



# Culver CITY

## PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

Attachment No. 4

(310) 253-5710  
FAX (310) 253-5721

### PROPOSED MITIGATED NEGATIVE DECLARATION

**Project Title and File No.:** Market Hall Comprehensive Plan  
Comprehensive Plan, P2017-0042-CP; General Plan Map Amendment, P2017-0042-GPMA; Zoning Code Map Amendment, P2017-0042-ZCMA; Tentative Parcel Map P2017-0042-TPM; and Mitigated Negative Declaration, P2017-00042-MND

**Project Location:** 12337 – 12423 Washington Boulevard

**Project Sponsor:** Regency Centers, LP (Applicant)

**Project Description:** Comprehensive Plan, General Plan Map Amendment, Zoning Code Map Amendment, and Tentative Parcel Map for a proposed multi-site commercial development totaling 26,835 sq. ft. of commercial floor area, consisting of:  
Site A: A one-story, 21,605 sq. ft. commercial building, including an 11,483 sq. ft. market/food hall and 10,122 sq. ft. of additional artisanal food retail/restaurant space, with an attached four-level public parking structure containing 184 parking stalls, and the creation of a commercial condominium subdivision.  
Site B: Two (2) one-story structures comprising 5,230 square feet of floor area for commercial/food retail development with a twenty (20) stall surface parking lot.

#### 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 identified 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**

Contact: Gabriela Silva, Associate Planner (310) 253-5736 or [gabriela.silva@culvercity.org](mailto:gabriela.silva@culvercity.org)

The public is invited to comment on the proposed MITIGATED NEGATIVE DECLARATION during the review period, which ends **Wednesday, October 25, 2017, 4:00 pm.**





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### INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

<b>Project Title:</b>	Market Hall Comprehensive Plan Comprehensive Plan, P2017-0042-CP; General Plan Map Amendment, P2017-0042-GPMA; Zoning Code Map Amendment, P2017-0042-ZCMA; Tentative Parcel Map, P2017-0042-TPM		
<b>Lead Agency Name &amp; Address:</b>	City of Culver City, Planning Division 9770 Culver Blvd., Culver City, CA 90232		
<b>Contact Person &amp; Phone No.:</b>	Gabriela Silva, Associate Planner – (310) 253-5736		
<b>Project Location/Address:</b>	NWC & NEC of W. Washington Blvd and Centinela Ave		
<b>Nearest Cross Street:</b>	Washington Blvd/ Centinela Ave	<b>APN:</b>	4231-002-900 thru 909 & 4232-009-900 thru 901
<b>Project Sponsor's Name &amp; Address:</b>	Regency Centers, LP (John Nahas) – Applicant 915 Wilshire Boulevard, Ste 2200 Los Angeles, CA 90017		
<b>Property Owner</b>	Successor Agency to the Culver City Redevelopment Agency 9770 Culver Boulevard Culver City, CA 90232		
<b>General Plan Designation:</b>	General Corridor Institutional	<b>Zoning:</b>	Commercial General (CG) Public Parking Facility (PPF)
<b>Redevelopment Project Area:</b>	Redevelopment Component Area No. 4		
<b>Overlay Zone/Special District:</b>	Commercial Zero Setback		

**Project Description and Requested Action:** The proposed Culver Public Market project consists of a 26,835 square foot artisanal food/market hall for a variety of food retail and restaurant uses, across two (2) sites (Site A and Site B), which are currently vacant and total approximately 1.89 acres. The Project would house several small vendors offering a variety of raw and prepared foods such as produce, baked goods, wines, olives, desserts, meats, and cheeses available for take-out or on-site dining. Site A will include 21,605 square feet of commercial floor area within the ground level of the building, which will have an attached three-and-a-half level public parking structure, containing 184 parking stalls, and reaching a maximum height of forty-four (44) feet. The parking structure will include a minimum of forty-seven (47) surplus parking stalls to support surrounding commercial uses. Site B will include two (2) one-story structures totaling 5,320 square feet of commercial floor area, and will provide twenty (20) parking stalls on a surface parking lot. The Culver Public Market design is proposed to incorporate materials such as exposed masonry, standing seam metal, steel, and faux wood to give the project a simple, rustic aesthetic appropriate for its location at a major intersection

while also complementing the adjacent residential neighborhood. Outdoor plazas are designed to connect to the public sidewalks to promote pedestrian activity and accessibility to the marketplace.

**Existing Conditions of the Project Site:**

The Project site is comprised of two sites (Site A on the northwest corner and Site B on the northeast corner) at the intersection of Washington Boulevard and Centinela Avenue, totaling approximately 1.89 acres. Both sites are generally flat in topography and are currently vacant.

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

West: CG Zone/R1 Zone – Commercial/Single Family Residential  
East: CG Zone – Commercial/ Multifamily Residential  
North: R1 Zone – Single Family Residential  
South: CG Zone – Commercial

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

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

*The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a 'Potentially Significant Impact' 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 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 type="checkbox"/> Hydrology / Water Quality                | <input type="checkbox"/> Mandatory Findings of Significance |

**ENVIRONMENTAL DETERMINATION:**

On the basis of this initial evaluation:

- ☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.

- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
\_\_\_\_\_  
Gabriela Silva, Associate Planner

October 4, 2017  
\_\_\_\_\_  
Date

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS -- Would the project:</b>				
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"/>
<b><u>Mitigation Measure(s):</u> None Required</b>				
<b>II. AGRICULTURE RESOURCES AND FOREST RESOURCES:</b> 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?	<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 12220(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"/>

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?  <b>Mitigation Measure(s):</b> None Required	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>III. AIR QUALITY</b> -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input 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"/>
<b>Mitigation Measure(s):</b> None Required				
<b>IV. BIOLOGICAL RESOURCES</b> -- 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"/>

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 wildlife 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 type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b><u>Mitigation Measure(s):</u></b> BIO-1				
<b>V. CULTURAL RESOURCES -- Would the project:</b>				
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) 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 checked="" type="checkbox"/>	<input type="checkbox"/>
<b><u>Mitigation Measure(s):</u></b> None Required				
<b>VI. GEOLOGY AND SOILS -- Would the project:</b>				
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
ii. Strong seismic ground shaking?	<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"/>
<b><u>Mitigation Measure(s):</u> GEO-1</b>				
<b>VII. GREENHOUSE GAS EMISSIONS --Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b><u>Mitigation Measure(s):</u> None Required</b>				
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS --Would the project:</b>				
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"/>

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>		Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input 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"/>
<b><u>Mitigation Measure(s):</u></b> HAZ-1					
<b>IX. HYDROLOGY AND WATER QUALITY -- Would the project:</b>					
a)	Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
<b>Mitigation Measure(s):</b> None Required				
<b>X. LAND USE AND PLANNING</b> - Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>
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"/>
<b>Mitigation Measure(s):</b> None Required				
<b>XI. MINERAL RESOURCES</b> -- 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"/>
<b>Mitigation Measure(s):</b> None Required				
<b>XII. NOISE</b> --Would the project result in:				
a) Exposure of persons to or generation of noise levels 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>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input 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"/>
<b>Mitigation Measure(s):</b> NOISE-1, NOISE-2, NOISE-3, NOISE-4, NOISE-5, NOISE-6, and NOISE-7				
<b>XIII. POPULATION AND HOUSING – Would the project:</b>				
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"/>
<b>Mitigation Measure(s):</b> None Required				
<b>XIV. PUBLIC SERVICES</b>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the 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"/>

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b><u>Mitigation Measure(s):</u></b> PS-1				
<b>XV. RECREATION</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b><u>Mitigation Measure(s):</u></b> None Required				
<b>XVI. TRANSPORTATION/TRAFFIC – Would the project:</b>				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulating system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>
<b><u>Mitigation Measure(s):</u></b> None Required				

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. UTILITIES AND SERVICE SYSTEMS –Would the project:</b>				
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"/>
<b><u>Mitigation Measure(s):</u> None Required</b>				
<b>XVIII. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

<b><i>EVALUATION OF ENVIRONMENTAL IMPACTS:</i></b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
<b><u>Mitigation Measure(s):</u></b> As specified above. No further mitigation measures required.				

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, at the intersection of two primary arteries (Washington Boulevard and Centinela Avenue), with a mix of commercial and multi-family residential buildings, as well as single family residential homes. The Project site and surrounding parcels are flat, with no notable ocean, mountain or other scenic vistas that would be affected by the Project. While the Commercial General (CG) zoning designation applicable to the Project Site allows building heights of up to 56 feet, plus allowances for rooftop projections, the maximum proposed building height is 43 feet at the Site A parking garage. In addition, surrounding development, such as the multi-story commercial buildings across Washington Boulevard, reach up to approximately 25 feet in height. Furthermore, 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 not located in the vicinity of a City or State-designated scenic highway. The Project Site is vacant and rough-graded with minimal vegetation and ground cover. No trees, rock outcroppings, or historic building are located in the property. Two (2) street trees will be removed to accommodate the driveways for the parking structure on Site A; however, the trees are not part of a scenic resource or within a state scenic highway. In addition, new street trees will be planted based on the City's Streetscape Plan and the CCMC, as further determined by the Director of Public Works. Thus, the Project would not damage scenic resources located within the vicinity of a scenic highway.

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 West Culver City at the intersection of Washington Boulevard and Centinela Avenue. The surrounding streetscape generally consists of low rise commercial and multifamily buildings along Washington Boulevard and Centinela Avenue and single family residential homes along the interior streets. The Project Site sits on twelve vacant, rough-graded parcels. Neither unique natural, urban features nor historic buildings exist on the Project Site. As it currently exists, the Project Site does not exhibit a positive visual character or quality, nor does it contribute to creating such in its surroundings.

The Project would activate the Washington and Centinela corridors by providing a high-quality, pedestrian-oriented market hall and related food retail uses complementing existing businesses in the area. In addition, the Project would provide much needed parking for businesses located within the commercial district. While the Project Site was formerly occupied by a gas station, liquor store and various commercial businesses, the proposed Project will be characterized by quality architectural and landscape design to promote a new standard of development which has been emerging in the area.

While the Project's proposed structures would be taller and greater in mass than those existing, in the immediately surrounding area, the West Washington area is in the process of revitalization and transition with new development projects underway. The proposed Project building heights and massing would be compatible with the nearby Pennylane Mixed-Use, Oliver Mixed-Use, and Axis Mundi Mixed-Use projects at Washington Boulevard and Inglewood, and Washington Boulevard and Moore Street, which reach heights of forty-six (46) to fifty-six (56) feet. The proposed Project, along with these nearby projects,



would contribute to the local area's ongoing revitalization and would be compatible in their urban character.

The majority of the surrounding buildings were built in the late 40s to early 50s in minimal traditional style architecture, reminiscent of a Post-World War II architectural design. Common design elements of the surrounding structures are boxy appearances with minimal architectural details, rectangular layouts, and low or intermediate pitched roofs.

The proposed Project design is inspired by the rustic appearance prevalent in many of California's most successful market halls. Materials such as exposed masonry, standing seam metal, steel, and punctual uses of faux wood give the project a simple, rustic aesthetic appropriate for its location on a busy corner, but also complementary to the adjacent residential neighborhood. The outdoor plazas on both sites connect to the public sidewalks to promote pedestrian activity and accessibility to the artisan food vendors which will operate in the market hall.

The Project has been designed at a scale and an architectural aesthetic that would be compatible with existing and planned development in the vicinity, and result in a marked improvement to the visual quality and character of the Project Site and general area. Thus, the Project would not substantially degrade the visual character and quality of the site and its surroundings and the impacts on visual quality would be less than significant.

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

#### Light and Glare

Less Than Significant Impact. The Project Site is located in West Culver City at the intersection of Washington Boulevard and Centinela Avenue, within a highly urbanized area. The surrounding streetscape generally consists of low rise commercial and multifamily buildings along Washington Boulevard and Centinela Avenue and single family residential homes along the interior streets.

The Project vicinity exhibits considerable ambient nighttime illumination levels due to the densely developed nature of the area. Artificial light sources from 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 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 will be subject to applicable regulations contained within the Culver City Municipal Code. Compliance with these regulations would ensure that impacts regarding Project lighting are less than significant.

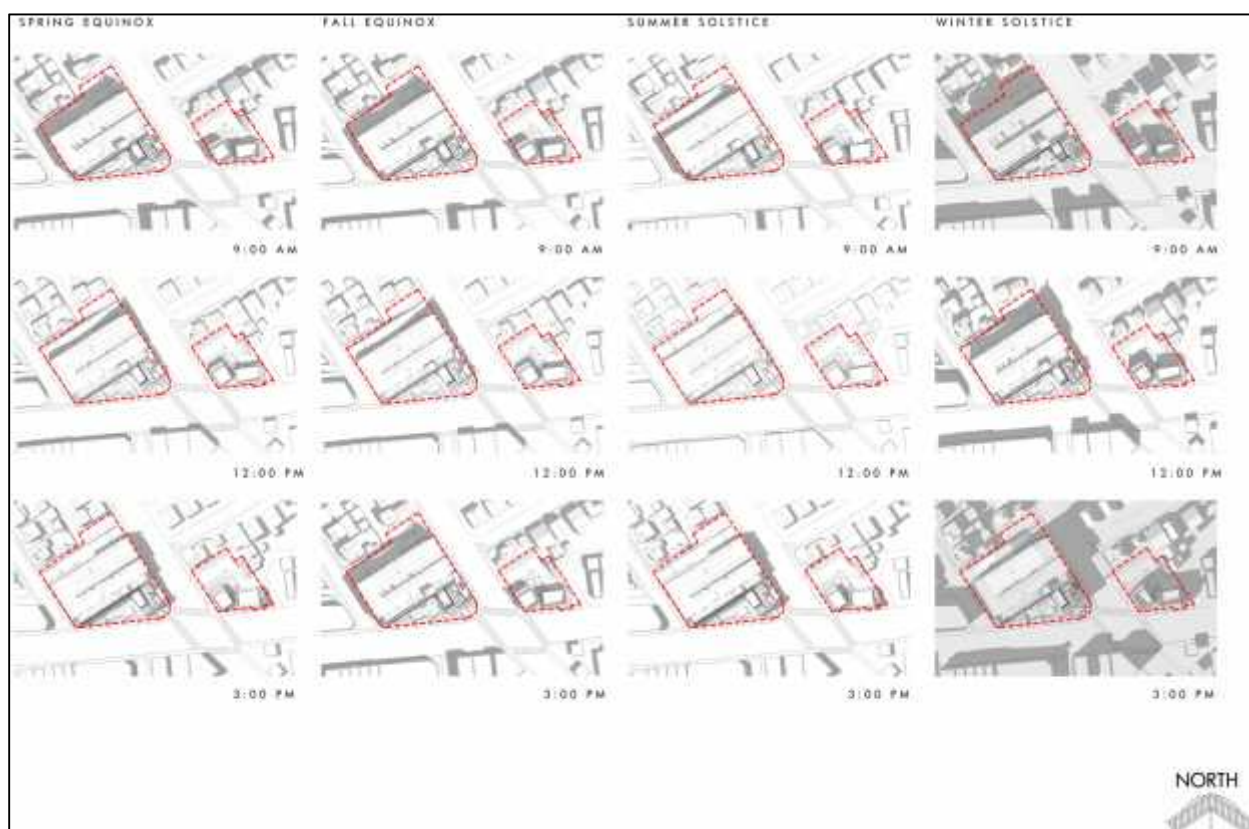
Glare occurs from sunlight reflected from reflective materials utilized in existing buildings along the adjacent roadways and from vehicle windows and surfaces. Glare-sensitive receptors include motorists on the roadways surrounding the site, and the residential uses to the north of the Project Site (Site A and Site B). 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 Project would be designed with low-reflectivity values (no mirror-like tints or films), minimizing off-site glare. Additional materials used on the Project buildings (e.g. standing seam metal, high pressure laminate panels, concrete masonry, steel, etc.) would be of a color and finish that would not create 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. A project shade and shadow analysis has been completed to illustrate shadow effects of the Project throughout the year at varying times of the day. Potential impacts related to shade and shadow could occur when sensitive uses are located to the north, northwest, or northeast of a structure, as in the case of the existing residential uses surrounding the Project Site in these three directions. A project impact could be considered significant if shadow-sensitive uses would be shaded by project related structures for more than four (4) hours between the hours of 9:00 am and 3:00 pm. Four conditions, Spring Equinox, Fall Equinox, Summer Solstice and Winter Solstice, are illustrated and described below in Figure 1.

Figure 1



The winter solstice marks the shortest day and the longest night of the year, whereas the summer solstice marks the longest day and the shortest night of the year. The spring and fall equinox represents the two days of year during which the day and night are approximately equal. Summer and winter solstice typically occur June and December 21, respectively. Spring and fall equinox typically occur on March and September 21, respectively.

Shade and shadow impacts vary according to seasons. The summer and winter solstice represent the two shade and shadow extremes. Shadows are at a maximum during the winter solstice, whereas shadows are at a minimum during the summer solstice. During the spring and fall equinox, shadow conditions are midway between those of the solstices.

### Spring/Fall Equinox

During the equinox condition, shadows of the longest duration are cast to the north of the proposed site. In this case, areas in the shade for more than four hours would be the parking garage ramps located at the rear (north) of the site.

### Summer Solstice

On this day, shadows of the longest duration are cast to the southwest and northeast of the proposed Project buildings. Under this extreme case, areas in shade for more than four hours would be portions of the Centinela Avenue public right-of-way.

### Winter Solstice

On this day, the sun appears at its lowest point in the sky and shadows of the longest duration are cast to the north of the proposed Project buildings. Under this extreme condition, areas in shade for more than four hours as a result of the Project would be areas located to the northwest and northeast of the proposed project buildings, which includes Centinela Avenue, the alleyway east of the Site B, the parking garage access ramps. Figure 2 illustrates an enlarged diagram of the Site A shade and shadow analysis. This exhibit confirms that although the maximum structure height would occur at the rear of the parking structure, the Project would not have a significant shade and shadow impact on any of the adjacent residential units located north of Site A.

Figure 2



In summary, shade and shadow effects caused by the Project will be minimal. Only under the extreme, winter solstice condition, would the Project cast a shadow over a nearby residence. Even in this case, the potential impact would occur for less than four (4) hours and, therefore, a less than significant impact would occur.

II. AGRICULTURE RESOURCES 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 vacant. The Project Site does not contain agricultural uses or related operations and is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.<sup>1</sup> Furthermore, the Culver City General Plan does not identify the Project Site as an area designated for agriculture use. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Accordingly, Project implementation would have no impact on farmland.

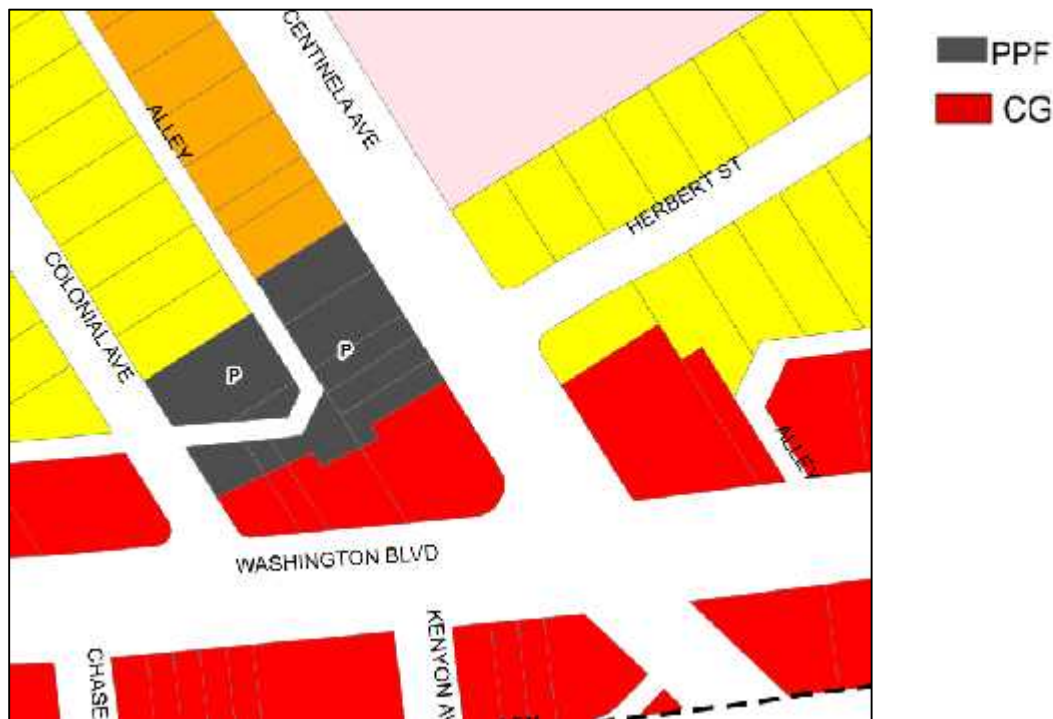
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Site A Zoning designations include Public Parking Facility (PPF) and CG (Commercial General), and Commercial Zero Setback Overlay (-CZO) along the Washington Boulevard frontage. Site B is zoned Commercial General (CG), and is also within the Commercial Zero Setback Overlay along the Washington Boulevard frontage. The existing zoning designations for Site A and Site B are depicted in Figure 3 below. No portion of the Project Site or surrounding properties are zoned for agriculture use or enrolled under the Williamson Act. As such, the Project would not conflict with any zoning for agricultural use or a Williamson Act contract and no impact would occur in this regard.

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<sup>1</sup> State of California Department of Conservation, California Important Farmland Finder, <http://maps.conservation.ca.gov/ciff/ciff.html>, accessed June 2017.

Figure 3



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) above, the Project Site's existing Zoning designations include PPF, CG and the -CZO. 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. Thus, no impacts to agricultural land or uses, or to forest land or uses, would occur.

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 result in any of the conditions specified in III.a) through III.e) below?

The following responses pertaining to air quality impacts is based on information contained in the Project's Air Quality Impact Analysis prepared by LSA in June 2017, which is available for review at the Culver City Planning Division. SCAQMD's current guidelines, the CEQA Air Quality Handbook (SCAQMD 1993) with associated updates, and the City guidelines were adhered to in the assessment of air quality impacts for the proposed 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), and the strategies contained therein.

The AQMP is based on regional growth projections developed by SCAG. The proposed project is a commercial retail development that would not house more than 1,000 persons, occupy more than 40 acres of land, or encompass more than 650,000 sf of floor area. Thus, the proposed project with approximately 35,416 sf of gross floor area (i.e., less than 1 acre) would not be defined as a regionally significant project under CEQA; therefore, it does not meet SCAG's Intergovernmental Review criteria.

Pursuant to the methodology provided in Chapter 12 of the 1993 SCAQMD CEQA Air Quality Handbook, consistency with the Basin 2016 AQMP is affirmed when a project (1) does not increase the frequency or severity of an air quality standards violation or cause a new violation and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented as follows:

1. The project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance emissions thresholds established by SCAQMD, as demonstrated above; therefore, the project could not result in an increase in the frequency or severity of any air quality standards violation and will not cause a new air quality standard violation.
2. The CEQA Air Quality Handbook indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities; therefore, the proposed project is not defined as significant.

Therefore, based on the consistency analysis presented above, the proposed project is consistent with the current regional AQMP and thus would have a less than significant impact.

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

Less Than Significant Impact. Emissions with regional effects during Project construction, calculated with the California Emission Estimator Model (CalEEMod; Version 2016.3.1), would not exceed criteria pollutant thresholds established by the South Coast Air Quality Management District (SCAQMD). Compliance with SCAQMD Rules and Regulations, including SCAQMD Rule 403 and 402, during construction will reduce construction-related air quality impacts from fugitive dust emissions and construction equipment emissions. Standard dust suppression measures have been identified for short-term construction to meet the SCAQMD emissions thresholds. The proposed Project would also not exceed the localized significance thresholds (LSTs) for construction activities.

Pollutant emissions from Project operation, also calculated with CalEEMod, would not exceed the SCAQMD mass daily thresholds for any criteria pollutants. LSTs would not be exceeded by long-term emissions from operation of the Project. Historical air quality data show that existing carbon monoxide (CO) levels for the Project area and the general vicinity do not exceed either State of California (State) or federal ambient air quality standards. The proposed Project would not result in any significant impact in CO concentrations at intersections in the Project vicinity. The proposed Project is located in Los Angeles County, which is not among the counties that are found to have serpentine and ultramafic rock in their soils (State of California 2000). Therefore, the potential risk for naturally occurring asbestos during Project construction is small and less than significant. However, if asbestos is found during construction activities, the Project is also required to comply with SCAQMD Rule 1403. Based on the analysis above, and as further detailed in the Air Quality Impact Analysis prepared for the Project, the proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, thus would have a less than significant impact.

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 project would contribute criteria pollutants to the area during temporary project construction. Table 1 below specifies the criteria pollutants for which the project region is in non-attainment status. Other projects in the area may be under construction concurrently with the proposed Project. As every project would be required to comply with same SCAQMD and City standard construction measures, there is little potential for the construction emissions to combine in such a way as to result in higher concentrations than each project would cause alone. As shown in Table H of the Air Quality Impact Analysis, construction emissions from this project would be less than significant at even the closest residence. Therefore, the project would not have a significant short-term cumulative construction impact. Additionally, the project's long-term operational emissions would not exceed SCAQMD's criteria pollutant thresholds, and therefore, the proposed Project would not result in a significant cumulative impact.

Table 1 – Attainment Status of Criteria Pollutants in the South Coast Air Basin

<b>Pollutant</b>	<b>State</b>	<b>Federal</b>
O <sub>3</sub> 1-hour	Nonattainment	N/A
O <sub>3</sub> 8-hour	Nonattainment	Extreme Nonattainment
PM <sub>10</sub>	Nonattainment	Attainment/Maintenance
PM <sub>2.5</sub>	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO <sub>2</sub>	Attainment	Unclassified/Attainment (1-hour) Attainment/Maintenance (annual)
SO <sub>2</sub>	Attainment	Unclassified/Attainment
Lead	Nonattainment <sup>1</sup>	Nonattainment <sup>1</sup>
All Others	Attainment/Unclassified	Attainment/Unclassified

Sources: South Coast Air Quality Management District. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin Website: [www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf](http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf), accessed June 2017.

United States Environmental Protection Agency. Nonattainment Areas for Criteria Pollutants (Green Book). Website: <https://www.epa.gov/green-book>, accessed June 2017.

<sup>1</sup> Only in Los Angeles County.

CO = carbon monoxide

N/A = not applicable

NO<sub>2</sub> = nitrogen dioxide

O<sub>3</sub> = ozone

PM<sub>10</sub> = particulate matter less than 10 microns in diameter

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in diameter

SO<sub>2</sub> = sulfur dioxide



d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. SCAQMD published its Final Localized Significance Threshold Methodology in June 2003 and updated it in July 2008 (SCAQMD 2003), recommending that all air quality analyses include an assessment of both construction and operational impacts on the air quality of nearby sensitive receptors. Localized significance thresholds (LSTs) represent the maximum emissions from a Project Site of up to 5 acres that are not expected to result in an exceedance of the NAAQS or CAAQS, as shown in Table 2 below. LSTs are based on the ambient concentrations of that pollutant within the project Source Receptor Area (SRA) and the distance to the nearest sensitive receptor. For this Project, the appropriate SRA for the LST analysis is the Northwest Coastal Los Angeles County area.

Table 2 - Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Ozone (O <sub>3</sub> ) <sup>8</sup>	1-Hour	0.09 ppm (180 $\mu$ g/m <sup>3</sup> )	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8-Hour	0.070 ppm (137 $\mu$ g/m <sup>3</sup> )		0.070 ppm		
Respirable Particulate Matter (PM <sub>10</sub> ) <sup>9</sup>	24-Hour	50 $\mu$ g/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 $\mu$ g/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 $\mu$ g/m <sup>3</sup>		—		
Fine Particulate Matter (PM <sub>2.5</sub> ) <sup>9</sup>	24-Hour	—	—	35 $\mu$ g/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 $\mu$ g/m <sup>3</sup>	Gravimetric or Beta Attenuation	12.0 $\mu$ g/m <sup>3</sup>	15 $\mu$ g/m <sup>3</sup>	
Carbon Monoxide (CO)	1-Hour	20 ppm (23 mg/m <sup>3</sup> )	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m <sup>3</sup> )	—	Non-Dispersive Infrared Photometry (NDIR)
	8-Hour	9.0 ppm (10 mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )	—	
	8-Hour (Lake)	6 ppm (7 mg/m <sup>3</sup> )		—	—	
Nitrogen Dioxide (NO <sub>2</sub> ) <sup>10</sup>	1-Hour	0.18 ppm (339 $\mu$ g/m <sup>3</sup> )	Gas Phase Chemiluminescence	100 ppb (188 $\mu$ g/m <sup>3</sup> )	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 $\mu$ g/m <sup>3</sup> )		0.053 ppm (100 $\mu$ g/m <sup>3</sup> )	Same as Primary Standard	
Sulfur Dioxide (SO <sub>2</sub> ) <sup>11</sup>	Annual Arithmetic Mean	—	Ultraviolet Fluorescence	0.030 ppm (for certain areas) <sup>11</sup>	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	24-Hour	0.04 ppm (105 $\mu$ g/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>11</sup>	—	
	3-Hour	—		—	0.5 ppm (1300 $\mu$ g/m <sup>3</sup> )	
	1-Hour	0.25 ppm (655 $\mu$ g/m <sup>3</sup> )		75 ppb (196 $\mu$ g/m <sup>3</sup> )	—	



Lead <sup>12,13</sup>	30-Day Averag	1.5 µg/m <sup>3</sup>	Atomic Absorption	—	—	High-Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m <sup>3</sup> (for certain	Same as Primary Standard	
	Rolling 3-Month Average <sup>11</sup>	—		0.15 µg/m <sup>3</sup>		
Visibility-Reducing Particles <sup>14</sup>	8-Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standard S		
Sulfates	24-Hour	25 µg/m <sup>3</sup>	Ion Chromatography			
Hydrogen Sulfide	1-Hour	0.03 ppm (42	Ultraviolet Fluorescence			
Vinyl Chloride <sup>12</sup>	24-Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chromatography			

Source: Ambient Air Quality Standards (ARB 2016). Website: <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>, accessed June 2017.

<sup>1</sup> California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>, and visibility-reducing particles) are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

<sup>2</sup> National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth-highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM<sub>10</sub>, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m<sup>3</sup> is equal to or less than 1. For PM<sub>2.5</sub>, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact the EPA for further clarification and current national policies.

<sup>3</sup> Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

<sup>4</sup> Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

<sup>5</sup> National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

<sup>6</sup> National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

<sup>7</sup> Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.

<sup>8</sup> On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

<sup>9</sup> On December 14, 2012, the national annual PM<sub>10</sub> primary standard was lowered from 15 µg/m<sup>3</sup> to 12.0 µg/m<sup>3</sup>. The existing national 24-hour PM<sub>2.5</sub> standards (primary and secondary) were retained at 35 µg/m<sup>3</sup>, as was the annual secondary standard of 15 µg/m<sup>3</sup>. The existing 24-hour PM standards (primary and secondary) of 150 µg/m<sup>3</sup> also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

<sup>10</sup> To attain the 1-hour standard, the 3-year average of the annual 98<sup>th</sup> percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

<sup>11</sup> On June 2, 2010, a new 1-hour SO<sub>2</sub> standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99<sup>th</sup> percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO<sub>2</sub> national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

<sup>12</sup> The ARB has identified lead and vinyl chloride as “toxic air contaminants” with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

<sup>13</sup> The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5  $\mu\text{g}/\text{m}^3$  as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standards are approved.

<sup>14</sup> In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are “extinction of 0.23 per kilometer” and “extinction of 0.07 per kilometer” for the statewide and Lake Tahoe Air Basin standards, respectively.

\*C = degrees Celsius

ARB = California Air Resources Board

EPA = United States Environmental Protection Agency

$\mu\text{g}/\text{m}^3$  = micrograms per cubic

meter  $\text{mg}/\text{m}^3$  = milligrams per

cubic meter ppm = parts per

million

ppb = parts per billion

If the total acreage disturbed is less than or equal to five acres per day, then the SCAQMD’s screening look-up tables can be utilized to determine if a Project has the potential to result in a significant impact. In the case of CO and NO<sub>2</sub>, if ambient levels are below the NAAQS and CAAQS a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM<sub>10</sub> and PM<sub>2.5</sub>, both of which are nonattainment pollutants (SCAQMD 2006). For these two, the significance criteria are the pollutant concentration thresholds presented in SCAQMD Rules 403 and 1301. The Rule 403 threshold of 10.4  $\mu\text{g}/\text{m}^3$  applies to construction emissions. The Rule 1301 threshold of 2.5  $\mu\text{g}/\text{m}^3$  applies to operational activities.

Based on the SCAQMD recommended methodology 1 and the construction equipment planned, no more than 0.5 acres would be disturbed on any one day; thus, the 1-acre LSTs have been used for construction emissions. For operational emissions, because the Project Site is approximately 1 acre, the 1-acre LSTs have been used for operational emissions.

Sensitive receptors include residences, schools, hospitals, retirement homes, parks and similar uses that are sensitive to adverse air quality. Existing residences are located immediately to the north and east of the project boundary. SCAQMD LST Methodology (SCAQMD 2003) specifies “Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.” Therefore, the following emissions thresholds apply during project construction and operation:

) Construction LSTs, 1-acre, 82-foot (25-meter) distance

- o 103 lbs./day of NO<sub>x</sub>
- o 562 lbs./day of CO
- o 4.0 lbs./day of PM<sub>10</sub>
- o 3.0 lbs./day of PM<sub>2.5</sub>

) Operation LSTs, 1-acre, 82-foot (25-meter) distance

- o 103 lbs./day of NO<sub>x</sub>
- o 562 lbs./day of CO
- o 1.0 lbs./day of PM<sub>10</sub>
- o 1.0 lbs./day of PM<sub>2.5</sub>

Pollutant emissions from Project operation, also calculated with CalEEMod, would not exceed the SCAQMD mass daily thresholds for any criteria pollutants. LSTs would not be exceeded by long-term emissions from operation of the Project. Thus, the Project potential to expose sensitive receptors to substantial pollutant concentrations is determined less than significant.

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

Less Than Significant Impact. Heavy-duty equipment in the project area during construction would emit odors, primarily from the equipment exhaust. However, the construction activity would cease to occur after individual construction is completed. No other sources of objectionable odors have been identified for the proposed project, and no mitigation measures are required.

Regarding nuisances, SCAQMD Rule 402 regarding states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." The proposed uses are not anticipated to emit any objectionable odors. Therefore, the potential for the Project to create objectionable odors affecting a substantial number of people on- and off-site would be less than significant.

#### IV. BIOLOGICAL RESOURCES -- Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in a highly urbanized area of Culver City, is vacant, rough-graded, flat, and maintains minimal vegetation. The City routinely clears the site brush for fire abatement and general property maintenance purposes. Additionally, the site is surrounded by housing, commercial buildings, and located at the intersection of two highly traveled commercial corridors. As such, the site does not offer a suitable habitat for candidate, sensitive, or special status species, and none are known to inhabit the Project Site currently. Thus the Project does 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 Game or US Fish and Wildlife Service?

No Impact. As discussed under Response IV.a), the Project Site is located in a highly urbanized area of Culver City. The Project Site is vacant, with only three (3) street trees surrounding it along the Centinela Avenue and Colonial Avenue segments of Site A. The Project Site is not near a body of water, nor is it subject to ponding as it is rough-graded and flat. Thus, no designated riparian habitat or natural communities exist on the Project Site or in the surrounding area. Additionally, 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 located in a highly urbanized area of Culver City. The Project Site is not near a body of water, nor is it subject to ponding, as it is rough-graded and flat. 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 wildlife nursery sites?

Less Than Significant Impact with Mitigation Incorporated. The Project Site is located in a highly urbanized area of Culver City, is rough-graded, and has minimal vegetation with no on-site trees. Three (3) street trees exist along the perimeter of the Project's Site A. There is one (1) mature Callistemon (Bottle Brush) tree along the Centinela Avenue frontage and two (2) mature Ulmus Parvifolia (Chinese Elm) trees along Colonial Avenue. 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 minimal. The urbanized nature of the Project area limits the potential for native resident or migratory wildlife species movement through the site. However, species tolerant of human disturbance have the potential to nest within the existing street trees. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. Therefore, the mitigation provided below will apply to further reduce potential impacts to protected, native resident, or migratory birds to a less than significant level.

#### Mitigation Measure

BIO-1: The applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through the following ways. Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would ensure that no active nests are disturbed. If vegetation and landscape removal is scheduled to occur during the general avian breeding season (February 15 through August 31) and/or commencement of construction activities (including but not limited to, staging, ground disturbance, grading, or construction activity) is proposed to begin during said season, and avoidance of said season is not avoidable, then the following measures shall be implemented to avoid take of birds or their eggs.

- a. Preconstruction Nesting Bird Survey. Beginning thirty days prior to the initiation of project activities (including, staging, grading, vegetation removal, grubbing, etc.), a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days (72 hours) prior to the initiation of project activities. 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.
- b. Presence of Birds and Active Nests. If a protected native bird is found, the applicant shall delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within

500 feet for suitable raptor nesting habitat) If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or larger buffer as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. 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. Flagging, stakes, and/or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the Culver City Planning Division and, upon request, the Department. Based on the submitted information, the Culver City Planning Division (and the Department of Fish and Game, if the Department requests) will determine whether to allow a narrower buffer.

- c. Biological Monitoring. Project personnel, including all contractors working on site, shall be informed of the active nest(s) and the avoidance requirement(s). 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. The project applicant shall provide the Culver City Planning Division the pre-construction nesting bird surveys, construction monitoring reports, and results of the recommended protective measures described above upon completion of each, 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?

No Impact. The Project Site is vacant with no existing trees on site. Vegetation within the Project area is limited and consists of low lying grasses and shrubbery. Three (3) trees, as described in IV.d) above, are located within the adjacent public right of way. Two (2) of the existing street trees (a Callistemon / Bottle Brush tree and a Ulmus Parvifolia / Chinese Elm tree) will be removed and replaced. Neither the Bottle Brush nor the Chinese Elm are a protected tree species. The Project would comply with the City's Streetscape Plans 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 (2) 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 City 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, no 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, the Project Site is vacant and located in a highly urbanized area, and 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 -- 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. 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.

All buildings were demolished by the end of 2009 and the Project Site is currently vacant and rough-graded. The buildings immediately surrounding the Project Site are not listed in a local, state, or national register for historic places. Thus, the Project would not cause a substantial adverse change in the significance of a historical resource and no impact would occur.

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

Less than Significant Impact. As stated in response V.a), all structures were cleared from the Project Site by the end of 2009, and therefore the Project Site does not contain above-grade archaeological resources. The Project consists of the construction of a 21,605 square foot multi-tenant commercial structure with attached multi-story parking structure (Site A), as well as two (2) smaller commercial structures totaling 5,230 square feet with surface parking (Site B). The Project does not include any subterranean parking or basements; however, portions of the loading dock within the proposed parking structure on Site A will be depressed to four (4) feet below grade, as will an elevator pit needed to support elevator function. Therefore, the Project will include minimal excavation for this Project feature and for building foundations. The Project is required to comply with State and Federal laws regulating the unearthing of archeological resources. Therefore, a less than significant impact would occur in this regard.

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

Less than Significant Impact. Multiple buildings were previously constructed on the Project Site. Thus, extended excavation and earthwork took place during the original buildout. Subsequently, all improvements were demolished and removed from the Project Site. Excavation work also occurred at this time as part of the removal of previously existing underground storage tanks. The Project Site is currently vacant. Given the Project Site's history, the discovery of unique paleontological resources on the Project Site is highly unlikely. As specified above, some minimal excavation will be necessary for

building foundations, the recessed loading dock feature within the parking structure, and elevator pit at Site A. The Project is required to comply with State and Federal laws regulating the unearthing of paleontological resources. Thus, a less than significant impact would occur in this regard.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. As stated in response V.c), the Project Site was previously disturbed, including the removal of four (4) underground storage tanks (USTs). In addition, the Project involves minimal excavation, as indicated above. Therefore the disturbance of any human remains on the Project Site is highly unlikely. In the event that 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. Thus, a less than significant impact would occur in this regard.

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

Less than Significant Impact. As stated in response V.c), the Project Site was previously disturbed and therefore the substantial adverse change in the significance of a tribal cultural resource is highly unlikely. The Project Site history of previous development, including removal of UST's, and the minimal proposed excavation present a condition where uncovering a tribal cultural resource would be unlikely. In addition, the Project is required to comply with applicable State and Federal laws regulating the unearthing of tribal cultural resources, including completion of consultation process and implementation of any strategies identified as a result. Thus, a less than significant impact would occur in this regard.

#### 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.

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. No currently known active or potentially active surface faults traverse the Project Site, and the site is not located within a designated Alquist-Priolo Earthquake Fault Zone. The nearest known potentially active fault near the Project Site is the Charnock Fault, with the closest trace approximately 0.6 miles away. Other nearby faults include the Overland Avenue Fault and the Santa Monica Fault, with the closest traces roughly 3.0 and 3.5 miles from the site, respectively. Therefore, the potential for ground rupture due to an earthquake beneath the sites 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 2016 California Building Code (CBC). Therefore, a less than significant impact would occur in this regard.

ii. Strong seismic ground shaking?

Less Than Significant Impact with Mitigation Incorporated. Southern California is a seismically active area that has historically been affected by generally moderate to occasionally high levels of ground motion. The Project Site lies in relative close proximity to several faults, as indicated above, therefore during the life of the proposed structures, the property will likely experience moderate to occasionally high ground shaking from these fault zones, as well as some background shaking from other seismically active areas of the southern California region. The nearest known potentially active fault near the Project Site is the Charnock Fault, with the closest trace approximately 0.6 miles away. Other nearby faults include the Overland Avenue Fault and the Santa Monica Fault, with the closest traces roughly 3.0 and 3.5 mile from the site, respectively.

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 3 Seismic Acceleration, the following chart shows the extent of perceived shaking and potential damage associated with a given acceleration:

Table 3 - Seismic Acceleration

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

Source: United States Geological Survey. Accessed from website at:  
[http://en.wikipedia.org/wiki/Peak\\_ground\\_acceleration](http://en.wikipedia.org/wiki/Peak_ground_acceleration), accessed April 2017.

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 Santa Monica Fault, the Overland Avenue Fault, the Charnock Fault, as well as on the other large active faults in the Southern California region. According to a 2006 Site Specific Geotechnical Study, prepared by Albus-Keefe & Associates, Inc., the largest estimated mean PHGA that may occur in the future is 0.48 g with a standard deviation of 0.32g, associated with a moment magnitude of 6.6 earthquake along the Santa Monica Fault. If this relatively high ground acceleration is 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. A Project specific Geotechnical Study will be prepared to confirm estimated site PHGA and provide design recommendations.

The City requires that all new construction meet or exceed the Culver City Building Code and the latest standards of the 2016 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. In addition, implementation of the site specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation per a Project Specific Geotechnical Engineering Investigation would further ensure that seismic-related ground shaking impacts would be less than significant.

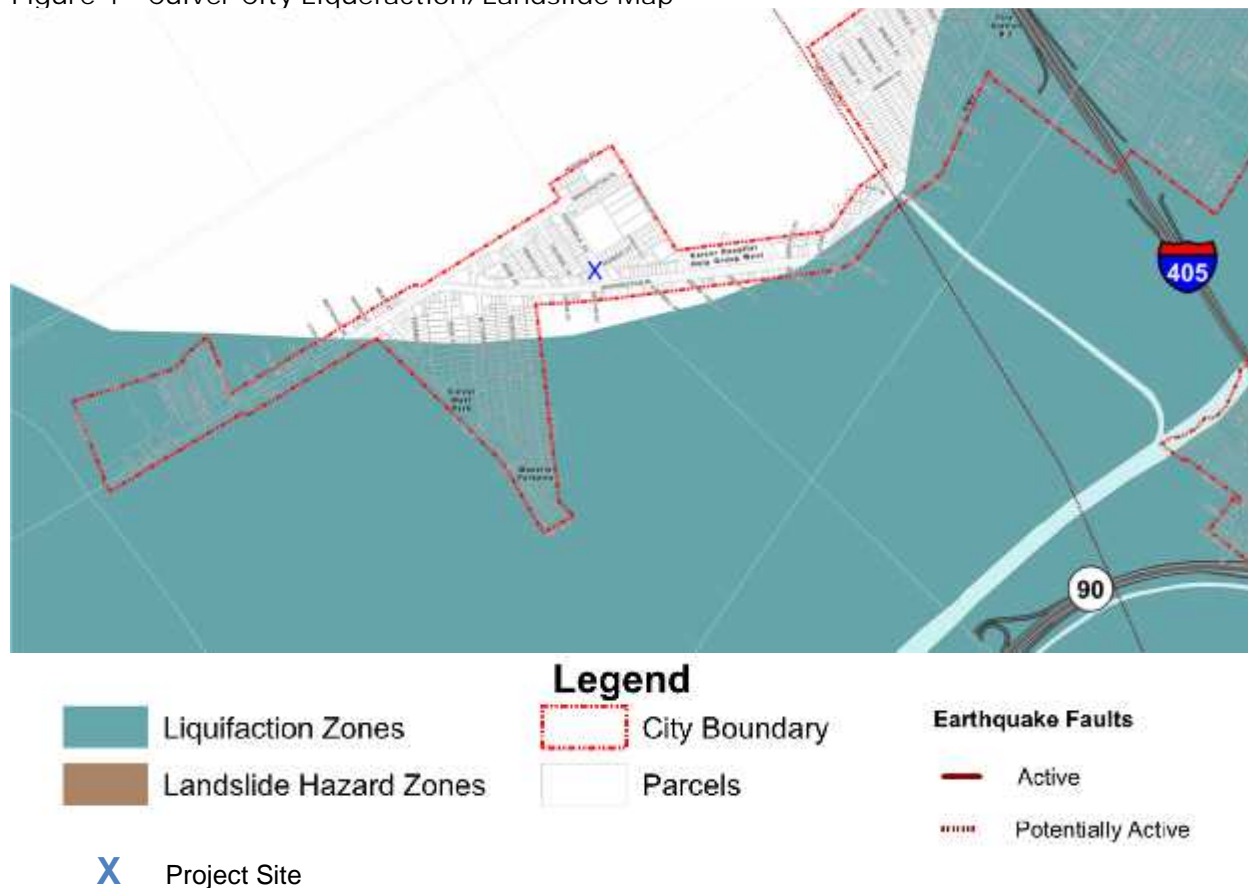
#### Mitigation Measure

GEO-1: A Project Specific Geotechnical Engineering Investigation, subject to review and approval by the Culver City Building Safety Division, shall be prepared by a qualified Professional Geotechnical Engineer. The investigation shall include site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation, which shall be implemented accordingly.

#### 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.

Figure 4 - Culver City Liquefaction/Landslide Map



According to the Culver City Liquefaction/Landslide Map, an excerpt of which is depicted above in Figure 4, the Project Site is not located within a liquefaction hazard zone, although the Project Site is within a relative short distance from a liquefaction zone (approximately 600 feet). According to the Phase I Environmental Site Assessment Report prepared for the Project by Arcadis (September 14, 2016) (the Phase I Report), static groundwater below the Project Site has ranged from 27.5 to 42.25 feet below ground surface. Groundwater levels at the Project Site were encountered at approximately 35 to 42 feet below ground surface. Project Site soil types include silty clay to clayey silt, silt, silty sand, sand, and sandy gravel. Thus, the potential for liquefaction exists during a seismic event. However, liquefaction-induced settlement could be readily mitigated by the implementation of a conventional foundation design and standards recommended in the Final Geotechnical Engineering Investigation. Thus, liquefaction would be less than significant.

#### Mitigation Measure

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

#### iv. Landslides?

No Impact. The Project Site, as well as the surround areas, is relatively flat. The Project Site lies at approximately 45 feet above mean sea level, and is not located within an identified landslide hazard zone as shown in Figure 4 above. No significant slopes are located on the Project Site or in the surrounding areas. Further, according to the State of California Seismic Hazard Zone Map of the Venice Quadrangle,

the Project Site is not located within an earthquake-induced landslide hazard zone. 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 occurrence whereby soil or earth material is loosened or dissolved and removed from its original location, and can occur by various ways and may occur in a project area where bare soil is exposed to wind or moving water (both rainfall and surface runoff). The Project Site is currently vacant, unimproved with any paving, and is rough-graded. The Project will involve minimal grading and excavation for the new improvements, including a depressed loading area within the parking structure on Site A. During construction, exposed soils from these activities may be subject to erosion, particularly during a wind or precipitation event. The Project will be constructed in accordance with the applicable requirements of the National Pollution Discharge Elimination System (NPDES) General Construction permit standards; a Standard Urban Stormwater Mitigation Plan (SUSMP) is also required to be prepared for the Project in accordance with NPDES and submitted for review and approval by the Public Works Department. In addition, a Project Stormwater Pollution Prevention Control Plan (SWPPP) would be prepared to establish best management practices to minimize soil erosion during project construction and post development. Thus the impacts due to erosion of topsoil would be less than significant.

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 Measures Incorporated. Impacts related to liquefaction and landslides are discussed above in Responses VI.a). 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. The Site is underlain by recent alluvial sediments consisting of clay, silt, sand, and gravel deposited by the Los Angeles River. As stated in Response VI.a), site-specific liquefaction should not pose a significant hazard to the Project with the implementation of Mitigation Measure GEO-1. 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 the site to 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. Therefore, the Project is determined to be less than significant in this regard.

Mitigation Measure

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 Measure Incorporated. According to a 2006 Site Specific Geotechnical Study, prepared by Albus-Keefe & Associates, Inc., the near-surface soils within the Project Site are generally anticipated to possess a medium expansion index. When concrete slabs-on-grade and shallow foundations are placed on expansive soils that have been allowed to lose moisture, the soil likely to swell as water re-enters the soil structure. Conversely, when slabs and foundations are constructed on moist to wet soils that are allowed to lose moisture, the soil will shrink, as the moisture is lost. Both

conditions can result in distress to structures founded on expansive soils. Mitigation is readily available and may include the removal and replacement of expansive soils or lime treatment to stabilize the expansive soils, as needed. A Project specific Geotechnical Study will be completed and provide appropriate design alternatives to mitigate expansive soils. Thus the expansive soil is less than significant in this regard.

#### Mitigation Measure

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 responses pertaining to air quality impacts is based on information contained in the Project's Greenhouse Gas Impact Analysis prepared by LSA in January 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. Overall, the following activities associated with the proposed project could directly or indirectly contribute to the generation of GHG emissions:

- J Construction Activities: During construction of the project, GHGs would be emitted through the operation of construction equipment and from worker and vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. Furthermore, CH<sub>4</sub> is emitted during the fueling of heavy equipment.
- J Gas, Electricity, and Water Use: Natural gas use results in the emission of two GHGs: CH<sub>4</sub> (the major component of natural gas) and CO<sub>2</sub> (from the combustion of natural gas). Electricity use can result in GHG production if the electricity is generated by combusting fossil fuel. California's water conveyance system is energy-intensive. Preliminary estimates indicate that the total energy used to pump and treat this water exceeds 6.5 percent of the total electricity used in the State per year (State of California 2008).
- J Solid Waste Disposal: Solid waste generated by the project could contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce additional GHGs to varying degrees. Landfilling, the most common waste management practice, results in the release of CH<sub>4</sub> from the anaerobic decomposition of organic materials. CH<sub>4</sub> is 25 times more potent a GHG than CO<sub>2</sub>. However, landfill CH<sub>4</sub> can also be a source of energy. In addition, many materials in landfills do not decompose fully, and the carbon that remains is sequestered in the landfill and not released into the atmosphere.
- J Motor Vehicle Use: Transportation associated with the proposed project would result in GHG emissions from the combustion of fossil fuels in daily automobile and truck trips.

The calculation below, prepared using CalEEMod, includes construction emissions, emissions from increased energy consumption, water usage, and solid waste disposal; and estimated GHG emissions from vehicular traffic that would result from implementation of the project. Table 4 lists the annual GHG emissions for each of the planned construction phases and shows that the GHG emissions would be highest during the building construction phase, at approximately 68 MT CO<sub>2</sub>e. Total construction GHG emissions over the entire construction period are estimated to be 80 MT CO<sub>2</sub>e.

Table 4  
Short-Term Regional Construction Emissions

Construction Phase		Total Regional Pollutant Emissions (MT/yr.)			
		CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
2017	Site Preparation	0.48	<0.01	0	0.48
	Grading	1.2	<0.01	0	1.2
	Building Construction	68	0.02	0	68
	Architectural Coating	6.9	<0.01	0	7.0
	Paving	3.0	<0.01	0	3.0
Total Construction Emissions		79	0.02	0	80

Source: Compiled by LSA (January 2017).

CH<sub>4</sub> = methane

MT/yr. = metric tons per year

CO<sub>2</sub> = carbon dioxide

N<sub>2</sub>O = nitrous oxide

CO<sub>2</sub>e = carbon dioxide equivalent

Table 5 shows total GHG emissions from the Project operational GHG emissions, as calculated using CalEEMod Version 2016.3.1. Based on SCAQMD guidance, construction emissions were amortized over 30 years (a typical project lifetime) and added to the total project operational emissions. Appendix A of the GHG Impact Analysis includes the worksheets for the GHG emissions.

Table 5  
Long-Term Operational Greenhouse Gas Emissions

Source	Pollutant Emissions (MT/yr.)					
	Bio-CO <sub>2</sub>	NBio-CO <sub>2</sub>	Total CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Construction emissions amortized over 30 years	0	2.6	2.6	<0.01	0	2.7
Operational Emissions						
Area Sources	0	<0.01	<0.01	0	0	<0.01
Energy Sources	0	599	599	0.02	<0.01	602
Mobile Sources	0	1,919	1,919	0.09	0	1,921
Waste Sources	19	0	19	1.1	0	46
Water Usage	2.3	34	36	0.24	<0.01	44
Total Project Emissions	21	2,554	2,575	1.4	0	2,615

Source: Compiled by LSA (January 2017).

Bio-CO<sub>2</sub> = biologically generated CO<sub>2</sub>

MT/yr. = metric tons per year

CH<sub>4</sub> = methane

N<sub>2</sub>O = nitrous oxide

CO<sub>2</sub> = carbon dioxide

NBio-CO<sub>2</sub> = non-biologically generated CO<sub>2</sub>

CO<sub>2</sub>e = carbon dioxide equivalent

As shown in Table 5, the project will produce 2,615 MT CO<sub>2</sub>e/yr., which is 0.0026 MMT CO<sub>2</sub>e/yr. For comparison, the existing emissions from the entire SCAG region are estimated to be approximately 176.79 MMT CO<sub>2</sub>e/yr., and the existing emissions for the entire State are estimated at approximately 496.95 MMT CO<sub>2</sub>e/yr.

At present, there is a federal ban on chlorofluorocarbons (CFCs); therefore, it is assumed the project would not generate emissions of CFCs. The project may emit a small amount of hydrofluorocarbons (HFCs) from leakage and service of refrigeration and air-conditioning equipment and from disposal at the end of the life of the equipment. However, the details regarding refrigerants to be used at the Project Site are unknown at this time. PFCs and SF<sub>6</sub> are typically used in industrial applications, none of which would be used on the Project Site. Therefore, it is not anticipated that the project would contribute significant emissions of these additional GHGs.

Because climate change impacts are cumulative in nature, no typical single project can result in emissions of such a magnitude that it, in and of itself, would be significant on a project basis. The project's operational emissions of 2,615 MT CO<sub>2</sub>e/yr. is less than the SCAQMD-recommended interim threshold of 3,000 MT CO<sub>2</sub>e/yr. for non-industrial uses. Therefore, the proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

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

Less Than Significant Impact. The United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States Supreme Court ruled that the EPA has the authority to regulate CO<sub>2</sub> emissions under the CAA. While there currently are no adopted federal regulations for the control or reduction of GHG emissions, the EPA commenced several actions in 2009 that are required to implement a regulatory approach to Global Climate Change (GCC).

On September 30, 2009, the EPA announced a proposal that focuses on large facilities emitting over 25,000 tons of GHG emissions per year. These facilities would be required to obtain permits that would demonstrate they are using the best practices and technologies to minimize GHG emissions.

On December 7, 2009, the EPA Administrator signed a final action under the CAA, finding that six GHGs (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to GCC. This EPA action does not impose any requirements on industry or other entities. However, the findings are a prerequisite to finalizing the GHG emission standards for light-duty vehicles.

At the State level, in 1988, AB 4420 directed the California Energy Commission (CEC) to report on "how global warming trends may affect California's energy supply and demand, economy, environment, agriculture, and water supplies" and offer "recommendations for avoiding, reducing and addressing the impacts." The California Climate Action Registry was created to encourage voluntary reporting and early reductions of GHG emissions with the adoption of Senate Bill (SB) 1771 in 2000. The CEC was directed to assist by developing metrics and identifying and qualifying third-party organizations to provide technical assistance and advice to GHG emission reporters. The next year, SB 527 amended SB 1771 to emphasize third-party verification.

SB 1771 also contained several additional requirements for the CEC, including updating the State's Greenhouse Gas Emissions Inventory from an existing 1998 report and continuing to update it every 5 years; acquiring, developing and distributing information on GCC to agencies and businesses; establishing a State interagency task force to ensure policy coordination; and establishing a climate change advisory committee to make recommendations on the most equitable and efficient ways to implement climate change requirements. In 2006, AB 1803 transferred preparation of the inventory from the CEC to the ARB, which updates the inventory annually.

AB 1493, authored by Assembly Member Fran Pavley in 2002, directed the ARB to adopt regulations to achieve the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles. The so-called “Pavley” regulations, or Clean Car regulations, were approved by the ARB in 2004. Since June 30, 2009, the ARB has since combined the control of smog-causing pollutants and GHG emissions to develop a single coordinated package of standards known as Low Emission Vehicles III. These regulations reduced GHG emissions from California passenger vehicles by approximately 22 percent in 2012 and approximately 30 percent in 2016, all while improving fuel efficiency and reducing motorists’ costs. AB 1493 also directed the California Climate Action Registry to adopt protocols for reporting reductions in GHG emissions from mobile sources prior to the operative date of the regulations.

The California Renewable Portfolio Standard (RPS) Program, which requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet 20 percent of its retail sales with renewable power by 2017, was established by SB 1078 in 2002. In 2006, the RPS Program was accelerated by SB 107 to 20 percent by 2010. The RPS Program was subsequently expanded by the renewable electricity standard approved by the ARB in September 2010, requiring all utilities to meet a 33 percent target by 2020. The renewable electricity standard is projected to reduce GHG emissions from the electricity sector by at least 12 MMT CO<sub>2e</sub> in 2020.

Executive Order (EO) S-3-05 (June 2005) established GHG targets for the State, such as returning to year 2000 emission levels by 2010; 1990 levels by 2020; and 80 percent below 1990 levels by 2050. It directed the Secretary of CalEPA to coordinate efforts to meet the targets with the heads of other State agencies. This group became the Climate Action Team (CAT).

The California Global Warming Solutions Act of 2006, best known by its bill number AB 32, created a first-in-the-country comprehensive program to achieve real, quantifiable, and cost-effective reductions in GHGs. The law set an economy-wide cap on California GHG emissions at 1990 levels by 2020. It directed the ARB to prepare, approve, and implement a Scoping Plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions. EO S-20-06, signed in October 2006, directed the Secretary for Environmental Protection to establish a Market Advisory Committee of national and international experts. The committee made recommendations to the ARB on the design of a market-based program for GHG emissions reduction. The ARB adopted the Scoping Plan, describing a portfolio of measures to achieve the target, in December 2008.

The ARB approved the First Update to the Scoping Plan (Update) on May 22, 2014. The Update shows how California continues on its path to meet the near-term 2020 GHG limit, but also sets a path toward long-term, deep GHG emission reductions. The report establishes a broad framework for continued emission reductions beyond 2020, with a goal of 80 percent below 1990 levels by 2050. The Update identifies progress made to meet the near-term objectives of AB 32 and defines California’s climate change priorities and activities Climate for the next several years. The Update does not set new targets for the State but rather describes a path that would achieve the long-term 2050 goal of EO S-3-05 for emissions to decline to 80 percent below 1990 levels by 2050.

The Governors of California, Arizona, New Mexico, Oregon, and Washington entered into a Memorandum of Understanding in February 2007, which has since grown to include Montana, Utah, and the Canadian provinces of British Columbia, Manitoba, Ontario, and Québec, and which established the Western Climate Initiative to set a regional goal for emissions reductions consistent with state-by-state goals; develop a design for a regional market-based, multi-sector mechanism to achieve the goal; and participate in a multi-state GHG registry.

California is implementing the world’s first Low Carbon Fuel Standard for transportation fuels, pursuant to both EO S-01-07 (signed January 2007) and AB 32. The standard requires a reduction of at least 10 percent in the carbon intensity of California’s transportation fuels by 2020. This reduction is expected to

reduce GHG emissions in 2020 by 17.6 MMT CO<sub>2</sub>e. Also in 2007, AB 118 created the Alternative and Renewable Fuel and Vehicle Technology Program. This act provides funding for alternative fuel and vehicle technology research, development, and deployment in order to attain the State's climate change goals, achieve the State's petroleum reduction objectives and clean air and GHG emission reduction standards, develop public-private partnerships, and ensure a secure and reliable fuel supply.

In addition to vehicle emissions regulations and the Low Carbon Fuel Standard, the third effort for reducing GHG emissions from transportation is the reduction in the demand for personal vehicle travel (VMT). This measure was addressed in September 2008 through the Sustainable Communities and Climate Protection Act of 2008, or SB 375. The enactment of SB 375 initiated an important new regional land use planning process to mitigate GHG emissions by integrating and aligning planning for housing, land use, and transportation for California's 18 MPOs. The bill directed the ARB to set regional GHG emissions reduction targets for most areas of the State. It also contained important elements related to federally mandated Regional Transportation Plans (RTPs) and the alignment of State transportation and housing planning processes.

Also codified in 2008, SB 97 required the Governor's Office of Planning and Research (OPR) to develop GHG emissions criteria for use in determining project impacts under CEQA. These criteria were developed in 2009 and went into effect in 2010.

EO S-13-08 launched a major initiative for improving the State's adaptation to climate impacts from sea level rise, increased temperatures, shifting precipitation, and extreme weather events. It ordered a California Sea Level Rise Assessment Report to be requested from the National Academy of Sciences. It also ordered the development of a Climate Adaptation Strategy. The strategy, published in December 2009, assesses the State's vulnerability to climate change impacts and outlines possible solutions that can be implemented within and across State agencies to promote resiliency. The strategy focused on seven areas: public health, biodiversity and habitat, ocean and coastal resources, water management, agriculture, forestry, and transportation and energy infrastructure.

As described above, on April 29, 2015, Governor Edmund G. Brown, Jr. issued EO B-30-15 to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. The Governor's EO aligns California's GHG reduction targets with those of leading international governments ahead of the United Nations Climate Change Conference in Paris set for late 2015. The EO also requires the State's climate adaptation plan to be updated every 3 years and for the State to continue its climate change research program, among other provisions. As with EO S-3-05, this EO is not legally enforceable against local governments and the private sector. Legislation that would update AB 32 to make post-2020 targets and requirements a mandate is in process in the State Legislature.

The initiatives, Eos, and statutes outlined above comprise the major milestones in California's efforts to address climate change through coordinated action on climate research, GHG mitigation, and climate change adaptation.

In accordance with the CCMC, Section 15.02.1000, the Project shall be equipped with a one kilowatt (1 kW) solar photovoltaic system per each 10,000 square feet of gross floor area, or fraction thereof. In the City has established a Green Building Program, which shall be administered by the Building Safety Division pursuant to the provisions of CCMC Section 15.02.1100. The purpose of the Green Building Program is to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional and global ecosystems. The Project shall conform to the City's Green Building Program, in addition to all current State of California Title 24 Energy Code requirements.



The proposed project would be subject to all applicable regulatory requirements, in effect for the reduction of the GHG emissions of the project. With compliance of regulatory requirements, the project would not conflict with or impede implementation of reduction goals identified in AB 32, the Governor's EO S-3-05, and other strategies to help reduce GHGs to the level proposed by the Governor. Therefore, the project's contribution to cumulative GHG emissions, and potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, would be less than significant.

#### VIII. HAZARDS AND HAZARDOUS MATERIALS –Would the project:

- c) 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 and/or transported 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. In addition, the Phase I Report indicates that no hazardous substances, petroleum products, or USTs were observed at the site; therefore, the likelihood of encountering a hazardous substance is during grading or excavation activities is minimal.

Operation of the retail and restaurant uses planned for the Project 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 Impact with Mitigation. A Project Phase I Environmental Site Assessment Report (the Phase I Report) was completed by Arcadis on September 14, 2016. The report concludes that the Site was formerly developed with a possible barn, small residence, and a gasoline station from at least the late 1920s until 1947 when the west portion of the Site was developed with a multi-tenant commercial/retail building, two residences with private garages, and two commercial buildings. In 1955, the existing gasoline station in the east portion of the Project Site was replaced with a new gasoline service station. The Site remained in this configuration until all of the structures were demolished in 2006. The Site has remained undeveloped since 2006.

The gas station facility contained three gasoline underground storage tanks (USTs), two dispenser islands, one waste oil UST, a station building containing two hoists, one clarifier, and an auto repair office. All identified product piping, tanks, dispensers, canopies, and buildings were removed from the Site by 2006. Environmental investigations of soil and groundwater were conducted at the facility between 1988 and 2010 and releases of fuel were identified and remediated. Closure was granted to the case by the Regional Water Quality Control Board (RWQCB) in 2010. This former gasoline station is considered an historical recognized environmental condition (HREC) for the Site. No de minimis conditions were identified in connection with the Site. Further, as indicated in responses for III.b), the Project Site is not located within a county that is found to have serpentine and ultramafic rock in their soils (State of California 2000). Therefore, the potential risk for naturally occurring asbestos during Project construction is small and less than significant.

A dry cleaner occupied the Site's west parcel between approximately 1959 and 1962. Based on this information, a Phase II soil and soil vapor investigation was conducted by SECOR, an environmental consultant, in 2006. The Phase II investigation of the property consisted of a total of three borings located outside of the back door of the former dry cleaner and two hand augered soil sampling points inside the building at the suspected location of the former dry cleaning unit. Soil and soil vapor samples were collected for analysis of volatile organic compounds (VOCs). Soil samples were collected at approximately 5 and 10 feet below ground surface (bgs). Soil-vapor sampling tubing and probes with expendable drive points were advanced using a GeoProbe™, truck-mounted drilling rig, at approximately 7 feet bgs.

Soil and soil vapor samples collected at the interior and exterior portions of the Site reported non-detectable concentrations of all VOCs. Based on the analytical data, there did not appear to be a detected release associated with the reported former dry cleaner. SECOR therefore concluded that the historical presence of a dry cleaning facility at 12421 Washington Boulevard did not represent a recognized environmental condition. SECOR recommended no further assessment.

Arcadis concurs that the former dry cleaner is unlikely to represent an environmental concern to the Site based on the length of time since the dry cleaner has been onsite (over 50 years), no records to identify if the dry cleaner used solvents or was only a drop off/transfer facility, and the non-detect VOC results of prior soil and soil vapor sampling.

Although the previous improvements have been demolished and the previously identified soil contamination has been remediated, if during construction grading activities, localized areas of petroleum impacts soils are encountered, these soils shall be isolated, sampled, and handled as per current regulatory guidelines. With the implementation of this mitigation measure during construction, potentially significant construction-related impacts associated with hazardous materials releases or accident conditions are less than significant.

#### 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 as per current regulatory guidelines.

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 Impact with Mitigation Incorporated. A Google Map search was done to locate schools within one-quarter mile from the Project Site. Westview School, located at 12101 W Washington Boulevard, Culver City, is approximately 0.20 miles from the Project Site. Wildwood School, located at

12201 Washington Pl, Los Angeles, is approximately 0.25 miles from the Project Site. There are no known proposals for new schools within Culver City and within a quarter mile 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. Additionally, as mentioned in VIII.b) above, the previous improvements have been demolished and previously identified soil contamination has been remediated. Regardless, Mitigation Measure HAZ-1 will be implemented during construction, thus construction-related impacts associated with hazardous materials emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school is less than significant.

Operation of the Project would not create a significant risk of exposure to hazardous materials for the public or the environment, including the schools. Occupancy of the proposed retail and restaurant 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 Measure

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

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact with Mitigation. The Phase I Report completed by Arcadis includes a regulatory agency database search report prepared by EDR, an environmental data management company. According to EDR's report, the former Shell Oil gasoline station is listed in various databases including LUST, UST, HAZNET, FINDS, and ECHO. The former facility is listed in the HAZNET and FINDS databases for the tracking of generated hazardous waste from 1994 to 1999. The facility is listed in the LUST database due to a reported release of gasoline to the soil and groundwater in 1988.

The former service station contained three gasoline underground storage tanks (USTs), two dispenser islands, one waste oil UST, a station building containing two hoists, one clarifier, and an auto repair office. All identified product piping, tanks, dispensers, canopies, and buildings were removed from the Site in 2001. The station building and canopies were demolished during the Second Quarter of 2006.

Environmental investigations at the Site began in June 1988. Since June 1988, a total of 76 soil borings were drilled or hand augured on Site, from which, 19 groundwater monitoring wells, 4 dual-nested soil vapor extraction with air sparging (SVE/AS) wells, 2 SVE wells, 25 AS wells, 7 oxygen sparge wells, 4 soil vapor survey probes, and 6 confirmation soil borings were installed.

During confirmation soil boring assessment activities, hydrocarbons and fuel oxygenates were detected in select soil samples collected between 15 and 35 feet below ground surface (bgs) in the unsaturated zone (at or above approximately 35 feet bgs). The extent of hydrocarbons and fuel oxygenates in the unsaturated zone was fully delineated, with most impacts present in/near the capillary fringe (just above the water table). In the saturated zone (below approximately 35 feet bgs), hydrocarbons and fuel

oxygenates were detected in soil samples collected at 40 feet bgs. The extent of hydrocarbons and fuel oxygenates in soil in the saturated zone was laterally delineated. In groundwater, the dissolved phase plume encompassed the area around the former tank pit, and the primary area of concern encompassed monitoring well B-7. The extent of hydrocarbons and fuel oxygenates in the groundwater was delineated.

Soil vapor extraction with air sparging was selected as the best active remedial action at the Site. The SVE/AS system operated onsite from April 30, 2007 through April 29, 2008, during which rebound testing was conducted between February 19 and April 29, 2008. The SVE system extracted soil vapors from six SVE wells (SVE-1 through SVE-6) using an electric catalytic oxidizer (E-Cat) for treatment. As of April 29, 2008, the SVE system had removed approximately 1,462.2 pounds of total petroleum hydrocarbons (TPH-g), 0.80 pounds of benzene and 8.87 pounds of MTBE during operation. Based on the results of the SVE rebound test, the termination of active, on-site remediation, which included the discontinuation of operation of the SVE/AS systems was recommended.

To address residual hydrocarbon and fuel-oxygenate concentrations in the groundwater beneath the Site, the implementation of three groundwater extraction (GWE) events using a vacuum truck was proposed. Vacuum truck GWE events occurred on October 16, 23, and 30, 2008, to remove residual fuel oxygenate concentrations in groundwater. A total of approximately 3,703 gallons of hydrocarbon-impacted groundwater was extracted over the course of three vacuum truck events.

Analytical data and modeling were used to evaluate risks to human health and to determine risk-based remediation goals. To further reduce constituents of concern (COC) concentrations in groundwater, an oxygen pulsed-sparg system (OPIS) was installed onsite in 2009. During Fourth Quarter 2009, a review of groundwater analytical data showed an overall decreasing trend indicating the OPIS system had been successful in remediating the remaining COC concentrations in groundwater. The contaminant plume beneath the Site was completely delineated and did not appear to pose a significant risk to human health or the environment. Remaining fuel oxygenates in groundwater beneath the Site were expected to continue to biodegrade over time. Therefore, the OPIS remediation system was recommended to be shut off and no further action be conducted at the Site (Delta, 2010).

Case closure was granted to the Site by the RWQCB on March 2, 2010 and a revised closure letter was issued by the RWQCB on May 12, 2010. Closure was granted by the RWQCB based on:

- ) The residual petroleum hydrocarbon concentrations in the soil beneath the Site should not cause direct contact concerns because concentrations were below EPA Soil Screening Levels.
- ) Although the tert-butyl alcohol (TBA) concentration exceeded the notification level in groundwater monitoring wells B-3 (47ug/L) and B-7 (42 ug/L), the contamination was limited to onsite groundwater monitoring wells B-3 and B-7. The dissolved plume was fully delineated, stable, shrinking, and was expected to further attenuate.
- ) The maximum groundwater concentrations reported at closing were 1.3 ug/L (MTBE) and 47 ug/L (TBA), and non-detect for TPHg and benzene.
- ) Vapor intrusion was not a concern because benzene concentrations were below the interim screening level of 180 ug/kg at five feet bgs.

As such, and with the implementation of Mitigation Measure HAZ-1, impacts are expected to be less than significant as they relate to the portions of the Project Site being listed on specified hazardous materials sites lists.

#### Mitigation Measure

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?

Less Than Significant Impact. The Project Site is approximately 1.8 miles south of the Santa Monica Municipal Airport (SMA). The Santa Monica Municipal Airport is located at 3223 Donald Douglas Loop S, Santa Monica, CA. According to the Federal Aviation Administration's National Plan of Integrated Airport Systems for 2009–2013, SMA is categorized as a reliever airport and scheduled to close in the year 2029. The Los Angeles International Airport (LAX) is located approximately 3.1 miles south of the Project Site, and thus is not further considered.

Given the SMAs proximity to residences, the City of Santa Monica has placed stringent noise restrictions on the airport. The following noise and public safety mitigation measures are cited on the Santa Monica Airport website ([https://www.smgov.net/Departments/Airport/Noise\\_Mitigation/Noise\\_Management\\_Information.aspx](https://www.smgov.net/Departments/Airport/Noise_Mitigation/Noise_Management_Information.aspx))

- ) Maximum Noise Level – A maximum noise level of 95.0 dBA Single Event Noise Exposure Level, measured at noise monitor sites 1,500 feet from each end of the runway, is enforced 24 hours a day, 7 days a week. There are no additional noise monitoring stations along the flight pattern, which is routed entirely over residential neighborhoods.
- ) Night Departure Curfew – No takeoffs or engine starts are permitted between 11 pm and 7 am Monday through Friday, or until 8 am on weekends. Exceptions are allowed for bona fide medical or public safety emergencies only.
- ) Operational Limitations – Touch-and-go, stop-and-go, and low approaches are prohibited on weekends, holidays, and weekdays from one half-hour after sunset until 7 am the following day.

The Santa Monica Municipal Airport runway runs east to west. Departure flights head west directly over the Pacific Ocean and arrival flights approach the airport from the east. Thus, given that the Project Site is located to the South, the Santa Monica Airport would pose less than significant safety risk for people 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. The Project is not within the vicinity of a private airstrip, thus a safety hazard from a private airstrip would not be likely. As such, the Project would have no impact as it relates to safety hazards resulting from proximity to a private airstrip.

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 an existing roadway network, including Washington Boulevard and Centinela Avenue, which are both identified as a Primary Artery within the Circulation Element of the General Plan. Per the City of Los Angeles Safety Element, Exhibit H, Venice Boulevard, north of the Project Site, and Centinela Avenue, are transportation facilities that could be utilized during a disaster event. Additionally, Centinela Avenue maintains an underground electrical transmission line identified as a Life Safety Facility. While it is expected that the majority of construction activities for the Project would be confined onsite, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day, during specific phases or types of construction activities. 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 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 additional vehicle trips in the Project vicinity and would result in some modifications to access (e.g. new curb cuts for Project driveways, elimination of existing curb cuts, elimination of alley access at southeast end of Colonial Avenue, elimination of northbound access to Colonial Avenue from Washington Boulevard, etc.) from the streets that surround the Project Site. However, emergency access to the Project Site and surrounding area would continue to be provided in a manner 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 designated emergency evacuation routes, and the proposed mix of uses would not impair implementation of Culver City's emergency response plan, the Project would have a less than significant impact with respect to these issues.

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. A review of the CAL FIRE Very High Fire Hazard Severity in LRA – Los Angeles Map indicates nearest very high fire hazard area (VHFHSZ) is the Ballona Wetlands Ecological Reserve located in Playa Del Rey approximately 1.85 miles south of the Project Site. The next closest very high fire hazard area (VHFHSZ) is located in an unincorporated area of Los Angeles County (West Los Angeles College), approximately 2.65 miles east 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 – Would the project:

c) Violate any water quality standards or waste discharge requirements?

##### Less Than Significant Impact.

The Project Site, which consists of two vacant lots, one west of Centinela Avenue (Site A) and one east of Centinela Avenue (Site B), are relatively flat. Site A slopes from the northeast corner with an elevation of 44 feet above sea level to the southwest with an elevation of 41 feet above sea level at the corner of Colonia Avenue and Washington Boulevard for a total grade change of approximately three (3) feet across the property. Site B slopes from the northeast corner with an elevation of 45 feet above sea level to the southwest corner with an elevation of 41 feet above sea level at the corner of Centinela Avenue and Washington Boulevard For a total grade change of approximately four (4) feet across the property.

Surface water at the Project Site consists of direct surface precipitation into the soil, and once the vacant lots become saturated the remaining water drains as sheet flow to low-lying areas, and then flows over

the sidewalk to the street. Both sites do not result in significant deep percolation, only surface percolation until soil is saturated and the water will flow offsite due to no retention dams.

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 commercial uses, including food retail and restaurant uses, and does not propose any uses that would generate point source pollutants. Therefore, water quality impacts due to point sources would be less than significant. Non-point-source pollutants (NPS) cannot be traced to a specific original source. NPS pollution is caused by rainfall or snowmelt moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants can include:

- ) Excess fertilizers, herbicides and insecticides from agricultural lands and residential areas;
- ) 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. Overall, compliance with applicable stormwater requirements and implementation of the BMPs would ensure that impacts to water quality during the Project's construction activities would be less than significant.

Additionally, as indicated in VI.a) iii, the Phase I Environmental Report indicates that, historically, static groundwater below the Project Site has ranged from 27.5 to 42.25 feet below ground surface, and further specifies groundwater levels at the Project Site were encountered at approximately 35 to 42 feet below ground surface. However, the Project does not include subterranean parking or any basements, and will only require minimal excavation for foundations and for a depressed loading dock that will be four (4)

feet below grade, and is unlikely to reach groundwater levels. Thus, the potential for impacts to water quality standards related to groundwater would be less than significant.

In accordance with the CCMC, including Section 5.05.040, the Project would require a Standard Urban Stormwater Mitigation Plan (SUSMP) that complies with the most recent LARWQCB approved LID and SUSMP. As part of the operational drainage plan, stormwater collected from roof drains, area drains, and downspouts would be routed through a pretreatment system to remove trash, debris, sediment, and hydrocarbons from stormwater runoff prior to entering an infiltration basin. 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 LID, 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 and related to waste discharge during the Project's operational activities would be less than significant.

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 currently vacant and rough-graded. The surface is comprised of earth, sporadic low-lying vegetation, gravel, and minimal paving. The Project Site does not currently provide a substantial opportunity for recharge of groundwater. The Project Site generally drains to the south and has no existing barriers to prevent site runoff after surface soils are saturated. The proposed multi-story, multi-structure commercial project will incorporate various areas of landscape, including planters within parking and open space areas and a stormwater treatment system. Water runoff will be directed to appropriate locations, including to proposed landscape areas and stormwater treatment system, which will aid in the capture and restoration into the groundwater system and/or stormdrain system. Given the depth of groundwater at the site is 27.5 to 42.25 feet below ground surface, and the nature of construction activities, dewatering is not anticipated during construction activities. 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. 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, nor will it include the alteration of the course of a stream or river, as such features are not present within the vicinity of the Project Site. Furthermore, the Project would include appropriate drainage treatment improvements onsite to direct stormwater flows to the local drainage systems, similar to existing conditions. The current requirement for the Culver City's SUSMP closely aligns with 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."

Site percolation tests were completed. Results indicate the Project Site is suitable for infiltration into native soils. Therefore as part of the operational drainage plan, stormwater collected from roof drains, area drains, and downspouts would be routed through a pretreatment system to remove trash, debris, sediment, and hydrocarbons from stormwater runoff prior to entering an infiltration basin. 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 85<sup>th</sup> percentile rainfall depth, 24-hour rain event. 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 previously discussed. As such, less than significant impacts associated with alterations to existing drainage patterns would occur with Project implementation.

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?

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 part of the operational drainage plan, stormwater collected from roof drains, area drains, and downspouts would be routed through a pretreatment system to remove trash, debris, sediment, and hydrocarbons prior to being infiltrated into the groundwater table. 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 alterations 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 explained above, post-development runoff quantities would not increase measurably, and the Project would include appropriate on-site drainage improvements to accommodate anticipated stormwater flows. Operation of the proposed uses would generate pollutant constituents commonly associated with urban uses to surface water runoff. However, the Project would

comply with all applicable water quality control requirements. 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. Construction and operational BMPs, including the proposed capture and infiltration system and good housekeeping practices during Project construction and operation would preclude substantial amounts of sediment and stormwater pollutants from entering stormwater flows, or otherwise potentially degrading water quality. As discussed, in the responses above, preparation of a SWPPP and SUSMP is required for the Project and will ensure will not violate any water quality standards or degrade water quality. 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?

No Impact. 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. The site is not located in a 100-year or 500-year flood zone as delineated by the Culver City Natural Hazards – Fire and Flooding Map. Furthermore, the Project does not include any on- or off-site housing. Thus, since the Project Site is not located within a 100-year flood plain and does not propose any housing, no impact would occur in this regard.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. 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. The site is not located in a 100-year or 500-year flood zone as delineated by Culver City's Natural Hazards – Fire and Flooding Map. 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. 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 located within the Stone Canyon Dam Inundation Zone

The Project Site is located approximately 11 miles away from Stone Canyon Dam and is separated from it by a variety of development, 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 dams 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 Stone Canyon Dam.

j) Inundation by seiche, tsunami, or mudflow?

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

The Project Site is within the Stone Canyon Dam inundation zone. However, 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 Venice Quadrangle, the Project Site is not located within the mapped tsunami inundation boundaries. 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?

No Impact. The Project Site is located in a highly urbanized area on a busy intersection of Washington Boulevard and Centinela Avenue, which are designated Primary Artery by the General Plan Circulation Element. The Project Site is currently vacant and fenced off, thus disconnected from the community and in its current condition can become a public nuisance and a catalyst for urban blight.

The Project will serve as an iconic gateway to the community along the West Washington corridor. It will anchor the burgeoning West Washington corridor by activating the Washington Boulevard and Centinela Avenue streetscapes, and by providing much needed off-street parking for businesses located within the District. While the Project site formerly contained a gas station, liquor store and various commercial businesses throughout time, the Project will transform what are currently vacant parcels and will deliver high quality architectural and landscape design to promote the emerging standard of development in the area.

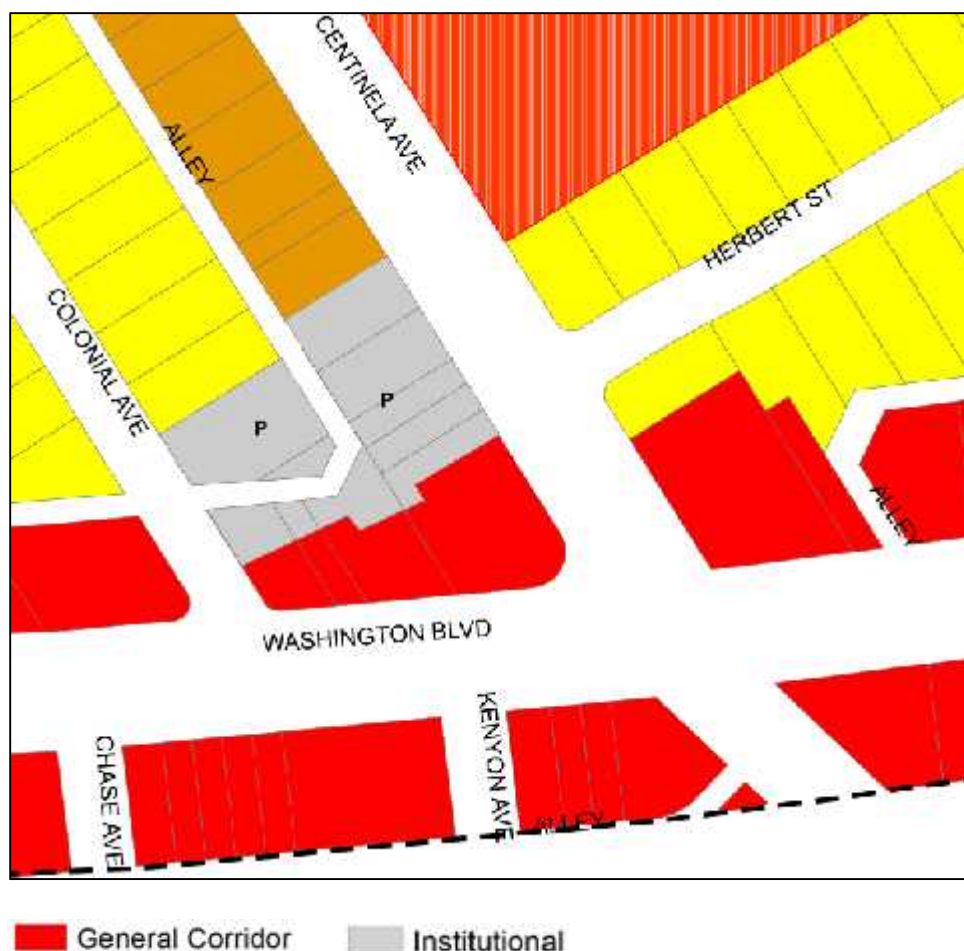
The Project will complement the existing collection of area businesses by providing an entire development that is devoted to culinary creativity, quality and experience. The Project will offer a Market Hall component that will provide local vendors with the opportunity to establish or expand their brick and

mortar presence in a shared format marketplace. This collection of vendors will in turn provide the community with a specialized shopping experience that is unique. The Project will include buildings on both the east and west sides of Centinela Avenue, creating visual consistency and cohesion across Washington Boulevard. Numerous project design features and amenities, such as a large outdoor seating area, will aid to foster a pedestrian friendly streetscape and a sense of community. Given the Project Site's current condition and location, the development of the Project would not physically divide an established community, therefore is no impact.

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?

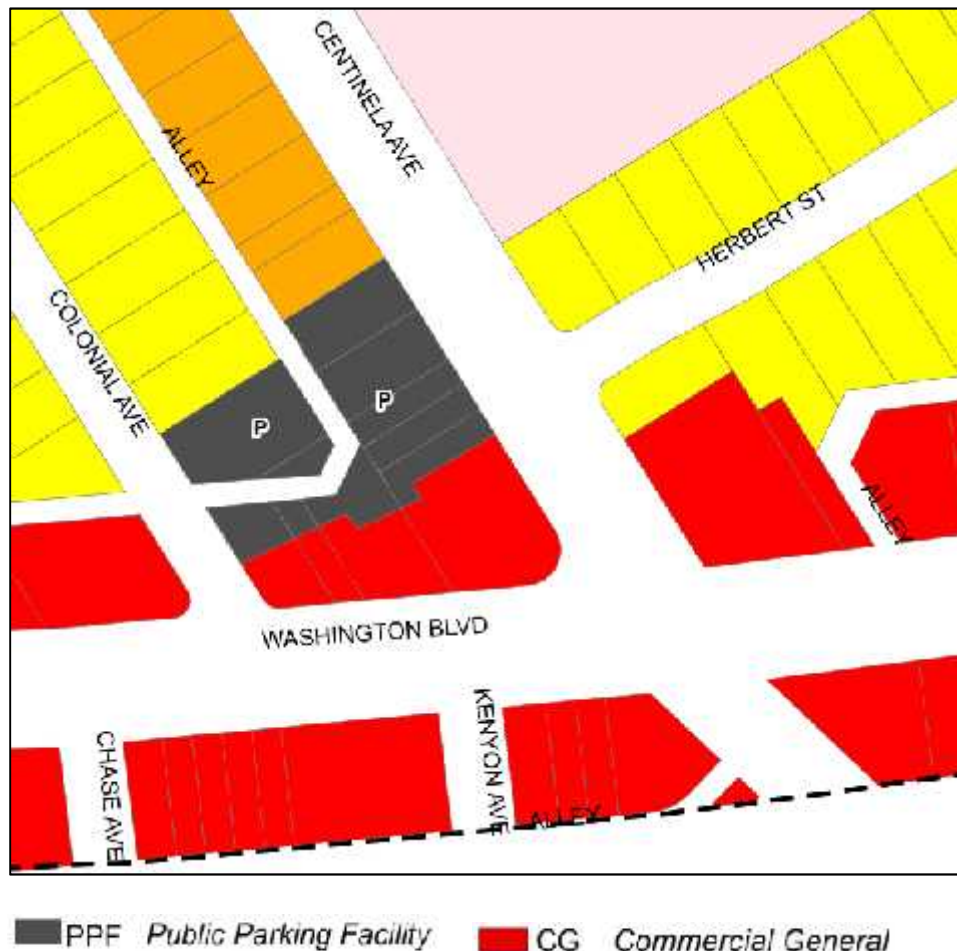
Less Than Significant Impact. The Land Use Element of the General Plan designates Site A as Institutional and General Corridor. The General Plan Land Use designation for Site B is General Corridor. Site A and Site B General Plan designations are depicted below in Figure 5. These designations allow for commercial uses and public parking facilities, as proposed by the Project. As noted below, the Project proposes to utilize a Comprehensive Plan for the development of the subject site; therefore, the portion designated as Institution will be changed to General Corridor. However, this change will only serve to maintain consistency and will not change any of the allowable uses.

Figure 5



The Culver City Zoning Map designates portions of Site A along Washington Boulevard as Commercial General (CG) Zone, while the northerly portion of the site is designated Public Parking Facility (PPF). Site B is zoned CG. Site A and Site B zoning designation are depicted below in Figure 6.

Figure 6



As part of the Project, a Comprehensive Plan is proposed to establish the development standards for the project site, and zoning designation for Site A and Site B will be changed to Planned Development. Pursuant to Chapter 17.560 of the Zoning Code – Comprehensive Plans, sites of one acre or greater may be developed under a Comprehensive Plan with Planned Development (PD) Zoning. A Comprehensive Plan allows consideration of innovation in site planning and other aspects of project design and more effective design response to site features, uses on adjoining properties and other development considerations. The site is proposed to be rezoned to PD in accordance with development standards and allowed uses consistent with Commercial General zoning standards, and of the PPF Zone, thereby allowing the proposed mass, scale, and uses (i.e. restaurants, food retailers, and public parking garage). Such rezoning is consistent with the long-range vision of the Culver City General Plan, Culver City Successor Agency, and the Culver City Long Range Property Management Plan. There is no applicable specific plan or local coastal program. In conclusion, although the Project involves a zone change, it does not 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. Thus potential impacts related to such conflicts are 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. A review of the California Department of Conservation, Division of Oil, Gas and Geothermal Resources Well Finder Map (<https://maps.conservation.ca.gov/doggr/wellfinder/#close>), indicates no oil wells, whether active or abandoned, are located on Project Site or in the immediate vicinity. Well production is located west of the site in Marina Del Rey area. As such, the potential of uncovering mineral resources during Project construction is considered low. In addition, grading and excavation for the Project is projected to be minimal, diminishing the possibility of unearthing or disturbing any unknown minerals below grade. 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 Impact Analysis prepared by LSA in June 2017 (the Noise Study), 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 levels 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. The noise standards specified in Table N-3 of the City's General Plan Noise Element provide a guideline to evaluate the acceptability of the noise levels generated by the proposed Project. Table 6 provided below shows the City's interior and exterior noise standards. These standards are applicable for assessment of long-term vehicular traffic noise impacts. In addition, the City's General Plan Noise Element also regulates stationary noise sources impacting residential uses and is used as a guideline to evaluate the acceptability of the noise levels generated by single events. Table 7 provided below shows the City's stationary noise standards impacting residential uses.

Table 6 Interior and Exterior Noise Standards

Land Use Categories		Design Standard (CNEL)	
Categories	Uses	Interior <sup>1</sup>	Exterior <sup>2</sup>
Residential	Single-Family, Multiple-Family	45 <sup>3</sup>	65
	Mobile Home	—	65 <sup>4</sup>
Commercial/Industrial	Hotel, Motel, Transient Lodging	45	65 <sup>5</sup>
	Commercial, Retail, Bank, Restaurant	55	—
	Office Building, Research and Development, Professional Offices, City Office Building	50	—
	Amphitheater, Concert Hall, Auditorium, Meeting Hall	45	—
	Gymnasium (Multipurpose)	50	—
	Sports Club	55	—
	Manufacturing, Warehousing, Wholesale, Utilities	65	—
	Movie Theaters	45	—
Institutional	Hospital, School's Classroom	45	65
	Church, Library	45	—
Open Space	Parks	—	65

Source: Table N-3, Culver City General Plan, Noise Element (City of Culver City 1996).

<sup>1</sup> Interior environment excludes bathroom, toilets, closets, and corridors.

<sup>2</sup> Exterior noise environment is limited to private yards of single-family homes; multi-family private patio or balcony which is greater than 6 feet in depth, and is not a required emergency fire exit as defined in the UBC; mobile home parks; hospital patios; park's picnic area; school's playground; and hotel and motel recreation area.

<sup>3</sup> Noise level requirement with closed windows. Mechanical ventilation system or other means of natural ventilation shall be provided as of Chapter 12, Section 1205 of the 1974 UBC.

<sup>4</sup> Exterior noise levels should be such that interior noise level will not exceed 45 dB CNEL.

<sup>5</sup> Except those areas affected by aircraft noise.

CNEL = Community Noise Equivalent Level

UBC = Uniform Building Code

Table 7 Stationary Noise Sources

Daytime Levels (L <sub>eq</sub> ) 7:00 a.m. – 10:00 p.m.	Nighttime Levels (L <sub>eq</sub> ) 10:00 p.m. – 7:00 a.m.	Duration
55	50	30 minutes (L <sub>50</sub> )
60	55	15 minutes (L <sub>25</sub> )
65	60	5 minutes (L <sub>8</sub> )
70	65	1 minutes (L <sub>2</sub> )
75	70	Never (L <sub>max</sub> )

Source: Culver City General Plan, Noise Element (City of Culver City 1996).

L<sub>eq</sub> = Equivalent Continuous Noise Level

L<sub>max</sub> = Maximum Instantaneous Noise Level

The City Municipal Code Noise Ordinance has not established any upper limits for construction noise because it is temporary and will cease to occur after completion of the project construction. The City Municipal Code Noise Ordinance in Section 9.07.035(a) regulates the timing of construction activities and includes special provisions for sensitive land uses. Pursuant to this Section of the CCMC, construction activities shall occur only between the hours of 8:00 a.m. and 8:00 p.m., Mondays through Fridays, between 9:00 a.m. and 7:00 p.m. on Saturdays, and between 10:00 a.m. and 7:00 p.m. on Sundays and National Holidays (Mitigation Measure NOISE-1), or as further restricted by the Project conditions of approval. No construction shall be permitted outside of these hours. The City Conditions of Approval may further limit construction activities to 6:00 p.m. on Saturdays and not allow construction activities on Sundays and national holidays.

## Thresholds of Significance

Based on Guidelines for the Implementation of the California Environmental Quality Act (CEQA), Appendix G, Public Resource Code Sections 15000–15387, a project will normally have a significant effect on the environment related to noise if it will substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and the goals of the community in which it is located. The applicable noise standards governing the Project Site are the criteria in the Noise Element of the Culver City General Plan (1996) and the City of Culver City Noise Ordinance (2017).

## Existing Setting

The Project Site is surrounded by commercial and residential development, with the nearest residential uses immediately adjacent to the north. The areas adjacent to the Project Site include the following uses:

- ] North: Residential uses
- ] East: Small retail businesses and a multi-family residential development along West Washington Boulevard farther east
- ] South: Many small businesses, a gas station, and single-family residential uses farther south
- ] West: Small retail businesses

Takeoffs and landings at Los Angeles International Airport (LAX), located approximately 3 miles (mi) south of the Project Site; and Santa Monica Municipal Airport (SMO), located 1.7 mi north of the Project Site, contribute some aircraft noise in the project area. However, the Project Site is located outside of the 65 dBA CNEL noise contour from both LAX and SMO (LAX, May 2017 and City of Santa Monica, October 2014).

The guidelines in the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (1977; FHWA RD-77-108) were used to evaluate highway traffic-related noise conditions along roadway segments in the project vicinity. The resultant noise levels are weighted and summed over 24 hour periods to determine the CNEL values. Traffic volumes in the project's traffic study (RAJU, June 2017) were used to assess the existing traffic noise impacts. Table 8 provides the traffic noise levels for the Existing without Project scenario. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn (See Appendix A of the Noise Study for the specific assumptions used in developing these noise levels and model printouts).

Table 8 below shows that traffic noise levels along Washington Boulevard and Centinela Avenue are moderate, while traffic noise level along Colonial Avenue is low. Results indicate that the 70 dBA CNEL impact zone is confined to the roadway right-of-way, while the 65 and 60 dBA CNEL impact zones extend up to 105 and 221 feet, respectively, from the centerline of Washington Boulevard and Centinela Avenue. The table also shows that the 70, 65, 60 dBA CNEL impact zone is confined to the roadway right-of-way.



Table 8 Existing Traffic Noise Levels

Roadway Segment	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane
Venice Boulevard West of Centinela Avenue	26,300	65	122	253	67.6
Venice Boulevard East of Centinela Avenue	27,100	66	124	258	67.7
Washington Boulevard West of Zanja Street	28,850	< 50	102	216	67.3
Washington Place Between Zanja Street and Wade Street	17,400	< 50	75	155	65.1
Washington Place Between Wade Street and Centinela Avenue	19,400	< 50	80	166	65.6
Washington Place East of Centinela Avenue	19,200	< 50	80	165	65.5
Washington Boulevard Between Zanja Street and Wade Street	15,250	< 50	71	143	64.3
Washington Boulevard Between Wade Street and Colonial Avenue	17,200	< 50	74	154	65.0
Washington Boulevard Between Colonial Avenue and Centinela Avenue	17,700	< 50	76	157	65.2
Washington Boulevard Between Centinela Avenue and Inglewood Boulevard	21,100	< 50	84	176	65.9
Washington Boulevard Between Inglewood Boulevard and McLaughlin Avenue	17,800	< 50	76	157	65.2
Washington Boulevard East of McLaughlin Avenue	17,750	< 50	76	157	65.2
Centinela Avenue North of Venice Boulevard	21,800	< 50	86	179	66.1
Centinela Avenue Between Venice Boulevard and Washington Place	29,950	< 50	105	221	67.5
Centinela Avenue Between Washington Place and Washington Boulevard	29,950	< 50	105	221	67.5
Centinela Avenue Between Washington Boulevard and Culver Boulevard	29,500	< 50	104	219	67.4
Centinela Avenue South of Culver Boulevard	25,000	< 50	94	196	66.7
Culver Boulevard West of Centinela Avenue	19,500	< 50	97	206	67.4
Culver Boulevard Between Centinela Avenue and Inglewood Boulevard	22,950	< 50	108	230	68.1
Culver Boulevard East of Inglewood Boulevard	25,600	56	116	247	68.6

Roadway Segment	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane
Inglewood Boulevard North of Washington Boulevard	11,350	< 50	55	116	64.2
Inglewood Boulevard Between Washington Boulevard and Culver Boulevard	22,450	< 50	86	182	66.6
Inglewood Boulevard South of Culver Boulevard	22,900	< 50	87	185	66.7
McLaughlin Avenue North of Washington Boulevard	4,800	< 50	< 50	65	61.0
McLaughlin Avenue South of Washington Boulevard	650	< 50	< 50	< 50	52.3
Wade Street North of Washington Place	3,650	< 50	< 50	< 50	56.3
Wade Street Between Washington Place and Washington Boulevard	500	< 50	< 50	< 50	47.7
Wade Street South of Washington Boulevard	1,450	< 50	< 50	< 50	52.3
Zanja Street North of Washington Place	3,900	< 50	< 50	< 50	58.5
Colonial Avenue North of Washington Boulevard	700	< 50	< 50	< 50	49.2

Source: Compiled by LSA (June 2017).

Note: Traffic noise within 50 feet of the roadway centerline should be evaluated with site-specific information.

ADT = average daily traffic

CNEL = Community Noise Equivalent Level

dBA = A-weighted decibels

ft = feet

Four short-term, 20-minute noise level measurements were conducted on June 15, 2017, to document the existing noise environment and ambient noise within the project area. Table 9 below shows the results of the noise level measurements at each location. Noise sources from all four measurement locations are primarily traffic on Centinela Avenue and Washington Boulevard. The short-term monitoring locations are shown on Figure 7.

Table 9 Summary of Short-Term Noise Level Measurements

Location	Location Description	Measured Ambient Noise Level (dBA)	
		Leq	Lmax
ST-1	4059 Colonial Avenue. On the sidewalk in front of the home. Located northwest of the project site at Site A.	59.9	90.5
ST-2	In the alleyway 4058 Colonial Avenue. In between two single-family residences. Located north of the project site at Site A.	54.6	63.8

Table 9 Summary of Short-Term Noise Level Measurements

Location	Location Description	Measured Ambient Noise Level (dBA)	
		L <sub>eq</sub>	L <sub>max</sub>
ST-3	12386 Herbert Street. In front of the home. Located northwest of the project site at Site B.	71.7	86.0
ST-4	In the alley way between 12362 and 12350 Herbert Street. Location represents two single-family residences northeast of the project site at Site B.	58.6	78.3

Source: Compiled by LSA (July 2017).

dBA = A-weighted decibels

L<sub>eq</sub> = equivalent continuous sound level

L<sub>max</sub> = maximum instantaneous noise level

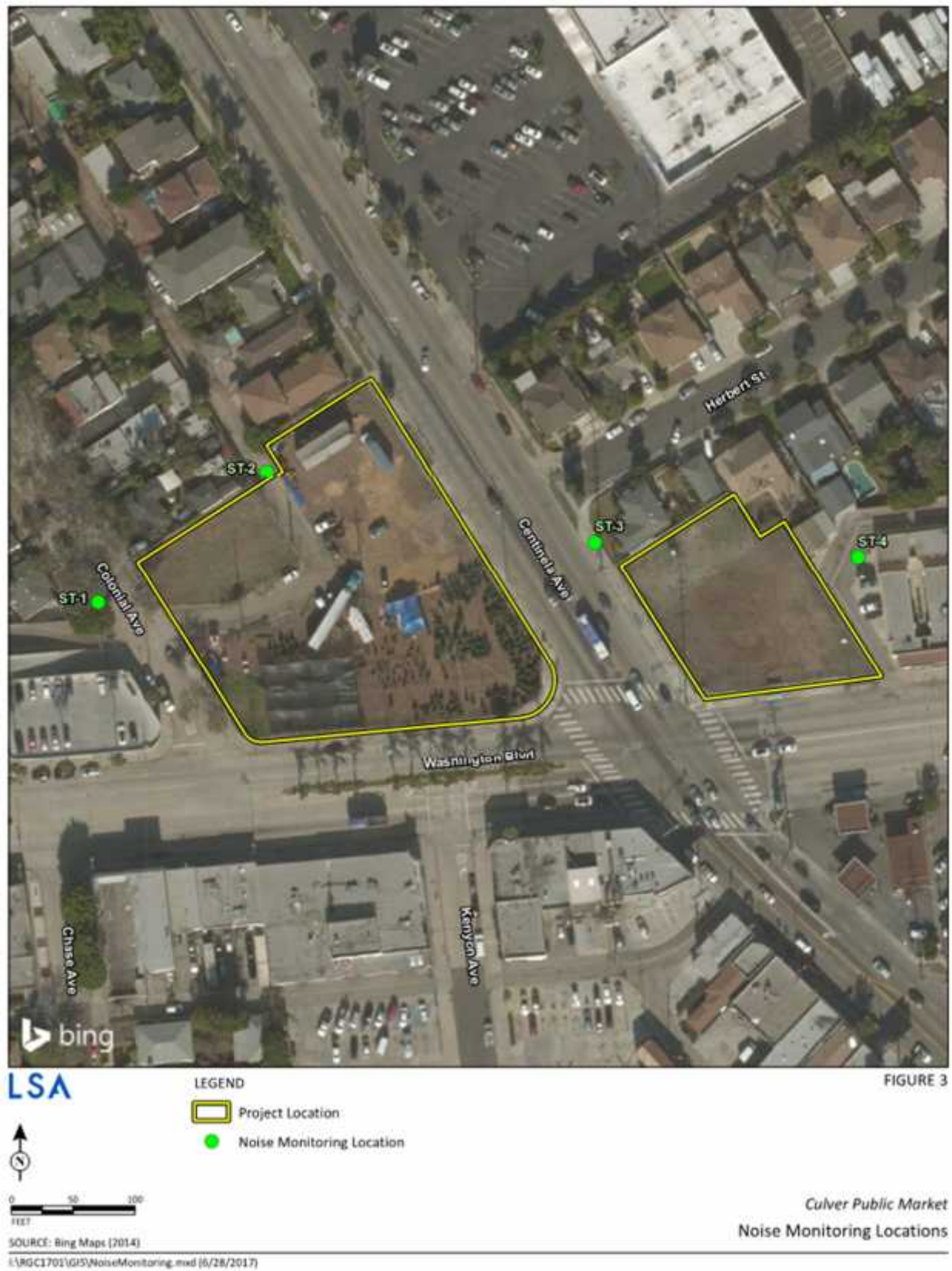
ST = Short-term monitoring location

## Impacts

### Short-Term Construction-Related Noise Impacts

Two types of short-term noise impacts would occur during project construction. The first type would be from construction crew commutes and the transport of construction equipment and materials to the Project Site and would incrementally raise noise levels on access roads leading to the site. Heavy equipment for grading and construction activities will be moved on site, will remain for the duration of each construction phase, and will not add to the daily traffic volume in the project vicinity. Although there would be high single-event noise exposure potential at a maximum level of 84 dBA L<sub>max</sub> from trucks passing at 50 feet, the effect on longer-term (hourly or daily) ambient noise levels would be small when compared to existing hourly and daily traffic volumes on Washington Boulevard and Centinela Avenue, which would be used to access the Project Site. Because construction-related vehicle trips would not approach the hourly and daily traffic volumes mentioned above, traffic noise would not increase by 3 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the Project Site would be less than significant.

Figure 7 Noise Monitoring Locations



The second type of short-term noise impact is related to noise generated during site preparation and grading on the Project Site. Construction is performed in discrete steps, each of which has its own mix of equipment and consequently its own noise characteristics. These various sequential phases would change the character of the noise generated as well as the noise levels along the project alignment as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 10 lists typical construction equipment noise levels ( $L_{\max}$ ) recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, obtained from the FHWA Roadway Construction Noise Model (RCNM; FHWA 2006).

Table 10 RCNM Default Noise Emission Reference Levels and Usage Factors

Equipment Description	Acoustical Usage Factor <sup>1</sup>	Spec. 721.560 $L_{\max}$ at 50 ft (dBA, slow) <sup>2</sup>	Actual Measured $L_{\max}$ at 50 ft (dBA, slow) <sup>3</sup>
All Other Equipment > 5 HP	50	85	N/A <sup>4</sup>
Auger Drill Rig	20	85	84
Backhoe	40	80	78
Bar Bender	20	80	N/A
Blasting	N/A	94	N/A
Boring Jack Power Unit	50	80	83
Chain Saw	20	85	84
Clam Shovel (dropping)	20	93	87
Compactor (ground)	20	80	83
Compressor (air)	40	80	78
Concrete Batch Plant	15	83	N/A
Concrete Mixer Truck	40	85	79
Concrete Pump Truck	20	82	81
Concrete Saw	20	90	90
Crane	16	85	81
Dozer	40	85	82
Drill Rig Truck	20	84	79
Drum Mixer	50	80	80
Dump Truck	40	84	76
Excavator	40	85	81
Flat Bed Truck	40	84	74
Front-End Loader	40	80	79
Generator	50	82	81
Generator (< 25 kVA, VMS Signs)	50	70	73
Gradall	40	85	83
Grader	40	85	N/A
Grapple (on backhoe)	40	85	87
Horizontal Boring Hydraulic Jack	25	80	82
Hydra Break Ram	10	90	N/A
Impact Pile Driver	20	95	101
Jackhammer	20	85	89
Man Lift	20	85	75
Mounted Impact Hammer (hoe ram)	20	90	90
Pavement Scarifier	20	85	90
Paver	50	85	77

Table 10 RCNM Default Noise Emission Reference Levels and Usage Factors

Equipment Description	Acoustical Usage Factor <sup>1</sup>	Spec. 721.560 L <sub>max</sub> at 50 ft (dBA, slow) <sup>2</sup>	Actual Measured L <sub>max</sub> at 50 ft (dBA, slow) <sup>3</sup>
Pickup Truck	40	55	75
Pneumatic Tools	50	85	85
Pumps	50	77	81
Refrigerator Unit	100	82	73
Rivet Buster/Chipping Gun	20	85	79
Rock Drill	20	85	81
Roller	20	85	80
Sand Blasting (single nozzle)	20	85	96
Scraper	40	85	84
Sheers (on backhoe)	40	85	96
Slurry Plant	100	78	78
Slurry Trench Machine	50	82	80
Soil Mix Drill Rig	50	80	N/A
Tractor	40	84	N/A
Vacuum Excavator (Vac-Truck)	40	85	85
Vacuum Street Sweeper	10	80	82
Ventilation Fan	100	85	79
Vibrating Hopper	50	85	87
Vibratory Concrete Mixer	20	80	80
Vibratory Pile Driver	20	95	101
Warning Horn	5	85	83
Welder/Torch	40	73	74

Source: FHWA Highway Construction Noise Handbook, Table 9.1 (FHWA 2006).

Note: Noise levels reported in this table are rounded to the nearest whole number.

- <sup>1</sup> Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.
- <sup>2</sup> Maximum noise levels were developed based on Specification (Spec.) 721.560 from the Central Artery/Tunnel (CA/T) program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.
- <sup>3</sup> The maximum noise level was developed based on the average noise level measured for each piece of equipment during the CA/T program in Boston, Massachusetts.
- <sup>4</sup> Since the maximum noise level based on the average noise level measured for this piece of equipment was not available, the maximum noise level developed based on Spec 721.560 would be used.

dBA = A-weighted decibels

L<sub>max</sub> = maximum instantaneous noise level

ft = feet

N/A = not applicable

HP = horsepower

RCNM = Roadway Construction Noise Model

kVA = kilovolt-amperes

VMS = variable message sign

Typical noise levels at 50 feet from an active construction area range up to 86 dBA L<sub>max</sub> during the noisiest construction phases. The site preparation phase, which includes grading and paving, tends to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment, including excavating machinery, such as backfillers, bulldozers, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings.

Project construction is expected to require the use of bulldozers, a front-end loader, and water trucks/pickup trucks. Noise associated with the use of construction equipment is estimated to be between 55 and 85 dBA L<sub>max</sub> at a distance of 50 feet from the active construction area for the grading phase. These construction equipment noise levels were selected from the Specification (Spec.) 721.560

noise levels as a worst-case scenario because construction equipment noise levels associated with grading are typically higher than the actual measured noise levels shown in Table 10.

As seen in Table 10, the maximum noise level generated by each dozer is assumed to be approximately 85 dBA  $L_{max}$  at 50 feet from the dozer in operation. Each front-end loader would generate approximately 80 dBA  $L_{max}$  at 50 feet. The maximum noise level generated by water trucks/pickup trucks is approximately 55 dBA  $L_{max}$  at 50 feet from these vehicles. Each doubling of the sound source with equal strength increases the noise level by 3 dBA. Each piece of construction equipment operates as an individual point source. The worst-case composite noise level at the nearest residence during this phase of construction would be 86 dBA  $L_{max}$  (85 dBA + 80 dBA + 55 dBA = 86 dBA) at a distance of 50 feet from an active construction area. Based on a usage factor of 40 percent, the worst-case combined noise level during this phase of construction would be 82 dBA  $L_{eq}$  at a distance of 50 feet from the active construction area.

The closest residences from Sites A and B are within 50 feet from the project construction boundary and would be exposed to construction noise reaching 86 dBA  $L_{max}$  or higher. The implementation of mitigation measures that include compliance with the construction hours specified in the City's Municipal Code Noise Ordinance, the use of construction equipment with noise mufflers that are properly operating and maintained (Mitigation Measure NOISE-2), placing construction staging area away from off-site sensitive uses (Mitigation Measure NOISE-3), and placing all stationary construction equipment so that the emitted noise is directed away from sensitive receptors whenever feasible (Mitigation Measure NOISE-4) would be required to minimize potential noise impacts from construction equipment. Construction-related short-term noise levels would be higher than existing ambient noise levels in the project area today, but would no longer occur once project construction is completed. Therefore, construction noise impacts would be considered less than significant with the implementation of mitigation measures.

#### Long-Term Aircraft Noise Impacts

The project would not contribute to any measurable long-term aircraft activity. The project is outside of the 65 dBA CNEL noise contour from both LAX or SMO. Based on the United States Environmental Protection Agency (EPA) Protective Noise Levels (EPA 1978), with a combination of exterior walls, doors, and windows, standard construction for Southern California (warm climate) buildings would provide more than 24 dBA in exterior-to-interior noise reduction with windows closed, and 12 dBA or more with windows open. With windows or doors open, the interior noise levels at these buildings would be 53 dBA CNEL, and with windows closed, interior noise levels would be 41 dBA CNEL. The potential noise level with windows and doors open and closed from aircraft noise would not exceed the City's interior noise standard of 55 dBA CNEL for commercial, retail, and restaurant uses. Therefore, no noise impacts from aircraft noise would occur and no mitigation measures are required.

#### Long-Term Traffic Noise Impacts

The guidelines in the FHWA Highway Traffic Noise Prediction Model (1977; FHWA RD-77-108) were used to evaluate highway traffic-related noise conditions along roadway segments in the project vicinity. The resultant noise levels are weighted and summed over 24 hour periods to determine the CNEL values. Traffic volumes in the project's traffic study (RAJU, June 2017) were used to assess the existing and future traffic noise impacts. Table 11 and Table 12 provide the traffic noise levels for the existing and future scenarios, respectively. These noise levels represent the worst-case scenario, which assumes no shielding is provided between the traffic and the location where the noise contours are drawn (See Appendix A of the Noise Study for the specific assumptions used in developing these noise levels and model printouts).

### Off-Site Traffic Noise Impacts

Table 11 and Table 12 show the existing and future with and without project traffic noise levels along with the project-related traffic noise increase. As discussed above, these noise levels represent the worst-case scenario, which assumes no shielding is provided between the traffic and the location where the noise contours are drawn. Factoring in the project would provide shielding to residences located north of the Project Site and traffic noise levels would be lower than the traffic noise levels shown in Table 11 and Table 12. Also, as shown in Table 11 and Table 12, the project-related traffic noise increase would be up to 2.1 dBA. This noise level increase would not be perceptible to the human ear in an outdoor environment. Therefore, no significant traffic noise impacts from project-related traffic would occur to off-site sensitive receptors.

### On-Site Traffic Noise Impacts

Table 12 shows the future with project traffic noise levels. On-site proposed commercial, retail, and restaurant uses would be exposed to traffic noise levels along Washington Boulevard and Centinela Avenue at Sites A and B. The following on-site areas would be affected by traffic noise exceeding the City's noise standard.



Table 11 - Existing Traffic Noise Levels Without and With Project

Roadway Segment	Existing Without Project					Existing With Project						
	ADT	Centerline to 70 dBA CNEL  (ft)	Centerline to 65 dBA CNEL  (ft)	Centerline to 60 dBA CNEL  (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	ADT	Change in ADT	Centerline to 70 dBA CNEL  (ft)	Centerline to 65 dBA CNEL  (ft)	Centerline to 60 dBA CNEL  (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	Increase over Baseline CNEL (dBA) 50 ft from Centerline of Outermost Lane
Venice Boulevard West of Centinela Avenue	26,300	65	122	253	67.6	26,300	0	65	122	253	67.6	0.0
Venice Boulevard East of Centinela Avenue	27,100	66	124	258	67.7	27,200	100	66	124	258	67.7	0.0
Washington Boulevard West of Zanja Street	28,850	< 50	102	216	67.3	29,000	150	< 50	103	216	67.3	0.0
Washington Place Between Zanja Street and Wade Street	17,400	< 50	75	155	65.1	18,150	750	< 50	77	159	65.3	0.2
Washington Place Between Wade Street and Centinela Avenue	19,400	< 50	80	166	65.6	19,650	250	< 50	81	168	65.6	0.0
Washington Place East of Centinela Avenue	19,200	< 50	80	165	65.5	19,500	300	< 50	80	167	65.6	0.1
Washington Boulevard Between Zanja Street and Wade Street	15,250	< 50	71	143	64.3	15,350	100	< 50	71	143	64.3	0.0
Washington Boulevard Between Wade Street and Colonial Avenue	17,200	< 50	74	154	65.0	17,400	200	< 50	75	155	65.1	0.1
Washington Boulevard Between Colonial Avenue and Centinela Avenue	17,700	< 50	76	157	65.2	18,100	400	< 50	77	159	65.3	0.1
Washington Boulevard Between Centinela Avenue and Inglewood Boulevard	21,100	< 50	84	176	65.9	21,450	350	< 50	85	177	66.0	0.1
Washington Boulevard Between Inglewood Boulevard and McLaughlin Avenue	17,800	< 50	76	157	65.2	18,050	250	< 50	77	159	65.3	0.1
Washington Boulevard East of McLaughlin Avenue	17,750	< 50	76	157	65.2	18,000	250	< 50	76	158	65.2	0.0
Centinela Avenue North of Venice Boulevard	21,800	< 50	86	179	66.1	21,950	150	< 50	86	180	66.1	0.0
Centinela Avenue Between Venice Boulevard and Washington Place	29,950	< 50	105	221	67.5	30,150	200	< 50	105	222	67.5	0.0
Centinela Avenue Between Washington Place and Washington Boulevard	29,950	< 50	105	221	67.5	30,400	450	< 50	106	223	67.5	0.0
Centinela Avenue Between Washington Boulevard and Culver Boulevard	29,500	< 50	104	219	67.4	29,800	300	< 50	104	220	67.4	0.0
Centinela Avenue South of Culver Boulevard	25,000	< 50	94	196	66.7	25,200	200	< 50	94	197	66.7	0.0
Culver Boulevard West of Centinela Avenue	19,500	< 50	97	206	67.4	19,550	50	< 50	97	206	67.5	0.1
Culver Boulevard Between Centinela Avenue and Inglewood Boulevard	22,950	< 50	108	230	68.1	23,100	150	< 50	108	231	68.2	0.1
Culver Boulevard East of Inglewood Boulevard	25,600	56	116	247	68.6	25,700	100	56	116	247	68.6	0.0
Inglewood Boulevard North of Washington Boulevard	11,350	< 50	55	116	64.2	11,450	100	< 50	55	116	64.2	0.0
Inglewood Boulevard Between Washington Boulevard and Culver Boulevard	22,450	< 50	86	182	66.6	22,600	150	< 50	86	183	66.7	0.1
Inglewood Boulevard South of Culver Boulevard	22,900	< 50	87	185	66.7	23,000	100	< 50	87	185	66.7	0.0
McLaughlin Avenue North of Washington Boulevard	4,800	< 50	< 50	65	61.0	4,800	0	< 50	< 50	65	61.0	0.0
McLaughlin Avenue South of Washington Boulevard	650	< 50	< 50	< 50	52.3	650	0	< 50	< 50	< 50	52.3	0.0
Wade Street North of Washington Place	3,650	< 50	< 50	< 50	56.3	3,650	0	< 50	< 50	< 50	56.3	0.0
Wade Street Between Washington Place and Washington Boulevard	500	< 50	< 50	< 50	47.7	650	150	< 50	< 50	< 50	48.9	1.2
Wade Street South of Washington Boulevard	1,450	< 50	< 50	< 50	52.3	1,450	0	< 50	< 50	< 50	52.3	0.0
Zanja Street North of Washington Place	3,900	< 50	< 50	< 50	58.5	3,900	0	< 50	< 50	< 50	58.5	0.0
Colonial Avenue North of Washington Boulevard	700	< 50	< 50	< 50	49.2	1,150	450	< 50	< 50	< 50	51.3	2.1
Source: LSA (June 2017). Note: Traffic noise within 50 feet of the roadway centerline should be evaluated with site-specific information. ADT = average daily traffic						CNEL = Community Noise Equivalent Level dBA = A-weighted decibels ft = feet						

Table 12 Future Year (2019) Traffic Noise Levels Without and With Project

Roadway Segment	Future (2019) Without Project					Future (2019) With Project						
	ADT	Centerline to 70 dBA CNEL  (ft)	Centerline to 65 dBA CNEL  (ft)	Centerline to 60 dBA CNEL  (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	ADT	Change in ADT	Centerline to 70 dBA CNEL  (ft)	Centerline to 65 dBA CNEL  (ft)	Centerline to 60 dBA CNEL  (ft)	CNEL (dBA) 50 ft from Centerline of Outermost Lane	Increase over Baseline CNEL (dBA) 50 ft from Centerline of Outermost Lane
Venice Boulevard West of Centinela Avenue	28,100	67	127	264	67.9	28,150	50	67	127	264	67.9	0.0
Venice Boulevard East of Centinela Avenue	29,100	68	129	270	68.0	29,150	50	68	130	270	68.0	0.0
Washington Boulevard West of Zanja Street	32,650	56	111	234	67.8	32,850	200	56	111	235	67.9	0.1
Washington Place Between Zanja Street and Wade Street	19,550	< 50	80	167	65.6	19,650	100	< 50	81	168	65.6	0.0
Washington Place Between Wade Street and Centinela Avenue	21,650	< 50	86	179	66.0	21,900	250	< 50	86	180	66.1	0.1
Washington Place East of Centinela Avenue	21,400	< 50	85	177	66.0	21,700	300	< 50	86	179	66.1	0.1
Washington Boulevard Between Zanja Street and Wade Street	17,000	< 50	75	153	64.7	17,100	100	< 50	76	154	64.8	0.1
Washington Boulevard Between Wade Street and Colonial Avenue	18,900	< 50	79	163	65.5	19,150	250	< 50	79	165	65.5	0.0
Washington Boulevard Between Colonial Avenue and Centinela Avenue	19,500	< 50	80	167	65.6	19,750	250	< 50	81	168	65.6	0.0
Washington Boulevard Between Centinela Avenue and Inglewood Boulevard	23,100	< 50	89	186	66.3	23,400	300	< 50	90	188	66.4	0.1
Washington Boulevard Between Inglewood Boulevard and McLaughlin Avenue	20,300	< 50	82	171	65.8	20,550	250	< 50	83	173	65.8	0.0
Washington Boulevard East of McLaughlin Avenue	20,150	< 50	82	170	65.7	20,400	250	< 50	83	172	65.8	0.1
Centinela Avenue North of Venice Boulevard	24,600	< 50	93	194	66.6	24,700	100	< 50	93	195	66.6	0.0
Centinela Avenue Between Venice Boulevard and Washington Place	33,600	56	113	238	68.0	33,850	250	57	113	240	68.0	0.0
Centinela Avenue Between Washington Place and Washington Boulevard	33,050	56	112	236	67.9	33,550	500	56	113	238	67.9	0.0
Centinela Avenue Between Washington Boulevard and Culver Boulevard	33,900	57	113	240	68.0	34,200	300	57	114	241	68.0	0.0
Centinela Avenue South of Culver Boulevard	30,600	< 50	106	224	67.5	30,800	200	< 50	107	225	67.6	0.1
Culver Boulevard West of Centinela Avenue	20,850	< 50	101	215	67.7	20,950	100	< 50	102	216	67.8	0.1
Culver Boulevard Between Centinela Avenue and Inglewood Boulevard	25,300	56	115	245	68.6	25,350	50	56	115	245	68.6	0.0
Culver Boulevard East of Inglewood Boulevard	28,400	60	124	264	69.1	28,400	0	60	124	264	69.1	0.0
Inglewood Boulevard North of Washington Boulevard	12,250	< 50	58	122	64.5	12,300	50	< 50	58	122	64.5	0.0
Inglewood Boulevard Between Washington Boulevard and Culver Boulevard	24,050	< 50	90	191	66.9	24,200	150	< 50	90	192	67.0	0.1
Inglewood Boulevard South of Culver Boulevard	24,950	< 50	92	195	67.1	25,050	100	< 50	92	196	67.1	0.0
McLaughlin Avenue North of Washington Boulevard	5,100	< 50	< 50	68	61.3	5,100	0	< 50	< 50	68	61.3	0.0
McLaughlin Avenue South of Washington Boulevard	1,050	< 50	< 50	< 50	54.4	1,050	0	< 50	< 50	< 50	54.4	0.0
Wade Street North of Washington Place	3,700	< 50	< 50	< 50	56.4	3,700	0	< 50	< 50	< 50	56.4	0.0
Wade Street Between Washington Place and Washington Boulevard	500	< 50	< 50	< 50	47.7	650	150	< 50	< 50	< 50	48.9	1.2
Wade Street South of Washington Boulevard	1,500	< 50	< 50	< 50	52.5	1,500	0	< 50	< 50	< 50	52.5	0.0
Zanja Street North of Washington Place	3,900	< 50	< 50	< 50	58.5	3,900	0	< 50	< 50	< 50	58.5	0.0
Colonial Avenue North of Washington Boulevard	700	< 50	< 50	< 50	49.2	1,150	450	< 50	< 50	< 50	51.3	2.1
Source: LSA (June 2017). Note: Traffic noise within 50 feet of the roadway centerline should be evaluated with site-specific information. ADT = average daily traffic						CNEL = Community Noise Equivalent Level dBA = A-weighted decibels ft = feet						

## Site A

### Washington Boulevard

The closest on-site structure is 55 feet from the roadway centerline and would experience an exterior traffic noise level of 67 dBA CNEL without any shielding. Based on the EPA's Protective Noise Levels (EPA 1978), with a combination of exterior walls, doors, and windows, standard construction for Southern California (warm climate) would provide more than 24 dBA in exterior-to-interior noise reduction with windows closed, and 12 dBA or more with windows open. With windows and doors open, interior noise levels would be 55 dBA CNEL and 43 dBA CNEL with windows and doors closed. These noise levels would not exceed the City's interior noise standard of 55 dBA CNEL; therefore, no mitigation measures are required.

### Centinela Avenue

The closest on-site structure is 75 feet from the roadway centerline and would experience an exterior traffic noise level of 68 dBA CNEL without any shielding. Based on the EPA's Protective Noise Levels (EPA 1978), with a combination of exterior walls, doors, and windows, standard construction for Southern California (warm climate) would provide more than 24 dBA in exterior-to-interior noise reduction with windows closed, and 12 dBA or more with windows open. With windows and doors open, interior noise levels would be 56 dBA CNEL and 44 dBA CNEL with windows and doors closed. These noise levels would not exceed the City's interior noise standard of 55 dBA CNEL, except for when windows and doors are open; therefore, mechanical ventilation such as air conditioning systems would be required so windows and doors can be closed as needed in order to maintain the City's interior noise standard of 55 dBA CNEL for commercial, retail, and restaurant uses (Mitigation Measure NOISE-5). No traffic noise impacts would occur with the implementation of the mitigation measure to provide mechanical ventilation, such as air conditioning systems.

## Site B

### Washington Boulevard

The closest on-site structure is 55 feet from the roadway centerline and would experience an exterior traffic noise level of 68 dBA CNEL without any shielding. Based on the EPA's Protective Noise Levels (EPA 1978), with windows and doors open, interior noise levels would be 56 dBA CNEL and 44 dBA CNEL with windows and doors closed. These noise levels would not exceed the City's interior noise standard of 55 dBA CNEL except for when windows and doors are open. Therefore, mechanical ventilation such as air conditioning systems would be required so windows and doors can be closed for a prolonged period of time in order to maintain the City's interior noise standard of 55 dBA CNEL for commercial, retail, and restaurant uses. No traffic noise impacts would occur with the implementation mitigation measure to provide mechanical ventilation such as air conditioning systems (Mitigation Measure NOISE-5).

### Centinela Avenue

The closest on-site structure is 55 feet from the roadway centerline and would experience an exterior traffic noise level of 70 dBA CNEL without any shielding. Based on the EPA's Protective Noise Levels (EPA 1978), with windows and doors open, interior noise levels would be 58 dBA CNEL and 46 dBA CNEL (70 dBA – 24 dBA = 46 dBA) with windows and doors closed. These noise levels would not exceed the City's interior noise standard of 55 dBA CNEL, except for when windows and doors are open. Therefore, mechanical ventilation, such as air conditioning systems, would be required so windows and doors can be closed for a prolonged period of time in order to maintain the City's interior noise standard of 55 dBA CNEL for commercial, retail, and restaurant uses. No traffic noise impacts would occur with the

implementation mitigation measure to provide mechanical ventilation such as air-conditioning systems ((Mitigation Measure NOISE-5).

#### Long-Term Stationary Off-Site Noise Impacts

Delivery trucks, truck loading and unloading activities parking lot activities, heating, ventilation, and air conditioning (HVAC) equipment, and outdoor dining areas associated with the proposed commercial, retail, and restaurant uses would potentially affect the existing off-site sensitive land uses. Truck delivery and truck loading and unloading activities would occur at Site A and B of the Project Site. Truck delivery consists of arrivals and departures at the project site that would take, at most, 5 minutes. Although a typical truck unloading process takes an average of 15–20 minutes, the maximum loading and unloading noise level occurs in a much shorter period of time, in a few minutes (at most 5 minutes) over each truck delivery. Truck delivery for the proposed on-site commercial, retail, and restaurant uses would result in maximum noise similar to noise readings from loading and unloading activities for other projects, which would generate a noise level of 75 dBA  $L_{max}$  at 50 feet based on measurements conducted by LSA in past years.

On Site A, the truck loading and unloading area is completely housed in the parking structure on the first floor with a dedicated truck access and garage doors on the east and west side of the building. Delivery trucks would enter from Colonial Avenue and exit onto Centinela Avenue. The truck loading and unloading area at Site A can accommodate heavy trucks or smaller truck sizes.

At Site A, the closest residences are 85 feet from on-site loading/unloading areas; at this distance, noise would be attenuated by 5 dBA. An exterior-to-interior noise level reduction of 25 dBA was assumed with the garage doors open on the east and west side of the building because a masonry building with windows and doors closed would achieve an exterior-to-interior noise level reduction of 35 dBA (FHWA, December 2011). Noise associated with the on-site truck loading and unloading activities at Site A would be reduced to 45 dBA  $L_{max}$  at the closest residence and would not exceed the City's exterior daytime  $L_8$ ,  $L_2$ , and  $L_{max}$  (5 minute, 1 minute, and anytime) standards of 65, 70, and 75, respectively. In addition, this noise level would not exceed the City's exterior nighttime  $L_8$ ,  $L_2$ , and  $L_{max}$  (5 minute, 1 minute, and anytime) standards of 60, 65, and 70, respectively. Therefore, no noise impacts from truck delivery and loading and unloading activities would occur.

On Site B, truck loading and unloading during daytime hours would be located on the south side of the surface parking lot near the center of the project site and north of Building B101, and during nighttime hours would be located on the north side of Buildings B102 and B103. Truck deliveries would enter and exit from Centinela Avenue. The truck loading and unloading area at Site B would only accommodate medium trucks or smaller truck sizes. The closest residences are 50 feet and 90 feet from on-site loading/unloading areas during daytime and nighttime hours. At a distance of 50 feet, noise would not be attenuated from the reference noise level, while the noise would be attenuated by 5 dBA at a distance of 90 feet. The 6 foot high perimeter wall on the north side of Site B would provide a noise level reduction of 5 dBA. Noise associated with the on-site truck loading and unloading activities at Site B during daytime hours would be 70 dBA  $L_{max}$  and 60 dBA  $L_{max}$  during nighttime hours at the closest residence. Noise levels generated from truck loading and unloading activities during daytime hours would exceed the City's exterior daytime  $L_8$  (5 minute) standard of 65 dBA. In addition, noise levels during nighttime hours would exceed the City's exterior nighttime  $L_8$  (5 minute) standard of 60 dBA.

A mitigation measures to construct an eight (8) foot high perimeter wall on the north side of Site B (Mitigation Measure NOISE-6) would be required to reduce noise levels by 11 dBA so noise levels generated from truck loading and unloading activities during daytime and nighttime hours would be reduced to a noise level of 64 dBA  $L_{max}$  and 59 dBA  $L_{max}$ , respectively. These noise levels would not exceed the City's exterior daytime and nighttime  $L_8$ ,  $L_2$ , and  $L_{max}$  (5 minute, 1 minute, and anytime)

standard of 65/60, 70/65, and 75/70 dBA, respectively. It should also be noted that because traffic noise along Centinela Avenue would range between 66 to 70 dBA CNEL in this area, traffic noise would mask truck loading and unloading activities. Therefore, no noise impacts would occur from truck loading and unloading activities with the implementation of a mitigation measure to construct an eight (8) foot high perimeter wall on the north side of Site B (Mitigation Measure NOISE-6).

Parking activities located north of the project site at both Site A and B have the potential to impact adjacent off-site residences. Noise generated from parking activities include vehicles traveling at slow speeds, engine start-up noise, car door slams, car horns, car alarms, and tire squeals. Representative parking activities would generate approximately 60 to 70 dBA  $L_{max}$  at 50 feet. Noise level generated from parking activities are intermittent in nature.

The closest residences at Site A are 50 feet to the north of the proposed three-and-a half-level parking structure, with two-and-a-half levels of parking. The north side of the parking structure, on the first and second levels of parking, is completely shielded by the structure except for openings on the east and west end of the building, while the third parking level is the top of the building with a 3.5 foot high solid perimeter barrier.

A noise level reduction of 25 dBA was assumed for the first and second level parking structure activities with the openings on the east and west side of the building because a masonry building with windows and doors closed would achieve an exterior-to-interior noise level reduction of 35 dBA (FHWA, December 2011). A noise level reduction of 5 dBA was assumed for parking lot activities on the third parking level with a 3.5 foot high solid perimeter barrier because the perimeter barrier would break the line of sight from the parking lot activity to the closest residence on the ground floor. Noise levels generated from parking activities on the first and second floor would be up to 45 dBA  $L_{max}$  and a noise level of 65 dBA  $L_{max}$  from parking activities on the third level. This intermittent noise level would not exceed the City's exterior daytime and nighttime maximum noise level of 75 and 70 dBA  $L_{max}$ , respectively. Therefore, no noise impacts would occur from parking activities at Site A.

The closest residences at Site B are within 10 feet to the north of the surface parking lot. At a distance of 10 feet from parking activities, noise level would be up to 84 dBA  $L_{max}$ . The north side of the surface parking lot is shielded by a 6 foot high solid perimeter barrier, which would provide noise attenuation of 5 dBA. Noise levels generated from the parking activities 79 dBA  $L_{max}$ . This intermittent noise level would exceed the City's exterior daytime and nighttime maximum noise level of 75 and 70 dBA  $L_{max}$ , respectively. Mitigation Measures NOISE-6 would be required to reduce noise levels by 14 dBA so that noise levels generated from parking activities would be reduced to a noise level of 70 dBA  $L_{max}$ . This noise level would not exceed the City's exterior daytime or nighttime maximum noise standard of 75 and 70 dBA  $L_{max}$ , respectively. Therefore, noise levels generated by parking activities would be less than significant with the implementation of Mitigation Measures NOISE-6.

The project would install HVAC equipment on the rooftop at Sites A and B, and would operate 24 hours a day as a worst-case scenario. Rooftop HVAC equipment would generate noise levels that range from 75 to 82 dBA  $L_{eq}$  at 3 feet based on reference noise measurements (Trane 2002).

The closest residence at Site A is 225 feet from the mechanical well on the southeast corner of the building near the intersection of Washington Boulevard and Centinela Avenue. At a distance of 225 feet, noise would be attenuated by 38 dBA. The barrier height of the mechanical well is approximately 7 feet high, which would provide an 8 dBA reduction and a 10 dBA reduction from the parking structure. Noise associated with HVAC equipment at Site A would be reduced to 26 dBA  $L_{eq}$  at the closest residence. Noise levels generated by HVAC equipment at Site A would not exceed the City's exterior daytime and nighttime  $L_{50}$ ,  $L_{25}$ ,  $L_8$ ,  $L_2$ , and  $L_{max}$  standards of 55/50, 60/55, 65/60, 70/65, and 75/70, respectively. Therefore, no noise impacts from HVAC equipment would occur and no mitigation measures are required.

The closest residence at Site B is 75 feet from the nearest building with HVAC equipment. At a distance of 75 feet, noise would be attenuated by 28 dBA. The 5 foot high parapet wall along the perimeter of the roofline would provide an attenuation of 8 dBA. Noise associated with HVAC equipment at Site B would be reduced to 46 dBA  $L_{eq}$  at the closest residence and would not exceed the City's exterior daytime and nighttime  $L_{50}$ ,  $L_{25}$ ,  $L_8$ ,  $L_2$ , and  $L_{max}$  standards of 55/50, 60/55, 65/60, 70/65, and 75/70, respectively. Therefore, no noise impacts from HVAC equipment would occur and no mitigation measures are required.

Noise levels generated from people talking is typically 60 to 65 dBA at a distance of three (3) feet. This noise level would be equivalent to 60 to 65 dBA  $L_{eq}$  at a distance of 3 feet when people talk continuously for one (1) hour.

The project at Site A would have approximately 200 seats for outdoor seating located on the south side of the Project Site adjacent to Washington Boulevard. With approximately 200 people talking at 60 to 65 dBA  $L_{eq}$  at a distance of 3 feet, noise levels would be 83 to 88 dBA  $L_{eq}$ . The center of the outdoor eating areas is 210 feet from the closest residence to the north. At a distance of 210 feet, the noise level would be attenuated by 37 dBA. The proposed building and parking structure that intervene between the outdoor eating area and the closest residence to the north would provide a noise level reduction of 10 dBA. Noise associated with the outdoor eating area at Site A would be reduced to 41 dBA  $L_{eq}$  at the closest residence and would not exceed the City's exterior daytime and nighttime  $L_{50}$ ,  $L_{25}$ ,  $L_8$ ,  $L_2$ , and  $L_{max}$  standards of 55/50, 60/55, 65/60, 70/65, and 75/70, respectively. Therefore, no noise impacts from outdoor eating areas at Site A would occur and no mitigation measures are required in this regard.

The project at Site B would have approximately 50 seats for outdoor seating located on the south side of the Project Site adjacent to Washington Boulevard. With approximately 50 people talking at 60 to 65 dBA  $L_{eq}$  at a distance of 3 feet, noise levels would be 77 to 82 dBA  $L_{eq}$ . The center of the outdoor eating areas is located approximately 90 feet from the closest residence to the north. At a distance of 90 feet, noise level would be attenuated by 30 dBA. Installation of an 8 foot high perimeter wall would intervene between the outdoor eating area and the closest residence to the north and provide a noise level reduction of 10 dBA (Mitigation Measure NOISE-6). Noise associated with outdoor eating area at Site B would be reduced to 42 dBA  $L_{eq}$  at the closest residence and would not exceed the City's exterior daytime and nighttime  $L_{50}$ ,  $L_{25}$ ,  $L_8$ ,  $L_2$ , and  $L_{max}$  standards of 55/50, 60/55, 65/60, 70/65, and 75/70, respectively. Therefore, no noise impacts from outdoor eating areas at Site B would occur and no mitigation measures are required.

Based on the above analysis and with the proposed mitigation measures relating to potential traffic noise and loading activities noise, the potential for the Project to have a potential impact related to the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, will be less than significant.

#### Mitigation Measures

- NOISE-1: Construction activities occurring as part of the project shall be subject to the limitations and requirements of Section 9.07.035 of the City's Municipal Code, which states that construction activities may occur between 8:00 a.m. and 8:00 p.m., Monday through Friday, 9:00 a.m. to 7:00 p.m. on Saturday, and 10:00 a.m. and 7:00 p.m. on Sunday. No construction activities shall be permitted outside these hours or on City holidays unless the City grants a temporary waiver.
- NOISE-2: Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturer's standards.

- NOISE-3: Construction staging areas shall be located away from off-site sensitive uses during the later phases of project development.
- NOISE-4: Whenever feasible, the project contractor shall place all stationary construction equipment so that the emitted noise is directed away from the sensitive receptors nearest the project site.
- NOISE-5: Mechanical ventilation such as air conditioning systems are required for on-site buildings along Centinela Avenue for Site A and on-site buildings along Washington Boulevard and Centinela Avenue for Site B so windows and doors can be closed for a prolonged period of time to maintain the City's interior noise standard of 55 dBA CNEL for commercial, retail, and restaurant uses.
- NOISE-6: Construction of an 8 foot high perimeter wall along the north side of Site B adjacent to residences.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact with Mitigation Incorporated. Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernible, but without the effects associated with the shaking of a building there is less adverse reaction. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby buildings, and then throughout the remainder of the structure. Building vibration may be perceived by occupants as the motion of building surfaces, the rattling of items on shelves or hanging on walls, or a low-frequency rumbling noise. The rumbling noise is caused by the vibration of walls, floors, and ceilings that radiate sound waves. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 vibration velocity decibels (VdB) or less. This is an order of magnitude below the damage threshold for normal buildings.

Typical sources of ground-borne vibration are construction activities (e.g. blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with both ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 feet (ft.) from the vibration source, although there are examples of ground-borne vibration causing interference out to distances greater than 200 feet. (FTA 2006). When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. It is assumed for most projects that the roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, construction of a project could result in ground-borne vibration that may be perceptible and annoying.

Ground-borne noise is not likely to be a problem because noise arriving via the normal airborne path will usually be greater than ground-borne noise. Ground-borne vibration has the potential to disturb people and damage buildings. It is not uncommon for heavy duty construction processes (e.g. blasting and pile driving) to cause vibration of sufficient amplitudes to damage nearby buildings (FTA 2006). Ground-borne vibration is usually measured in terms of vibration velocity, either the root-mean-square (RMS) velocity or peak particle velocity (PPV). The RMS is best for characterizing human response to building vibration, and PPV is used to characterize potential for damage. Decibel notation acts to compress the range of numbers required to describe vibration. Table 13 illustrates human response to various vibration levels, as described in the Transit Noise and Vibration Impact Assessment (FTA 2006).

Table 13 Human Response to Different Levels of Ground-Borne Noise and Vibration

Vibration Velocity Level	Noise Level		Human Response
	Low-Frequency <sup>1</sup>	Mid-Frequency <sup>2</sup>	
65 VdB	25 dBA	40 dBA	Approximate threshold of perception for many humans. Low-frequency sound usually inaudible; mid-frequency sound excessive for quiet sleeping areas.
75 VdB	35 dBA	50 dBA	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying. Low-frequency noise acceptable for sleeping areas, mid-frequency noise annoying in most quiet occupied areas.
85 VdB	45 dBA	60 dBA	Vibration acceptable only if there are an infrequent number of events per day. Low-frequency noise annoying for sleeping areas, mid-frequency noise annoying even for infrequent events with institutional land uses such as schools and churches.

Source: Transit Noise and Vibration Impact Assessment (FTA 2006).

<sup>1</sup> Approximate noise level when vibration spectrum peak is near 30 Hz.

<sup>2</sup> Approximate noise level when vibration spectrum peak is near 60 Hz.

dBA = A-weighted decibels                      Hz = Hertz

FTA = Federal Transit Administration                      VdB = vibration velocity decibels

Factors that influence ground-borne vibration and noise include vibration source, vibration path (e.g. soil type), and vibration receiver. In addition, there are significant differences in the vibration characteristics when the source is underground compared to at the ground surface. Further, soil conditions have a strong influence on the levels of ground-borne vibration. Among the most important factors are the stiffness and internal damping of the soil and the depth to bedrock.

Experience with ground-borne vibration indicates: (1) vibration propagation is more efficient in stiff, clay soils than in loose, sandy soils; and (2) shallow rock seems to concentrate the vibration energy close to the surface and can result in ground-borne vibration problems at large distances from a railroad track. Soft, loose, sandy soils tend to attenuate more vibration energy than hard, rocky materials. Vibration propagation through groundwater is more efficient than through sandy soils.

#### Federal Transit Administration

Vibration standards in the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment (FTA 2006) are used in this analysis for ground-borne vibration impacts on human annoyance, as shown in Table 14. The criteria presented in Table 14 accounts for variation in project types as well as the frequency of events, which differ widely among projects. It is intuitive that when there will be fewer events per day, it should take higher vibration levels to evoke the same community response. This is accounted for in the criteria by distinguishing between projects with frequent and infrequent events, in which the term "occasional events" is defined as between 30 and 70 events per day.



Table 14 Ground-Borne Vibration and Ground-Borne Noise Impact Criteria for General Assessment

Land Use Category	Ground-Borne Vibration Impact Levels (VdB re 1 $\mu$ in/sec)			Ground-Borne Noise Impact Levels (dB re 20 $\mu$ Pa)		
	Frequent <sup>1</sup> Events	Occasional <sup>2</sup> Events	Infrequent <sup>3</sup> Events	Frequent <sup>1</sup> Events	Occasional <sup>2</sup> Events	Infrequent <sup>3</sup> Events
Category 1: Buildings where low ambient vibration is essential for interior operations.	65 VdB <sup>4</sup>	65 VdB <sup>4</sup>	65 VdB <sup>4</sup>	N/A <sup>5</sup>	N/A <sup>5</sup>	N/A <sup>5</sup>
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB	35 dBA	38 dBA	43 dBA
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA

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

<sup>1</sup> Frequent events are defined as more than 70 events per day.

<sup>2</sup> Occasional events are defined as between 30 and 70 events per day.

<sup>3</sup> Infrequent events are defined as fewer than 30 events per day.

<sup>4</sup> This criterion limit is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.

<sup>5</sup> Vibration-sensitive equipment is not sensitive to ground-borne noise.

$\mu$ in/sec = microinches per second

FTA = Federal Transit Administration

$\mu$ Pa = micropascals

HVAC = heating, ventilation, and air conditioning

dB = decibels

N/A = not applicable

dBA = A-weighted decibels

VdB = vibration velocity decibels

The criteria for environmental impact from ground-borne vibration and noise are based on the maximum levels for a single event. Table 15 lists the potential vibration building damage criteria associated with construction activities, as suggested in the *Transit Noise and Vibration Impact Assessment* (FTA 2006).

FTA guidelines show that a vibration level of up to 102 VdB (FTA 2006) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction building vibration damage criterion is 94 VdB.

Table 15 Construction Vibration Damage Criteria

Building Category	PPV (in/sec)	Approximate $L_v$ (VdB) <sup>1</sup>
Reinforced concrete, steel, or timber (no plaster)	0.50	102
Engineered concrete and masonry (no plaster)	0.30	98
Non-engineered timber and masonry buildings	0.20	94
Buildings extremely susceptible to vibration damage	0.12	90

Source: Transit Noise and Vibration Impact Assessment (FTA 2006).

<sup>1</sup> RMS vibration velocity in decibels (VdB) re 1  $\mu$ in/sec.

$\mu$ in/sec = inches per second

FTA = Federal Transit Administration

in/sec = inches per second

$L_v$  = velocity in decibels

PPV = peak particle velocity

RMS = root-mean-square

VdB = vibration velocity decibels

## Thresholds of Significance for Vibration

### Federal Transit Administration

The criteria for environmental impact from ground-borne vibration are based on the maximum levels for a single event. lists the potential vibration damage criteria associated with construction activities, as suggested in the Transit Noise and Vibration Impact Assessment (FTA 2006).

### Short-Term Construction Vibration Impacts

This construction vibration impact analysis discusses the level of human annoyance using vibration levels in VdB and will assess the potential for building damages using vibration levels in PPV (in/sec). As shown in Table 15, the FTA guidelines indicate that a vibration level up to 102 VdB (an equivalent to 0.5 in/sec in PPV) (FTA 2006) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 94 VdB (0.2 in/sec in PPV).

Table 16 shows the PPV and VdB values at 25 feet from the construction vibration source. As shown in Table 16, bulldozers and other heavy-tracked construction equipment (except for pile drivers and vibratory rollers) generate approximately 87 VdB of ground-borne vibration when measured at 25 feet, based on the Transit Noise and Vibration Impact Assessment (FTA 2006). This level of ground-borne vibration levels would result in potential annoyance to residences and workers located adjacent to the Project Site, but would not cause any damage to the buildings. Construction vibration, similar to vibration from other sources, would not have any significant effects on outdoor activities. Outdoor site preparation for the project is expected to use a bulldozer and loaded truck. The greatest levels of vibration are anticipated to occur during the site preparation phase. All other phases are expected to result in lower vibration levels. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project boundary (assuming the construction equipment would be used at or near the project boundary) because vibration impacts occur normally within the buildings.

Table 16 Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L <sub>v</sub> at 25 ft	
	PPV (in/sec)	L <sub>v</sub> (VdB) <sup>1</sup>
Pile Driver (Impact), Typical	0.644	104
Pile Driver (Sonic), Typical	0.170	93
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer <sup>2</sup>	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Sources: Transit Noise and Vibration Impact Assessment (FTA 2006).

<sup>1</sup> RMS vibration velocity in decibels (VdB) is 1 µin/sec.

<sup>2</sup> Equipment shown in bold is expected to be used on site.

µin/sec = micro-inches per second

ft = feet

FTA = Federal Transit Administration

in/sec = inches per second

L<sub>v</sub> = velocity in decibels

PPV = peak particle velocity

RMS = root-mean-square

VdB = vibration velocity decibels

Table 17 below lists the projected vibration level from various construction equipment expected to be used on the Project Site to the nearest buildings in the project vicinity. For typical construction activity, the equipment with the highest vibration generation potential is the large bulldozer, which would generate 87 VdB at 25 feet. The closest residential structure from Sites A and B are within 10 feet from the project construction boundary. The closest commercial/retail build from Site A is approximately 50 feet to the west and 25 feet to the east from Site B. As shown in , the closest residences from both Sites A and B would experience vibration levels of up to 99 VdB (0.19 PPV [in/sec]). The closest commercial/retail to the west from Site A would experience vibration levels of 78 VdB (0.03 PPV [in/sec]) and to the east from Site B would experience vibration levels of 87 VdB (0.089 PPV [in/sec]). Other adjacent buildings in the project area are farther away and would experience lower vibration levels.

Construction vibration levels at surrounding residential structures from construction equipment or activity at Sites A and B would exceed the FTA threshold of 94 VdB (0.2 [in/sec]) for building damage when bulldozers and loaded trucks are in operation within 10 feet of the project construction boundary. The implementation of mitigation measures to use light construction equipment (e.g. small bulldozers and trucks) within 15 feet from the northern construction boundary at Sites A and B (Mitigation Measure NOISE-7), would reduce construction vibration levels to 94 VdB (0.2 [in/sec]). This vibration level would not exceed the FTA threshold of 94 VdB (0.2 [in/sec] PV) for building damage because the building is categorized as a non-engineered timber and masonry structure. Thus the Project construction activities would be less than significant with regard to groundborne vibration or groundborne noise. Although construction vibration levels at residential uses would have the potential to result in annoyance, these vibration levels are temporary and would no longer occur once construction of the project is completed.

Table 17 Summary of Construction Equipment and Activity Vibration

Land Use	Direction	Equipment/ Activity	Reference Vibration Level (VdB) at 25 ft	Reference Vibration Level (PPV) at 25 ft	Distance (ft)	Maximum Vibration Level (VdB)	Maximum Vibration Level (PPV)
Site A							
Residential	North	Large Bulldozers	87	0.089	10	99	0.352
		Loaded trucks	86	0.076	10	98	0.300
Commercial/ Retail	West	Large dozers	87	0.089	50	78	0.031
		Loaded trucks	86	0.076	50	77	0.027
Site B							
Residential	North	Large dozers	87	0.089	10	99	0.352
		Loaded trucks	86	0.076	10	98	0.300
Commercial/ Retail	East	Large dozers	87	0.089	25	87	0.089
		Loaded trucks	86	0.076	25	86	0.076

Source: Compiled by LSA (2017).

Note: The FTA-recommended building damage threshold is 94 VdB (0.2 PPV [in/sec]) at the receiving residential structures and 98 VdB (0.3 PPV [in/sec]) at the receiving commercial/retail structures.

ft = feet

PPV = peak particle velocity

in/sec = inches per second

VdB = vibration velocity decibels

FTA = Federal Transit

Administration

Construction vibration levels at surrounding commercial/retail structures from construction equipment or activity at Sites A and B would not exceed the FTA threshold of 98 VdB (0.3 PPV [in/sec]) for building damage because the building is categorized as an engineered concrete and masonry structure. Although construction vibration levels at commercial/retail uses would have the potential to result in annoyance, these vibration levels are temporary and would no longer occur once construction of the project is completed. Therefore, with the implementation of mitigation measures, potential construction vibration impacts would be less than significant.

### Mitigation Measure

NOISE-7: The construction contractor shall only use light construction equipment (e.g. small bulldozers and trucks) within 15 feet from the northern construction boundary at Site A and B.

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

Less than Significant Impact with Mitigation Incorporated. As indicated in response XII.a), existing noise measurements were collected and results are summarized in Table 9; collection points are shown on Figure 7. Further, based on the above analysis, noise sources that would have a potential long-term impact include vehicle traffic, on-site loading activities, mechanical equipment, and parking areas.

### Long-term Traffic Noise Impacts

As indicated in response XII.a), the guidelines in the FHWA Highway Traffic Noise Prediction Model (1977; FHWA RD-77-108) were used to evaluate highway traffic-related noise conditions along roadway segments in the project vicinity. Table 11 and Table 12 presented in Section XII.a) provide the traffic noise levels for the existing and future scenarios, respectively, with and without Project. These noise

levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn.

In terms of off-site traffic noise impacts, considering the project would provide shielding to residences located north of the Project Site, traffic noise levels would be lower than the traffic noise levels shown in Table 11 and Table 12, and the project-related traffic noise increase would be up to 2.1 dBA. This noise level increase would not be perceptible to the human ear in an outdoor environment. Therefore, no significant traffic noise impacts from project-related traffic would occur to off-site sensitive receptors.

On-site proposed commercial, retail, and restaurant uses would be exposed to traffic noise levels along Washington Boulevard and Centinela Avenue at Sites A and B. As discussed in responses to XII.a), the following on-site areas would be affected by traffic noise exceeding the City's noise standard.

#### Site A

The closest on-site structure along Centinela Avenue is 75 feet from the roadway centerline and would experience an exterior traffic noise level of 68 dBA CNEL without any shielding. Based on the EPA's Protective Noise Levels (EPA 1978), interior noise levels would be 56 dBA CNEL with windows and doors open and 44 dBA with windows and doors closed. These noise levels would exceed the City's interior noise standard of 55 dBA CNEL, during times when windows and doors are open; therefore, Mitigation Measure NOISE-5 would be required so windows and doors could be closed for a prolonged period of time. No traffic noise impacts would occur with the implementation mitigation measures to provide mechanical ventilation, such as air conditioning systems.

#### Site B

The closest on-site structure along Washington Boulevard and Centinela Avenue is 55 feet from the roadway centerline and would experience an exterior traffic noise level of 68 dBA CNEL, and 70 dBA CNEL, respectively, without any shielding. Interior noise levels would be 56 dBA CNEL with windows and doors open and 44 dBA with windows and doors closed along Washington Boulevard. Similarly, interior noise levels would be 58 dBA CNEL with windows and doors open and 46 dBA CNEL with windows and doors closed. These noise levels would exceed the City's interior noise standard of 55 dBA CNEL when windows and doors are open. Therefore, Mitigation Measure NOISE-5 would be required so windows and doors could be closed for a prolonged period of time. No traffic noise impacts would occur with the implementation Mitigation Measure NOISE-5.

#### Long-Term Stationary Noise Impacts

Delivery trucks, truck loading and unloading activities, heating, ventilation, and air conditioning (HVAC) equipment, parking lot activities, and outdoor eating areas associated with the proposed commercial, retail, and restaurant uses would potentially affect the existing off-site sensitive land uses. As discussed in response XII.a), delivery and loading/unloading facilities for Site A are located within an dedicated enclosed area of the parking structure and would not result in a significant impact related to noise. Due to the proximity to residential uses and unenclosed delivery/loading facilities at Site B, noise associated with on-site delivery/loading activities would be 70 dBA  $L_{max}$  at the closest residence and would potentially exceed the City's exterior daytime  $L_8$  standard of 65 dBA. Therefore, the construction of an eight (8) foot high perimeter wall on the north side of Site B will be required per Mitigation Measure NOISE-6 to reduce noise levels by 14 dBA to a noise level of 61 dBA  $L_{max}$ , and comply with the City's exterior daytime  $L_8$  standard of 65 dBA.

As discussed above, representative parking activities would generate approximately 60 to 70 dBA  $L_{max}$  at 50 feet. This level of noise is lower than that of truck delivery and truck loading and unloading activities,

and is also intermittent in nature. For Site A, the north side of the parking structure on first and second level of parking is completely shielded by the structure except for openings on the east and west end of the building, while the third level is the top of the building with 3.5–4 foot high solid perimeter barrier. As discussed in the Noise Study, noise levels from parking activities on the first and second level would be up to 45 dBA  $L_{max}$  and 65 dBA  $L_{max}$  from parking activities on the third/rooftop level, which would not exceed the City's thresholds, and would not result in a significant impact. For Site B, due to the proximity to residential uses and unenclosed parking facilities, noise levels from parking activities would be 79 dBA  $L_{max}$ , exceeding the City's exterior daytime and nighttime maximum noise level of 75 and 70 dBA  $L_{max}$ , respectively. Therefore, the construction of an eight (8) foot high perimeter wall on the north side of Site B will be required per Mitigation Measure NOISE-6 to reduce noise levels by 14 dBA to a noise level of 70 dBA  $L_{max}$ , and comply with the City's exterior standard.

The project would install rooftop HVAC equipment at Sites A and B that would operate 24 hours a day as a worst-case scenario. Rooftop HVAC equipment would generate noise levels that range from 75 to 82 dBA  $L_{eq}$  at 3 feet based on reference noise measurements (Trane 2002). Based on the equipment locations and building design features, noise levels generated by HVAC equipment would be 26 dBA  $L_{eq}$  at Site A and 46 dBA  $L_{eq}$  for Site B, and would not exceed the City's exterior daytime and nighttime  $L_{50}$ ,  $L_{25}$ ,  $L_8$ ,  $L_2$ , and  $L_{max}$  standards of 55/50, 60/55, 65/60, 70/65, and 75/70, respectively. Therefore, impacts related to a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project would be less than significant in this regard.

The Project will feature an outdoor dining/seating area, which may contribute to the ambient noise levels. Noise levels generated from people talking is typically 60 to 65 dBA at a distance of 3 feet. This noise level would be equivalent to 60 to 65 dBA  $L_{eq}$  at a distance of 3 feet when people talk continuously for one hour. Site A would have approximately 200 seats for outdoor dining located on the south side of the site adjacent to Washington Boulevard, and produce noise levels of 83 to 88 dBA  $L_{eq}$ . The center of the outdoor eating areas is 210 feet from the closest residence to the north, and the noise level would be attenuated by 37 dBA. The proposed building and parking structure that intervene between the outdoor eating area and the closest residence to the north would provide a noise level reduction of 10 dBA. Noise associated with the outdoor eating area at Site A would be reduced to 41 dBA  $L_{eq}$  at the closest residence and would not exceed the City's exterior daytime and nighttime  $L_{50}$ ,  $L_{25}$ ,  $L_8$ ,  $L_2$ , and  $L_{max}$  standards of 55/50, 60/55, 65/60, 70/65, and 75/70, respectively. Therefore, no noise impacts from outdoor eating areas at Site A would occur and no mitigation measures are required.

Site B would have approximately 50 seats for outdoor seating located on the south side of the site adjacent to Washington Boulevard, and produce noise levels of 77 to 82 dBA  $L_{eq}$ . The center of the outdoor eating areas is located approximately 90 feet from the closest residence to the north, and the noise level would be attenuated by 30 dBA. The proposed eight (8) foot high perimeter wall that intervenes between the outdoor eating area and the closest residence to the north would provide a noise level reduction of 10 dBA. Noise associated with outdoor eating area at Site B would be reduced to 42 dBA  $L_{eq}$  at the closest residence and would not exceed the City's exterior daytime and nighttime  $L_{50}$ ,  $L_{25}$ ,  $L_8$ ,  $L_2$ , and  $L_{max}$  standards of 55/50, 60/55, 65/60, 70/65, and 75/70, respectively. Therefore, no noise impacts from outdoor eating areas at Site B would occur and no mitigation measures are required.

#### Mitigation Measure

Refer to Mitigation Measure NOISE-5 and NOISE-6. No additional mitigation measures are necessary.

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. Two types of short-term noise impacts would occur during project construction. The first type would be from construction crew commutes and the transport of construction equipment and materials to the Project Site and would incrementally raise noise levels on access roads leading to the site. Heavy equipment for grading and construction activities will be moved on site, will remain for the duration of each construction phase, and will not add to the daily traffic volume in the project vicinity. Although there would be high single-event noise exposure potential at a maximum level of 84 dBA  $L_{max}$  from trucks passing at 50 feet, the effect on longer-term (hourly or daily) ambient noise levels would be small when compared to existing hourly and daily traffic volumes on Washington Boulevard and Centinela Avenue (RAJU, May 2017). Because construction-related vehicle trips would not approach the hourly and daily traffic volumes mentioned above, traffic noise would not increase by 3 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment.

The second type of potential temporary noise is related to site preparation and grading. Construction occurs in discrete steps, which have a unique mix of equipment and noise characteristics. Due to similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. As discussed in XII.a) typical noise levels at 50 feet from an active construction area range up to 86 dBA  $L_{max}$  during the noisiest construction phases. The site preparation phase, which includes grading and paving, tends to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment, including excavating machinery, such as backfillers, bulldozers, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders.

Project construction is expected to require the use of bulldozers, a front-end loader, and water trucks/pickup trucks. Noise associated with the use of construction equipment is estimated to be between 55 and 85 dBA  $L_{max}$  at a distance of 50 feet from the active construction area for the grading phase. These construction equipment noise levels were selected from the Specification (Spec.) 721.560 noise levels as a worst-case scenario because construction equipment noise levels associated with grading are typically higher than the actual measured noise levels shown in Table 10.

The maximum noise level generated by each dozer is assumed to be approximately 85 dBA  $L_{max}$  at 50 feet from the dozer in operation. Each front-end loader would generate approximately 80 dBA  $L_{max}$  at 50 feet. The maximum noise level generated by water trucks/pickup trucks is approximately 55 dBA  $L_{max}$  at 50 feet from these vehicles. Each doubling of the sound source with equal strength increases the noise level by 3 dBA. The worst-case composite noise level at the nearest residence during this phase of construction would be 86 dBA  $L_{max}$  at a distance of 50 feet from an active construction area. Based on a usage factor of 40 percent, the worst-case combined noise level during this phase of construction would be 82 dBA  $L_{eq}$  at a distance of 50 feet from the active construction area.

The closest residences from Sites A and B are within 50 feet from the project construction boundary and would be exposed to construction noise reaching 86 dBA  $L_{max}$  or higher. Compliance with the construction hours specified in the City's Municipal Code Noise Ordinance (NOISE-1) and specific construction practices would be required to ensure minimal noise impacts from construction equipment. Construction-related short-term noise levels would be higher than existing ambient noise levels in the project area today, but would no longer occur once project construction is completed. Therefore, potential construction noise impacts would be less than significant with the implementation of mitigation measures.

## Mitigation Measures

Refer to Mitigation Measures NOISE-1, NOISE-2, NOISE-3, and NOISE-4. 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 expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is located 1.7 miles south of SMO, a municipal airport which contributes some aircraft noise to the project area. However, the project is outside of the 65 dBA CNEL noise contour from both LAX or SMO. In addition, the project does not include any residential component, nor have any features that would contribute to any measurable airport/aircraft activity or airport/aircraft related noise..

Based on the United States Environmental Protection Agency (EPA) Protective Noise Levels (EPA 1978), with a combination of exterior walls, doors, and windows, standard construction for Southern California (warm climate) commercial or residential buildings would provide more than 24 dBA in exterior-to-interior noise reduction with windows closed, and 12 dBA or more with windows open. Accordingly, interior noise levels at these buildings would be 53 dBA CNEL with windows or doors open, and 41 dBA CNEL with windows closed. The potential noise level from aircraft noise with windows and doors open and closed would not exceed the City's interior noise standard of 55 dBA CNEL for commercial, retail, and restaurant uses. Therefore, no noise impacts from aircraft noise would occur and no mitigation measures are required.

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?

No Impact. Although the Project Site is located within 1.7 miles south of SMO, the Project is not within the vicinity of a private airstrip. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels, 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 26,835 square feet of restaurant, food retail, and culinary retail space that could indirectly increase the population by approximately 34 persons based on the Southern California Association of Governments (SCAG) forecast and the following formula:

1.86 acres of retail X 20.18 employees per acre (per the Retail Centers Use factor in Table B-1 for Los Angeles County in The Natelson Company, Table B-1, Employment Densities [employees per acre] by Anderson Code) x 1.5 Factor of Safety to account for more intensive restaurant uses. Fifty-seven (57) 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.) = 34 indirect residents. Indirect residents are one-quarter of the employees multiplied by 2.36



persons per household. The estimated 34-person indirect increase in the City's population would represent a 0.09 percent increase to the existing population (39,364<sup>2</sup> persons) in Culver City.

According to the SCAG, Culver City's forecast population and household growth of 1,100 persons and 500 households is predicted between 2008 and 2035<sup>3</sup>. 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 34-person indirect Project generated increase in population is within SCAG's growth forecast.

The Project would attract new businesses to the area with the artisanal food retail and restaurant 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 57 employees. According to SCAG, the forecast of employment growth predicted between 2008 and 2035 for Culver City is 5,000 jobs.<sup>4</sup> Project employment is within the employment growth assumptions of Culver City. Furthermore, the Project would be located in an area already served by existing infrastructure and anticipated within applicable Culver City infrastructure plans (i.e., roadways, utility lines, etc.). As such, the Project would not induce substantial population growth in the area either directly or indirectly and impacts would be less than significant.

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). The Project Site was previously developed with various commercial uses, and three (3) of the parcels that comprise Site A were developed with single-family dwellings. All structures were demolished in 2006, and the Project Site is now vacant. As such, Project implementation would not displace existing housing or people, and would not necessitate the construction of replacement housing. Therefore, no impact would occur to existing housing or populations, such that construction of replacement housing would be necessary.

#### XIV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the 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:

i. Fire protection?

The following fire protection responses are based on information gathered from the Culver City Community Assessment & Standards of Cover 2014, Culver City Fire Department and the Annual

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<sup>2</sup> <https://www.census.gov/quickfacts/fact/table/culvercitycitycalifornia,CA/PST045216?>

<sup>3</sup> 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, Table 18, Proposed 2012-2035 RTP/SCS Growth Forecast, page 36, prepared by Southern California Association of Governments, adopted April 2012, [http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP\\_GrowthForecast.pdf](http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf), accessed April 2016.

<sup>4</sup> 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, Table 18, Proposed 2012-2035 RTP/SCS Growth Forecast, page 36, prepared by Southern California Association of Governments, adopted April 2012, [http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP\\_GrowthForecast.pdf](http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf), accessed April 2016.

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

Less Than Significant Impact With Mitigation Incorporated. Fire protection and emergency medical services for the Project Site are provided by the Culver City Fire Department (CCFD). In addition, it is acknowledged that the CCFD has a mutual aid agreement with the City of Los Angeles Fire Department to provide fire and emergency medical services on an as needed basis. The CCFD provides fire protection to an existing population of approximately 39,364 persons.<sup>5</sup> The City is divided into three (3) fire districts, two (2) rescue/emergency medical services (EMS) districts, and fifteen (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 2, Rescue/EMS District 3, and Fire Management Zone 2. Fire District 2 has a service population of 13,493 persons, 37.52 centerline miles, and a service area of approximately 1.5 square miles.<sup>6</sup> Rescue/EMS District 3 has a service population of 21,364 persons, 61.04 centerline miles, and a service area of approximately 2.66 square miles.<sup>6</sup> Fire Management Zone 2 is a general corridor, consisting of 0.14 square miles, located in the western portion of the City.<sup>6</sup> Zone 2 has mostly single and multiple family residences, along with some street front retail.

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. 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 18, CCFD Daily Minimum Staffing Levels, provides information on the quantity of apparatus, personnel per apparatus, and total personnel. Table 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.

Table 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
Rescue	2	2	4
Battalion Chief Command	2	1	1
Total			18

<sup>5</sup> <https://www.census.gov/quickfacts/fact/table/culvercitycitycalifornia,CA/PST045216?>

<sup>6</sup> Culver City Community Risk Assessment & Standards of Cover/2014

Table 19 CCFD Fire Stations Located in the Vicinity of the Project Site

Fire Station	Address	Apparatus Equipment/Staffing	Approximate Distance/ Direction from Project Site
Fire Station 1 (headquarters)	9600 Culver Blvd	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	2.8 miles east
Fire Station 2	11252 Washington Boulevard	Engine Two (3 personnel), Truck Two (4 personnel)	1.4 miles east
Fire Station 3	6030 Bristol Parkway	Engine Three (3 personnel), Rescue Three (2 personnel), Reserve Engine Six, Reserve Rescue Two	3.0 miles southeast

Construction activities associated with the Project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Further, fire suppression equipment specific to construction would be maintained on the Project Site. As applicable, construction activities would be required to comply with the 2013 CBC, the 2013 California Fire Code (CFD), or latest versions thereof, 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 businesses and/or residences within the Project vicinity, due to travel time delays to through traffic. However, the impacts of such construction activity would be temporary and on an intermittent basis. Further, a Preliminary Construction Management Plan and Preliminary Construction Traffic Management Plan for the Project have been prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours (Mitigation Measure PS-1). As part of the Plans, the times of day and locations of all temporary lane closures would be coordinated so that they do not occur during peak periods of traffic congestion, to the extent feasible. Such events would be coordinated with neighboring construction projects, as necessary. Truck routes for material and equipment deliveries, as well as for soil export and disposal, would require approval by the Culver City Public Works Department prior to construction activities. The Final Construction Management Plan and Final Construction Traffic Management Plan would be prepared for review and approval by the Culver City Building and Safety, Planning, and Engineering Divisions, as well as Culver City's Fire and Police Departments, prior to commencement of any construction activity. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic (i.e. lights and sirens), are expected to limit the potential for significant delays in emergency response times during Project construction. Therefore, impacts regarding emergency response times and emergency access during construction would be less than significant with the incorporation of the Project's Final Construction Management Plan and 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 34 persons. The estimated 34-person indirect increase in the City's population would represent a 0.09 percent increase to the existing population (39,364 persons) in Culver City.

As mentioned above, up to three (3) CCFD fire stations would provide fire protection and emergency medical services to the Project area. According to the CCFD, Fire Station 2 would provide primary fire protection services to the Project Site. Both Fire Station 1 and Fire Station 3 would provide back-up fire protection services when Fire Station 2 is unavailable (i.e. responding to a separate fire incident) or when the type of service call requires more resources. Over a period of five years, from 2009-2013, for 90 percent of all moderate risk structure fires, the total response time from the CCFD for the arrival of the first-due unit, staffed with three (3) firefighters, is 8 minutes and 38 seconds.<sup>7</sup> The first-due unit shall be staffed with a minimum of three (3) firefighters, capable of establishing command, evaluating the need for additional specialized resources, and advancing the first line for fire attack. For 90 percent of all moderate risk structure fires, the response time for the arrival of the effective response force (ERF), staffed with 18 firefighters and officers is 12 minutes and 20 seconds. The ERF shall be capable of providing 4,500 gallon per minute pumping capability and be able to accomplish the necessary tasks to contain a moderate risk fire.<sup>8</sup> NFPA 1710 states that fire departments shall establish a performance objective of not less than 90 percent for each of the following response time objectives:

- ) One minute (60 seconds) for call processing time.
- ) One minute and twenty seconds (80 seconds) for turnout time for fire and special operations response and one minute (60 seconds) turnout time for EMS response
- ) Four minutes (240 seconds) or less travel time for the arrival of the fire arriving engine company at a fire suppression incident and eight minutes (480 seconds) or less travel time for the deployment of an initial full alarm assignment at a fire suppression incident
- ) Four minutes (240 seconds) or less travel time for the arrival of a unit with first responder with automatic external defibrillator (AED) or higher level capability at an emergency medical incident
- ) Eight minutes (480 seconds) or less travel time for the arrival of an advanced life support (ALS) unit at an emergency medical incident, where this service is provided by the fire department provided a first responder with AED or basic life support (BLS) unit arrived in 240 seconds or less travel time.<sup>9</sup>

Table 20 below outlines the First-Due Unit Fire Incident Counts and Response Times for Fire Management Zone 2 and Culver City, including processing times, turnout times, travel time, etc.

Table 20 First-Due Unit Fire Incident Counts and Response Times

All Emergencies – 90th Percentile	Fire Management Zone 2 (2016)	Culver City (2015-2016)
Incident Count	363	5,155
Call Processing Time	1:53	2:13
Turnout Time	2:08	2:18

<sup>7</sup> Culver City Community Risk Assessment & Standards of Cover/2014

<sup>8</sup> Ibid

<sup>9</sup> Culver City Community Risk Assessment & Standards of Cover/2014

Table 20 First-Due Unit Fire Incident Counts and Response Times

All Emergencies – 90th Percentile	Fire Management Zone 2 (2016)	Culver City (2015-2016)
Travel Time	5:55	5:20
Total Response Time	8:48	8:41
All Emergencies – 50th Percentile		
Call Processing Time	1:00	1:07
Turnout Time	1:12	1:20
Travel Time	3:07	2:49
Total Response Time	5:55	5:42
Structural Fire – 90th Percentile		
Incident Count 1st Unit	4	67
Incident Count ERF	0	12
Alarm Handling (pick up to dispatch)	3:01	2:11
Turnout Time (1st Unit)	1:36	1:56
Travel Time (1st Unit)	2:50	3:24
Travel Time (ERF)	N/A	7:59
Total Response Time (1st Unit)	6:25	6:34
Total Response Time (ERF)	N/A	10:48
EMS – 90th Percentile		
Incident Count	88	4,290
Alarm Handling (pick up to dispatch)	1:40	2:08
Turnout Time (1st Unit)	2:21	2:15
Travel Time (1st Unit)	4:24	5:11
Travel Time (EFR)	8:04	7:20
Total Response Time (1st Unit)	7:04	8:27
Total Response Time (ERF)	10:48	10:33
Technical Rescue – 90th Percentile		
Incident Count 1st Unit	2	75
Incident Count ERF	0	1
Alarm Handling (pick up to dispatch)	0:58	2:25
Turnout Time (1st Unit)	1:33	1:52
Travel Time (1st Unit)	2:47	4:50
Travel Time (Effective Response Force)	NA	3:48
Hazardous Materials – 90th Percentile		
Incident Count 1st Unit	3	90
Incident Count ERF	1	6
Alarm Handling (pick up to dispatch)	4:18	2:40
Turnout Time (1st Unit)	2:21	2:23
Travel Time (1st Unit)	3:26	5:25
Travel Time (ERF)	6:07	7:57
Total Response Time (1st Unit)	9:51	9:10
Total Response Time (ERF)	9:56	11:39

The Project Site is not located in an area of moderate or very high fire hazard. A review of the CAL FIRE Very High Fire Hazard Severity in LRA – Los Angeles Map indicates nearest very high fire hazard area (VHFHSZ) is the Ballona Wetlands Ecological Reserve located in Playa Del Rey approximately 1.85 miles south of the Project Site. The next closest very high fire hazard area (VHFHSZ) is located in an unincorporated area of Los Angeles County (West Los Angeles College), approximately 2.65 miles east 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.

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, and would not result in the need for new or physically altered governmental facilities. Thus, impacts regarding fire services would be less than significant.

#### Mitigation Measure

PS-1: Construction Management Plan and Construction Traffic Management Plan – A Final Construction Management Plan and 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 Plans 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 meeting 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 any concurrent projects are managed in collaboration with one another.

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

- J The name and telephone number of a contact person who can be reached 24 hours a day, regarding construction traffic complaints or emergency situations.

- J 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.
- J Procedures for the training and certification of the flag persons.
- J The location, times, and estimated duration of any roadway closures, traffic detours, use of protective devices, warning signs, and staging or queuing areas.
- J The location and travel routes of off-site staging and parking locations.
- J The location of temporary power, portable toilet(s), and refuse and materials storage locations.
- J 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 electronic distribution 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.
- J Prior to approval of the Plan(s), the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community:
  1. Construction schedule and hours.
  2. Framework for construction phases.
  3. Identify traffic diversion plan by phase and activity. (The Traffic Control Plan will be submitted for review and approval by the City for each phase).
  4. Potential location of construction parking and office trailers.
  5. Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for which construction activity).
  6. Emergency access plan.
  7. Demolition plan.
  8. Staging plan for the concrete pours, material loading and removal.
  9. Crane locations.
  10. Accessible applicant and contractor contacts during construction activity and during off-hours (relevant email address and phone numbers)

ii. 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 project, 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 (4) officers. The nearest CCPD station is located at 4040 Duquesne Avenue,

approximately 2.8 miles southeast of the Project Site. The CCPD is currently divided into four patrol districts, with the establishment of a fifth patrol district authorized to maintain CCPD response time goals. The Project Site is located within Patrol District 3<sup>10</sup>.

During construction, equipment and building materials could be temporarily stored on site, which could result in possible theft, graffiti, and vandalism. However, the Project Site is located in an area with high vehicular activity from Washington Boulevard and Centinela Avenue. 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 also be coordinated with any 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 Management Plan and 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 Management Plan and 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 34 person indirect increase in the City's population would represent 0.09 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 26,835 square feet of artisanal food retail and restaurant uses which would increase the daytime population in the Project area given the new employees and patrons. The Project would incorporate a 24-hour per day, seven-day per week security surveillance system to ensure the safety of its employees and site visitors. The Project design would include lighting of entry-ways and public areas for site security purposes. The buildings would include controlled access to retail uses during non-operating hours 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 activities 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 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 (4) 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 system would minimize the need for police services on the Project's public open space and public parking areas. Accordingly, the CCPD's

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<sup>10</sup> Culver City Police Department Website, Operations Bureau, Culver City Police Car Districts Map, dated September 18, 2014, [http://www.culvercitypd.org/D\\_table\\_images/DistrictMap.jpg](http://www.culvercitypd.org/D_table_images/DistrictMap.jpg), accessed October 2016.



response times would not be substantially changed such that response time objectives are compromised in any significant manner, and no new or expanded police facilities would need to be constructed as a result of the project. Thus, impacts regarding police services would be less than significant.

#### Mitigation Measure

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

#### iii. 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 La Ballona Elementary School, the Culver City Middle School, and the Culver City High School. The La Ballona School, kindergarten through fifth grade (K-5), is located at 10915 Washington Boulevard, approximately 1.8 miles east of the Project Site. The Culver City Middle School, (grades 6-8), is located at 4601 Elenda Street, approximately 2.3 miles southwest of the Project Site. The Culver City High School (grades 9-12), is located at 4401 Elenda Street, approximately 2.1 miles southwest of the Project Site.

Project operation would result in a negligible increase in demand for school services. The estimated 34 person indirect increase in the City's population would represent 0.09 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. Student generation rates for 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.) The total number of students has been rounded up, in order to provide whole student number counts. The Project is estimated to generate one (1) elementary school student, one (1) middle school student, and one (1) high school student for a total of three (3) students.

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

#### iv. 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. Nearby park facilities include the facilities shown in Table 21.

Table 21 – Park Facilities Located in the Vicinity of the Project Site				
<u>Park/ Facility</u>	<u>Location</u>	<u>Size (acres)</u>	<u>Parks Amenities/Activities</u>	<u>Approximate Distance/Direction from Project Site</u>
Culver West Alexander Park	4162 Wade St, Los Angeles, CA 90066 (In Culver City)	3 acres	soccer & baseball fields, a basketball court, a playground & picnic areas.	0.6 miles southwest
Tellefson Park	Washington Place and Tilden Avenue (In Culver City)	1.5 acres	barbeques, children's playground, covered picnic area, multi-purpose field	1.5 miles northeast
Veterans Memorial Park	4117 Overland Ave Culver City, CA 90230 (In Culver City)	12.9 acres	barbeques, community garden, court(s) – basketball, paddle tennis, tennis, handball wall(s), heated pool, picnic areas, playground (ages 2 – 5, & 5 – 12), dog path, multi-purpose sports field(s), walking/jogging Path	2.0 miles east
Mar Vista Gardens	Fire and Service Rd, Los Angeles, CA 90230	4 acres	roller hockey rink, athletic courts & picnic area	1.3 miles southeast
Glen Alla Park	4601 Alla Rd, Marina Del Rey, CA 90292	4 acres	playground, basketball courts, picnic tables.	1.2 miles southwest
Penmar Recreation Center	1341 Lake St, Venice, CA 90291	11 acres	indoor gym, basketball & tennis courts, playing fields & a playground	2.3 miles northwest

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 XIII.a), above, the Project could result in an indirect population increase of 34 persons to the City's population, which would represent a 0.09 percent increase to the existing population in Culver City.

Despite the incremental indirect population increase, most Project 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). Given the amount of proposed floor area, the minimal number of commercial employees would not be substantial so as to adversely impact park facilities or services during anytime of the week. In addition, the Project would incorporate open space along Washington Boulevard with a streetscape design that includes wide public sidewalks with street trees, landscape planters, benches/seating, bicycle racks, trash receptacles, and plaza furniture to activate the pedestrian environment and allow for passive recreation. The Project would also provide an open space terrace located on Level 2 of the Site A building. 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 Mar Vista Branch Library, which is located at 12006 Venice Blvd, Los Angeles, approximately 0.8 miles northeast of the Project Site. The Julian Dixon Branch Library, located at 4975 Overland Avenue, Culver City, is located approximately 2.65 miles away. 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 Responses XIII.a) and XIV.a)iv, it is expected that there will not be substantial population growth related to the Project and the use of existing parks is not expected to substantially increase as a result of the Project, given the minimal number of commercial employees and on-site open space areas. Therefore, potential impacts related to the use of existing parks or recreational facilities, or the need for new or expanded parks and recreational facilities, would be less than significant.

## XVI. TRANSPORTATION/TRAFFIC

The following discussion is based, in part, on the Traffic Study for the Culver Public Market Project (herein referred to as the "Traffic Study"), prepared by Raju Associates, Inc., dated June 2017 . The scope of work for this study was developed in conjunction with the City of Culver City and City of Los Angeles staff. The base assumptions, technical methodologies and geographic coverage of the study were all identified as part of the study approach. The study is directed at the analysis of potential traffic impacts on the street system produced by the Proposed Project per the City of Culver City traffic study guidelines. The Traffic Study evaluates four (4) project scenarios: Existing (2017) Conditions, Existing (2017) Plus Project Conditions, Cumulative (2019) Base Conditions, and Cumulative (2019) Plus Project Conditions. Future conditions take into account the potential development of fifty-two (52) related projects in the general Project vicinity. A total of nineteen (19) intersections within two jurisdictions were analyzed. Eighteen (18) of the nineteen (19) analyzed intersections are signalized, while one intersection is stop-controlled; twelve (12) intersection are located in the City Of Culver City. Access and circulation at the proposed driveways to the parking area for the Project were also evaluated, as was the mass transit system and bicycle facilities.

Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulating 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. As described above, the Traffic Study analyzed current and future traffic at 19 intersections within the Cities of Culver City and Los Angeles, using the Level of Service (LOS) Methodology. LOS is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. LOS D is typically recognized as the minimum acceptable level of service in urban areas. Further, the Culver City threshold criteria<sup>11</sup> was applied to intersections within Culver City. The Intersection Capacity Utilization (ICU) method was used to determine the intersection volume to capacity (V/C) ratio and corresponding level of service for City of Culver City study intersections. Further, the ITE's Trip Generation Manual, 9<sup>th</sup> Edition trip rates were applied to determine, the Proposed Project's trip generation.

For the City of Los Angeles study locations, the "Critical Movement Analysis-Planning", (Transportation Research Board, 1980) method of intersection capacity analysis was used to determine the intersection V/C ratio and corresponding level of service at the signalized intersections. LADOT data, procedures, and methodology were used where applicable. Intersections under the jurisdiction of the City of Los Angeles were evaluated using threshold criteria<sup>12</sup> established by the City of Los Angeles to determine if a project has a significant traffic impact.

The Highway Capacity Manual (HCM) 2010 method of unsignalized intersection analysis was used to determine the delay (in seconds) and corresponding LOS at the stop-controlled intersection. For two-way stop-controlled locations, 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. The following highlight the key findings of the Project Traffic study.

- J Currently, 18 of the 19 analyzed intersection locations are operating at levels of service (LOS) D or better during the morning peak hours and 16 of the 19 analyzed intersection locations are operating at levels of service (LOS) D or better during the evening peak hours.
- J In the Cumulative (Future Year 2019) Base conditions, i.e. future conditions without the implementation of the Proposed Project, 14 of the 19 study intersections are projected to operate at LOS D or better during the morning peak hour. During the evening peak hour, 10 of the 19 study intersections are projected to operate at LOS D or better.
- J The Traffic Study assumed a proposed Project (Sites A and B) consisting of approximately 15,526 square feet of specialty retail use, 14,680 square feet of quality restaurant use and 5,210 square feet of high-turnover restaurant use, which is estimated to generate a total of approximately 1,802 daily trips of which 58 trips during the morning peak hour and 137 trips during the evening peak hour. These floor area figures are well above the proposed total of 26,835 square feet.
- J In the Existing (2017) plus Project conditions, both the morning and evening peak hour operating conditions would be similar to those for the Existing Conditions. During the morning peak hour, 18 of the 19 analyzed intersection locations would be operating at levels of service (LOS) D or better. During the evening peak hour, 16 of the 19 analyzed intersection locations would be operating at levels of service (LOS) D or better.
- J The Existing (2017) plus Project traffic conditions indicate that the Proposed Project would not cause significant traffic impacts at any of the analysis locations during the weekday morning and evening peak hours.

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<sup>11</sup> *Traffic Study Criteria for the Review of Proposed Development Projects within the City of Culver City, July 2012, City of Culver City Public Works Department/Engineering Division and Community Development Department/Planning Division*

<sup>12</sup> *Transportation Impact Study Guidelines, December 2016, City of Los Angeles Department of Transportation.*

- J In the Cumulative (Future Year 2019) plus Project conditions, both the morning and evening peak hour operating conditions would be similar to those projected for the Cumulative (Future Year 2019) Base conditions. Fourteen of the 19 study intersections are projected to operate at LOS D or better during the morning peak hour. During the evening peak hour, 9 of the 19 study intersections are projected to operate at LOS D or better.
- J The Cumulative (Future Year 2019) plus Project traffic conditions indicate that the Proposed Project would not cause significant traffic impacts at any of the analysis locations during both the weekday morning and evening peak hours.
- J The Proposed Project would add less than 50 trips to the nearest Congestion Management Program (CMP) arterial monitoring locations and would add less than 150 trips in either direction to the nearest CMP mainline freeway monitoring locations during both the weekday morning and evening peak hours. Per CMP guidelines, no further CMP analysis is required.
- J In order to minimize the potential for neighborhood traffic intrusion, the Proposed Project would provide the required improvements to allow southbound only traffic along Colonial Avenue just north of the project driveway. The Project would also make provisions at the project driveways to prevent project traffic from driving through the residential neighborhood north of the Project site.
- J Analysis of Street Segment Traffic Volumes indicates the Project would not have a significant impact on the residential streets in the local neighborhood.
- J Access and circulation systems were assessed as part of this study. A review of the proposed site plan was also conducted. This review indicates that they would all function adequately.

Summarizing, the Proposed Project would not cause any significant impacts at any of the analyzed intersections and would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulating 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?

Less Than Significant Impact. As indicated in response XVI.a), the Project will not have a significant impact related to LOS standards. Section VII Regional/CMP Analysis of the Traffic Study presents the Congestion Management Program (CMP) transportation impact analysis, which was conducted in accordance with the procedures outlined in the 2010 Congestion Management Program for Los Angeles County (Los Angeles County Metropolitan Transportation Authority, 2010).

#### CMP TRAFFIC IMPACT ANALYSIS

The CMP guidelines for determining the study area for analysis of CMP arterial monitoring intersections and for freeway monitoring locations are as follows:

- J All CMP arterial monitoring intersections where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic.
- J All CMP mainline freeway monitoring locations where the proposed project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.

The CMP arterial monitoring intersections within three miles from the Project site include the following:

- ) Lincoln Boulevard/Venice Boulevard (Study Int. 1) – City of Los Angeles jurisdiction
- ) Centinela Avenue/Venice Boulevard (Study Int. 5) – City of Los Angeles jurisdiction
- ) Overland Avenue/Venice Boulevard – City of Culver City jurisdiction

Based on the Proposed Project trip generation estimates presented in Chapter III of the Project Traffic Study, the Project is not expected to add 50 or more new trips per hour to any of these locations. Therefore, no further analysis of these CMP monitoring intersections would be required. However, two of the CMP arterial monitoring intersections listed above, Lincoln Boulevard/Venice Boulevard and Centinela Avenue/Venice Boulevard have been included in the traffic analysis and it was also determined that the Project would not have a significant intersection traffic impact at either of these locations.

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

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

Based on the incremental Project trip generation estimates, the Proposed Project will 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. As such, Project 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 is considered less than significant.

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, Santa Monica Municipal Airport (SMO), the closest airport to the Project Site, is 1.8 miles north of the site. The Los Angeles International Airport (LAX) is located approximately 3.1 miles south of the Project Site. The maximum building height proposed is 44 feet, thus would not 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 with regard to air traffic patterns and traffic levels.

- a) 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 proposed Project comprises of a multi-tenant commercial (artisanal food retail and restaurant) development with attached parking structure, as allowed by the Zoning and General Plan Land Use designations, and consistent with the type of uses found along the surrounding commercial corridors. The Project Site is located on two sites along the northwest (Site A) and northeast (Site B) corners of the intersection of Centinela Avenue and Washington Boulevard in the City of Culver City. Site A is located on the north side of Washington Boulevard between Colonial Avenue and Centinela Avenue, and Site B is located on the north side of Washington Boulevard east of Centinela Avenue. 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 driveways) and lane restriping as described below. Direct vehicular access for Site A will be from Colonial Avenue and Centinela Avenue, and from Centinela Avenue and a public alley for Site B. All on-site roadway and site

access improvements would be designed in compliance with applicable City standards as further described below.

#### Site A Access and Circulation

Driveways located along Centinela Avenue and Colonial Avenue, both north of Washington Boulevard, would provide access to Project Site A. The Project driveway at Centinela Avenue will provide full access and egress movements. This driveway would be located approximately 250 feet north of the Centinela Avenue/Washington Boulevard intersection. In order to determine the traffic control at this intersection, traffic signal warrants were conducted for this location and the results indicated no signal warrants were satisfied. Therefore, the Project Driveway/Centinela Avenue intersection would be controlled by a stop-sign at the driveway approach at Centinela Avenue. Centinela Avenue would be uncontrolled at this driveway intersection.

Figure 8, which is Figure 13 from the Project Traffic Study and is provided below, shows the conceptual striping plan along Centinela Avenue and Washington Boulevard. As shown in Figure 8, this location would provide a northbound left-turn lane measuring approximately forty (40) feet in length. The addition of this northbound left-turn lane at the Project Driveway and Centinela Avenue would result in a 152-foot (approximate) southbound left-turn lane at the intersection of Centinela Avenue and Washington Boulevard along with a 60-foot transition between the northbound left-turn lane at the driveway and the southbound left-turn lane at Washington Boulevard. Therefore, the proposed striping and circulation design will not create or increase hazards due to a design feature or incompatible uses.

Figure 8 –Conceptual Striping Plan

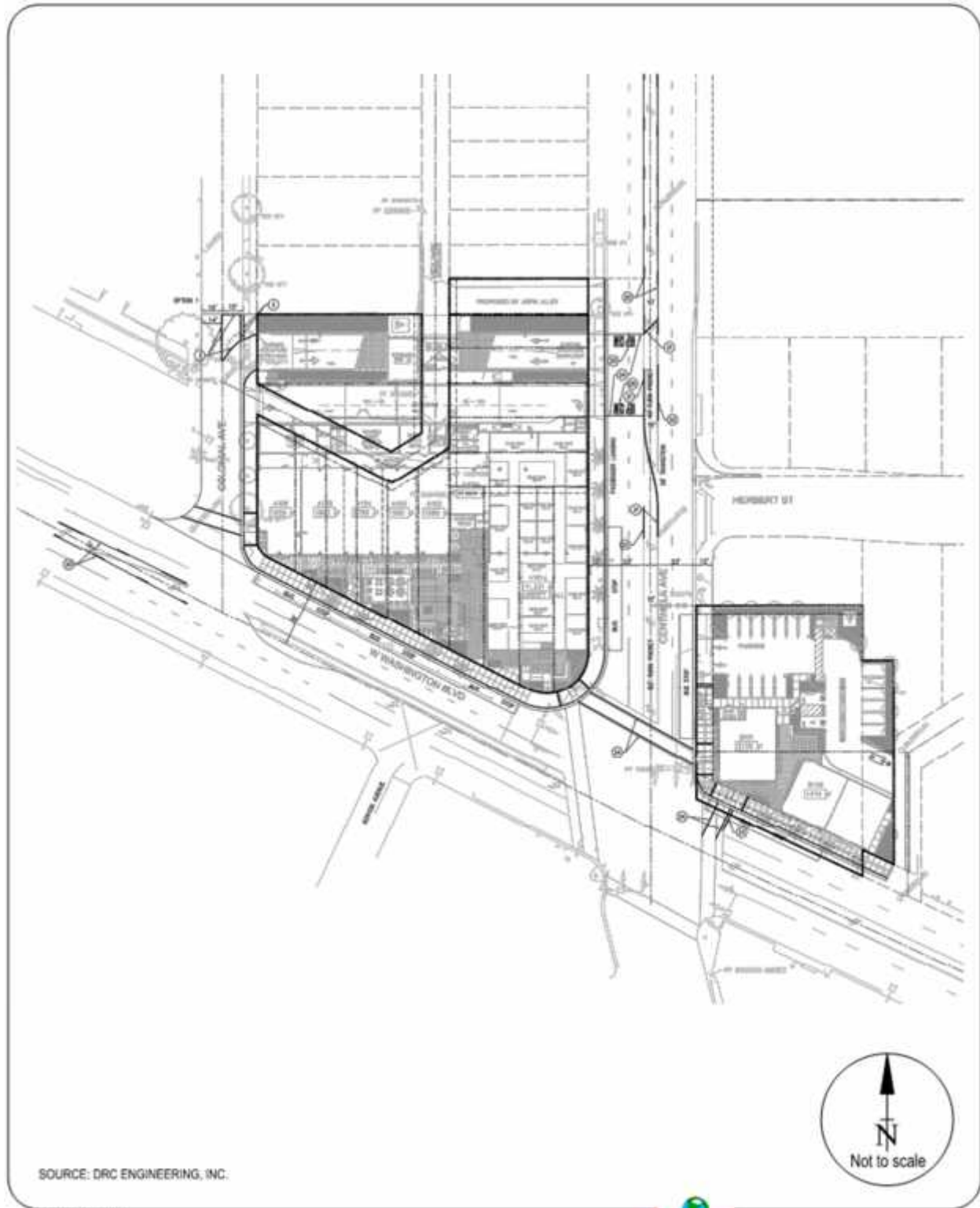


FIGURE 13  
CONCEPTUAL STRIPING PLAN  
CENTINELA AVENUE AND WASHINGTON BOULEVARD

 **RAJU** Associates, Inc.



A micro-simulation evaluation was performed using Synchro 8 and SimTraffic programs to determine the adequacy of these two left-turn lanes. The results of the micro-simulation indicate that both the northbound left-turn lane at the Centinela Avenue/Project driveway intersection and the southbound left-turn lane at the Centinela Avenue/Washington Boulevard intersection have adequate storage length to accommodate the projected Cumulative (2019) plus Project peak hour traffic volumes.

The driveway on Colonial Avenue providing access to/from the Site A parking structure would provide a right-turn in and a left-turn out driveway to and from the Colonial Avenue roadway to and from the south only. The driveway design to the parking structure would be coordinated with the City to prevent project traffic from using neighborhood streets and alleys. Three alternative design options at the Colonial Avenue driveway, to prevent any potential neighborhood parking/traffic intrusion, have been developed in conjunction with the City of Culver City staff. All options will be designed in conformance with applicable standards and will not present any increase hazards due to a design feature or incompatible uses. These options include the following:

1. Option 1 provides for a 15-foot wide median that would extend from the curb adjacent to the Project's driveway to the centerline of Colonial Avenue. This option would prevent northbound traffic on Colonial Avenue north of the Project's driveway. A 14-foot southbound lane would be provided along this section. The Project driveway would be angled/curved so that left-turns from southbound Colonial Avenue into the site and right-turns from westbound out of the driveway onto northbound Colonial Avenue would be prevented. This option would result in the loss of two on-street parking spaces on the west side of the Colonial Avenue roadway just north of the Project driveway.
2. Under Option 2, two 8-foot wide mountable curbs (to maintain fire truck access) would be constructed on both sides of the street just north of the Project driveway. This treatment would also result in a single 14-foot southbound-only lane. Northbound traffic access to Colonial Avenue north of the site would be prohibited from the Project driveway and Colonial Avenue south of the Project driveway. The Project driveway would be angled/curved so that southbound left-turns into the site and westbound right-turns out of the driveway would be prevented. This option does not result in any loss of on-street parking. This is the preferred option.
3. Option 3 would continue to allow northbound traffic (two-way traffic). The Project driveway would be angled/curved so that southbound left-turns into the site and westbound right-turns out of the site would be discouraged. This option also does not result in any loss of on-street parking.

A second driveway on Centinela Avenue and a second driveway on Colonial Avenue would provide access to the truck loading area. These driveways would be located just south of the driveways providing access to the parking structure. These loading/unloading access driveways would be gate controlled and would be right in to enter at Colonial Avenue and right out to exit at Centinela Avenue.

#### Site B Access and Circulation

Project Site B has one driveway on Centinela Avenue, north of Washington Boulevard, and one driveway on the alley connecting to Washington Boulevard, east of Centinela Avenue. Both driveways would provide right-turns in and out access/egress only. Driveway design will implement standard widths connecting at ninety (90) degree angles with the public right-of-way, and access aprons will be in compliance with applicable design standards.

Based on the above, the proposed Project does not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); therefore impacts in this regard would be less than significant.

b) 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 Centinela Avenue, are transportation facilities that could be utilized during a disaster event. While it is expected that the majority of construction activities for the Project would be confined onsite, 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). 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 Final Construction Management Plan and Final Construction Traffic Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate increased traffic in the Project vicinity and would result in some modifications to access (i.e. new curb cuts for the Project driveway) along Washington Boulevard, Centinela Avenue, and Colonial Avenue. 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 and Centinela Avenue. 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 shall 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:

- ) A multi-year transit pass program
- ) Short and long-term bicycle storage, including bike lockers
- ) Participation in future bike share program
- ) Access to multi-modal transit including bike and bus routes
- ) Designated drop-off area for ride hailing providers (i.e. Uber and Lyft)
- ) Streetscape and related pedestrian improvements, as well as improvements to surrounding bus stops, in compliance with the City's approved Streetscape Plan

The various modes of transportation relating to the Project are reviewed below in greater detail.

#### Public Transit

The project site is located in an area well served by public transportation. Three bus lines operated by Culver City (Lines 1 and 2) and Big Blue Bus (Line 14) currently serve the Project intersection. Bus stops for the three (3) lines are located directly adjacent to the Project along Washington Boulevard and Centinela Avenue. Additional nearby bus lines include Culver City Line 5 and Big Blue Bus Line 16; Metro Line 33 and 733 (Rapid) are available further north on Venice Boulevard. Line 1 offers eastbound and

westbound service extending from Northeast Culver City to Venice Beach. Line 2 offers eastbound and westbound service extending from Venice High School to Culver City Mall in the Fox Hills area. Line 14 (operated by Santa Monica Big Blue Bus) offers northbound and southbound service extending from Brentwood to Playa Vista. Both Lines 1 and 14 offer direct connections to Expo Metro Rail Line (Culver City Expo Metro Rail Station and Bundy Expo Metro Rail Station, respectively). The Expo Metro Rail Line offers eastbound and westbound service extending from Downtown Santa Monica to Downtown Los Angeles. Service routes maps are provided below. The Project will include the relocation and upgrading of existing bus stop facilities as required by the Culver City Transportation Department.

Figure 9 Culver City Bus Line 1



Figure 10 Culver City Bus Line 2

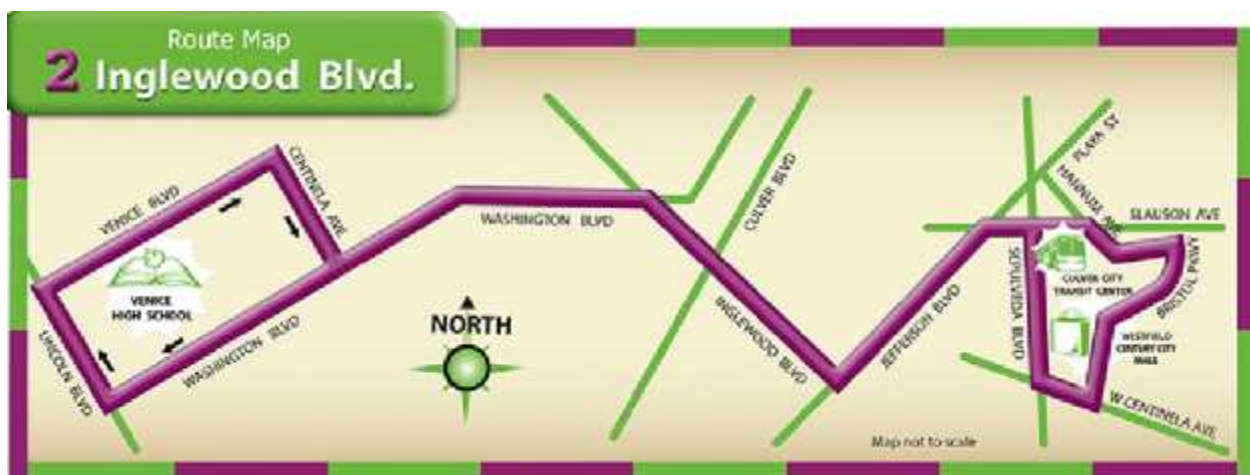
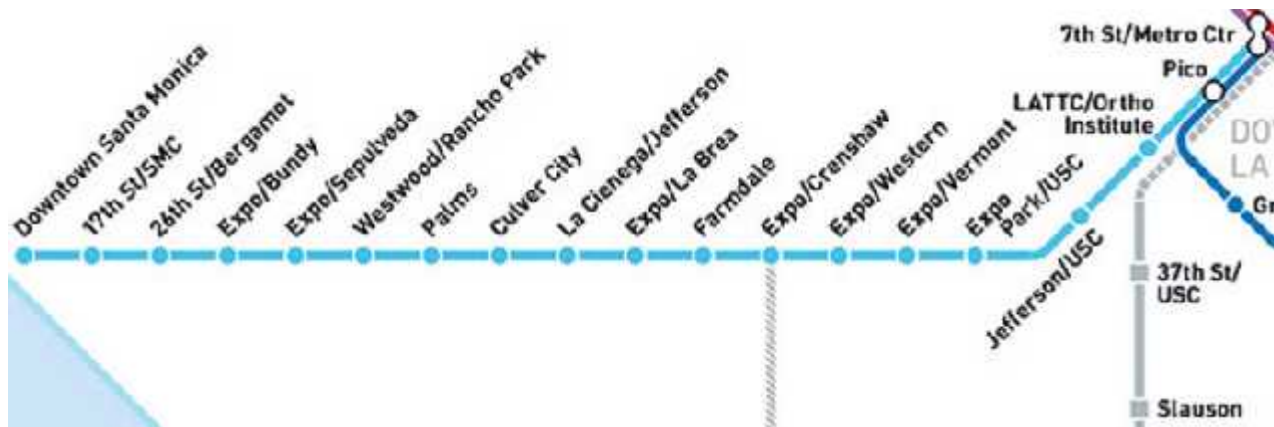


Figure 11 Big Blue Bus Line 14



Figure 12 Metro Expo Line



## Pedestrian Travel

The Project has incorporated features that will encourage pedestrian travel within the surrounding area. Such features include:

1. The primary entrance for Site A is located at the intersection of Washington Boulevard and Centinela Avenue with direct pedestrian walkways to main entry. Entries and façades for all other building areas are oriented to the public sidewalk (see Figure 13).
2. All off-street parking and loading areas are located at the rear the Project, thereby minimizing visibility of the off-street parking from the pedestrian walkways and the primary façade.
3. Install new pedestrian sidewalk along Washington Boulevard and Centinela Avenue at a minimum width of 10 feet.
4. The parking ingress and egress points are located at the rear of the buildings to avoid pedestrian and vehicle interaction.
5. Over 75% of primary façade at ground-level incorporates doors or windows.
6. The primary façade incorporates ground-level plazas and dining areas.
7. Restripe the cross walks at the intersection of Washington Boulevard and Centinela Avenue to increase pedestrian safety.
8. Install street trees and street amenities in accordance with the City's Street Tree Master Plan and Streetscape Plan.

Figure 13 Project perspective: NWC of Washington Boulevard and Centinela Avenue



## Bicycle

The Project Site is located within close proximity to various bicycle lanes, including those on Washington Boulevard, Washington Place, and Venice Boulevard. To encourage bicycle access, secure bicycle parking is provided to accommodate a minimum of fifteen (15) bicycles, including six (6) long-term spaces and nine (9) short-term spaces. All required bicycle parking shall be provided free of charge to any building occupants, tenants, employees and/or visitors. Bicycle parking is provided as follows:

Minimum Required Bicycle Parking	Site A	Site B	Total
Short Term Bike Parking	7	2	9
Long Term Bike Parking	4	2	6
Total Bike Stalls	11	4	15

Short-term bicycle spaces shall be secured using City approved "Inverted - U" bicycle racks. The short-term bicycle parking spaces shall be provided within 50 foot walking distance of the main pedestrian entrances to the building lobby, and the commercial tenant spaces in the building. Bicycle parking location, layout and equipment shall comply with the City's approved Bicycle and Pedestrian Master Plan Design Guide. Long-term bicycle spaces provide individual bike lockers or bike racks in a secure locking enclosure and are protected from the weather, easily accessed.

As summarized above, the Project would be implemented to conform to existing applicable policies, plans, or programs and improve upon existing facilities. Overall, the Project would not interfere with or degrade the performance or safety of existing or planned public transit, bicycle, or pedestrian facilities; therefore, a less than significant impact would result in this regard.

## 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. 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?

#### 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.

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.

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.

Los Angeles Department of Water and Power (LADWP) is the designated water purveyor for the Project Site. Nearly 4 million people reside and 1.84 million work within the LADWP service area. The purveyor projects its service demand will increase to 4.44 million residents and 2.0 million employees by the year 2040.<sup>13</sup> Demographic projections are based on demographic data from Southern California Association of Governments (SCAG). LADWP's primary sources of water include the Los Angeles Aqueducts (LAA), local groundwater, State Water Project (supplied by Metropolitan Water District), Colorado River Aqueduct (supplied by Metropolitan Water District) and recycled water, which is becoming a larger part of the overall water supply.<sup>13</sup> The LADWP 2015 Urban Water Management Plan (UWMP) states that with its current water supplies, planned future water conservation, and planned future water supplies, LADWP has available supplies to meet all demands under all three hydrologic scenarios through the 25-year planning period covered by this UWMP.

The Project consists of 26,835 square feet of food retail and restaurant space. As discussed in XIII, the potential increase in employment and population is within forecasted growth for the City and LADWP. Further, the expected activity will not necessitate the construction of new facilities. In addition, the Project will be required to conform to the City's Green Building Program, which includes implementation of water saving plumbing features, such as auto flush toilets, waterless urinals, hands-free faucets, etc.

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, potential impacts associated with the Project (construction and/or operation) as it relates to water or wastewater treatment facilities would be less than significant.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. The City is primarily served by the Los Angeles County Storm Drainage System, and Culver City currently maintains some of its own storm drains that connect to the County system. 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, potential impacts from the Project would be less than significant with regard to storm water drainage facilities.

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 discussed in Section XVII b), Los Angeles Department of Water and Power (LADWP) is the designated water purveyor for the Project Site, and the Project would fall within the 2015 UWMP projections. LADWP's primary sources of water include the Los Angeles Aqueducts (LAA), local groundwater, State Water Project (supplied by Metropolitan Water District), Colorado River

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<sup>13</sup> 2015 Urban Water Management Plan, Los Angeles Department of Water and Power



Aqueduct (supplied by Metropolitan Water District) and recycled water, which is becoming a larger part of the overall water supply.<sup>16</sup> The LADWP 2015 Urban Water Management Plan states that with its current water supplies, planned future water conservation, and planned future water supplies, LADWP has available supplies to meet all demands under all three hydrologic scenarios through the 25-year planning period covered by this UWMP. As a result, the Project is within the capacity of the LADWP to serve the Project as well as existing and planned future water demands of its service area, and potential impacts related to water supplies are less than significant.

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. On average 275 millions of gallons of wastewater enters the HTP on a dry weather day. The HTP as designed to accommodate a maximum daily flow of 450 million gallons of water per day and peak weather flow of 800 million gallons of water per day.<sup>17</sup> Given the current capacity of the HTP, Project wastewater generation would account for a less than one percent (1%) 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 (EPO) Division collects all solid waste within Culver City, which is taken to the City's transfer station. 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. From the transfer station, 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. In addition to in-County landfills, out-of-County disposal facilities may also be available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the Los Angeles County Integrated Waste Management Plan (ColWMP), the County anticipates that future Class III disposal needs can be adequately met through 2027 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices.

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 expressed 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.

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<sup>16</sup> 2015 Urban Water Management Plan, Los Angeles Department of Water and Power

<sup>17</sup> [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=s2nv5zlu0\\_4&\\_afLoop=15042133900019137&\\_afWindowMode=0&\\_afWindowId=null#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D15042133900019137%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3D9cjrnl38e\\_70](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=s2nv5zlu0_4&_afLoop=15042133900019137&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D15042133900019137%26_afWindowMode%3D0%26_adf.ctrl-state%3D9cjrnl38e_70)

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:

- J) 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.

the Project will also provide adequate on-site refuse facilities per the requirements of the EPO Division to address the solid waste needs related to the operation of the Project, which will primarily include food retail and restaurant uses. As required by the EPO Division, a Trash/Recycling Management Plan shall be submitted to show compliance with Assembly Bill 939, 1826, and 341 waste diversion goals. Due to the types of uses in the Project, organic waste will comprise an important factor in the on-site refuse facilities. Further, the Project is subject to provide separate recycling bin for organic waste per AB 1826, and will be addressed within the required Trash/Recycling Management Plan, as stated above. Therefore, the Project would not cause any significant impacts related to having sufficient permitted capacity at the applicable landfill(s) to accommodate the Project's operational solid waste disposal needs.

Based on the above, a less than significant impact regarding solid waste and existing landfill facilities 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. 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, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ('Cumulatively considerable' means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact With Mitigation Incorporated. A description of 52 related projects in the Project study area is provided in Table 22, List of Related Projects, below. Related projects are mapped in Figure 14, 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 22 List of Related Projects Near the Project Site			
Map No.	Project Name	Location	Description
<b>City of Culver City [1]</b>			
1	Arora Condominium Project	3837 Bentley Avenue	3 new condominium dwelling units, resulting in 2 net new dwellings.
2	Bentley Condos	3873 Bentley Avenue	3 new condominium dwelling units, resulting in 2 net new dwellings.
3	Radisson (Entrada) Office Project	6161 W. Centinela Avenue	342,409 s.f. of commercial office use.
4	Union 76 Gas Station	10638 Culver Boulevard	2,676 s.f. gas station and convenience store
5	The Wende Museum	10808 Culver Boulevard	Tenant improvements to convert existing 12,596 s.f. armory building into a museum.
6	Globe Housing Project	4044-4068 Globe Avenue	A total of 10 new, for sale, residential dwelling units on currently vacant land. The site was previously developed with 7 single family homes.
7	Grandview Apartments	4025 Grand View Boulevard	New 36 townhome rental units. Previous/existing use includes 20 mobile home units.
8	Orchard Supply Hardware	11441 Jefferson Boulevard	Addition of 12,163 s.f. to an existing 19,057 s.f. commercial space used as a retail office supply store, to be used as a home improvement store, within an existing 34,438 s.f. multi-tenant commercial building, and conversion of an existing 5,139 s.f. paint store into a nursery area
9	Boutique Hotel	11469 Jefferson Boulevard	Demolition of 12,958 sq. ft. commercial shopping center. New 5-story hotel of 144 rooms with restaurant and outdoor dining.

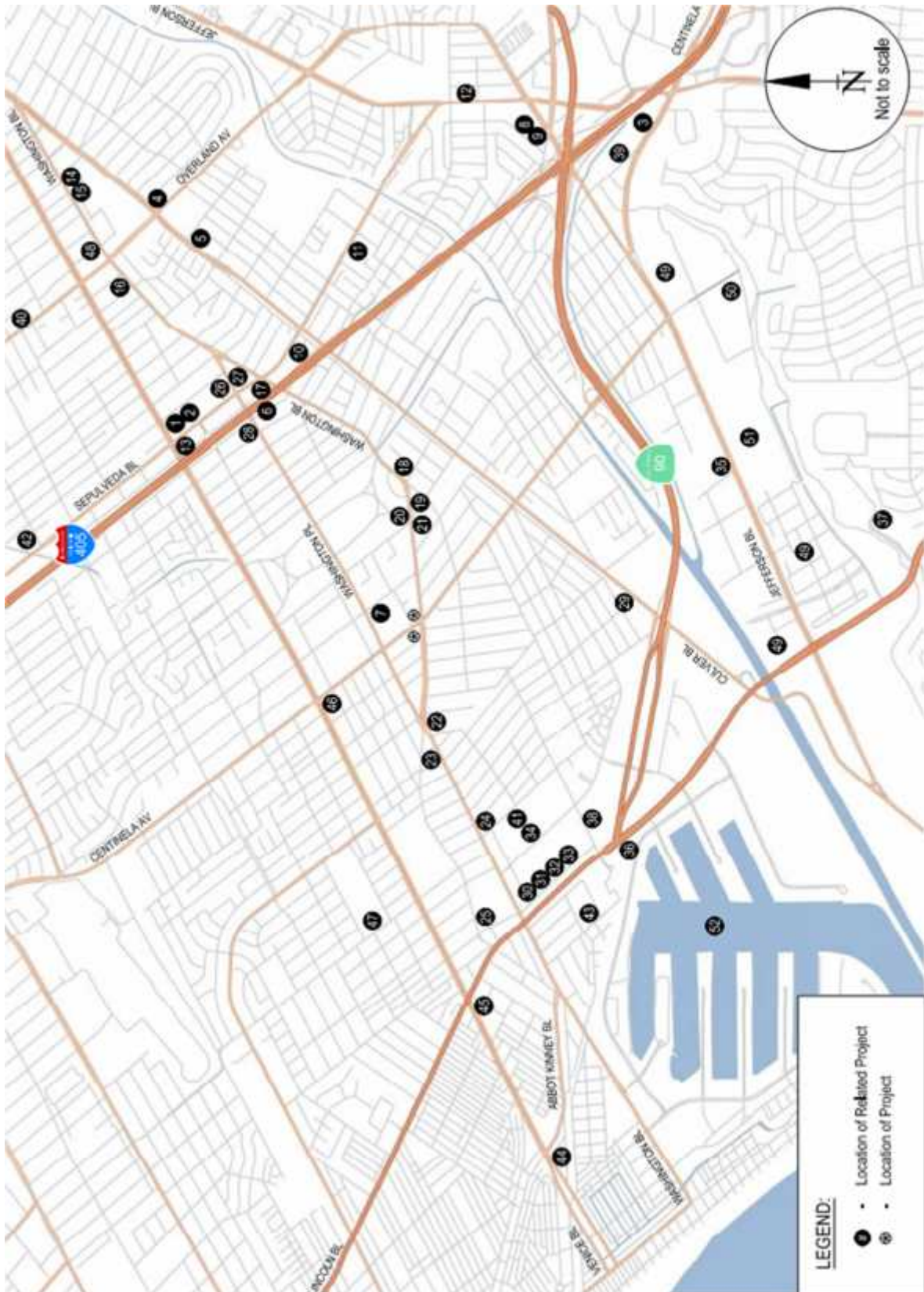
Table 22 List of Related Projects Near the Project Site			
Map No.	Project Name	Location	Description
10	Westside Bake and Tires	4215 Sepulveda Boulevard	Convert existing 2,068 s.f. retail building into auto repair facility with three service bays.
11	Harbor Freight [2]	4545 Sepulveda Boulevard	Renovation of 28,534 s.f. of former ice rink into a two tenant commercial space including home retail outlet.
12	HB Dental	5450 Sepulveda Boulevard	New 14,800 s.f. commercial/retail building.
13	Shell Car Wash [3]	11224 Venice Boulevard	New 3,150 s.f. commercial building, which includes a 2,285 s.f. convenience store and 864 s.f. automated car wash facility.
14	Sony Pictures	10202 Washington Boulevard	New 8-story, 218,450 s.f. office building, a 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 square feet is 212,524 s.f.
15	Sony Pictures	10202 Washington Boulevard	New 22,929 s.f. 4- story office building (net new 9,758 s.f.).
16	Culver Center Shopping Center - New Restaurant	10799 Washington Blvd	New 2,000 sq. ft. restaurant at existing commercial shopping center
17	Auto Dealership Expansion	11215 Washington Boulevard	5,492 s.f. addition to Mazda Dealership.
18	Culver City Christian School	11828 Washington Boulevard	Private school with grades K-8th for approximately 128 students.
19	Pennylane Mixed-Use Project [4]	11924-11960 Washington Boulevard	Mixed Use with 3,750 s.f. of restaurant, 11,250 s.f. of specialty retail and 98 for lease dwelling units. Previous use includes 26,445 s.f. of commercial uses.
20	Marcasel Mixed-Use Project [5]	11957 Washington Boulevard	Mixed-Use Project with 30 dwelling units and 8,682 s.f. Retail.
21	Office Project	12038 Washington Boulevard	New 2,685 s.f. office building.
22	Kayvon Mixed-Use Project	12712-12718 Washington Boulevard	New 4-story mixed-use building with 5 for lease residential units, 3,308 s.f. retail, and subterranean parking. Approximately 2,340 s.f. existing/previous commercial uses.
23	Baldwin Site Mixed-Use Project	12803 Washington Boulevard	Mixed-use project consisting of 27 dwelling units and 7,293 s.f. of retail.
24	Washington/Tivoli Mixed-Use Project	13112-13114 Washington Boulevard	Construction of 1,536 s.f. retail/restaurant, 3,702 s.f. of office and 2 for-lease residential dwelling units.

Table 22 List of Related Projects Near the Project Site			
Map No.	Project Name	Location	Description
25	Costco Expansion	13463 Washington Boulevard	A 31,023 s.f. expansion of an existing 142,152 s.f. retail warehouse and demolition of an existing 63,213 s.f. grocery store/supermarket. Addition of two fuel pumps at existing fueling station.
26	Gas Station Car Wash	11197 Washington Place	Conversion of existing vehicle repair and mini-mart into drive-through car wash and construction of new 2,500 s.f. convenience store.
27	Commercial Building	11198 Washington Place	New 3,850 s.f. commercial building and 500 s.f. outdoor dining.
28	Mixed-Use Project	11281 Washington Place	New 4-story mixed-use project with 4,898 s.f. retail and 14 residential dwelling units.
City of Los Angeles [8]			
29	Marina Island Mixed-Use: Apartment & Office	5000 S. Beethoven Street	Mixed-Use: 156-Unit Apartment and 33,484 s.f. Office.
30	Mixed-Use: Apartment, Mini-Warehouse & Office	4040 S. Del Rey Avenue	New 195-Unit Apartment; 15,000 sf Office & 80,000 s.f. Mini-Warehouse (Option 1) or 235-Unit Apartment & 15,000 s.f. Office (Option 2 Preferred).
31	Apartment	4090 S. Del Rey Avenue	51 dwelling unit apartments
32	Apartment	4100 S. Del Rey Avenue	77 dwelling unit apartments
33	Mixed-Use: Condominium & Office	4210 S. Del Rey Avenue	Proposed 136 Condominium Units & 20,000 s.f. Commercial Office.
34	Mixed-Use: Apartment & Office	4140 S. Glencoe Avenue	67 dwelling unit apartments & 3,211 s.f. of office use
35	Office	12777 W. Jefferson Boulevard	Commercial Office Expansion (49,950 s.f.).
36	Mixed-Use: Condominium & Retail [10]	4363 S. Lincoln Boulevard	Consultation: proposed 10-Story, 80 Condominium Units & 15,100 s.f. Supermarket.
37	LMU Master Plan	1 LMU Drive	Increase enrollment capacity to 7,800 students.
38	Mixed-Use: residential & retail	13488 W. Maxella Avenue	The Villa Marina Mixed-Use: 244 Condominium Units and 9,000 s.f. Retail.
39	Mixed-Use: Apartment & Automotive Dealership	5748 S. Mesmer Avenue	New 400-Unit Apartment & 250,000 s.f. Automotive Dealership (West LA Hooman) - 5 Auto Dealers.
40	Mixed-Use: Apartment & Restaurant	3644 S. Overland Ave.	New Mixed-Use: 92-Unit Apartment & 1,573 sf Restaurant use (110 spaces).
41	Mixed-Use: Condominium & Office	4091 S. Redwood Avenue	67 d.u. condominium & 7,525 s.f. commercial office building with 141 parking spaces
42	Condominium	11131 Rose Ave	227-unit condominium. Existing 89-unit apartment to be removed

Table 22 List of Related Projects Near the Project Site			
Map No.	Project Name	Location	Description
43	LADPW Maintenance Yard	3233 Thatcher Avenue	Improve/expansion of the existing LADPW maintenance yard plus addition of 30 new employees to site.
44	Residential & Retail	580 Venice Boulevard	(Preliminary) 5-unit residential plus 5,700 s.f. retail space.
45	Restaurant	1020 W. Venice Boulevard	Proposed House of Pies Sit-Down Restaurant land use (3,895 s.f.).
46	Starbucks w/o Drive Thru	12404 Venice Boulevard	2,195 s.f. Starbucks Coffee Shop w/o Drive Thru.
47	LAUSD Elementary School	2224 S. Walgrove Avenue	New 567-Student Elementary School (K-5) Immersive Mandarin Language program.
48	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.
49	Playa Vista Phase I	Jefferson Boulevard b/t Lincoln Boulevard and Centinela Avenue	Includes 3,246 dwelling units, 1,570,000 s.f. of office use, 25,000 s.f. of retail use and 65,000 s.f. of community serving use.
50	Playa Vista Plant Site (Spruce Goose)	Campus Center Drive/Bluff Creek Drive	Includes 1,129,900 s.f. of production and staging support and 572,050 s.f. of office use.
51	The Village at Playa Vista (Phase II)	s/o Jefferson Boulevard/Westlawn Avenue	Includes 2,600 dwelling unit, 175,000 s.f. of office use, 150,000 s.f. of retail use, and 40,000 s.f. of community serving uses.
County of Los Angeles			
52	Marina Del Rey Local Coastal Plan	Marina del Rey	Development contained within Local Coastal Plan

[1] Source: Related projects obtained Culver City Planning Division - Active Projects List October 2016.

Figure 14 Location of Related Projects Map



## 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 the “West Washington” area of Culver City. The proposed Project has been designed with the goal of serving as an iconic gateway to the Culver West community along the West Washington corridor. It will anchor the burgeoning West Washington area by activating the Washington Boulevard and Centinela Avenue streetscapes, and by providing much needed parking for businesses located within the District. While the Project site formerly contained a gas station, liquor store and various commercial businesses throughout time, the Project will transform what are currently vacant parcels and will deliver high quality architectural and landscape design to promote a new standard of development in the area.

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 existing nearby buildings in the surrounding Project vicinity, the West Culver area is in the process of revitalization and transition with proposed new development projects occurring throughout the Project vicinity. For example, the proposed building heights and massing would be compatible with the nearby Pennylane Mixed-Use, Oliver Mixed-Use, and Axis Mundi Mixed-Use projects, at Washington Boulevard and Inglewood, and Washington Boulevard and Moore Street. The proposed Project along with these nearby projects would contribute to the local area’s ongoing revitalization and would be compatible in the 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 is currently vacant 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.

### Agriculture and Forestry Resources

Any related projects, as with the subject Project, are located within a highly urbanized area where there is no land zoned or designated for agricultural or forestry purposes, and uses such as farming and forest-related operations are not supported by the existing zoning and land uses. Development of the Project in combination with related projects would not result in the conversion of State designated agricultural land to a non-agricultural use, nor result in the loss 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 (e.g. Pennylane, Axis Mundi). 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, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, Section 15064(h)(3) of the CEQA Guidelines provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that: "A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g. water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency..." For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2012 AQMP. The Project would not conflict with or obstruct implementation of AQMP and would be consistent with the growth projections in the AQMP.

Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. The Project Air Quality Analysis demonstrates that the regional burden emissions calculated for Project construction and operations are less than the applicable SCAQMD daily significance thresholds, which are designed to assist the region in attaining the applicable State and national ambient air quality standards. These standards apply to both primary (criteria and precursor) and secondary pollutants (ozone). Although the Project Site is located in a region that is in non-attainment for ozone and PM<sub>10</sub>, the emissions associated with the Project would not be cumulatively considerable as the emissions would fall below SCAQMD daily significance thresholds. In addition, the Project would be consistent with the AQMP, which is intended to bring the Basin into attainment for all criteria pollutants. 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. It is anticipated that implementation of mitigation measures on an as needed basis, 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 significant direct historic impacts. Furthermore the Project would result in no significant indirect impacts to historical resources in the vicinity of 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, completion of 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 not located within a liquefaction zone; therefore, 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 and, 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 naught. 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 or pervious areas. Accordingly, the potential to generate a notable amount of new impermeable surfaces is limited. Pursuant to the City's LID and SUSMP 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 Public Works Department 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. 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, and would be located in proximity to an existing transit facility (e.g. bus lines on Washington Boulevard). 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 Zoning Code, 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 no related projects in the surrounding area within approximately 500 feet of the Project Site. The project closest to the Project Site is the Grandview Apartment project located at 4025 Grand View Boulevard, approximately 1,000 feet away. 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

As described in Section XII.c), worst-case scenario Project-related traffic noise increase would increase by 2.1 dBA. This noise level increase would not be perceptible to the human ear in an outdoor environment. 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 along the main corridors such that noise levels would be less than significant at the property line adjacent to the neighboring residential uses. Noise levels for similar equipment and facilities for each related project would be subject to City noise ordinance requirements. For this reason, on-site noise produced by any related project would not result in a

substantial or noticeable additive increase to project-related noise levels. As the Project's composite stationary-source and operational impacts would be less than significant, composite stationary-source and operational noise impacts attributable to cumulative development would also be less than significant.

## Vibration

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the Project Site, there is no potential for the Project to result in a cumulatively considerable contribution, when considered together with the related projects, to cumulatively significant construction-related or operational impacts.

## Population and Housing

The Project would not include a housing component and, thus, would not generate a direct change or increase in population or housing. As discussed in response XIII, the Project would have a negligible indirect increase (34 persons) in population. The increase in area population and employment resulting from the Project and the related projects would have a less than significant cumulative impact as these increases are anticipated to be within SCAG, Culver City, and City of Los Angeles Subregion growth forecasts. Related projects in combination with the Project would not result in the cumulative loss or reduction of housing. Therefore, cumulative impacts with respect to population and housing are considered to be less than significant.

## Public Services

### Fire Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional fire protection and emergency medical services. Although there would be cumulative demand on fire protection services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site specific design and safety requirements, similar to the Project. All related projects would be subject to review by the LAFD and/or CCFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety. Further, project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD and CCFD are expected to help support adequate response times. Even in consideration of the related projects, if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted, and was foreseeable, the Project study area is highly developed, and the site of a fire station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government, and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the Project is required to mitigate. Based on the above considerations, the Project would not result in a cumulatively considerable contribution to cumulative impacts associated with the construction of new fire facilities.

### Police Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional police protection services. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the LAPD or CCPD on a project-by-project basis to ensure that sufficient

security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. Even in consideration of the related projects, if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted, and was foreseeable, the Project study area is highly developed, and the site of a police station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government, and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the Project is required to mitigate. Based on the above considerations, the Project would not make a cumulatively considerable contribution to cumulative impacts associated with the construction of new police facilities.

### Schools

Pursuant to California Government Code Section 65995, the payment of developer fees under the provisions of SB 50 address the impacts of new development on school facilities serving that development. Compliance with the provisions of Section 65995 is deemed to provide full and complete mitigation of school facilities impacts. The 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

While the Project is comprised of commercial only and would not directly generate new residential population, related projects include commercial, residential, and mixed-use projects. New related projects with residential units 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 significant cumulative impact is expected to occur. Refer to discussion under Parks, above.

## Transportation and Circulation

Cumulative impacts on traffic associated with construction (e.g. an intermittent reduction in street and intersection operating capacity) are typically considered short-term adverse, but not significant impacts. The Project would result in a less than significant traffic impact during construction with the implementation of a Construction Management Plan and 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 Construction Management Plan and Construction Traffic Management Plan, to reduce potential traffic impacts during construction.

The Project Traffic Study determined that in the Cumulative (Future Year 2019) plus Project conditions, both the morning and evening peak hour operating conditions would be similar to those projected for the Cumulative Base conditions. Fourteen of the 19 study intersections are projected to operate at LOS D or better during the morning peak hour. During the evening peak hour, 9 of the 19 study intersections are projected to operate at LOS D or better. Thus, the Cumulative (Future Year 2019) plus Project traffic conditions, which account for related projects' traffic estimates, indicate that the Proposed Project would not cause significant traffic impacts at any of the analysis locations during both the weekday morning and evening peak hours.

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. 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 as deemed necessary. 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, and 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 and 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.



## 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 indicates 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 unless otherwise indicated. The mitigation measures have been identified by impact category and numbered for ease of reference.

<b>MITIGATION MONITORING PROGRAM</b> Market Hall Comprehensive Plan – P2017-0042-CP Date				
<b>MITIGATION MEASURE</b>	<b>Implementing Action, Condition or Mechanism</b>	<b>Method of Verification</b>	<b>Timing of Verification</b>	<b>Responsible Persons</b>
<b><u>BIOLOGICAL RESOURCES</u></b>				
<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 the following ways. Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would ensure that no active nests are disturbed. If vegetation and landscape removal is scheduled to occur during the general avian breeding season (February 15 through August 31) and/or commencement of construction activities (including but not limited to, staging, ground disturbance, grading, or construction activity) is proposed to begin during said season, and avoidance of said season is not avoidable, then the following measures shall be implemented to avoid take of birds or their eggs.</p> <p>a. Preconstruction Nesting Bird Survey. Beginning thirty days prior to the initiation of project activities (including, staging, grading, vegetation removal, grubbing, etc.), a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the</p>	Condition of Approval	Plan Check Notes; Reports, Surveys, and Field Inspections	Prior to Issuance of a Building Permit	Culver City Planning Division

**MITIGATION MONITORING PROGRAM**  
Market Hall Comprehensive Plan – P2017-0042-CP  
Date \_\_\_\_\_

MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<p>last survey being conducted no more than 3 days (72 hours) prior to the initiation of project activities. 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.</p> <p>b. Presence of Birds and Active Nests. If a protected native bird is found, the applicant shall delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or larger buffer as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. 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. Flagging, stakes, and/or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the Culver City Planning Division and, upon request, the Department. Based on the submitted information, the Culver City Planning Division (and the Department of Fish and Game, if the Department requests) will determine whether to allow a narrower</p>				

<b>MITIGATION MONITORING PROGRAM</b> Market Hall Comprehensive Plan – P2017-0042-CP Date				
<b>MITIGATION MEASURE</b>	<b>Implementing Action, Condition or Mechanism</b>	<b>Method of Verification</b>	<b>Timing of Verification</b>	<b>Responsible Persons</b>
buffer.  c. Biological Monitoring. Project personnel, including all contractors working on site, shall be informed of the active nest(s) and the avoidance requirement(s). 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. The project applicant shall provide the Culver City Planning Division the pre-construction nesting bird surveys, construction monitoring reports, and results of the recommended protective measures described above upon completion of each, to document compliance with applicable State and Federal laws pertaining to the protection of native birds.				
<b>GEOLOGY AND SOILS</b>  GEO-1: A Project Specific Geotechnical Engineering Investigation, subject to review and approval by the Culver City Building Safety Division, shall be prepared by a qualified Professional Geotechnical Engineer. The investigation shall include site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation, which shall be implemented accordingly.	Condition of Approval	Plan Check Notes; Reports, Surveys, and Field Inspections	Prior to Grading and Building Permits and a Foundation Plan	Culver City Building and Safety Division, and Building and Safety Inspector
<b>HAZARDS AND HAZARDOUS MATERIALS</b>  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.	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	On-Going during Construction	Culver City Building and Safety Division, Building and Safety Inspector, Fire Prevention, Fire Inspector, Planning

<b>MITIGATION MONITORING PROGRAM</b> Market Hall Comprehensive Plan – P2017-0042-CP Date				
<b>MITIGATION MEASURE</b>	<b>Implementing Action, Condition or Mechanism</b>	<b>Method of Verification</b>	<b>Timing of Verification</b>	<b>Responsible Persons</b>
<p><b>NOISE</b></p> <p>NOISE-1: Construction activities occurring as part of the project shall be subject to the limitations and requirements of Section 9.07.035 of the City's Municipal Code, which states that construction activities may occur between 8:00 a.m. and 8:00 p.m., Monday through Friday, 9:00 a.m. to 7:00 p.m. on Saturday, and 10:00 a.m. and 7:00 p.m. on Sunday. No construction activities shall be permitted outside these hours or on City holidays unless the City grants a temporary waiver.</p> <p>NOISE-2: Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturer's standards.</p> <p>NOISE-3: Construction staging areas shall be located away from off-site sensitive uses during the later phases of project development.</p> <p>NOISE-4: Whenever feasible, the project contractor shall place all stationary construction equipment so that the emitted noise is directed away from the sensitive receptors nearest the project site.</p> <p>NOISE-5: Mechanical ventilation such as air conditioning systems are required for on-site buildings along Centinela Avenue for Site A and on-site buildings along Washington Boulevard and Centinela Avenue for Site B so windows and doors can be closed for a prolong period of time to maintain the City's interior noise standard of 55 dBA CNEL for commercial, retail, and restaurant uses.</p> <p>NOISE-6: Construction of an eight (8) foot high perimeter wall along the north side of Site B adjacent to residences.</p> <p>NOISE-7: The construction contractor will use light construction equipment (e.g. small bulldozers and trucks) within 15 feet from the</p>	Condition of Approval	Plan Check Notes; Reports, Surveys, and Field Inspections	Prior to Demolition, Grading and Building Permits, and On-Going during construction	Culver City Building and Safety Division, Building and Safety Inspector, Planning Division

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north construction boundary at both Sites A and B.				
<p><b>PUBLIC SERVICES</b></p> <p>PS-1: Construction Management Plan and Construction Traffic Management Plan – A Final Construction Management Plan and 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 Plans 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.</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 meeting with City Staff and other surrounding developments that will potential be under construction at around the same time as the Project, shall be required, as determined appropriate by City Staff, to ensure any concurrent projects are managed in collaboration with one another.</p> <p>The Plans all together shall, at minimum, identify the following to the satisfaction of the City:</p> <ul style="list-style-type: none"> <li>)] The name and telephone number of a contact person who can be reached 24 hours a day, regarding construction traffic complaints or emergency situations.</li> <li>)] An up-to-date list of local police, fire, and emergency response organizations and</li> </ul>	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	Prior to Demolition, Grading, and Building Permits and On-Going during construction	Culver City Planning Division, Public Works, Fire and Police Departments

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<p>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.</p> <p>) Procedures for the training and certification of the flag persons.</p> <p>) The location, times, and estimated duration of any roadway closures, traffic detours, use of protective devices, warning signs, and staging or queuing areas.</p> <p>) The location and travel routes of off-site staging and parking locations.</p> <p>) The location of temporary power, portable toilet(s), and refuse and materials storage locations.</p> <p>) 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 electronic distribution 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.</p> <p>) Prior to approval of the Plan(s), the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community:</p> <ol style="list-style-type: none"> <li>1. Construction schedule and hours.</li> <li>2. Framework for construction phases.</li> <li>3. Identify traffic diversion plan by phase and activity. (The Traffic Control Plan will be submitted for review and</li> </ol>				

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<p>approval by the City for each phase).</p> <p>4. Potential location of construction parking and office trailers.</p> <p>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 which construction activity).</p> <p>6. Emergency access plan.</p> <p>7. Demolition plan.</p> <p>8. Staging plan for the concrete pours, material loading and removal.</p> <p>9. Crane locations.</p> <p>10. Accessible applicant and contractor contacts during construction activity and during off-hours (relevant email address and phone numbers).</p>				