduction in transportation-related emissions compared to the South Coast Air Basin-wide average. According to the Project Traffic Study,²⁹ the Project would result in a reduction in total Project VMT by a minimum of 25 percent from its proximity to major high-quality public transit stations and stops.

With regard to energy usage, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Future fuel consumption rates are estimated based on specific square footage of the existing and Project land uses, as well as estimated water supply needs. Energy usage (off-site electricity generation and on-site natural gas consumption) for the Project is calculated within CalEEMod using the California Energy Commission (CEC) California Commercial End Use Survey (CEUS) data set for nonresidential uses, which lists energy demand by building type.³⁰ Since the data from the CEUS is from 2002, the CalEEMod software incorporates correction factors to account for compliance with the current Title 24 Building Standards Code. This assessment also includes electricity-related GHG emissions from the proposed enclosed parking structure, which includes elevators, lighting, and a ventilation system. The existing site uses were modeled using historical energy factors based on previous Title 24 standards.

Water and wastewater generated from the existing site and Project requires energy to supply, distribute and treat. The CalEEMod software uses the electrical intensity factors from the 2006 CEC report *Refining Estimates of Water-Related Energy Use in California*.³¹ The emissions of GHGs associated with the

²⁸ California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, (2010).

²⁹ Raju Associates, Inc, *Draft Traffic Study for the 8777 Washington Boulevard Project*, (2017).

³⁰ California Energy Commission, *California Commercial End-Use Survey*, <http://capabilities.itron.com/CeusWeb/Chart.aspx>. Accessed December 2013.

³¹ California Energy Commission, *Refining Estimates of Water-Related Energy Use in California*, *PIER Final Project Report*, CEC-500-2006-118, (2006).

wastewater treatment process emissions are also calculated using the CalEEMod software as described in the *California Emissions Estimator Model User's Guide, Appendix A*.³²

Emissions from solid waste handling generated from the existing site and Project are also accounted for in the GHG emissions inventory. The GHG emission factors, particularly for CH₄, are based on the default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery).

Other sources of GHG emissions from operation of the existing site uses and Project uses include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment GHG emission factors from the CARB OFFROAD2011 model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)*.³³ The CalEEMod software estimates that landscaping equipment operate for 250 days per year in the South Coast Air Basin.

Emissions calculations for the Project include credits or reductions for GHG reducing measures that are required by regulation, such as reductions in energy and water demand from the current Title 24 standards and the California Green Building Standards (CALGreen) Code. The Project would be designed to meet the standards for LEED Silver level by the USGBC through the incorporation of green building techniques and other sustainability features. The Project also would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the Culver City Green Building Program. Some of the Project's "green building measures" as part of its design to reduce GHG emissions would include, but are not limited to the following:

- Installation of efficient fixtures and flush technology will reduce indoor water use by 26 percent over the baseline, which would exceed the California Green Building Code's mandatory 20 percent reduction, and further reduce wastewater generation .
- Installation of a 14 kilowatt photovoltaic system, which exceeds the Culver City requirements.
- 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 occupancy-sensor controlled. A demonstration project by the United States Department of Energy indicated that the use of occupancy-sensor controlled lighting achieved a reduction of 50 percent or more in lighting energy use compared to a similarly lighted parking structure without occupancy-sensor controls.³⁴
- Incorporation of low-water and drought tolerant plants in the landscape plan, which would use at least 50 percent less potable water from irrigation than the LEED baseline.

The results of the analysis for operational emissions are presented in **Table B-7, Annual Greenhouse Gas Emissions**. As shown, the incremental net change in Project GHG emissions would not exceed the SCAQMD Tier 3 annual mass emission threshold of 3,000 MTCO₂e. As a result, the Project would have a less than significant impact with respect to GHG emissions for construction as well as for operation, and mitigation measures would not be required.

³² California Air Pollution Control Officers Association, *California Emissions Estimator Model User's Guide*, (2013).

³³ California Air Resources Board, *OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, (6/13/2003)*, http://www.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_act.pdf. Accessed November 2013.

³⁴ United States Department of Energy, Building Technologies Office, *SSL Demonstration: Parking Garage Lighting*, Washington DC, June 2013.

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

No Impact. The Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, requires the State to achieve 1990 GHG emission levels by 2020 by setting statewide GHG reduction targets. To achieve these goals, the 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.

Table B-7

Annual Greenhouse Gas Emissions

Emissions Sources	CO ₂ e (Metric Tons per Year) ^a
	Project
Existing Operational	
On Road Mobile Sources	982
Area	<1
Electricity	129
Natural Gas	60
Water Conveyance	5
Waste	7
Existing Subtotal	1,184
Proposed Project Operational (Opening Year 2019)	
On Road Mobile Sources	1,999
Area	<1
Electricity	554
Natural Gas	76
Water Conveyance	160
Waste	56
Proposed Subtotal	2,845
Net Operational	1,661
Construction (Amortized)	88
Total Annual Emissions	1,749
Significance Threshold	3,000
Over/(Under)	(1,251)
Exceeds Threshold?	No

^a Totals may not add up exactly due to rounding in the modeling calculations

Source: ESA PCR, 2016.

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.³⁵ Thus, the transit-oriented development 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.

Table B-8, *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-8, the Project would be consistent with the applicable portions of Culver City's Green Building Program and Culver City SCP strategies, is a TOD Project 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-9, *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 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.

³⁵ California Air Resources Board, *First Update to the Climate Change Scoping Plan*, (2014) 104.

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 square feet 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, and no impact would occur.

Table B-8

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
Culver City Strategies (not formally adopted)		
Environmental Pollution and Public Health Protection	<p>Work to improve stormwater quality by implementing a Stormwater Management Program.</p> <p>Catching as much trash 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>	<p>Consistent. 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.</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, and Chapter 6, Public Works and Property, Article 4.4, Stormwater and Urban Runoff Pollution Control, of the LAMC, the Project would require a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. As part of the operational drainage plan, the Project would implement a capture and filtration system that utilizes cartridges for filtration at parking level. The stormwater runoff would be collected from roof drains, area drains, and downspouts and routed through the filtration system before it is pumped to street level and released into a parkway drain along Washington Boulevard.</p> <p>Consistent. The Project’s storm drain filtration system would prevent large pieces of debris from entering the parkway drain.</p>

Strategy	Description	Demonstration of Project Consistency
	<p>Completing improvements to make 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>	<p>Consistent. The Project's traffic impact analysis, <i>Raju Associates, Inc, Draft Traffic Study for the 8777 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, 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>
Resource Conservation	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Consistent. The Project would meet applicable City Code requirements for environmental sustainability and resource conservation. The Project would include at least 14 kW of photovoltaic electricity generation on site.</p> <p>Consistent. The Project would incorporate low-water and drought tolerant plants in the landscape plan, which will use less potable water from irrigation than the LEED baseline.</p> <p>Consistent. The Project would incorporate low-water and drought tolerant plants in the landscape plan.</p> <p>Consistent. The Project would incorporate low-water and drought tolerant plants in the landscape plan, which will use less potable water from irrigation. The open space areas within the Project Site would incorporate seating to serve the Project, commuters and the local community.</p> <p>Consistent. The Project would provide areas for the collection of recyclable materials on the Project Site.</p>

Strategy	Description	Demonstration of Project Consistency
Waste Management and Recycling	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.	Consistent. 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.
Sustainable Land Use and Open Space	<p>Encouraging multi-use developments that make the City more walkable.</p> <p>Promoting revitalization, encouraging reinvestment and eliminating blight in the City's Area Improvement Projects.</p> <p>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 maintain landscaped areas.</p> <p>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.</p>	<p>Consistent. The Project is a transit oriented development and would incorporate ground level pedestrian serving retail and food retail uses within an office building. At grade retail uses would create connectivity between the various uses and the community. Connectivity would further be achieved through streetscape improvements that incorporate the City approved Streetscape plan to help create an attractive and inviting walkable environment that connects to the nearby Culver City light rail station.</p> <p>Consistent. The perimeter of the site area would incorporate a City approved Streetscape plan which would create an attractive and inviting walkable environment. The Project would include a total of approximately 3,305 square feet of outdoor open spaces. Of this total, approximately 2,675 square feet of at grade landscape and hardscape areas.</p> <p>Consistent. 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 install at least 14 kilowatt photovoltaic system. The Project would rely on high efficiency lighting systems for all interior and exterior lighting. New lighting installed in parking structures and all common areas would be motion sensor controlled. The Project would incorporate low-water and drought tolerant plants in the landscape plan and utilize rainwater harvesting systems, which will use less potable water from irrigation. The Project would use mixed-mode ventilation strategies to shut down mechanical cooling systems when windows are open and use high efficiency mechanical systems.</p> <p>Consistent. The Project would include a total of approximately 3,305 square feet of outdoor open spaces. Of this total, approximately 2,675 square feet of landscape and hardscape areas. The open space areas within the Project Site would incorporate seating and would support outdoor dining and rooftop recreational activities. The Project would not have a have a significant physical impact upon parks, nor would there be a significant increase in demand for existing public park facilities.</p>

Strategy	Description	Demonstration of Project Consistency
Sustainable Transportation	<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"> ▪ 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. ▪ Removal of over 80,000 pounds of NO_x (oxides of nitrogen - the brown emission exhaust) from the air ▪ Removal of over 32,000 pounds of PM (particulate matter - the black soot exhaust) from the atmosphere. <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.</p>	<p>Consistent. While the measure applies to the City, the Project would nonetheless support the City efforts to reduce transportation-related emissions by encouraging alternative transit. The Project would be a TOD and would provide nearby and convenient access to multi-modal transit with connecting bike, bus, and train routes. The Project would be very near the Culver City Metro Station, which is the approximate center of the Expo Line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to 14 bus routes and bicycle lanes/routes. The Project would also be developed with a bicycle friendly design with bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services.</p>
	<p>Operating Culver CityBus, a high-quality municipal bus service that provides transportation options for the community. Culver CityBus was the first public transit fleet 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.</p>	<p>Consistent. The Project would promote bicycle and public transportation use by providing: bike racks for site tenants and public use; other bicycle oriented facilities such as safe lockable storage areas for office use; and secured-access end-of-trip amenities such as bathrooms and showers for use by office tenants in order to promote riding to work. Further, the Project is a transit oriented development adjacent to public transit.</p>
	<p>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.</p>	<p>Consistent. While the measure applies to the City, the Project would nonetheless support the City efforts to reduce transportation-related emissions by encouraging alternative transit. The Project would be a TOD and 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 Expo Line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to 14 bus routes and bicycle lanes/routes.</p> <p>Consistent. The Project would be a TOD and 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 Expo Line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to 14 bus routes and bicycle lanes/routes. The Project would also be developed with a bicycle friendly design with bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services.</p>

Strategy	Description	Demonstration of Project Consistency
Regional Strategies		
Sustainable Communities Strategy	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.	Consistent. The Project would be a TOD and would provide nearby and convenient access to high-quality 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 Expo Line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to 14 bus routes and bicycle lanes/routes. The Project would reduce Project-wide VMT by a minimum of 25 percent as compared to a BAU project of similar size and land uses (but not located in a high-quality multi-modal transit area). The Project would provide bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for 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.
<hr/> <i>Source: ESA PCR, 2016.</i> <hr/>		

Table B-9

Applicable GHG Reduction Strategies

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

Source	Description	Demonstration of Project Consistency
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	Consistent. 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.	Consistent. 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.	Consistent. 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.	Consistent. 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.
Culver City		
Green Building Program	Enhance building insulation, low flow fixtures, efficient lighting and HVAC systems.	Consistent. 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.	Consistent. 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.	Consistent. The Project would be consistent with this requirement via compliance with City ordinances and/or the Green Building Program.
Photovoltaic Requirement	Requires 1 kilowatt (kw) of photovoltaic power installed per 10,000 square feet of new development	Consistent. 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.

VIII. HAZARDS AND HAZARDOUS MATERIALS

The following hazardous materials discussion is based, in part, on the *Phase 1 Environmental Site Assessment of 8777 Washington Boulevard, Culver City, California* (herein referred to as the "Phase I"), prepared by Alpha Environmental, dated September 18, 2014 (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 office, and retail uses would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping. 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 identify the presence, or likely presence, use, or release of hazardous substances or petroleum products as defined in the American Testing and Materials Practice E 1527 as a "recognized environmental condition" (REC). In order to identify RECs at the Project Site, the Phase I included a site inspection, interviews with parties familiar with the properties, historical research into the past use of the properties, and hazardous materials research with regard to the site, adjacent properties, and surrounding area. According to the Phase I, environmental concerns identified were related to the former presence of a 2,000-gallon and a 500-gallon waste oil underground storage tank (UST), in-ground hydraulic hoists, and an on-site clarifier associated with the former auto dealership operations at the Project Site. These environmental concerns were associated with the potential leaks of hydraulic oils from the tanks and/or hoists and other hazardous waste from the clarifier, considering the age of the hydraulic hoists and the clarifier. The USTs were removed from beneath the site in 1991. At the time, approximately 275 tons of hydrocarbon impacted soil was removed from the area of the USTs. However, subsequent to UST removal, soil/groundwater investigations, and remediation to the satisfaction of the Los Angeles County Department of Public Works (LACDPW), no further action was required for both soil and groundwater in 1992. During a soil remediation activity in 2004 that involved removal of 11

hydraulic hoists and associated petroleum hydrocarbon impacted soil, some localized residual petroleum hydrocarbon (hydraulic oil) impacted soil was left in place near the west portion of the building to protect the structural integrity of the building. This contamination is likely to have attenuated over the last ten years, subjected to naturally occurring biodegradation. Therefore, the former USTs, hydraulic hoists, clarifier, and related soil contamination represent a Historical REC.³⁶ No other RECs were identified in the Phase I. As concluded in the Phase I, based on the findings in the Phase I and review of for the former hazardous materials investigations and soil remedial actions, no further investigation related to soil and/or groundwater is warranted at this time. However, during construction grading activities, if localized areas of petroleum impacts soils are encountered, these soils shall be isolated, sampled, and handled as per current regulatory guidelines (Mitigation Measure HAZ-1). As such, with implementation of Mitigation Measure HAZ-1, potentially significant impacts associated with contaminated soils would be reduced to a less than significant level.

The Project would involve the demolition and removal of the existing building and detached storage garage building. As the current building was constructed in 1951, it is possible that lead-based paint (LBP), asbestos 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/cm² (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-2 and HAZ-3 would require comprehensive surveys of the existing buildings 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-2 and HAZ-3 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-2 and HAZ-3 would reduce risks associated with LBPs and ACMs to acceptable levels and associated impacts would be less than significant.

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, painting supplies, and pesticides for landscaping 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. Therefore, impacts in this regard would be less than significant.

³⁶ A Historical REC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been address to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

Mitigation Measures

- HAZ-1:** During construction grading activities, if localized areas of petroleum impacts soils are encountered, these soils shall be isolated, sampled, and handled as per current regulatory guidelines.
- HAZ-2:** Prior to the issuance of any permit for the demolition or alteration of the existing on-site buildings, 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-3:** 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.

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. Turning Point School, located at 8780 National Boulevard, is located approximately 0.06 miles south of the Project Site. Park Century School, located at 3939 Landmark Street, is located 0.12 miles south 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, the former USTs, hydraulic hoists, clarifier, and related soil contamination represent a Historical REC. No other RECs were identified. In accordance with Mitigation Measure HAZ-1, during construction grading activities, if localized areas of petroleum impacts soils are encountered, these soils shall be isolated, sampled, and handled. Also, Project demolition activities could involve the removal of ACM and LBPs. However, any such removal would occur in adherence with Mitigation Measures HAZ-2 and HAZ-3. The Project's excavation and 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 soil excavation, 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 office and retail 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, painting supplies, and pesticides for landscaping 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, HAZ-2, and 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 With Mitigation Incorporated. 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 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 Division, the CCFD, the Los Angeles County Department of Public Health, the Los Angeles County Department of Public Works, Environmental Programs Division, the LARWQCB, the DTSC, the SCAQMD and the California Department of Oil, Gas and Geothermal Resources (DOGGR). A regulatory agency database search report prepared by EDR was reviewed within the Phase I. Based on a recent review of the above reference databases and the results of the Phase I, the Project Site is listed on the Los Angeles County Hazardous Materials System (HMS), Haznet, RCRA-SQG, and HIST UST databases. These listings are related to the former auto dealership (with a hazardous waste generator in 1985 with no violations) and one unleaded UST and one waste oil UST. Additionally, HAZNET records indicate 58.99 tons of asbestos containing waste and 14.17 tons of wasted oil and mixed oil in 2005 likely associated with the Project Site's remedial action at the time of the conversion to current retail/restaurant use. However, with implementation of Mitigation Measure HAZ-1 provided under Response VIII.b, impacts regarding hazardous materials with the existing site would be reduced to a less than significant level. Further, no off-site facilities were listed on the databases reviewed that would appear to present an environmental concern for the Project Site. As such, and with mitigation, impacts are expected to be less than significant.

Mitigation Measures

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

- 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.^{37,38} 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 Traffic Management Plan (see Mitigation Measure PS-1), 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 employees and visitors. Subject to review and approval of Project Site access and circulation plans by the 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 a designated emergency evacuation routes,

³⁷ City of Los Angeles General Plan Safety Element – Critical Facilities and Lifeline Systems, Exhibit H November 26, 1996.

³⁸ County of Los Angeles Department of Public Works. <http://dpw.lacounty.gov/dsg/disaster/routes/map/culver%20city.pdf> Accessed April 2016.

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.

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.^{39,40} The nearest very high fire hazard severity zone (VHFHSZ) is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately 0.75 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, Washington 8777 Boulevard, Culver City, CA 90232* (herein referred to as the "LID Report"), prepared by Kimley Horn, dated February 2017 (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 relatively flat ranging from approximately 100 feet above sea level to 105 feet above sea level for a total grade change of approximately five feet across the property. Surface water at the Project Site consists of direct precipitation onto the site. Much of this water drains as sheet flow to low-lying areas, area drains, off site and/or to the street.

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 is proposing a mix of office and retail 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.

³⁹ Culver City Fire Department Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012.

⁴⁰ The Culver City Very High Fire Hazard Severity Zones in LRA as recommended by CAL FIRE, prepared by CAL FIRE, dated September 2011.

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;
- 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 Geotechnical Assessment, groundwater was encountered during exploration at depths between 30 and 35 feet below the ground surface. During a previous site exploration performed by a previous geotechnical consultant, groundwater was encountered at the site to depths ranging between 20 and 27 feet below the existing site grade. According to the Seismic Hazard Zone Map of the Beverly Hills Quadrangle, the historic high groundwater level for the Project Site was approximately 18 feet below the 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.

With regard 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. As part of the operational drainage plan, stormwater collected from roof drains, area drains, and downspouts would be routed through a Vortechs system for pretreatment to remove trash, debris, sediment, and hydrocarbons from stormwater runoff prior to entering a cistern and being reused for irrigation. 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 Culver City Planning Division, Building Safety 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 main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot. 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 one acre and the temporary nature of construction activities, while some dewatering could be

necessary during construction activities, such dewatering activities would not be of an extent that would substantially alter groundwater supplies. Therefore, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that 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 93 percent where the post-development imperviousness of the new Project area is approximately 99 percent. In addition, site-generated surface water runoff would continue to flow into the City's storm drain system. Furthermore, the Project would include appropriate drainage treatment improvements on site to direct stormwater flows to the local drainage systems, similar to existing conditions. The current requirement for the 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 Project's Geotechnical Assessment, the Project Site is not recommended for infiltration into native soils. Therefore, as discussed under Response IX.a, as part of the operational drainage plan, stormwater collected from roof drains, area drains, and downspouts would be routed through a hydrodynamic separation system (i.e., Vortechs, CDS) for pretreatment to remove trash, debris, sediment, and hydrocarbons from stormwater runoff prior to entering a cistern and being reused for irrigation. The proposed drainage facilities would capture and treat the design storm for which the SWQDv is calculated, which for the Project Site is the 1.1 inch for the 85th percentile rainfall depth, 24-hour rain event.⁴¹ 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.

⁴¹ *Low Impact Development, 8777 Washington Boulevard, Culver City, CA 90232, prepared by Kimley Horn, dated January 2017.*

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, as part of the operational drainage plan, stormwater collected from roof drains, area drains, and downspouts would be routed through a Vortechs system for pretreatment to remove trash, debris, sediment, and hydrocarbons from stormwater runoff prior to entering a cistern and being reused for irrigation. 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 capture and 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. Similar to existing conditions, 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 capture and filtration system 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.⁴² The site is not located in a 100-year or 500-year flood zone as delineated by Culver City.⁴³ 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 Mullholland Dam Inundation Zone.⁴⁴

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.⁴⁵ The Project Site is located approximately six miles away from both dams and separated from it by 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 impact with regard to the exposure of people and structures to risk of loss or injury associated with the Hollywood or Franklin Canyon Dam.

⁴² FEMA Mapping Information Platform January 2013. FEMA <https://hazards.fema.gov>. Accessed September 2016.

⁴³ 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.

⁴⁴ Ibid

⁴⁵ Los Angeles County General Plan, *Safety Element*, December 6, 1990.

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.⁴⁶ 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. 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 main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot. 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 Culver City Station. The Project is an office building with pedestrian and community serving retail uses at the ground level. As such, the Project would be an infill project providing uses in keeping with the commercial and mixed-use 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 open space and streetscape design along National Boulevard and Washington Boulevard and close proximity to the Metro Expo Line would promote the movement of people throughout the established community. The location of 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

⁴⁶ 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.

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 office and retail uses within a four-story building located within the City's Transit Oriented Development (TOD) area near the Metro Expo Line and Culver City Metro Station. No amendment 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/Zone Change

The site's existing Zoning designations are Commercial General (CG) and East Washington Overlay (EW). The Project is proposing to change the Zoning designations for the Project Site to Planned Development 13 (PD-13) District with adoption of the Comprehensive Plan. In combination with the PD zoning district, the Comprehensive Plan supports innovation in site planning and other aspects of Project design, and more effective design responses to site features, and uses on adjoining properties. The PD zoning district is applied to areas of existing large scale, multiple family residential and commercial complexes developed as a PD zoning district, and sites suitable for similar large scale development. The PD-13 zoning district is consistent with the General Corridor land use designation of the General Plan.

Pursuant to the Comprehensive Plan, buildings heights would not exceed the maximum allowed height of 56 feet. 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.⁴⁷

Pursuant to the Comprehensive Plan and consistent with the Project location within a TOD area, the Project includes setbacks in excess of zoning requirements to promote pedestrian and commuter activity and will enhance the streetscape that forms the perimeter of the site street trees, planters, tree grates, benches, bicycle racks, trash receptacles, and other street furniture consistent with the City's TOD Streetscape Plan.

⁴⁷ The skylight/photovoltaic projections would be allowed up to a maximum of 13 feet 6 inches above the 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.

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 which is discussed in Section XVI, Transportation and Circulation, below. As such, the Project would have a less than significant impact with respect to the Zoning Code.

Comprehensive Plan

Development plans would be submitted for review by the Culver City Planning Division, who would determine consistency with the PD zone and Comprehensive Plan approval. According to Chapter 17.240: Planned Development (PD) Zoning Districts, Section 17.240.010: Purpose of Planned Development (PD) Zoning Districts, of the CCMC, the PD zoning district is applied to areas of existing large-scale, multiple-family residential and commercial complexes developed as a planned district, and sites suitable for similar large-scale development. The Project includes office uses with pedestrian supporting retail and food retail uses within a four-story building located within the City's TOD area near the Metro Expo Line and Metro Culver City Station.

The Comprehensive Plan along with the PD zone would be reviewed and considered for adoption. As discussed in this Initial Study document, no significant physical impacts as a result of implementation of the Comprehensive Plan would occur that could not be reduced to less than significant levels with the implementation of the prescribed mitigation measures, where applicable. Thus, because the development would not result in unmitigated, adverse physical impacts with respect to this land use action would be less than significant.

Other

It is noted that other land use related approvals, programs and/or or permits as part of the Project may include, but are not limited to, the following: Master Sign Program pursuant to CCMC Section 17.330.050.D.2; demolition permits; grading, excavation, foundation, and building permits; and haul route permits. None of these 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, programs, and permits have been assessed as part of the Project throughout this MND evaluation.

Conclusion

Based on the analysis above, with approval of the requested discretionary actions, 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, with approval of the requested discretionary actions, the Project would not result in conflicts with the applicable General Plan or Zoning Code or any other applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project 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 0.75 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 main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot. 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 with regard to mineral resources.

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 March 2017, which is available for review at the Culver City Planning Division.

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?**

Less Than Significant Impact With Mitigation Incorporated.

Applicable Noise Regulations

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-10**, *Culver City Interior and Exterior Noise Standards*, lists interior and exterior noise level standards and the type of occupancy to which they should be applied.

Table B-10

Culver City Interior and Exterior Noise Standards

Zone	Interior Standard dBA (CNEL)	Exterior Standard dBA (CNEL)
Residential	45	65
Commercial Retail	55	--
Office Building	50	--
Open Space – Parks	--	65

Source: Culver City Noise Element.

Title 9: General Regulations, Chapter 9.07: Noise Regulations, Section 9.07.055: Amplified Sounds, of the CCMC, states that it shall be prohibited for any persons to operate a loud speaker or sound amplified equipment for the purposes of transmitting messages, giving instructions or providing entertainment which is audible at a distance of fifty (50) feet or beyond the subject's property line without first filing an application and obtaining a permit. According to Section 9.07.055, every user of sound amplifying equipment on public or private property, except block parties which have obtained a permit from the Chief of Police or activities in public parks which have obtained a permit for use of amplifying equipment from the Parks, Recreation and Community Services Department, shall file an application with the Committee on Permits and Licenses at least ten (10) days prior to the day on which the sound amplifying equipment is to be used. The commercial and noncommercial use of sound amplifying equipment shall be subject to the following restrictions:

- a. The only sounds permitted shall be either music or human speech, or both.
- b. The operation of sound amplifying equipment shall occur only between the hours of:
 - 8:00 AM through 8:00 PM Monday through Thursday,
 - 8:00 AM through 10:00 PM Friday,
 - 10:00 AM through 10:00 PM Saturday, and
 - 10:00 AM through 8:00 PM Sunday and City specified holidays.

Table B-11, *Noise and Land Use Compatibility Matrix*, illustrates land use compatibility with regard to noise. These 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) for specific land uses are classified into four categories: (1) "Clearly Compatible" (2) "Compatible with Mitigation" (3) "Normally Incompatible" and (4) "Clearly Incompatible".

Table B-11
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.

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.

Title 9: General Regulations, Chapter 9.07: Noise Regulations, of the CCMC provides specific noise restrictions and exemptions for noise sources within Culver City. Culver City's noise regulation states that construction activity shall be prohibited, except between the hours of 8:00 AM and 8:00 PM Mondays through Fridays; 9:00 AM and 7:00 PM Saturdays; and 10:00 AM and 7:00 PM 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, California Department of Transportation (Caltrans) has developed a guidance manual for evaluating potential vibration impacts ("Transportation and Construction Vibration Guidance Manual" dated September 2013). 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 PPV. For example, 0.035 inches per second (PPV) is identified as a level that is "barely" perceptible, 0.24 is "distinctively" perceptible, 0.9 is "strongly" perceptible and 2.0 is "severe."

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 PM and 8:00 AM Monday through Friday; 7:00 PM and 9:00 AM Saturdays; and 7:00 PM and 10:00 AM Sundays; |
| NOISE 2 | The Project-related operations would cause ambient noise levels to increase by 5 dBA Leq or more. |
| NOISE 3 | Potential building damage – Project construction activities cause ground-borne vibration levels to exceed 0.2 inch-per-second PPV at the nearest buildings. |
| NOISE 4 | Potential human perception - Project construction activities cause ground-borne vibration levels to exceed 0.035 inch-per-second PPV at the nearest residential buildings. |

Existing Conditions

The Project Site is bounded by the intersection at Washington Boulevard and National Boulevard followed by vacant land and the Metro Expo Line and Metro Culver City Station to the south; the Access Culver City Mixed-Use Development and commercial uses to the east; a surface parking lot for the Metro Culver city Station to the west (future site of the Ivy Station mixed-use project); and commercial uses to the north. Interstate 10 (I-10) is located approximately 0.3 miles northwest of the Project Site. Existing noise sensitive uses within 500 feet of the Project Site include:

- Single-family residential uses approximately 440 feet east of the Project Site along Helms Avenue;

- Multi-family residential within the Access Culver City project located south of the Project Site across Washington Blvd; and
- A surface parking lot for the Metro Culver City Station to the west of the Project Site. To be developed as part of the future Ivy Station mixed-use project (residential, hotel, office, opens space and commercial uses).

Figure B-5, Noise Measurement Locations, presents locations of noise measurements taken within and near the Project Site. The results of ambient sound measurements taken to establish the existing environmental setting are summarized in **Table B-12, Summary of Ambient Noise Measurements**. As shown in Table B-12, the measured daytime average noise levels on site are 70 dBA Leq⁴⁸ and 63 dBA Leq at R1 and R2, respectively, and measured Community Noise Equivalent Level (CNEL)⁴⁹ are 71 dBA and 64 dBA at R1 and R2, respectively. Noise measurements were taken at R3 and R4 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 are 74 dBA at R3 and 70 dBA at R4. Monitoring demonstrated that the primary source of noise in the immediate area of the Project Site was traffic on Washington Boulevard and National Boulevard.

Table B-12

Summary of Ambient Noise Measurements

Site ID	Monitoring Date(s)	Start Time	End Time	24-hour Leq	Daytime Leq	CNEL
R1	5/5-5/6/2016	13:00	13:00	68	70	71
R2	5/5-5/6/2016	13:00	13:00	61	63	64
R3	5/6/2016	15:08	15:23	74	--	--
R4	5/6/2016	15:30	15:45	70	--	--

^a Detailed measured noise data, including hourly Leq levels, are included in the Noise and Vibration Technical Report.

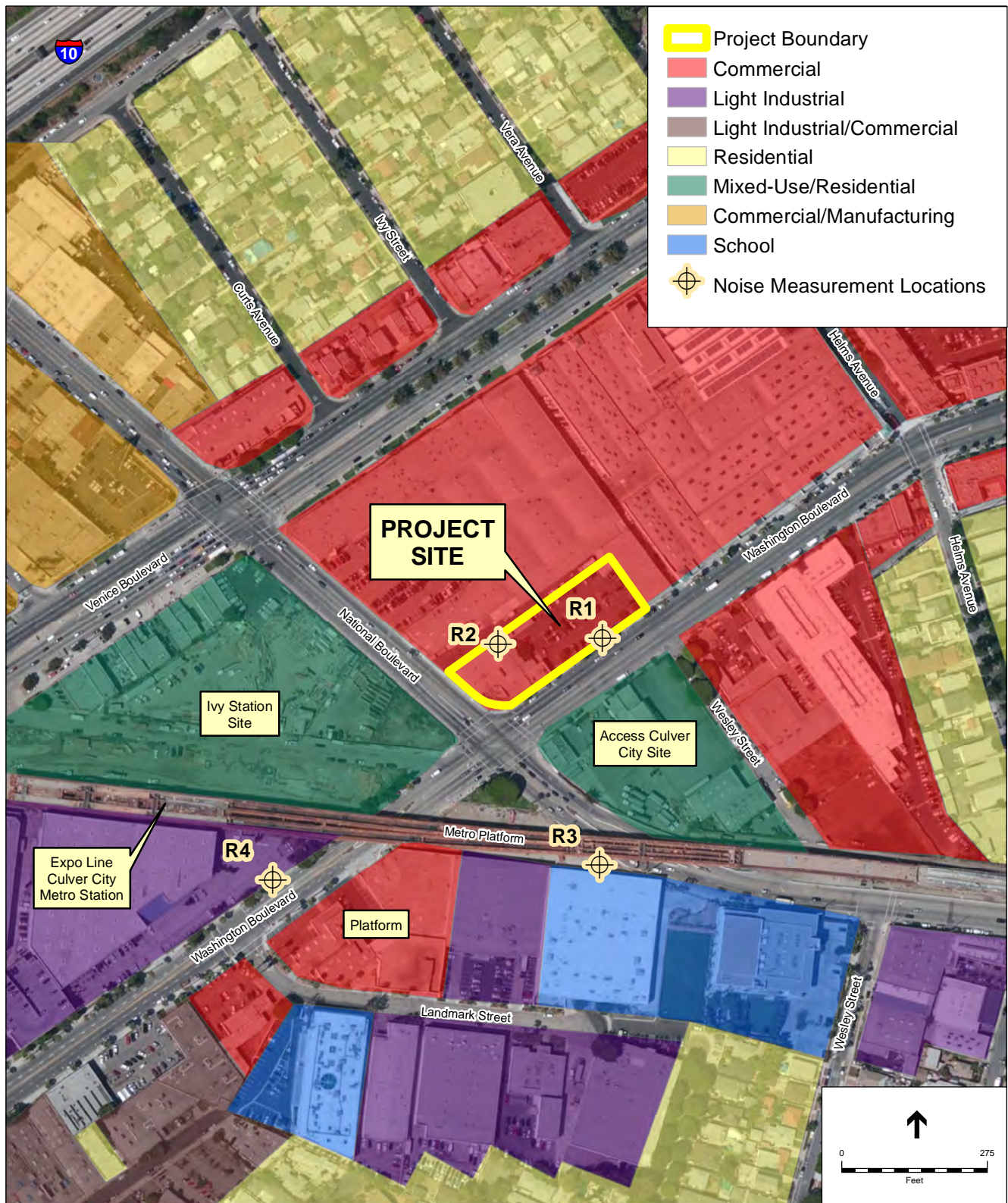
Source: ESA PCR, 2017.

Construction Noise

Construction is anticipated to begin in June 2017. The expected duration of construction is approximately 27 months. The Project would be fully operational in 2019. The below assessment include construction noise impacts 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).

⁴⁸ Leq is the equivalent steady-state A-weighted sound level that would contain the same acoustical energy as the time-varying A-weighted sound level during the same time interval.

⁴⁹ 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 PM to 7:00 AM) and a 5 dBA adjustment (upward) added to the sound levels which occur in the evening (7:00 PM to 10:00 PM). These penalties attempt to account for increased human sensitivity to noise during the quieter nighttime periods, particularly where sleep is the most probable activity.



SOURCE: Google Map, 2015 (Aerial).

8777 Washington

Figure B-5
Noise Measurement Locations

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 Project was analyzed using a mix of typical construction equipment, estimated durations and construction phasing. **Table B-13, 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-13

Construction Equipment and Estimated Noise Levels (Leq)

Construction Equipment	Noise Level at 50 ft (dBA)	Usage Factor (%)	Hourly Quantity	Estimated Hourly Noise Level at 50 ft (dBA)
Demolition				
Air Compressors	80	40	1	87
Backhoes	80	40	1	
Concrete/Industrial Saws	90	20	1	
Forklifts	85	20	1	
Water Truck	84	40	1	
Haul Truck	84	40	1	
Site Prep/Grading/Excavation				
Air Compressors	80	40	1	92
Backhoes	80	40	2	
Bore/Drill Rigs	85	20	2	
Excavator	85	40	1	
Rough Terrain Forklifts	85	20	1	
Rubber Tired Loaders	80	40	2	
Skid Steer Loaders	80	40	1	
Sweepers/ Scrubbers	80	10	1	
Haul Truck	84	40	12	
Drainage/Utilities/Sub-Grade				
Backhoes	80	40	1	78
Compactor	80	20	1	
Building Construction				
Air Compressors	80	40	5	89
Cement/Mortar Mixers	85	40	2	
Concrete/Industrial Saws	90	20	1	
Cranes	85	16	1	
Forklifts	85	20	1	
Pumps	77	50	2	
Boom Pump	77	50	2	

Construction Equipment	Noise Level at 50 ft (dBA)	Usage Factor (%)	Hourly Quantity	Estimated Hourly Noise Level at 50 ft (dBA)
Architectural Coatings				
Air Compressor	80	40	1	76
Paving				
Rollers	80	20	1	79
Paving Equipment	85	20	1	

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

Source: ESA PCR, 2017.

These noise levels account for the Project contractor(s) equipping 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 uses to the south (Access Culver City) are approximately 100 feet from the Project Site. The noise measurement location R1 is representative of the noise level at Access Culver City, which is the closest noise sensitive receptor to the Project Site. During the excavation, the noise level would be 92 dBA at 50 feet. The noise level at the façade of the multi-family residences would be 87 dBA. As it is described in Threshold Noise 1, the Project construction would be limited to the hours between 8:00 AM and 8:00 PM from Monday through Friday; between 9:00 AM and 7:00 PM on Saturdays; and 10:00 AM and 7:00 PM on Sundays, 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 R1 is 70 dBA Leq. 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 between approximately 13 to 15 dB.

Off-Site Construction Activities

During the phase of grading and excavation, there would be up to 95 haul truck trips per day. Because the construction hours are limited to between 8:00 AM and 8:00 PM from Monday to Friday; between 9:00 AM and 7:00 PM on Saturdays; and 10:00 AM and 7:00 PM on Sundays, it is assumed that a maximum of 12 haul truck trips (6 in and 6 out) would occur during a peak hour. Haul trucks would approach the Project Site from I-10 via Venice Boulevard through La Cienega Boulevard and Washington Boulevard. Haul trucks would depart from the Project Site toward I-10 via Washington Boulevard and National Boulevard.

According to the traffic analysis report, traffic volumes for the roadways designated for the haul truck route are greater than 2,000 vehicles during a peak hour. The addition of 6 haul trucks per hour would result in a negligible noise level increase and would not increase noise levels by 5 dBA over the ambient condition. Therefore, noise impacts from off-site construction traffic would be less than significant and 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.

Off-Site 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-14, *Off-Site Traffic Noise Impacts*, presents the change in traffic volumes resulting from Project implementation. It should be noted that in order to increase noise levels by 3 dBA due to the increase of the traffic, the traffic volumes need to be doubled (100 percent increase). Table B-14 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. Because the traffic would spread out as it moves away from the Project Site, the roadways further away from the Project Site would experience less increase than the roadways mentioned in Table B-14. Therefore, those roadways away from the Project Site were not included for the analysis. Because traffic volumes would not double, the noise level increase would be well below a 5 dBA increase as mentioned in the Noise 2 Threshold. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Open Space, Landscaping and Amenities

The Project would include outdoor open spaces, including landscape and hardscape areas along the main building frontages (Ground Level), and a terrace located on Level 4. The Ground Level open space areas would be accessible to the public, including the Washington frontage where the building has been set back

Table B-14
Off-Site Traffic Noise Impacts

Roadway Segment	Traffic Volumes			Project Increment ^c	Cumulative Increment ^d
	Existing	Future (2019) No Project ^a	Future (2019) with Project ^b		
Washington Boulevard					
Between Landmark Street and National Boulevard	2296	2879	2892	0.4%	27.0%
Between National Boulevard and Wesley Street	2432	2943	3009	2.3%	21.3%
National Boulevard					
Between Venice Boulevard and Washington Boulevard	2121	2789	2812	0.8%	30.5%
Between Washington Boulevard and Wesley Street	2314	2897	2932	1.2%	25.2%

^a Includes future growth plus related (cumulative) projects identified in the Traffic Study.

^b Includes future growth plus related (cumulative) projects and Project traffic.

^c Increase due to Project-related traffic only at Project build-out.

^d Increase due to future growth, related (cumulative) projects, and Project traffic.

Source: ESA PCR, 2017.

6 feet to encourage commuter and pedestrian access to Ground Level retail. The Ground Level public open space along National Boulevard would include a streetscape design that includes wide public sidewalks with street trees, landscape planters, tree grates, benches, bicycle racks, trash receptacles, and street furniture to activate the pedestrian environment. Federal Highway Administration's (FHWA) Traffic Noise Model (TNM) Version 2.5 was used to estimate noise levels at the Project's western facade. It is assumed that the traffic mix would be 97 percent/2 percent/1 percent for Auto/Medium Truck/Heavy Truck, respectively and that the speed limit on Washington Boulevard would be 35 miles per hour, and traffic volume assumptions were based on the PM peak hour derived from the Project traffic analysis.

Using these assumptions, the estimated noise levels on western facade would be 68 dBA. For the western façade, there would be the ground level open space and the terrace located on Level 4 along National Boulevard. As shown in Table B-11, the noise level up to 70 dBA CNEL is considered "Conditionally Acceptable" for commercial retail uses. As such, impacts would be less than significant.

Parking Facility

Noise associated with parking primarily includes moving vehicle noise and infrequent car alarms. The Project would include 392 vehicular parking spaces within a, valet assisted managed parking area distributed over the Ground Level and three levels of subterranean parking. Noise associated with vehicle activities, (e.g. slamming doors and car alarms), would be contained within and shielded by the Project building to the nearby noise sensitive uses due to the proposed buildings. Therefore, parking facility noise would not increase ambient noise levels at the nearby existing residential uses, school uses, and the future multi-family residential uses. As such, noise impacts associated with the parking garage would be less than significant.

Loading Areas

Loading for large deliveries for office and retail uses would occur in a designated loading area located on site on the Ground Level upon entering the parking structure. The loading area would be accessed from Washington Boulevard and designed to allow for box trucks and smaller vans to head into the space fronting the entry driveway and then reverse into the loading areas. Delivery drivers would access the retail uses on the Ground Level from the loading area through appropriate corridors. Access for deliveries would be from either loading area or the secured parking areas by use of elevators accessible on all parking levels. Delivery vehicles would not block access to the retail parking areas. The loading area would be largely shielded to the nearest existing and future noise sensitive receptors due to the Project buildings along Washington Boulevard and National Boulevard. Therefore, loading dock related activity noise would not increase ambient noise levels at the existing and future sensitive receptor locations. Therefore, impacts would be less than significant.

Refuse Collection

A scout service, or an employee of the City's Environmental Programs and Operation Division, would collect all trash bins serving the Project from the dedicated trash rooms and move the bins to a curbside collection area where the refuse would be collected by the City's EPO truck(s). The trash bins would then be returned to the dedicated trash rooms by the scout service.

The commercial trash rooms and the trash room for retail and office uses would be largely shielded to the nearest existing and future noise sensitive receptors due to the Project buildings along Washington Boulevard and National Boulevard. However, the moving of trash and recycling bins would generate noise levels that have a potential to adversely impact adjacent land uses during long-term Project operations. The moving of trash and recycling bins manually and refuse truck idling would generate noise levels up to approximately 75 dBA (L_{eq}) at 5 feet distance.⁵⁰

The nearest noise-sensitive uses, the multi-family residential buildings as part of the Access Culver City Project across Washington Boulevard are located approximately 100 feet from the proposed loading area along Washington Boulevard. Based on a noise level source strength of 75 dBA at a reference distance of 5 feet, and accounting for distance attenuation (24 dBA), the moving of trash bins and truck idling noise would be 51 dBA at the residential property line and would not exceed the significance threshold of 75 dBA (daytime average ambient noise level of 70 dBA plus 5 dB at R1) at the receptor location across Washington Boulevard. Therefore, refuse collection related activity noise would not increase ambient noise levels at the existing and future sensitive receptor locations. 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

⁵⁰ Noise measurement conducted at a refuse collection area by ESA PCR, 2015.

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 10 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 10-foot tall along the west and south boundaries which are 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.

Regulatory Framework

The City does not address vibration either in the CCMC 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 thresholds of vibration impact for structure and human annoyance. The threshold of vibration impact for human annoyance would apply for residential uses since commercial uses are not considered vibration sensitive uses.⁵¹ This FTA document is used to identify the impacts for this Project. **Table B-15, Human Response to Transient Vibration**, and **Table B-16, Groundborne Vibration Impact Criteria for Structure Damage**, includes the vibration impacts criteria for human annoyance and for structure damage.

Table B-15

Human Response to Transient Vibration

Human Response	Transient Vibration PPV (in/sec)
Severe	2.0
Strongly Perceptible	0.9
Distinctly Perceptible	0.24
Barely Perceptible	0.035

Source: Transportation and Construction Vibration Manual, Caltrans, 2013.

⁵¹ *Transportation and Construction Vibration Manual, Caltrans, 2013..*

Table B-16

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 would 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-17**, *Vibration Source Levels for Typical Construction Equipment*, presents typical construction equipment with vibration source levels.

Table B-17

Vibration Source Levels for Typical Construction Equipment

Equipment	Approximate PPV (in/sec) at 25 feet	Approximate RMS (VdB) at 25 feet
Large Bulldozer	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

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

Structure Damage

Structures in the vicinity of the Project Site would be classified as Class III buildings as it is described in Table B-16. 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 some adjacent buildings are at their property lines, 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 NOISE-5 would ensure potentially significant impacts are reduced to a less than significant level.

Human Annoyance

Construction vibration could annoy people within a residential building. The vibration impact threshold for human annoyance at a residential structure would be 0.035 in/sec PPV. The residential structures that would be affected by construction activity would be the multi-family residential buildings to the south across Washington Boulevard, which is approximately 100 feet from the Project Site and to the west across National Boulevard. The PPV value of a large bulldozer at 80 feet would be 0.016 in/sec PPV. Therefore, the impact of human annoyance would be less than significant and no mitigation measures would be required.

Operation Vibration

Once construction activities have been completed, there would be no vibration activities from the Project Site. Therefore, it is considered no vibration impact from the Project operation would occur.

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 structure damage 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, light rail trains on the Metro Expo line, 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, programs and events in open spaces areas, parking areas, and loading dock areas. Motor vehicle travel on local roadways attributable to the 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, loading docks, trash, open spaces, 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 Impact 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 Measure NOISE-1 through NOISE-4).

- 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?**
- 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 (e-f). 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. The Project Site is not located within an airport land use plan or within two miles of a public or private airport, airstrip, heliport or helistop. 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.

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 include up to 128,000 square feet of office and up to 4,500 square feet of retail that could indirectly increase the population by approximately 97 persons.⁵² The estimated 97-person indirect increase in the City's population would represent a 0.24 percent increase to the existing population (39,717 persons) in Culver City.⁵³

⁵² 128,000 square feet (2.94 acres) of office X 55.28 employees per acre (per the Low to Medium Rise Major Office Use factor of 55.28 for Los Angeles County in The Natelson Company, Table B-1, Employment Densities [employees per acre] by Anderson Code) = 53 employees. 163 employees X .25 X 2.36 (per 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 April 2016.) = 96 indirect residents. Indirect residents are one-quarter of the employees multiplied by 2.36 persons per household.

4,500 square feet (0.10 acres) of retail X 20.18 employees per acre (per the Retail Centers factor in Table B-1 mentioned above) = 2 employees X .25 X 2.36 = 1 indirect resident.

96 + 1 = 97 total indirect residents.

⁵³ U.S. Census Bureau, 2010 Census, <http://quickfacts.census.gov/qfd/states/06/0617568.html>, accessed April 2016.

According to the Southern California Association of Governments (SCAG), Culver City's forecast population and household growth of 1,100 persons and 500 households is predicted between 2008 and 2035.⁵⁴ This slow rate of growth indicates that population increase due to construction of multi-family housing has been offset by other factors such as residents moving out of Culver City. The estimated 97-person indirect Project generated increase in population is within SCAG's growth forecast. The Project would attract new businesses to the area with the proposed office and retail 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 165 employees.⁵⁵ According to SCAG, the forecast of employment growth predicted between 2008 and 2035 for Culver City is 5,000 jobs.⁵⁶ 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.

- 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 commercial (retail/warehouse) uses and surface parking along Washington Boulevard and National Boulevard, 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:

⁵⁴ 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, Table 18, Proposed 2012-2035 RTP/SCS Growth Forecast, page 31, prepared by Southern California Association of Governments, adopted April 2012, http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf, accessed April 2016 and the Culver City October 2013-2021 Housing Element, https://www.culvercity.org/~media/Files/Planning/GeneralPlan/2013-2021_HousingElement.ashx, accessed April 2016.

⁵⁵ 128,000 square feet (2.94 acres) of office X 55.28 employees per acre (per the Low to Medium Rise Major Office Use factor of 55.28 for Los Angeles County in The Natelson Company, Table B-1, Employment Densities [employees per acre] by Anderson Code) = 163 employees.

4,500 square feet (0.10 acres) of retail/restaurant X 20.18 employees per acre (per the Retail Centers factor in Table B-1 mentioned above) = 2 employees.

163 + 2 = 165 total employees.

⁵⁶ 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, accessed April 2016.

a. Fire protection?

Less Than Significant Impact With Mitigation Incorporated. Fire protection and emergency medical services for the Project Site are provided by the CCFD. In addition, it is acknowledged that the CCFD has a mutual aid agreement with the City of Los Angeles Fire Department 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.⁵⁷ 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 6. 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 6 is a general corridor, consisting of 0.22 square miles, located in the eastern portion of the City. Zone 6 has mostly single and multiple family residences, along with an industrial park and the Culver City Metro Station and Expo Line.⁵⁸

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; and Telecommunications.⁵⁹ 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-18, CCFD Daily Minimum Staffing Levels**, provides information on the quantity of apparatus, personnel per apparatus, and total personnel. **Table B-19, 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 implementing 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

⁵⁷ U.S. Census Bureau, 2015 population estimate based on 2010 Census data, <http://quickfacts.census.gov/qfd/states/06/0617568.html>, accessed April 2016.

⁵⁸ Chief Dave White, Culver City Fire Department, written correspondence dated August 9, 2016 and Community Risk Assessment & Standards of Cover, Culver City Fire Department, Chris Sellers, Fire Chief, 2014.

⁵⁹ Annual Compliance Report 8th Edition, Culver City Fire Department, prepared by Cara Flores, Management Analyst for the Commission on Fire Accreditation International, Inc., dated June 28, 2016.

have some firefighting capability with full paramedic capability. The apparatus would be a type 6 engine, similar to a pick-up truck.⁶⁰

Table B-18

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
			Total: 18

Source: Chief Dave White, Culver City Fire Department, written correspondence dated August 9, 2016.

Table B-19

CCFD Fire Stations Located in the Vicinity of the Project Site

Fire Station	Address	Apparatus Equipment/Staffing	Approximate Distance/Direction from Project Site ^a
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	0.50 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	2.85 miles south

^a 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 and Culver City Website, About the Department, Department Stations and Facilities, <https://www.culvercity.org/Government/PublicSafety/Fire/AbouttheDepartment/Locations.aspx>, accessed August 2015.

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,

⁶⁰ Chief Dave White, Culver City Fire Department, written correspondence dated August 9, 2016.

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.

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 Traffic Management 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). As part of the Plan, 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 Traffic Management Plan would be prepared for review and approval by the Culver City Building and Safety, Planning and Engineering Divisions 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 Traffic Management 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 indirect population increase of 97 persons (The estimated 97-person indirect increase in the City's population would represent a 0.24 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.⁶¹ 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,

⁶¹ Chief Dave White, Culver City Fire Department, written correspondence dated August 9, 2016.

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.⁶² **Table B-20**, *First-Due Unit Fire Incident Counts and Response Times*, provides call

Table B-20

First-Due Unit Fire Incident Counts and Response Times

	Fire Management Zone 6 (2015)¹	Culver City (2015-2016)
All Emergencies – 90th Percentile		
<i>Incident Count</i>	143	5,155
Call Processing Time	2:07	2:13
Turnout Time	2:19	2:18
Travel Time	4:46	5:20
Total Response Time	8:16	8:41
All Emergencies – 50th Percentile		
Call Processing Time	1:06	1:07
Turnout Time	2:19	1:20
Travel Time	3:32	2:49
Total Response Time	6:17	5:42
Structural Fire – 90th Percentile		
<i>Incident Count 1st Unit</i>	2	67
<i>Incident Count ERF</i>	0	12
Alarm Handling (pick up to dispatch)	1:25	2:11
Turnout Time (1 st Unit)	1:38	1:56
Travel Time (1 st Unit)	2:52	3:24
Travel Time (ERF)	N/A	7:59
Total Response Time (1 st Unit)	5:49	6:34
Total Response Time (ERF)	N/A	10:48
EMS – 90th Percentile		
<i>Incident Count</i>	88	4,290
Alarm Handling (pick up to dispatch)	1:55	2:08
Turnout Time (1 st Unit)	2:21	2:15
Travel Time (1 st Unit)	4:37	5:11
Travel Time (EFR)	6:24	7:20
Total Response Time (1 st Unit)	8:04	8:27
Total Response Time (ERF)	9:39	10:33
Technical Rescue – 90th Percentile		
<i>Incident Count 1st Unit</i>	2	75
<i>Incident Count ERF</i>	1	1
Alarm Handling (pick up to dispatch)	1:09	2:25
Turnout Time (1 st Unit)	2:18	1:52
Travel Time (1 st Unit)	2:29	4:50
Travel Time (Effective Response Force)	7:29	3:48

⁶² *Ibid.*

	Fire Management Zone 6 (2015) ¹	Culver City (2015-2016)
Total Response Time (1 st Unit)	5:21	4:00
Total Response Time (ERF)	10:19	5:57
Hazardous Materials – 90th Percentile		
Incident Count 1 st Unit	7	90
Incident Count ERF	0	6
Alarm Handling (pick up to dispatch)	1:48	2:40
Turnout Time (1 st Unit)	2:06	2:23
Travel Time (1 st Unit)	4:53	5:25
Travel Time (ERF)	N/A	7:57
Total Response Time (1 st Unit)	7:53	9:10
Total Response Time (ERF)	N/A	11:39

Notes: (1) Most recent information available.

Source: Cara Flores, Management Analysis, Culver City Fire Department, email correspondence dated August 9, 2016 and Chief Dave White, Culver City Fire Department, email correspondence August 10, 2016.

processing times, turnout times, travel times, and total response times for Fire Management Zone 6 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 0.5 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.⁶³

The Project Site is not located in an area of moderate or very high fire hazard.^{64,65} The nearest very high fire hazard severity zone (VHFHSZ) is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately 0.75 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.

⁶³ Chief Dave White, Culver City Fire Department, written correspondence dated August 9, 2016 and telephone correspondence January 25, 2017.

⁶⁴ Zimas Website, <http://zimas.lacity.org/>, accessed April 2016 and Culver City Fire Department Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012.

⁶⁵ The Culver City Very High Fire Hazard Severity Zones in LRA as recommended by CAL FIRE, prepared by CAL FIRE, dated September 2011.

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 on-site 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.⁶⁶ Thus, impacts regarding fire services would be less than significant.

Mitigation Measures

PS-1: Construction Traffic Management Plan – A Final Construction Traffic Management Plan shall be developed by the Project contractor in consultation with the Project's traffic and/or civil engineer 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 Plan shall also be reviewed and approved by Culver City's Fire and Police Departments. The Culver City's 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 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 Final Construction Traffic Management Plan 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.

⁶⁶ Chief Dave White, Culver City Fire Department, written correspondence dated August 9, 2016 and telephone correspondence January 25, 2017.

- 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 Department of Public Works or designee determined appropriate by Public Works.
- Prior to approval of the Plan, 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.
 - 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, Los Angeles 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 City's TOD area 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 0.6 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.⁶⁷ The Project Site is located within Patrol District 1.⁶⁸

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 and National 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. 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. 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 Traffic Management 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, 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 Traffic Management 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 97 person indirect increase in the City's population would represent 0.24 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 128,000 square feet of office and up to 4,500 square feet of retail uses which would increase the daytime population in the Project area given the new employees and patrons. As discussed in Attachment A, *Project Description*, the Project would incorporate a 24-hour/seven-day security program to ensure the safety of its office and retail uses and site visitors. 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 site tenants and visitors. The site security would regularly interface and collaborate with the CCPD, as necessary.

With development on the site, patrol routes in the area would be slightly modified to include the site, as necessary. 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

⁶⁷ Captain Ron Iizuka, Culver City Police Department, written correspondence dated September 21, 2016.

⁶⁸ 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, accessed October 2016.

comment upon improvement 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 on-site security would minimize the need for police services on the Project's public open space and public parking space areas. 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 be constructed as a result of the Project.⁶⁹ 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 Site is located within the boundaries of the Culver City Unified School District (CCUSD). The CCUSD includes one high school, one continuation high school, one middle school, five elementary schools, and one adult school. The Project 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 Linwood Elementary School, kindergarten through fifth grade (K-5), is located at 4100 Irving Place, approximately 0.5 miles southwest of the Project Site. The Culver City Middle School, (grades 6-8), is located at 4601 Elenda Street, approximately 1.6 miles southwest of the Project Site. The Culver City High School (grades 9-12), is located at 4401 Elenda Street, approximately 1.6 miles southwest of the Project Site.

Project operation would incrementally increase demand for school services. The estimated 97 person indirect increase in the City's population would represent 0.24 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 two elementary school students, one middle school student, and one high school student for a total of four students.⁷⁰

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,

⁶⁹ Captain Ron Iizuka, Culver City Police Department, written correspondence dated September 21, 2016 and telephone correspondence January 31, 2017.

⁷⁰ Student generation rates for office and retail 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.

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 six park facilities. **Table B-21**, *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.

Table B-21

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

Park/Facility	Location	Size (acres)	Parks Amenities/Activities	Approximate Distance/Direction from Project Site^a
Ivy Substation and Media Park	9070 Venice Boulevard	N/A	99-seat theatre facility, passive grass area	0.15 miles southwest
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	0.50 miles east
Linwood E. Howe Playground	4100 Irving Place	N/A	Linwood Elementary Playground	0.50 miles southwest
Culver City Park	9700 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	0.75 miles south
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	1.00 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	1.05 miles southwest

^a 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, accessed April 2016.

Project operation would incrementally increase demand for park services. The Project would not generate a new direct residential population as no residential uses are proposed. As discussed in Response XIIIa, above,

the Project could result in an indirect population increase of 97 persons to the City's population, which would represent a 0.24 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 retail uses, the minimal number of retail employees would not be substantial so as to adversely impact park facilities or services during anytime of the week. In addition, the Project would incorporate public open space along National Boulevard and Washington Boulevard with a streetscape design that includes wide public sidewalks with street trees, landscape planters, tree grates, benches, bicycle racks, trash receptacles, and street furniture to activate the pedestrian environment. The Project would also provide an open space terrace located on Level 4 for use by office patrons. 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 1.25 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 4.4 miles southwest of the Project Site. The West Hollywood Library is located at 625 North San Vicente Boulevard, West Hollywood, approximately 3.75 miles north of the Project Site. The View Park Library is located at 3854 West 54th 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 on-site open space 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 8777 Washington Boulevard Project* (herein referred to as the “Traffic Study”), prepared by Raju Associates, Inc., dated March 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: 1) Existing (2016) Conditions, 2) Existing (2016) Plus Project Conditions, 3) Cumulative (2019) Base Conditions, and 4) Cumulative (2019) Plus Project Conditions. Future conditions take into account the potential development of 35 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-eight (28) 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-22, Study Area Intersections**. Of the 28 study intersections, fourteen (14) intersections are located within Culver City and fourteen (14) intersections are located within the City of Los Angeles. An intersection level of service (LOS) analysis was performed at the study intersections to assess significant impacts resulting from the Project. **Figure B-6, Study Area Intersections**, illustrates the location of each study area intersection.

Table B-22

Study Area Intersections

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

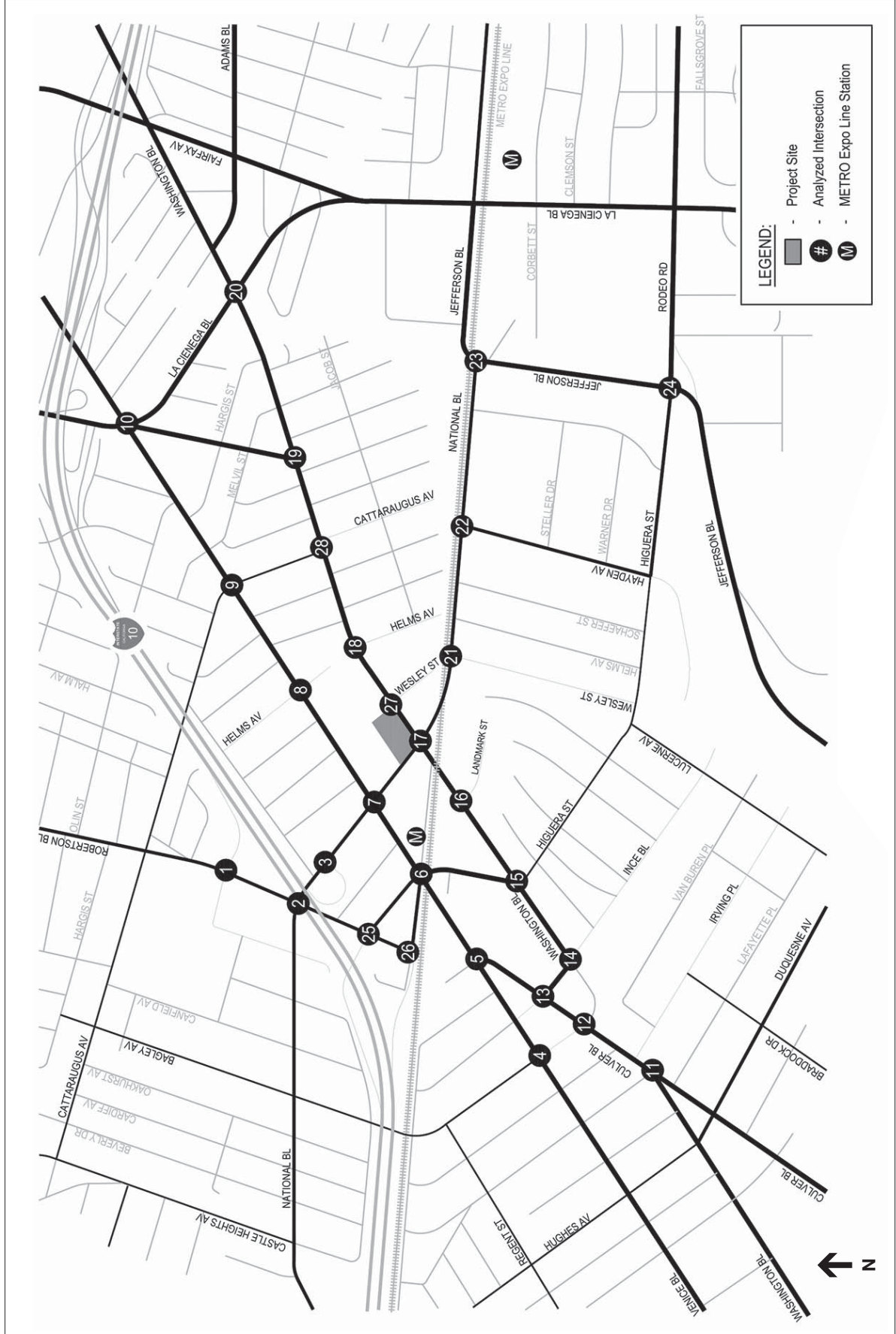
^a Study intersection is located within the City of Los Angeles.

^b Los Angeles County Congestion Management Program arterial monitoring location.

^c Study intersection is located within the Culver City.

^d Signalized intersection.^e The intersection will be signalized in the future.

Source: Raju Associates, Inc., 2017.



SOURCE: Raju Associates, Inc., 2017

8777 Washington

Figure B-6
Study Area Intersections

Level of Service Methodology

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-23**, *Level of Service Definitions for Signalized Intersections* and **Table B-24**, *Level of Service Definitions for Stop-Controlled Intersections*. Twenty-four of the 28 analyzed intersections are controlled by traffic signals and four analyzed intersections are unsignalized.

Table B-23

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-24

Level of Service Definitions for Stop-Controlled Intersections

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

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

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 10 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 12 signalized 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.

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-24 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-25, Culver City Criteria for Significant Traffic Impact**. Using this criteria, for example, 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-25

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-26, LADOT Criteria for Significant Traffic Impact**.

Table B-26

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 two 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-27, *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-27 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-27, 26 of the 28 study intersections are currently operating at LOS “D” or better during the morning peak hour. During the evening peak hour, 25 of the 28 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-28**, *Estimated Project Trip Generation*. The Project is estimated to generate approximately 30 net daily trips of which 120 trips would occur during the morning peak hour and 69 trips during the evening peak hour.⁷¹

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%
- 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.

⁷¹ The number of net daily trips subtracts the existing trips generated on the project site from the Project’s new trips.

Table B-27

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/Kincaid Avenue ^a	0.588	A	0.839	D
2.	Robertson Boulevard & National Boulevard ^a	0.892	D	0.817	D
3.	National Boulevard & I-10 Eastbound On-Ramp ^a	0.223	A	0.452	A
4.	Bagley Avenue & Venice Boulevard ^a	0.672	B	0.710	C
5.	Culver Boulevard & Venice Boulevard ^a	0.565	A	0.624	B
6.	Robertson Boulevard & Venice Boulevard ^a	0.728	C	0.721	C
7.	National Boulevard & Venice Boulevard ^a	0.707	C	0.792	C
8.	Helms Avenue & Venice Boulevard ^a	0.284	A	0.375	A
9.	Cattaraugus Avenue & Venice Boulevard ^a	0.688	B	0.604	B
10.	La Cienega Boulevard & Venice Boulevard ^{a b}	0.813	D	0.814	D
11.	Washington Boulevard/Irving Place & Culver Boulevard ^c	0.656	B	0.648	B
12.	Main Street & Culver Boulevard ^c	0.684	B	0.602	B
13.	Washington Boulevard/Canfield Avenue & Culver Boulevard ^c	0.697	B	0.622	B
14.	Ince Boulevard & Washington Boulevard ^c	0.858	D	0.813	D
15.	Robertson Boulevard/Higuera Street & Washington Boulevard ^c	0.710	C	0.649	B
16.	Landmark Street & Washington Boulevard ^c	0.442	A	0.444	A
17.	National Boulevard & Washington Boulevard ^c	0.670	B	0.816	D
18.	Helms Avenue & Washington Boulevard ^c	0.540	A	0.510	A
19.	La Cienega Avenue/McManus Avenue & Washington Boulevard ^c	0.573	A	0.521	A
20.	La Cienega Boulevard & Washington Boulevard ^c	0.898	D	0.840	D
21.	Wesley Street & National Boulevard ^c	0.429	A	0.463	A
22.	Hayden Avenue & National Boulevard ^c	0.461	A	0.468	A
23.	Jefferson Boulevard & National Boulevard ^a	0.875	D	0.514	A
24.	Jefferson Boulevard & Higuera Street/Rodeo Road ^a	0.757	C	0.727	C
25.	Robertson Boulevard & I-10 Westbound On-Ramp ^{a d}	55.2	F	41.8	E
26.	Robertson Boulevard & Exposition/I-10 Eastbound Off-Ramp ^{a d}	10.4	B	14.9	B
27.	Wesley Street & Washington Boulevard ^{c e}	22.3	C	49.7	E
28.	Cattaraugus Avenue & Washington Boulevard ^{c e}	***	F	41.9	E

V/C - Volume to Capacity Ratio

LOS - Level of Service

^a Study intersection is located within the City of Los Angeles.

^b Los Angeles County Congestion Management Program arterial monitoring location.

^c Study intersection is located within the City of Culver City.

^d All-way stop-controlled intersection. LOS based on average vehicular delay in seconds.

^e Stop-controlled on minor approach(es). LOS based on worst-case approach delay in seconds.

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

Source: Raju Associates, Inc. 2017

Table B-28

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
Retail	4,500 s.f.	905	15	9	24	36	39	75
Office	128,000 s.f.	1,584	205	28	233	38	184	222
Project Trip Generation Total		2,489	220	37	257	74	223	297
Transit Trip Use (25%) –Office		(396)	(51)	(7)	(58)	(10)	(46)	(56)
*Internal Capture (10%) Trip Credit		(91)	(2)	(1)	(3)	(4)	(4)	(8)
**Pass-By (25%) Trip Reduction – Retail		(204)	(3)	(2)	(5)	(8)	(9)	(17)
Existing Uses (to be removed)								
Retail	(12,485) s.f.	(1,756)	(27)	(17)	(44)	(72)	(77)	(149)
High-Turnover Restaurant	(4,731) s.f.	(602)	(28)	(23)	(51)	(28)	(19)	(47)
Pass-By (25%) Trip Reduction – Retail/Café		590	14	10	24	25	24	49
Project Net Trip Generation Total		30	123	(3)	120	(23)	92	69
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

* Internal capture credit taken after reduction of transit trips.

** Pass-by trip reduction taken after internal capture credits.

[1] Trip Generation Manual, 9th Edition, ITE 2012

[2] Trip generation estimates 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 of gross leasable 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 of gross leasable area.

Source: Raju Associates, Inc., 2017.

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-29, Summary of Intersection Level of Service Analysis**, presents the results of the Existing (2016) Plus Project traffic analysis. As illustrated in Table B-29, 25 of the 28 study intersections are currently operating at LOS “D” or better during the morning peak hour. During the evening peak hour, 26 of the 28 study intersections are operating at LOS “D” or better. The remaining locations are projected to operate at LOS “E” and includes:

- 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”; and
- 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 (2019) Base Traffic Projections

The Cumulative (2019) 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.

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 2019, the Existing 2016 traffic volumes were adjusted upward by a factor of three percent to reflect this area-wide regional growth. The resulting Existing Plus Ambient Growth (2019) traffic volumes are illustrated in Figures 8A and 8B, Existing With Ambient Growth (2019) 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-five (35) related projects were identified within the study area and are listed in Table 6, Estimated Weekday Trip Generation of Related Projects, of the Traffic Study. The locations of these projects are shown in Figure 9, Location of Related Projects, of the Traffic Study.

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 3,995 trips during the morning peak hour and 4,728 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 (2019) Base Traffic Volumes

The related project's traffic estimates were added to the Existing Plus Ambient Growth traffic to obtain the Cumulative (2019) Base traffic volumes. Figures 11A and 11B, Cumulative (2019) Base Conditions – Peak Hour Traffic Volumes, of the Traffic Study, provides the Cumulative (2019) Base traffic volumes at each of the analysis intersections during both AM and PM peak hours. These volumes represent Future (2019) Cumulative Base Without Project conditions.

Cumulative (2019) Plus Project Traffic Volumes

Utilizing the Project-only traffic estimates developed for both AM and PM peak hours, traffic forecasts for the Future Year 2019 Plus Project conditions were developed. The Cumulative (2019) Base traffic forecasts were combined with the Project-only traffic volumes to obtain the Future with Project traffic volume forecasts. The Future Year 2019 Cumulative Plus Project traffic volumes during both AM and PM peak hours are presented in Figures 12A and 12B, Cumulative (2019) Plus Project Conditions – Peak Hour Traffic Volumes, of the Traffic Study.

Cumulative (2019) Base Traffic Conditions

The Cumulative (2019) 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-29 presents the results of the Year 2019 Cumulative Base (without Project) traffic analysis. As indicated in Table B-29, 21 of the 28 analyzed intersections are projected to operate at LOS "D" or better during the morning peak hour. During the evening peak hour, 20 of the 28 analyzed intersections are projected to operate at LOS "D" or better. Ten of the 28 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"
- Robertson Boulevard/Venice Boulevard: AM Peak Hour – LOS "E"
- National Boulevard/Venice Boulevard: PM Peak Hour – LOS "F"
- La Cienega Boulevard/Venice Boulevard: PM Peak Hour – LOS "E"
- 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 Hours – 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 Hours – LOS "F"

Table B-29

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 V/C	Significant Project Impact LOS	Cumulative (2019) Conditions		Cumulative (2019) 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 ^a	Los Angeles	AM	0.588	A	0.595	A	0.007	No	0.738	C	0.745	C	0.007	No
			PM	0.839	D	0.839	D	0.000	No	0.884	D	0.884	D	0.000	No
2.	Robertson Boulevard & National Boulevard ^a	Los Angeles	AM	0.892	D	0.898	D	0.006	No	0.981	E	0.987	E	0.006	No
			PM	0.817	D	0.816	D	-0.001	No	0.936	E	0.934	E	-0.002	No
3.	National Boulevard & I-10 Eastbound On-Ramp ^a	Los Angeles	AM	0.223	A	0.223	A	0.000	No	0.272	A	0.272	A	0.000	No
			PM	0.452	A	0.455	A	0.003	No	0.569	A	0.572	A	0.003	No
4.	Bagley Avenue & Venice Boulevard ^a	Los Angeles	AM	0.672	B	0.672	B	0.000	No	0.739	C	0.739	C	0.000	No
			PM	0.710	C	0.714	C	0.004	No	0.807	D	0.810	D	0.003	No
5.	Culver Boulevard & Venice Boulevard ^a	Los Angeles	AM	0.565	A	0.569	A	0.004	No	0.653	B	0.657	B	0.004	No
			PM	0.624	B	0.624	B	0.000	No	0.791	C	0.790	C	-0.001	No
6.	Robertson Boulevard & Venice Boulevard ^a	Los Angeles	AM	0.728	C	0.728	C	0.000	No	0.912	E	0.915	E	0.003	No
			PM	0.721	C	0.728	C	0.007	No	0.888	D	0.896	D	0.008	No
7.	National Boulevard & Venice Boulevard ^a	Los Angeles	AM	0.707	C	0.712	C	0.005	No	0.889	D	0.895	D	0.006	No
			PM	0.792	C	0.801	D	0.009	No	1.043	F	1.052	F	0.009	No
8.	Helms Avenue & Venice Boulevard ^a	Los Angeles	AM	0.284	A	0.284	A	0.000	No	0.333	A	0.333	A	0.000	No
			PM	0.375	A	0.377	A	0.002	No	0.425	A	0.426	A	0.001	No
9.	Cattaraugus Avenue & Venice Boulevard ^a	Los Angeles	AM	0.688	B	0.688	B	0.000	No	0.769	C	0.769	C	0.000	No
			PM	0.604	B	0.605	B	0.001	No	0.702	C	0.703	C	0.001	No
10.	La Cienega Boulevard & Venice Boulevard ^{a b}	Los Angeles	AM	0.813	D	0.818	D	0.005	No	0.885	D	0.886	D	0.001	No
			PM	0.814	D	0.815	D	0.001	No	0.904	E	0.904	E	0.001	No
11.	Washington Boulevard/Irving Place & Culver Boulevard ^c	Culver City	AM	0.656	B	0.656	B	0.000	No	0.738	C	0.738	C	0.000	No
			PM	0.648	B	0.648	B	0.000	No	0.741	C	0.743	C	0.002	No
12.	Main Street & Culver Boulevard ^c	Culver City	AM	0.684	B	0.684	B	0.000	No	0.874	D	0.874	D	0.000	No
			PM	0.602	B	0.605	B	0.003	No	0.749	C	0.752	C	0.003	No
13.	Washington Boulevard/Canfield Avenue & Culver Boulevard ^c	Culver City	AM	0.697	B	0.697	B	0.000	No	0.829	D	0.829	D	0.000	No
			PM	0.622	B	0.625	B	0.003	No	0.778	C	0.782	C	0.004	No
14.	Ince Boulevard & Washington Boulevard ^c	Culver City	AM	0.858	D	0.862	D	0.004	No	1.040	F	1.044	F	0.004	No
			PM	0.813	D	0.815	D	0.002	No	1.057	F	1.058	F	0.001	No
15.	Robertson Boulevard/Higuera Street & Washington Boulevard ^c	Culver City	AM	0.710	C	0.718	C	0.008	No	0.853	D	0.861	D	0.008	No
			PM	0.649	B	0.646	B	-0.003	No	0.847	D	0.851	D	0.004	No
16.	Landmark Street & Washington Boulevard ^c	Culver City	AM	0.442	A	0.442	A	0.000	No	0.550	A	0.549	A	-0.001	No
			PM	0.444	A	0.442	A	-0.002	No	0.624	B	0.622	B	-0.002	No
17.	National Boulevard & Washington Boulevard ^c	Culver City	AM	0.670	B	0.670	B	0.000	No	0.865	D	0.864	D	-0.001	No
			PM	0.816	D	0.828	D	0.012	No	1.005	F	1.019	E	0.014	No
18.	Helms Avenue & Washington Boulevard ^c	Culver City	AM	0.540	A	0.550	A	0.010	No	0.626	B	0.637	B	0.011	No
			PM	0.510	A	0.516	A	0.006	No	0.618	B	0.625	B	0.007	No
19.	La Cienega Avenue/McManus Avenue & Washington Boulevard ^c	Culver City	AM	0.573	A	0.581	A	0.008	No	0.640	B	0.647	B	0.007	No
			PM	0.521	A	0.527	A	0.006	No	0.597	A	0.604	B	0.007	No
20.	La Cienega Boulevard & Washington Boulevard ^c	Culver City	AM	0.898	D	0.903	E	0.005	No	0.993	E	0.999	E	0.006	No
			PM	0.840	D	0.844	D	0.004	No	0.970	E	0.974	E	0.004	No
21.	Wesley Street & National Boulevard ^c	Culver City	AM	0.429	A	0.439	A	0.010	No	0.524	A	0.534	A	0.010	No
			PM	0.463	A	0.470	A	0.007	No	0.568	A	0.575	A	0.007	No

No.	Intersection	Jurisdiction	Peak Hour	Existing (2016) Conditions		Existing (2016) Plus Project Conditions		Project Increase in V/C V/C	Significant Project Impact LOS	Cumulative (2019) Conditions		Cumulative (2019) Plus Project Conditions		Project Increase in V/C	Significant Project Impact
				V/C	LOS	V/C	LOS			V/C	LOS	V/C	LOS		
22.	Hayden Avenue & National Boulevard ^c	Culver City	AM	0.461	A	0.463	A	0.002	No	0.584	A	0.586	A	0.002	No
			PM	0.468	A	0.474	A	0.006	No	0.609	B	0.615	B	0.006	No
23.	Jefferson Boulevard & National Boulevard ^a	Los Angeles	AM	0.875	D	0.879	D	0.004	No	1.062	F	1.067	F	0.005	No
			PM	0.514	A	0.518	A	0.004	No	0.744	C	0.748	C	0.004	No
24.	Jefferson Boulevard & Higuera Street/Rodeo Road ^a	Los Angeles	AM	0.757	C	0.761	C	0.004	No	0.831	D	0.835	D	0.004	No
			PM	0.727	C	0.729	C	0.002	No	0.851	D	0.854	D	0.003	No
25.	Robertson Boulevard & I-10 Westbound On-Ramp ^a	Los Angeles	AM	55.2	F	55.2	F	0.000	No	54.1	F	54.1	F	0.000	No
			PM	41.8	E	41.9	E	0.008	No	45.3	E	45.4	E	0.007	No
			AM	0.601	^c	0.601	^c	-	-	0.744	^c	0.744	^c	-	-
			PM	0.628	^c	0.636	^c	-	-	0.847	^c	0.854	^c	-	-
26.	Robertson Boulevard & Exposition/I-10 Eastbound Off-Ramp ^a	Los Angeles	AM	10.4	B	10.4	B	0.000	No	15.1	C	15.1	C	0.000	No
			PM	14.9	B	14.9	B	0.000	No	22.3	C	22.3	C	0.000	No
			AM	0.209	^c	0.209	^c	-	-	0.353	^c	0.353	^c	-	-
			PM	0.414	^c	0.414	^c	-	-	0.505	^c	0.505	^c	-	-
27.	Wesley Street & Washington Boulevard ^c	Culver City	AM	22.3	C										
			PM	49.7	E										
			AM			0.657	B	n/a	No	0.627	B	0.693	B	0.066	No
28.	Cattaraugus Avenue & Washington Boulevard ^c	Culver City	PM			0.584	A	n/a	No	0.633	B	0.677	B	0.044	No
			AM	***	F	***	F	0.017	No	***	F	***	F	0.017	No
			PM	41.9	E	42.8	E	0.007	No	***	F	***	F	0.008	No
			AM	0.961	^c	0.978	^c	-	-	1.085	^c	1.102	^c	-	-
			PM	0.763	^c	0.770	^c	-	-	0.906	^c	0.914	^c	-	-

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

^a Los Angeles County Congestion Management Program monitoring location.

^b Unsignalized intersection - stop-controlled on minor approach(es).

^c V/C ratio was calculated, based on signalized LOS methodology, to determine Project impacts.

^d The intersection will be signalized in the future.

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

Source: Raju Associates, Inc. 2017

Cumulative (2019) Plus Project Traffic Conditions

The Cumulative (2019) 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-29. As indicated in Table B-29, both the morning and evening peak hour operating conditions would be similar to those projected for the Cumulative Base conditions. Twenty-one (21) of the 28 analyzed intersections are projected to operate at LOS “D” or better during the morning peak hour. During the evening peak hour, 20 of the 28 analyzed intersections are projected to operate at LOS “D” or better. Ten of the 28 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”
- Robertson Boulevard/Venice Boulevard: AM Peak Hour – LOS “E”
- National Boulevard/Venice Boulevard: PM Peak Hour – LOS “F”
- La Cienega Boulevard/Venice Boulevard: PM Peak Hour – LOS “E”
- Ince Boulevard/Washington Boulevard: AM and PM Peak Hours – LOS “F”
- National Boulevard/Washington Boulevard: PM Peak Hour – LOS “E”
- La Cienega Boulevard/Washington Boulevard: AM and PM Peak Hours – 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 Hours – LOS “F”

Table B-29 identifies the individual impacts during both AM and PM peak hours at each of the analysis locations. Using the specified significant impact criteria, the Project would not cause significant impacts at any of the analyzed intersections under Cumulative (2019) Plus Project Traffic 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, four 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; and
- Hayden Avenue Street between National 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 analysis:

Project 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-30, Residential Street Traffic Analysis**. As indicated in Table B-30, 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; and
- Hayden Avenue Street between National Boulevard and Higuera Street – 10,085 ADT.

Cumulative (2019) Base – Street Segment Traffic Volumes

With the assumed completion date of 2019, the existing 2016 traffic volumes were adjusted upward by three percent (one percent per year compound annually) to reflect this area-wide regional growth. From 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 (2019) Base traffic volumes. The resulting Cumulative (2019) Base street segment daily and peak hour traffic volumes are summarized in Table B-30. It was observed that the increase in traffic along Higuera Street and Hayden Avenue is primarily due to the future planned projects along Hayden Place and Warner Drive.

Cumulative (2019) 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 30 daily trips for the Project, daily traffic estimates of Project-only trips were developed. It was determined the Project would add one daily trip to Hayden Avenue between National Boulevard and Higuera Street. The Cumulative (2019) Plus Project daily traffic volumes resulting from the addition of trips generated by the Project are shown on Table B-30.

In summary, as shown in Table B-30, the Project would not increase the traffic on the Higuera Street and Wesley Street analyzed roadway segments. On Hayden Avenue between National Boulevard and Higuera Street, the Project would nominally increase traffic on a daily basis and by 0.7 percent during the morning peak hour and would reduce traffic by -0.1 percent during the evening peak hour. As such, the Project would not have a significant impact on the residential streets in the local neighborhood. A less than significant impact would occur in this regard.

Table B-30

Residential Street Traffic Analysis

Street Segment	Time Period	Two-Way Traffic Volume				Project % Increase	Significant Impact
		Existing (2016) Conditions	Cumulative (2019) Base Conditions	Project Traffic	Cumulative (2019) Plus Project		
Higuera Street	ADT	8,157	9,309	0	9,309	0.0%	No
between Washington Boulevard and Lucerne Avenue	AM	797	881	0	881	0.0%	No
	PM	704	792	0	792	0.0%	No
Higuera Street	ADT	7,642	8,677	0	8,677	0.0%	No
between Wesley Avenue and Hayden Avenue	AM	776	855	0	855	0.0%	No
	PM	761	842	0	842	0.0%	No
Wesley Street	ADT	951	1,006	0	1,006	0.0%	No
between National Boulevard and Higuera Street	AM	85	89	0	89	0.0%	No
	PM	131	137	0	137	0.0%	No
Hayden Avenue	ADT	10,085	12,145	1	12,146	0.0%	No
between National Boulevard and Higuera Street	AM	739	887	6	893	0.7%	No
	PM	973	1,127	-1	1,126	-0.1%	No

Source: Raju Associates, Inc. 2017

Parking Evaluation

The Project would include 392 vehicular parking spaces within a valet assisted managed parking area distributed over the Ground Level and three levels of subterranean parking.

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; and
- Retail and personal service uses, general: 1 space per 350 gross square feet.

Based on the Zoning Code requirements, the required off-street parking for the Project would be 379 spaces as shown on the following calculations:

- Office: 128,000 gross square feet X 1 space/350 gross square feet = 366 spaces
- Retail: 4,500 gross square feet X 1 space/350 square feet = 13 spaces

In summary, the Project requires 379 parking spaces and the Project would provide a total of 392 parking spaces, which exceeds the required parking per the CCMC. As such, there would be adequate parking for the Project, and a less than significant impact would occur in this regard.

Overall, based on the above, the Project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. As such, a less than significant impact would occur in these regards.

- 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 (approximately 30 net daily trips of which 120 trips would occur during the morning peak hour and 69 trips during the evening peak hour), the Project would not add 150 or more new trips per hour to these locations in either direction. Therefore, no further analysis of any of these CMP monitoring intersections is 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 include 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 these locations in either direction. Therefore, no further analysis of CMP freeway monitoring stations is required.

Caltrans Freeway Impact Screening Analysis

A freeway impact screening analysis was conducted 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 project 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 1,500 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 1,500 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-28. 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 westbound off-ramp at National Boulevard and I-10 Freeway 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 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-31, the screening analysis determined that the screening threshold criteria would not be triggered at 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.

Table B-31

Caltrans Freeway Impact Screening Analysis – Freeway Mainline

Location	Peak Hour	Project Trips		Freeway Mainline Capacity ^a		Caltrans Criteria for Impact Analysis ^b		Freeway Impact Analysis Required?
		WB	EB	WB	EB	WB	EB	
I-10 Freeway, east of National Boulevard	AM	6	0	8,000	10,000	80	100	NO
	PM	-1	5	8,000	10,000	80	100	NO
I-10 Freeway, west of Robertson Boulevard	AM	0	12	8,000	10,000	80	100	NO
	PM	9	-2	8,000	10,000	80	100	NO

WB = westbound, EB = eastbound

^a The freeway capacity is 2,000 vehicles per hour per lane.

^b 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.

Freeway Ramp Analysis

Project trips on the I-10 Freeway westbound off-ramp at National Boulevard and I-10 Freeway eastbound off-ramp at Robertson Boulevard during the AM and PM peak hours are shown in **Table B-32, 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 assumed ramp capacity if approach LOS is “D” and 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-32, the screening analysis determined that the screening threshold criteria would not be triggered at 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.

Overall, as no further analysis of the CMP monitoring intersections, freeway mainline, or freeway ramps are required, impacts would be considered less than significant.

Table B-32

Caltrans Freeway Impact Screening Analysis – Freeway Off-Ramp

Location	Peak Hour	Project Trips	Freeway Off-Ramp Capacity ^a	Caltrans 1% Criteria for Impact Analysis ^b	Caltrans 2% Criteria for Impact Analysis -	Off-Ramp Impact Analysis Required?
I-10 Freeway Westbound	AM	6	1,700	17	34	NO
Off-Ramp at National Boulevard	PM	-1	1,700	17	34	NO
I-10 Freeway Eastbound	AM	12	1,700	17	34	NO
Off-Ramp at Robertson Boulevard	PM	-2	1,700	17	34	NO

^a The freeway off-ramp capacity is 850 vehicles per hour per lane.

^b 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.

^c 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.

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) and a traffic signal at the Project driveway along Washington Boulevard at Wesley Street. Direct vehicular access for all of the proposed uses to the parking area would be provided from Washington Boulevard. Vehicles would enter and exit on the Ground Level via an automatic entry system that would be activated by either a ticket and/or key card system. The driveway would provide one lane of ingress and two lanes of egress. The entry drive aisle would include a sentry gate with a short raised median to separate the ingress and egress vehicular traffic and would be located a minimum of 30 feet past the public sidewalk to allow for a stacking area before the sentry gate. Once past the sentry gate, visitor parking spaces would be directly accessible. Parking on the Ground Level would be for visitor uses with the three subterranean levels containing a mix of single stall and managed parking spaces for tenant uses arranged in double and triple tandem formation. All on-site roadway and site access improvements would be designed in compliance with applicable City standards. As such, impacts 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.^{72,73} 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 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 Traffic Management Plan (see Mitigation Measure PS-1), 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) and a traffic signal at the Project driveway along Washington Boulevard at Wesley Street. 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 employees and visitors. 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 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 with connecting bike, bus, and train routes. The property is located northeast of 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 14 bus routes and bicycle lanes/routes.

⁷² City of Los Angeles General Plan Safety Element – Critical Facilities and Lifeline Systems, Exhibit H November 26, 1996.

⁷³ County of Los Angeles Department of Public Works. <http://dpw.lacounty.gov/dsg/disaster/routes/map/culver%20city.pdf> Accessed October 10, 2015.

- Bike friendly design with bicycle parking for visitors and occupants. Also, the City of Culver City is studying the adoption of a bike share program as part of its mobility planning. When an operator is selected for a future bike share program, the Project would subsidize bike share participation for employees of tenant businesses via integration with the transit TAP card or other similar mechanism.
- Designated parking for low-emission/zero-emission vehicles, carpools and loading areas for shared-ride vehicles to allow for convenient pick up and drop off for visitors and occupants utilizing Uber, Lyft, and other similar rideshare companies.
- Site planning to allow bicycle connections to the Expo Line bike path and Culver City and City of Los Angeles bike paths. A bicycle path has been constructed along most of the Expo Light Rail alignment, but not in the vicinity of the Project. The City of Culver City is undertaking a study regarding options to complete the bicycle path. The Project's setbacks have been designed to accommodate a future bicycle and parking lane along the Washington Boulevard right-of-way should the City of Culver City determine that alignment best meets its mobility objectives.
- Promotion of walking through a "walk to work" program in coordination with the on-site office employees and a posted neighborhood map with approximate walking distances and times to local neighborhood amenities.
- The perimeter of the site area will incorporate the City's TOD Streetscape plan which will create an attractive and inviting walkable environment.
- Office tenants provided with end-of-trip facilities that include shower(s) and changing room.

The Project Site is located in an area well served by public transportation. In the existing transit system, 14 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); eight bus lines are operated by the Los Angeles County Metropolitan Transportation Authority (Metro); one bus line is 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 include 392 dedicated vehicular parking spaces and 20 dedicated long-term bicycle spaces. As shown in Table A-3, *Project Bicycle Parking Requirements*, in Attachment A of this MND, the Project would be required to provide a total of 25 bicycle spaces based on the City's Bicycle and Pedestrian Master Plan (BPMP) requirements. By providing 20 long-term and 12 short-term for a total of 32 bicycle parking spaces, the Project would exceed the required number of bicycle spaces.

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 "sharrow" 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)
- South side of Washington Boulevard between Landmark Street and Expo bridge
- North side of Washington Boulevard between Wesley Street and National Boulevard (bike lane). Bike lanes would be installed on the south side of Washington Boulevard between Wesley Street and National Boulevard with the development of the 8770 Washington Boulevard project.
- Bike lanes would be installed on both side of National Boulevard between Venice Boulevard and Washington Boulevard with the Ivy Station mixed-use project.

As noted above, bike lanes are anticipated along Washington and National Boulevards adjacent to the Project Site. The Project would allow for development of these bike facilities.

It is also acknowledged that Culver City is currently in the process of planning and/or designing bicycle and pedestrian infrastructure improvements. The bicycle infrastructure improvements include the “Expo to Downtown Connector” project potentially involving a two-way protected bicycle lane along Washington Boulevard from Downtown Culver City to the Metro Culver City Station area; a Citywide bikeshare system and various other provisions of bicycle lanes/facilities 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 Culver City 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 would not interfere with or degrade the performance or safety of existing or planned 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 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 8777 Washington Utility Memorandum, prepared by Kimley-Horn, dated February 16, 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 National Boulevard, there is an existing 8" sewer line flowing southeasterly to connect to the 8" sewer system on Washington Boulevard via an existing manhole at the National Boulevard and Washington Boulevard intersection. The existing 8" sewer line on National Boulevard is located on the Project side of the street center line under the northbound lanes. Along Washington Boulevard, there is an existing 8" sewer line along the Project frontage adjacent to the westbound curb and gutter. The existing sewer system was proposed to be lined based on City record plans from 1996 (Plan No. 5049-125). The record documents also show two existing laterals west of Wesley Street intersection.

As shown in **Table B-33 Estimated Wastewater Generation**, implementation of the Project would generate approximately 26,050 gallons per day (gpd) of wastewater. The Project would generate a peak total of 0.101 cubic feet per second (cfs) or a peak 65,125 gpd of additional sewer discharge to the existing 8" 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. The Project's Conceptual Street Utility Plan shows a new 6" sewer lateral connection to the existing 8" sewer line on Washington Boulevard. As detailed in their Utility Memorandum, based on sewer metering and analysis for the adjacent Ivy Station project, Kimley-Horn determined that the existing 8" sewer line would have adequate capacity for the Project. The analysis also considered flows from the Ivy Station project.

Table B-33

Estimated Wastewater Generation

Land Use	Quantity	Factor	Average Daily Flow (gpd)
Commercial-Office	128,000 sf	200 gpd/1,000 sf	25,600 gpd
Commercial-Retail	4,500 sf	100 gpd/1,000 sf	450 gpd
Total GPD			26,050
Total CFS			0.040
Total Peak CFS			0.101
Total Peak GPD			65,125

sf = square feet; gpd = gallons per day; d.u. = dwelling unit; cfs = cubic feet per second
1. Peak factor of 2.5

Source: Washington 8777 – Utility Memorandum, prepared by Kimley-Horn, dated February 16, 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 Traffic Management 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 Traffic Management 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.^{74,75} 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.

Existing water lines within Culver City adjacent the Project Site include a 6" water line along National Boulevard on the western half of the street with 87" storm drain along the center line of the street. The 6" water line gets combined into a single 12" water line near the intersection of Washington and National Boulevards. Also, there is a single 16" water line on Washington Boulevard, but the location of the line is across the street under the east bound lanes. The Golden State Water Company (GSWC) provides water and water treatment to Culver City, including the Project Site. The Project Site also has one fire hydrant at mid-point of Washington Boulevard frontage. There are two existing water meters around the Project Site; one on each street frontage. The Project would consider reusing the meters and laterals to an extent feasible based on 6" fire service on Washington Boulevard.

The Project's Conceptual Street Utility Plan shows the proposed water/fire service connections for the Project at the western end of the site on Washington Boulevard. The proposed connection would need to cross Washington Boulevard to the east bound lanes to tie into the existing 16" main. The presence of the above referenced meters also confirms that the large County storm drain lines (87"-90" RCP) can be crossed over from the Project Site for the proposed water and fire services.

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 City's fire department was based on the flow rate from the existing hydrant (#946) at 200 feet east of National Boulevard. The test was completed on June 3, 2016. The Project's plumbing engineer and/or fire service consultant will need to assess the Project water/fire service design requirements based on the preliminary pressure information provided by GSWC. The plumbing engineer will also need to assess the need for any booster pump for the Project in coordination with GSWC and CCFD.

⁷⁴ 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.)

⁷⁵ City of Los Angeles Bureau of Sanitation, Wastewater: Facts & Figures. Available at: <http://www.lacitysan.org/wastewater/factsfigures.htm>. Accessed April 2016.

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-34, Projected West Basin Service Area Water Demand (AFY)**.

Table B-34

Projected West Basin Service Area Water Demand (AFY)

Year	2020	2025	2030	2035	2040
Baseline Demand ¹	135,719	136,447	136,466	136,706	136,284
Planned Conservation ¹	32,280	35,190	37,928	40,255	42,773
Final Total Retail Demand	167,999	171,637	174,394	176,961	179,057
Recycled Water Demand ²	21,894	27,135	27,135	27,135	27,135
Final Potable Demand	146,105	144,502	147,259	149,826	151,922

1. Projections based on Metropolitan Demand Forecasting Model.

2. 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.

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-35, 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-35

Projected West Basin Service Area Water Supply (AFY)

Year	2020	2025	2030	2035	2040
Groundwater ¹	36,293	36,293	36,293	36,293	36,293
Imported Water ²	98,426	77,654	77,673	77,913	77,491
Recycled Water ³	21,894	27,135	27,135	27,135	27,135
Desalination ⁴	1,000	22,500	22,500	22,500	22,500
Total	157,613	163,582	163,601	163,841	163,419
Conservation ⁵	32,280	35,190	37,928	40,255	42,773
Total	189,893	198,772	201,529	204,096	206,192

1. Groundwater production within West Basin service area only.

2. Imported retail use only; does not include replenishment deliveries (i.e. Barrier).

3. Recycled water does not include replenishment deliveries (i.e. Barrier) and deliveries outside the service area.

4. Desalination includes both brackish and ocean water.

5. 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 78,150 gpd, or 28,524,750 gallons per year (approximately 87.54 AFY) when fully occupied.⁷⁶ 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 87.54 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.

⁷⁶ The water demand would be consistent with the estimated wastewater generation of the project per Table B-32, Estimated Wastewater Generation. To be conservative, 20 percent was added (to account for outdoor water use).

Proposed: 65,125 gpd X 1.20 = 78,150 gpd. 78,150 gpd X 365 days = 28,524,750 gallons per year = 87.54 AFY estimated project water demand.

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 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. 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. A typical 500 unit subdivision would typically consume 0.3 to 0.5 acre-feet of water per year, or approximately 150 to 250 AFY, depending upon several factors, including the regional climate.⁷⁷ As discussed under Response XVII, the Project would generate a water demand of approximately 87.54 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 and would not require preparation of a WSA.

one dwelling unit typically consumes .3 to .5 acre-feet of water per year, depending upon several factors, including the regional climate.

Thus, for the reasons listed above, the Project would have a less than significant impact with respect to water entitlements and supply.

⁷⁷ *Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001, prepared by California Department of Water Resources, 2003.*

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 a peak demand of 65,125 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 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. Commercial and industrial solid waste is picked up by private haulers. 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.⁷⁸ 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 (CIWMP), 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-36, 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 791 lbs/day (0.396 tons/day or 144.54 tons/year) of solid waste, or approximately 705 lbs/day (0.353 tons/day or 128.84 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.

⁷⁸ County of Los Angeles Department of Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan: 2012 Annual Report*. August 2013.

Table B-36

Projected Solid Waste Generated During Operation

Land Uses	Quantity	Factor ^a	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Existing Land Uses					
Commercial	12,485	5 lbs/k.s.f./day	62	0.031	11.32
Restaurant	4,731	5 lbs/k.s.f./day	24	0.012	4.38
		Total	86	0.043	15.70
Proposed Land Uses					
Office	128,000 s.f.	6 lbs/k.s.f./day	768	0.384	140.16
Retail & Restaurant	4,500 s.f.	5 lbs/k.s.f./day	23	0.012	4.38
		Total	791	0.396	144.54
Net Increase (Existing/Proposed)			705	0.353	128.84

Notes: d.u. = dwelling unit; s.f. = square feet; k.s.f.= thousand square feet; lbs. = pounds.

^a 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 2017.

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:

- 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 existing site is developed with a main single-story commercial (retail/warehouse) building with attached café and a detached storage garage building with an associated asphalt-paved surface parking lot. The site does not support sensitive plant or animal species. As discussed above in Response V.a, no 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, paleontological, and Native American 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 35 related projects in the Project study area is provided in **Table B-37, List of Related Projects**, below. Related projects are mapped in **Figure B-7, 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-37

List of Related Projects

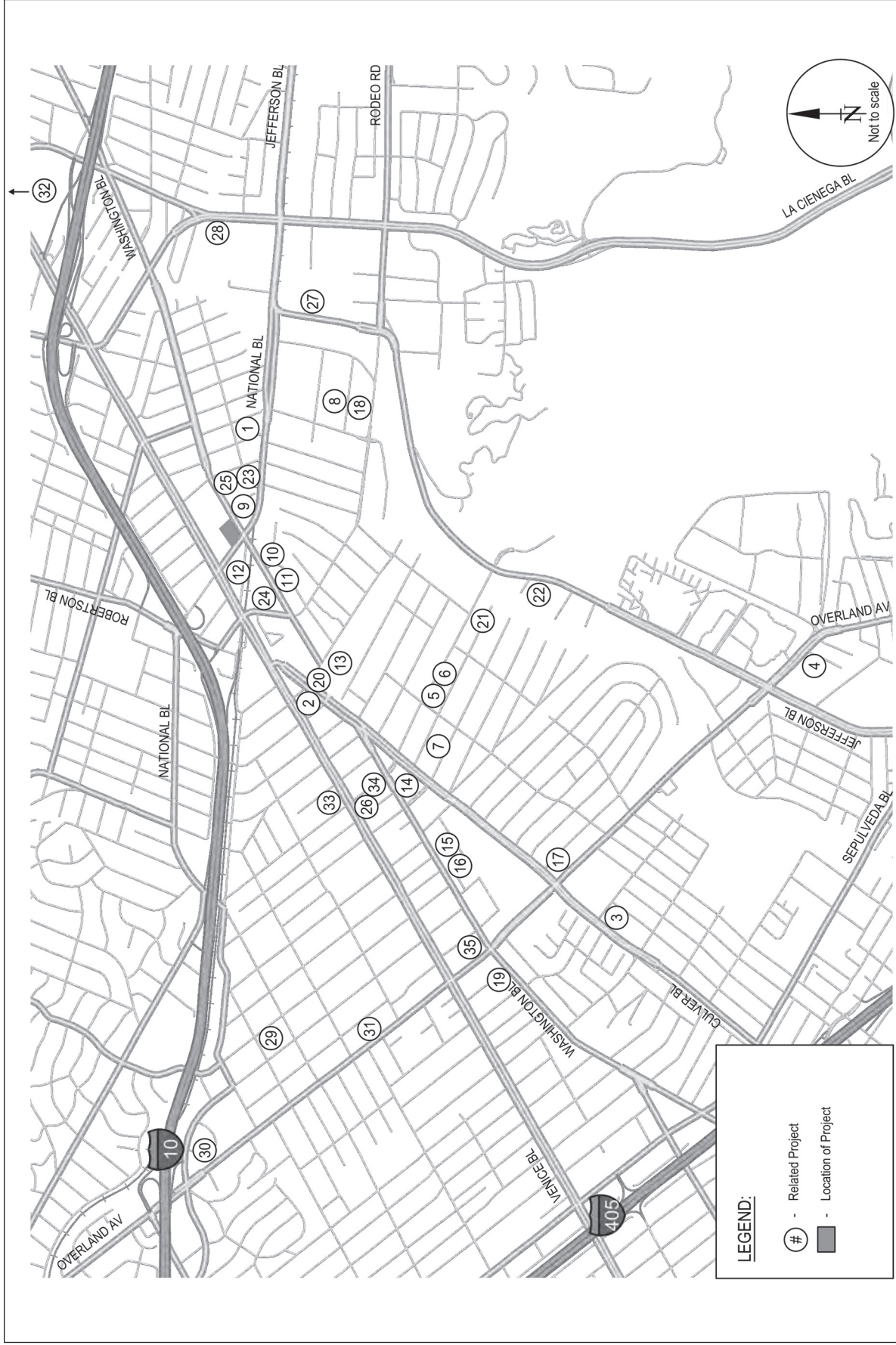
Map No.	Project Name	Location	Description
City of Culver City			
1	Residential Project	3440 Caroline Avenue	Two detached residential condominium dwelling units (net addition of one unit).
2	Mixed-Use Project	9355 Culver Boulevard	3-story mixed use building consisting of a ground level salon, mezzanine, 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 Deshire 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	8888 Washington Boulevard	Construct new office building with 128,000 s.f. of office use and 4,500 s.f. of retail use.

Map No.	Project Name	Location	Description
12	Triangle Site – Washington/National TOD	Corner of Washington Boulevard/National Boulevard	Transit oriented development to include 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 413,127 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	809 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.
24	Mixed-Use Project	3710 & 3750 S. Robertson Boulevard	141 unit apartments, 30,000 s.f. retail, 64,200 s.f. office. Existing FedEx distribution center to be removed.
25	Washington & Helms Mixed-Use Development	Helms Avenue & Washington Boulevard	262 unit apartments, 69,500 s.f. office, 22,000 s.f. retail, 5,000 s.f. restaurant. Existing manufacturing, retail, auto body, residential uses to be removed.

Map No.	Project Name	Location	Description
City of Los Angeles			
26	Apartment	3822 S. Dunn Drive	7-story, 86-unit apartment building over ground floor.
27	Wrapper Office Building Project	5790 W. Jefferson Boulevard	Construct new 10-story 150,761 s.f. office building.
28	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.
29	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.
30	Restaurant & Retail	10612 National Boulevard	1,726 s.f. coffee shop (Coffee Bean) including 250 s.f. outdoor seating. Existing vacant lot.
31	Mixed-Use: Apartment & Restaurant	3644 S. Overland Avenue	New mixed-use: 92-unit apartment & 1,573 s.f. restaurant use (110 spaces).
32	Venice Fairfax Residential Project	5930 W. Sawyer Street	Construct 60 single-family homes.
33	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.
34	Mixed-Use Apartment & Retail	9901 Washington Boulevard	131-unit apartment & 12,000 s.f. retail. Existing 16,900 s.f. retail to be removed.
35	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: Culver City Traffic Study Criteria; Raju Associates, Inc., 2017.



8777 Washington
Figure B-7
 Locations of Related Projects

SOURCE: Raju Associates, Inc., 2017

CUMULATIVE IMPACTS

Aesthetics

Development of the Project in conjunction with the related projects would result in an incremental intensification of land uses in a highly urbanized area of Culver City. This Project is sited within Culver City's TOD area. Centrally located with the Helms Bakery and Arts District to the east, Hayden Tract to the south, and downtown Culver City just to the west, the Project would be one part of a larger scheme that places the Washington/National area at the fulcrum of Culver City activity. The driving force behind the district is the new Metro Expo Line connecting Culver City with Santa Monica and downtown Los Angeles. The proposed Project has been designed with the goal of bringing office and retail life within walking distance of the new Culver City Metro Station. New development and concentration of development, particularly in TOD areas, as are the Project Site and 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 north, the TOD area is in the process of revitalization and transition with recent and new development projects occurring throughout the Project vicinity.

For example, the proposed building heights and massing would be compatible with the adjacent 5-story Access Culver City mixed-use project to the east and the one- and multi-story building(s) and parking structure (up to 5-stories) constructed as part of the Platform project located to the southeast, both of which also include architecturally modern buildings that support a mix of land uses. Further, the future two to six-story Ivy Station mixed-use project is located immediately to the west of the Project Site. 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 Building and Safety Division 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, the 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, NO₂, PM₁₀, and PM_{2.5}, 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 PM₁₀, 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. Therefore, cumulative impacts on air quality would be less than significant.

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 CULT-1 through CULT-8 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, such as archaeological, Native American, and paleontological construction monitoring, 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. Furthermore, the Project would result in no indirect impacts to historical resources in the vicinity of the Project Site as the nearest recorded prehistoric site is more than 0.75 miles from the Project Site. Further, the historic setting in the area around the Project Site is already eroded by contemporary development. Finally, in association with CEQA review, future AB 52 consultations with Native American tribes would be required in order to identify tribal cultural resources for projects that have the potential to cause significant impacts to tribal cultural resources. 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 Assessment 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. 12 and 23) 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 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-16, 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., parking and 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 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. The Project is consistent with the growth policies of the RTP/SCS in that it would concentrate employment and community retail serving uses, in addition to mixed uses within a TOD. 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 Project as well as 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

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. Similar to the Project, 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' residents, 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, as applicable. The full payment of all applicable fees would reduce potential cumulative impacts to other governmental services/facilities to less than significant levels.

Recreation

No impact: 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 Preliminary Construction Traffic Management 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 Preliminary Construction Traffic Management Plan, to reduce potential traffic impacts during construction.

The future (2019) service level conditions presented in Table B-29 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-29, 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. The Project would not contribute to a significant cumulative impact with regard to these issues, cumulative impacts on parking would be less than significant.

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 Hyperion Treatment Plant (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 Building Safety Division Mandatory Green Building Program, 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 (i.e., construction noise). 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 adjacent roadway segments and intersections. The analysis herein concludes that direct and indirect environmental effects will at most require mitigation to reduce potentially significant impacts 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. *Air Quality Technical Report* prepared by ESA-PCR in February 2017.
2. *Annual Compliance Report 8th 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 September 21, 2016 and telephone correspondence on January 31, 2017.
4. Chief Dave White, Culver City Fire Department, written correspondence 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 and Paleontological Resources Inventory for the 8777 Washington Boulevard, Culver City Project*, Los Angeles County, California, prepared by Dudek, dated February 17, 2017.
7. *Draft Traffic Study for the 8777 Washington Boulevard Project*, prepared by Raju Associates, Inc., dated March 2017.
8. *Greenhouse Gas Technical Report* prepared by ESA-PCR in February 2017.
9. *Low Impact Development, 8777 Washington Boulevard, Culver City, CA 90232*, prepared by Kimley Horn, dated February 2017.
10. *Preliminary Geotechnical Assessment, Proposed Office Development 8777 Washington Boulevard, Culver City, California*, prepared by Geotechnologies, Inc., dated February 14, 2017.
11. *Phase 1 Environmental Site Assessment of 8777 Washington Boulevard, Culver City, California*, prepared by Alpha Environmental, dated September 18, 2014.
12. *Nesting Bird Habitat Assessment Report for the 8777 Washington Boulevard Project*, prepared by Dudek, dated April 2015
13. *Noise and Vibration Technical Report* prepared by ESA-PCR in March 2017.
14. *Preliminary Construction Management Plan, 8777 Washington Boulevard*, prepared by Morley Builders, 2017.
15. *Shade/Shadow Report* prepared by ESA-PCR in February 2017.
16. *8777 Washington, Comprehensive Plan, Planned Development Zone No. 13*, prepared by Gensler, 2017.
17. *8777 Washington Utility Memorandum*, prepared by Kimley-Horn, dated February 16, 2017.

ATTACHMENT C
MITIGATION MONITORING PROGRAM



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 P2016-0049-CP - Comprehensive Plan; P2016-0049-ZCMA – Zone Change				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<u>BIOLOGICAL RESOURCES</u>				
<p>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. Either:</p> <p>(1) 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; or</p> <p>(2) If avoidance of the avian breeding season (February 15 through August 31) is not feasible, then:</p> <p>(a) 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</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 P2016-0049-CP - Comprehensive Plan; P2016-0049-ZCMA – Zone Change				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>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>(b) 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.</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</p>				

MITIGATION MONITORING PROGRAM P2016-0049-CP - Comprehensive Plan; P2016-0049-ZCMA – Zone Change				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
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				
<u>CULTURAL RESOURCES</u> 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 Gabrielino 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	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 P2016-0049-CP - Comprehensive Plan; P2016-0049-ZCMA – Zone Change				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>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>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</p>				

MITIGATION MONITORING PROGRAM P2016-0049-CP - Comprehensive Plan; P2016-0049-ZCMA – Zone Change				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>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>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.</p> <p>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</p>				

MITIGATION MONITORING PROGRAM P2016-0049-CP - Comprehensive Plan; P2016-0049-ZCMA – Zone Change				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>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>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.</p> <p>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 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>CULT-8: If human remains are encountered</p>				

MITIGATION MONITORING PROGRAM P2016-0049-CP - Comprehensive Plan; P2016-0049-ZCMA – Zone Change				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>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.</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</p>				

MITIGATION MONITORING PROGRAM P2016-0049-CP - Comprehensive Plan; P2016-0049-ZCMA – Zone Change				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.				
<u>Geology and Soils</u> 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.	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
<u>Hazards and Hazardous Materials</u> HAZ-1: During construction grading activities, if localized areas of petroleum impacts soils are encountered, these soils shall be isolated, sampled, and handled as per current regulatory guidelines. HAZ-2: Prior to the issuance of any permit for the demolition or alteration of the existing on-site buildings, 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-3: 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.	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; Fire Prevention; Fire Inspector; Planning Division
<u>Hydrology and Water Quality</u> WQ-1: If dewatering activities occur on-site during future redevelopment, samples shall be obtained from the water and analyzed for volatile	Condition of Approval	Plan Check Notes, Reports, Surveys and	On-Going During Construction	Culver City Planning, Public Works, and

MITIGATION MONITORING PROGRAM				
P2016-0049-CP - Comprehensive Plan; P2016-0049-ZCMA – Zone Change				
Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
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 Culver City Planning Division, Building and Safety Division, and Department of Public Works prior to issuance of grading permit.		Field Inspections		Building Safety Division
<p>Noise</p> <p>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.</p> <p>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.</p> <p>NOISE-3: Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.</p> <p>NOISE-4: Temporary noise barriers that provide minimum of 10 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 10-foot tall along</p>	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Building Permit 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>the west and south boundaries which are adjacent to residential uses.</p> <p>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 structure damage 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>				
<p><u>Public Services</u></p> <p>PS-1: Construction Traffic Management Plan – A Final Construction Traffic Management Plan shall be developed by the Project contractor in consultation with the Project's traffic and/or civil engineer 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 Plan shall also be reviewed and approved by Culver City's Fire and Police Departments. Culver City's 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 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> <p>The Final Construction Traffic Management Plan shall identify, at a minimum, the following to the satisfaction of the City:</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 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
<ul style="list-style-type: none"> ▪ 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 Department of Public Works or designee determined appropriate by Public Works. ▪ Prior to approval of the Plan, the applicant shall conduct one (1) Community Meeting pursuant to the 				

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<p>notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community.</p> <ol style="list-style-type: none"> 1) Construction schedule and hours. 2) Framework for construction phases. 3) Identify traffic diversion plan by phase and activity. 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). 				