RESOLUTION NO. 2021-R

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CULVER CITY, CALIFORNIA, (1) CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT SCH NO. 2016111044; AND (2) ADOPTING CEQA FINDINGS AND A MITIGATION MONITORING PROGRAM, IN COMPLIANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, FOR ZONING MAP AMENDMENT P2021-0025-ZMA TO DEVELOP PLANNED DEVELOPMENT ZONE NO. 16, COMPREHENSIVE PLAN P2021-0025-CP, DENSITY AND OTHER BONUS INCENTIVES P2021-0025-DOBI, TENTATIVE PARCEL MAP P2021-0025-TPM AND ADMINISTRATIVE USE PERMIT P2021-0025-AUP 11111 JEFFERSON BOULEVARD PROJECT.

(P2021-0025-EIR)

WHEREAS, on March 5, 2021, Jefferson Park LLC (the "Applicant" and "Owner") filed an application for a Zoning Map Amendment, Comprehensive Plan, Density and Other Bonus Incentives, Tentative Parcel Map and Administrative Use Permit to construct a five-story mixed-use development (the "Project") as follows:

Project Location

The Project Site is located at the intersection of Jefferson Boulevard and Sepulveda Boulevard on a 3.43-acre site and more specifically described by Los Angeles County Assessor Parcel Numbers 4215-001-010, 4215-001-013, 4215-001-016, and 4215-001-020 in the City of Culver City, County of Los Angeles, State of California at 11111 Jefferson Boulevard.

The Project Site is relatively flat with a two-foot difference in elevation from north to south from approximately 35 feet from the northwestern corner of the Project Site at the intersection of Sepulveda Boulevard and Machado Road and sloping down to 33 feet on the southern corner of the Project Site at the intersection of Sepulveda Boulevard and Jefferson Boulevard. The Project Site is made up of four parcels from north to south. The northernmost parcel consists of a surface parking lot with 34

parking spaces used by the Exceptional Children's Foundation (ECF) as off-site parking. This parcel will be incorporated into the development and include ECF replacement parking under a separate agreement between the applicant and ECF. The northern central parcel is occupied by a United States Post Office (27,225 square feet) built in the early 1960s and includes a mail processing and distribution center and a rear loading dock. The adjacent parcel to the south is occupied by Coco's Bakery Restaurant (6,064 square feet) built in the late 1960s. The southernmost parcel is occupied by Valvoline Instant Oil Change (1,722 square feet) built in the 1990s. The Project Site includes approximately 216 existing vehicle parking spaces, including 194 regular spaces, 12 truck loading spaces, and 10 handicap spaces, for existing uses.

Project Description

The Project is a residential mixed-use development that includes retail, office, and a park for use by the public.

The Project would involve demolition of approximately 35,011 square feet of existing buildings on the Project Site to support the new mixed-use development. The Project would consist of five stories of development over one subterranean level for vehicular parking and building infrastructure. The proposed five-story building would be 67 feet tall (70.5 feet including the parapet) with a total building area of 555,221 square feet, including all parking areas (subterranean, ground level, and above-ground) and usable building area of 311,109 square feet. The Project includes 244,609 square feet of residential uses (including the residential lobby and amenity room) with 230 residential apartment units (including 19 very low-income units and 2 workforce units); 66,500 square feet of commercial uses, including a market,

retail/restaurant uses and office uses; three levels of vehicular parking (653 spaces), including one subterranean level; and public and private open space areas.

The Project would provide an approximately 13,800 square foot Machado Park, that is to be made available for public use but privately maintained as well as an approximately 13,000 square foot Paseo Courtyard at the corner of Sepulveda Boulevard and Jefferson Boulevard and between the retail spaces at the southern end of the Project Site. An additional 2,000 square foot entry courtyard at the entrance on Sepulveda Boulevard across from Janisann Avenue would also be provided. All publicly accessible open space areas on the ground floor would be accessed from Machado Road, Sepulveda Boulevard, and Jefferson Boulevard, as well as from the interior of the Project Site from the ground-floor parking level or via escalators from the above- and below-ground parking levels.

There are currently 10 driveways serving the Project Site: five on Sepulveda Boulevard, three on Jefferson Boulevard, and two on Machado Road. The Project would change the locations of and remove seven driveways, resulting in three remaining driveways serving the Project. Vehicular access to the Project Site would be provided from one driveway on Sepulveda Boulevard at Janisann Avenue and two driveways on Machado Road. Access for trucks and deliveries would be off Machado Road where they would access a 2,856 square foot loading dock within the Project Site via the eastern-most retail entrance. The Project also includes a proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard. Additionally, the Project includes proposed road improvements for Machado Road, including a new 8-foot sidewalk, curb, street trees and removal of portions of the median to allow for

turn lanes for eastbound and westbound left turns into Heritage Park and the Project Site, respectively. A channelizing island would be added on the Heritage Park approach to prevent through and left turns from Heritage Park into the Project and eastbound Machado Road, respectively.

The Project would provide three levels of vehicular parking including one subterranean level. Structured parking containing 653 vehicular parking spaces would be provided with 308 spaces for residential uses, 311 spaces for commercial uses, and 34 for ECF. Bicycle parking would include 71 long-term and 26 short-term bicycle parking spaces provided in various locations throughout the Project Site. Bicyclists would be able to access the Project Site from all three Project frontages. Bicycle racks for visitors would be available at the corner of Machado Road and Sepulveda Boulevard, the corner of Jefferson Boulevard and Sepulveda Boulevard, and in front of the ground level market by the surface parking spaces for the retail uses. Bicycle lockers would be provided for residents in the subterranean parking level.

The Project would establish bicycle lanes along the abutting segment of Sepulveda Boulevard between Machado Road and Jefferson Boulevard, and the Applicant will make a contribution towards the cost to design and construct bike lanes on Sepulveda Boulevard between Machado Road and the Ballona Creek Bike Path. This bicycle infrastructure link with Ballona Creek Bike Path would encourage bicycling trips to and from the Project Site and other areas of Culver City.

Separate from the Project, the City intends to implement a bicycle share facility on the Project Site adjacent to the Machado Park. The bicycle share facility would

allow for connections to the City's proposed bicycle lanes along Jefferson Boulevard and Sepulveda Boulevard as part of the City's Bicycle & Pedestrian Action Plan.

Construction is anticipated to start in April of 2022, subject to Project approval and is anticipated to be completed May of 2024; and

WHEREAS, in order to implement the Project, approval of the following land use permits (collectively, "Entitlements") are required:

1. Zoning Map Amendment P2021-0025-ZMA, for the change of the existing Zoning from Commercial General (CG) and Single Family (R1) to Planned Development (PD-16), to ensure the proper rezoning of the property and maintain consistency with the General Plan designation; and

2. Comprehensive Plan P2021-0025-CP, to adopt a Comprehensive Plan to establish development standards, land uses, and a conceptual development plan pursuant to the requirements for Planned Development Zoning Districts as set forth in Zoning Code Section 17.240.015; and

3. Density and Other Developer Incentives P2021-0025-DOBI, to ensure appropriate implementation of the requirements of State law for density bonuses and other bonus incentives, pursuant to California Government Code Section 65915, or as may be amended, and the goals and policies of the Housing Element of the City's General Plan; and

4. Tentative Parcel Map P2021-0025-TPM (consolidating four separate lots into one lot) to ensure compliance with the Zoning Code and General Plan, to ensure lot sizes of a size compatible with the size of existing lots in the immediate neighborhood, to provide necessary street dedication and improvements, and to

prevent interference with the opening or extension of streets necessary for emergency vehicular access, proper traffic circulation, drainage, and the future development of adjacent properties; and

5. Administrative Use Permit: P2021-0025-AUP for Project ancillary alcoholic beverage sales and outdoor dining associated with food service establishments to ensure compatibility, configuration, design, location, and potential impacts of the proposed use, and suitability of the use to the site and surrounding area; and

WHEREAS, the California Environmental Quality Act of 1970, as amended (California Public Resources Code 21000, et.seq.; and California Code of Regulations, Title 14, Ch. 3 15000, et.seq.; collectively, "CEQA"), gives to the lead agency the responsibility for considering the effects of a project, both individual and collective, of all physical development activities involved when action is taken by a lead agency to approve a Project; and

WHEREAS, the City prepared an Initial Environmental Study (Initial Study) for the Project, which determined that the Project may have a significant effect on the environment and that an Environmental Impact Report must be prepared. The Initial Study determined that the following areas must be addressed in the Project EIR: air quality, historical resources, archaeological resources, energy, paleontological resources, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services (fire protection and police protection), transportation, and tribal cultural resources; and

WHEREAS, the City prepared a Notice of Preparation ("NOP") of the Draft EIR, which was circulated to the affected agencies and the public, pursuant to CEQA for 33 days

beginning on September 17, 2020, and numerous comments from agencies and the public were received in response. The City held a public scoping meeting on October 6, 2020, to obtain information from the public as to issues that should be addressed in the Draft EIR; and

WHEREAS, the City in accordance with provisions of CEQA Guidelines Sections 15085(a) and 15087(a), the City, serving as the Lead Agency: (1) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (2) published a Notice of Availability (NOA) of a Draft EIR which indicated that the Draft EIR was available for public review at the City's Current Planning Division; (3) provided copies of the NOA and Draft EIR to the Culver City Julian Dixon Library; (4) posted the NOA and the Draft EIR on the City's Planning Division website:

(https://www.culvercity.org/city-hall/city-government/city-departments/community-development/planning)

(5) sent the NOA to all property owners within 1,000 feet of the Project Site; (6) sent the NOA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project; and (7) filed the NOA with the County Clerk. The public review period commenced on May 6, 2021, and ended on June 21, 2021, for a total of 47 days. The City conducted a virtual Community Meeting focused on the Project and a Public Meeting focused on the Draft EIR on May 25, 2021; and

WHEREAS, the City received numerous written and oral comments to the Draft EIR, prepared responses to those comments and made appropriate changes to the Draft EIR. Those changes, comments and responses were made a part of the Final EIR for the Project in compliance with California Public Resources Code, Section 21092.5. The proposed written

responses to comments from public agencies received during the 47-day review period were provided to such agencies and the Final EIR was made available on August 4, 2021; and

WHEREAS, the Final Environmental Impact Report (EIR) includes the Draft EIR, dated May 2021, responses to written comments on the Draft EIR, responses to public testimony regarding Draft EIR issues raised during the public comment period, modifications to the Draft EIR text, Findings Required by CEQA, and the Mitigation Monitoring Program (MMP). The Final EIR was prepared and circulated in compliance with CEQA; and

WHEREAS, on August 25, 2021, the Planning Commission held a duly noticed public meeting to receive public comment on and consider the Final EIR. During the course of the public hearing, the Planning Commission considered staff and consultant presentations, written comments received from public agencies and the public, staff reports, Applicant presentations, information presented to the Planning Commission to assist its understanding of the Project, the Final EIR, and public comments and testimony on the Project. In addition, the Planning Commission considered the Final EIR prepared for the Project, including information provided in staff reports, the amended text of the Final EIR, information presented from experts and in public testimony, including letters submitted to the Planning Commission following the close of the public hearing before the Planning Commission, and other matters in the public record; and

WHEREAS, following conclusion of the public discussion and thorough deliberation of the subject matter, the Planning Commission determined by a vote of 5 to 0 adopted Resolution 2021-008 recommending to the City Council (1) certification of the Final Impact Report SCH No. 2016111044; and (2) adoption of CEQA findings and a mitigation monitoring program, in compliance with the California Environmental Quality Act, for Zoning Map

Amendment P2021-0025-ZMA, Comprehensive Plan P2021-0025-CP, Density and Other Bonus Incentives P2021-0025-DOBI, Tentative Parcel Map P2021-0025-TPM and Administrative Use Permit P2021-0025-AUP, for the 11111 Jefferson Boulevard Project; and

WHEREAS, on September 27, 2021, the City Council held a duly noticed public meeting to receive public comment on and consider the Final EIR. During the course of the public hearing, the City Council considered staff and consultant presentations, written comments received from public agencies and the public, staff reports, Applicant presentations, information presented to the City Council to assist its understanding of the Project, the Final EIR, and public comments and testimony on the Project. In addition, the City Council considered the Final EIR prepared for the Project, including information provided in staff reports, the amended text of the Final EIR, information presented from experts and in public testimony, including letters submitted to the City Council following the close of the public hearing before the City Council, and other matters in the public record; and

NOW, THEREFORE, the City Council of the City of Culver City, California, DOES HEREBY RESOLVE as follows:

SECTION 1. GENERAL FINDINGS. Pursuant to the foregoing recitations, the following findings are hereby made:

1. Based on the findings contained in the Initial Study prepared by the City, dated September 17, 2020, the Project may have a significant effect on the environment and an EIR is required.

2. The Draft and Final EIRs, including the technical appendices and responses to comments, were prepared, circulated, and completed in compliance with CEQA.

3. Revisions have been appropriately made to the Draft EIR and such revisions, including responses to comments, and other documents related to the Draft EIR have been made a part of or incorporated into the Final EIR.

4. The revisions made to the Draft EIR and incorporated into the Final EIR do not require recirculation of the Draft EIR based on the following:
    a. No significant new information has been added that would deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project, a feasible way to mitigate or avoid such an impact that the Applicant has declined to implement, or a feasible project alternative;
    b. The new information, including certain factual corrections and minor changes, provides clarification to points and information already included in the Draft EIR;
    c. There are not significant new environmental impacts resulting from the Project from a new mitigation measure proposed to be implemented;
    d. There is no substantial increase in the severity of an environmental impact that has not been mitigated to a level of insignificance;
    e. The Applicant has not declined to adopt any feasible project alternatives or mitigation measures, considerably different from others previously analyzed, that clearly lessen the environmental impacts of the Project; and
    f. The Draft EIR is not fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment precluded.

5. The Final EIR accurately describes the Project and identifies the discretionary approvals necessary for the project as listed in the recitations above.

6. The Final EIR adequately analyzes all of the potentially significant environmental impacts of approval of the Project, mitigation measures, environmental impacts and cumulative impacts which have been mitigated to a less than significant level, alternatives to the Project on the Project site, short-term and long-term impacts, growth inducing impacts, and significant irreversible impacts.

SECTION 2. <u>CERTIFICATION FINDINGS.</u> Based on the foregoing recitations, findings and the entire record, including, without limitation, the 11111 Jefferson Boulevard Draft and Final EIR, oral and written testimony and other evidence received, at the public hearings held on the Project and the Final EIR, the City Council further finds:

1. The EIR for the Project is adequate, complete, and has been prepared in accordance with the California Environmental Quality Act (CEQA).

2. The City Council has independently reviewed and considered the EIR in reaching its conclusions.

3. The City Council has reviewed and considered the EIR, as well as the whole of the administrative record and the evidence and testimony presented in this matter, prior to approval of the Project.

4. The Final EIR reflects the decision-maker's independent judgment and analysis.

5. A mitigation monitoring program (MMP) has been prepared to enforce the mitigation measures required by the Final EIR and Project approvals (Exhibit B).

SECTION 3. CERTIFICATION OF EIR AND ADOPTION OF CEQA FINDINGS AND MITIGATION MONITORING PROGRAM. Based on the foregoing recitations and findings, the City Council does hereby (1) certify the Final Environmental Impact Report; and (2) adopt CEQA findings (attached hereto as Exhibit A and incorporated herein by reference) and the mitigation monitoring program (attached hereto as Exhibit B and incorporated herein by reference), for the 11111 Jefferson Project.

APPROVED and ADOPTED this ____ day of September 2021.

ALEX FISCH, Mayor
City of Culver City, California

ATTESTED BY:

JEREMY GREEN, City Clerk

APPROVED AS TO FORM:

for CAROL SCHWAB, City Attorney

A21-00147

EXHIBIT A
FINDINGS REQUIRED BY CEQA

Pursuant to Public Resources Code Section 21081 and California Environmental Quality Act (CEQA) Guidelines Section 15091 (Title 14 Cal. Code Regs. § 15091), no public agency shall approve or carry out a project where an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out, unless the public agency makes one or more findings for each of those significant effects, accompanied by a brief explanation of the rationale of each finding. The possible findings, which must be supported by substantial evidence in the record, are:

(1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.

(2) Changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

(3) Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR.

These findings do not attempt to describe the full analysis contained within the Draft EIR and Final EIR (collectively referred to herein as the EIR). Instead, a full explanation of these environmental findings and conclusions can be found in the EIR, and these findings hereby incorporate by reference the discussion and analyses in the EIR supporting the EIR's determination regarding the Project's impacts and mitigation measures designed to address those impacts.

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required, however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency (CEQA Guidelines, § 15091(a), (b)). With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternative, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, §§ 15093, 15043(b); see also Public Resources Code, § 21081(b)). The California Supreme Court has stated that, "[t]he wisdom of approving any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced" (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 576, 276 Cal.Rptr.410, 801 P.2d 1161). These findings reflect the independent judgment of the City and constitute its best efforts to set forth the rationale and support for its decision under the requirements of CEQA.

All Final EIR mitigation measures, as discussed below and as set forth in the Mitigation Monitoring Program (Exhibit B, following), are incorporated by reference into these findings. The Mitigation Monitoring Program also contains the Project Design Features (PDFs) that are incorporated into the Project. In accordance with the provisions of CEQA (Cal. Pub. Res. Code §§ 21000 et seq.) and the CEQA Guidelines, the City adopts these findings as part of its certification of the Final EIR for the 11111 Jefferson Boulevard Mixed-Use Project (Project). As the Project does not include any significant unavoidable impacts and all impacts are either less than significant or less than significant with implementation of mitigation measures, no statement of overriding considerations is required.

SECTION 1
ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT AFTER MITIGATION

The City Council of Culver City has determined that, where the EIR found the Project will have potentially significant project-level effects, project revisions, mitigation measures and conditions of approval will substantially mitigate those environmental effects, and that, as a result, those effects have been mitigated to a less than significant level. Thus, CEQA Finding 1 applies to these issues. The section provides the findings and facts in support of findings for the relevant issue areas.

1.1 AIR QUALITY (Construction Impacts)

FINDINGS. Construction activities would increase the frequency or severity of an existing violation for pollutant emissions but would not exceed the assumptions utilized in preparation of the Air Quality Management Plan (AQMP). Construction of the Project would exceed the applicable South Coast Air Quality Management District (SCAQMD) regional significance threshold for nitrogen oxides (NOx). In addition, the Project would exceed SCAQMD localized construction emissions thresholds for NOx, particulate matter (PM)10, and PM2.5. Furthermore, construction of the Project would generate substantial short-term Toxic Air Contaminant (TAC) emissions from Diesel Particulate Matter (DPM) that would exceed the health risk threshold for cancer risk. Implementation of PDF-TRAF-1, and Mitigation Measures AIR-1 and AIR-2 will reduce construction-related air quality impacts to a less than significant level.

FACTS IN SUPPORT OF FINDINGS. Construction related NOx emissions would exceed regulatory thresholds without mitigation during Project construction. Implementation of Mitigation Measure AIR-1 would reduce NOx emissions through implementing cleaner, more efficient construction equipment and limiting the number of haul and vendor trucks that can access the site on a given day. As shown in Table 4.1-10 of the EIR, with the implementation of Mitigation Measure AIR-1, NOx emissions would be reduced to below regulatory thresholds. Therefore, the Project would result in less than significant impacts following implementation of mitigation.

Construction related NO_X, PM10, and PM2.5 emissions would exceed regulatory screening levels without mitigation. Implementation of Mitigation Measure AIR-1 would reduce emissions through implementing cleaner, more efficient construction equipment, increasing watering to 4 times per day during site preparation and grading phases, and by limiting the

number of haul and vendor trucks that can access the site on a given day. As shown in Table 4.1-11 of the EIR, with the implementation of Mitigation Measure AIR-1, NO_X, PM10, and PM2.5 emissions would be reduced to below regulatory thresholds. Therefore, the Project would result in less than significant impacts with mitigation. Additionally, as localized concentrations would be reduced to below the localized significance thresholds, the Project is not anticipated to contribute to localized health impacts related to these pollutants.

Construction related cancer risk for both sensitive receptors would exceed regulatory thresholds without mitigation. Implementation of Mitigation Measure AIR-1 would reduce DPM emissions through implementing cleaner, more efficient construction equipment. As shown in Table 4.1-12 of the EIR, with the implementation of Mitigation Measure AIR-1, cancer risk would remain above the regulatory threshold for sensitive receptors. With implementation of Mitigation Measures AIR-1 and AIR-2, cancer risk would be reduced to below regulatory thresholds for both residential and school receptors. Therefore, the Project would result in less than significant impacts with implementation of mitigation. While cancer risk exceeds the threshold prior to implementation of Mitigation Measures AIR-1 and AIR-2, the cancer risk was based on the assumption that the worst day scenario for each construction phase occurs every day, representing a highly conservative risk estimate. When accounting for the typical daily activities that occur on the Project Site, the average daily emissions would be lower than what was used to quantify risk. Therefore, since the conservative risk scenario was reduced to below regulatory thresholds with implementation of mitigation measures, the actual risk based on an average construction day would also be below the regulatory threshold and would most likely be substantially lower than the risk presented in Table 4.1-12 of the EIR.

Cumulative Impacts: With implementation of the above PDF and mitigation measures, the Project's contribution to cumulatively significant construction impacts to air quality would not be cumulatively considerable and cumulative impacts would be less than significant for regional and localized criteria pollutants during construction.

1.2 CULTURAL RESOURCES (Archaeological Resources)

FINDINGS. Although the Project Site has been previously disturbed through grading and development for the existing development, Project construction activities may encounter buried archaeological resources and/or buried human remains. As a result, construction may cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 or disturb human remains, including those interred outside of dedicated cemeteries. Implementation of Mitigation Measures ARCH-1 through ARCH-4 will reduce construction-related impacts on Cultural Resources to a less significant level.

Operation of the new facilities on the Project Site would not result in any further ground disturbing activities such as grading or excavation; therefore, there is no potential to encounter, alter, or disturb archaeological resources.

FACTS IN SUPPORT OF FINDINGS. No known archaeological resources were identified within or immediately adjacent to the Project Site, although the majority of the Project Site is

developed which may have obstructed the identification of surface resources. In addition, this does not preclude the possibility that subsurface archaeological deposits underlie the Project Site. Such resources could qualify as historical resources or unique archaeological resources under CEQA and impacts to any such resources would constitute a significant impact on the environment. Prehistoric or Native American archaeological resources are the material remains the results from human activities that predate written records and can include village sites, temporary camps, lithic (stone tool) scatters, rock art, roasting pits/hearths, milling features, rock features, and human remains. Historic archaeological resources can include refuse heaps, bottle dumps, ceramic scatters, privies, foundations, and human remains and are generally associated in California with the Spanish Mission Period to the mid-20th century of the American Period.

Excavations associated with the original construction of the existing uses on the Project Site and the installation and removal of underground storage tanks may have displaced or destroyed buried archaeological resources. However, it is possible that other buried historic or prehistoric archaeological resources still exist underneath the Project Site given that resources have been recovered during construction in similar settings and given the large number of archaeological resources that have been recorded in the area. For instance, two of the 26 known prehistoric or Native American archaeological sites identified through the records search are located within a 0.5-mile radius of the Project Site. Moreover, two prehistoric metate artifacts were recently encountered during construction and redevelopment of a project near Downtown Culver City. In regard to historic archaeological resources, review of historic aerial photographs reveal that the eastern portion of the Project Site was subject to historic period land uses (agricultural and residential uses) dating back to the early 1920s through the 1950s. This suggests that the Project Site has potential to contain historic archaeological resources. In addition, many areas of the Project Site are developed with a surface parking lot, and these areas would not have been subject to deep excavations that would have displaced or destroyed resources that may be present. Therefore, the sequence of construction and development at the Project Site may have allowed for preservation of buried archaeological resources. Lastly, it is anticipated that excavations for the Project will reach depths of up to 25 feet below ground surface (bgs). The Geotechnical Report does not provide information regarding depth or thickness of artificial fill soils at the Project Site, but it does indicate that surface materials consist of asphalt, concrete, and aggregate base (2.5 to 7.5 inches bgs), followed by 12 to 16 feet of stiff clay with variable sand content underlain by alternating layers and/or lenses of medium dense to very dense sand.

In the event that Archeological resources are found, the Project is required to comply with Mitigation Measures ARCH-1 through ARCH-4, ensuring proper identification, treatment and preservation of any resources, and reducing significant impacts on archaeological resources and human remains to less than significant levels. These regulations require excavation monitoring, and treatment and curation of discoveries. Therefore, to the extent impacts on archaeological resources may occur, the impacts would be less than significant.

Cumulative Impacts: The related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. In association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures will be

required for related projects that have the potential to cause significant impacts to undiscovered resources. Implementation of such mitigation measures will avoid significant impacts. For those projects not subject to CEQA review, there could be some potential for impacts on archaeological resources. However, since the Project would be subject to Mitigation Measures ARCH-1 through ARCH-4, ensuring proper identification, treatment, and preservation of any resources, and reducing significant impacts on archaeological resources and human remains, contribution from the Project will not be cumulatively considerable, and the cumulative impacts of the Project will be less than significant.

GEOLOGY AND SOILS (Paleontological)

FINDINGS. Although the Project Site has been previously disturbed through grading and development for the existing post office, Project construction may encounter native soil/sediment associated with younger Quaternary Alluvium, which has a low-high potential for preserving buried paleontological resources. As a result, construction may directly or indirectly destroy unique paleontological resources or sites or unique geologic features. Implementation of Mitigation Measures GEO-1 through GEO-4 will reduce construction-related impacts on Geology and Soils to a less significant level.

Operation of the new facilities on the Project Site would not result in any further ground disturbing activities such as grading or excavation; therefore, there is no potential to encounter, alter, or disturb paleontological resources. No operational impacts would occur.

FACTS IN SUPPORT OF FINDINGS. The Project Site is completely developed with three single story commercial buildings, surface parking, and landscaping, with no visible soil/sediment or rock outcrops to examine for paleontological resources or fossiliferous geological formations. The surficial sediments of the Project Site identified as younger Quaternary alluvium are assigned low to high paleontological sensitivity, increasing with depth. Based upon the depth at which fossils have been found within three miles of the Project Site (as shallow as 12 feet bgs) as indicated in the record search results from the Natural History Museum of Los Angeles County (LACM), it is estimated that the transition from low to high sensitivity sediments occurs at around 10 feet bgs. Since it is anticipated that excavations at the Project Site would exceed 10 feet in depth and would reach depths of up to 25 feet bgs, Project excavations have the potential to impact older alluvium determined as having a high sensitivity for retaining paleontological resources.

The Project is required to comply with the Mitigation Measures GEO-1 through GEO-4, requiring construction monitoring of excavation activities and treatment and curation of discoveries, ensuring proper identification, treatment, and preservation of any resources that are encountered during excavation. These mitigation measures would reduce the potential for significant impacts on paleontological resources to less than significant levels.

Cumulative Impacts: The related projects, like the Project, are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. For related projects that have the potential to encounter buried or subsurface paleontological resources during construction, these are expected to implement standard mitigation measures to reduce impacts on

paleontological resources. With the incorporation of Mitigation Measures GEO-1 through GEO-4, the Project will result in less than significant impacts to paleontological resources. Therefore, as impacts on paleontological resources from related projects would be less than significant with implementation of mitigation measures, and as the Project would mitigate its potential impacts to paleontological resources to a less than significant level, cumulative impacts would be less than significant.

NOISE (Construction Impacts)

FINDINGS. Construction activities will increase noise levels at off-site noise-sensitive receptors in excess of ambient noise levels and the applicable thresholds. Implementation of PDF-NOISE-1, PDF-NOISE-3, and PDF-NOISE-4, PDF-TRAF-1, and Mitigation Measures NOISE-1 and NOISE-2 will reduce construction noise levels to a less significant level.

FACTS IN SUPPORT OF FINDINGS. Construction activities will temporarily increase the existing ambient noise in close proximity of the construction site and are estimated to reach a maximum of 86 A-weighted decibels (dBA) at the nearest sensitive receptors (R1, R2, and R3) (Table 4.8-7 of the EIR). Construction activities will comply with the City's noise standard and construction will occur during allowable hours and will be temporary in nature. Policy 2.A of the Culver City General Plan Noise Element requires noise reduction techniques to ensure that the construction noise impacts are minimized to the maximum extent feasible. Implementation of PDF-NOISE-1 through PDF-NOISE-4 will help reduce Project noise impacts during construction. Construction traffic noise levels generated by truck trips will be below the threshold.

Based on the analyses in the EIR, the Project will result in construction noise impacts. Mitigation Measure NOISE-1, which requires the installation of a noise barrier, Mitigation Measure NOISE-2 and which requires construction equipment to be equipped with properly operating and maintained noise shielding and muffling devices, combined with PDF-NOISE-1 PDF-NOISE-3, PDF-NOISE-4, and PDF-TRAF-1, will reduce construction noise levels to a less than significant level. With implementation of PDFs, mitigation measures and City requirements for Construction Management Plans, construction noise impacts will be less than significant at the sensitive receptor locations.

Cumulative Impacts: Noise associated with other cumulative construction projects will be required to comply with the City's construction noise standards and Culver City General Plan Noise Element Policy 2.A, similar to the Project, and will be required under CEQA, if necessary, to reduce construction noise levels to the degree reasonably and technically feasible through proposed mitigation measures for each individual project, including time restrictions for construction activities. PDF-TRAF-1, which requires construction management meetings, will ensure concurrent construction projects are managed in collaboration with one another. With implementation of PDFs and mitigation measures, cumulative construction noise impacts will be less than significant.

TRANSPORTATION

FINDINGS. The Project would not exceed the City's threshold for household vehicle miles

traveled (VMT) per capita for the residential uses but would exceed the City's threshold for daily work VMT per employee for the office uses, resulting in potentially significant impacts. With implementation of Mitigation Measure TRAF-1, VMT impacts would be reduced to less than significant.

FACTS IN SUPPORT OF FINDINGS. The Project is estimated to generate a total of 4,934 daily vehicle trips and a total daily VMT of 32,774. The daily household VMT per capita for the Project is estimated at 5.7, which is below the threshold of 7.1 for the City. Each of the restaurant, retail, gym/studio fitness center, and supermarket spaces proposed for the Project would be under 50,000 square feet (sf) in size and therefore would be considered to be local-serving. As local-serving retail uses are screened from further VMT analysis, the retail VMT impact would be considered to be less than significant. The daily work VMT per employee for the Project is estimated at 9.2, which is above the threshold of 8.6 for the City. Accordingly, Project-generated VMT would be below the City's household VMT significance threshold but would exceed the City's work VMT significance threshold. Therefore, the Project would result in a potentially significant VMT impact.

Mitigation Measure TRAF-1 requires the Project to implement a Transportation Demand Management (TDM) Program to reduce the VMT impacts from office uses. The TDM Program will be subject to review and approval by the City's Planning Division, Public Works Mobility and Traffic Engineering Division, and Transportation Staff prior to the issuance of the first building permit for the Project. The TDM Program shall include a Commute Marketing Program to educate and inform travelers about site-specific transportation options and the effects of travel choices, with educational and promotional materials, and a TDM Coordinator from building management to oversee the TDM program. The TDM will also include Off-Street Parking Pricing requiring employees of the office land use to pay for parking within the Project Site. With implementation of Mitigation Measure TRAF-1, the Project's daily work VMT per employee would be reduced from 9.2 to 8.4, which would be below the threshold of 8.6 for the City. Therefore, with implementation of Mitigation Measure TRAF-1, VMT impacts would be reduced to less than significant.

Cumulative Impacts: Similar to the Project, any related project that would be subject to environmental review would be required to evaluate VMT on a project-by-project basis. If the related project were determined to have potentially significant VMT impacts, it would be required to include appropriate mitigation measures to reduce VMT impacts to a less-than-significant level. The Project would result in a potentially significant impact on work VMT per employee as estimated by the VMT Calculator. With implementation of Mitigation Measure TRAF-1, which would require the Project to implement a TDM Program including a Commute Marketing Program and Off-Street Parking Pricing, impacts on work VMT per employee would be reduced to less than significant. As the Project would result in a less than significant impact on VMT with implementation of Mitigation Measure TRAF-1, the Project would similarly result in a less than significant impact on VMT in cumulative conditions, and further analysis is not necessary.

ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT PRIOR TO MITIGATION

This section sets forth the environmental impacts found to be less than significant prior to mitigation, and with respect to each impact states facts in support of these findings.

AIR QUALITY (Operational Impacts and CO Hotspot)

FINDINGS. Section 4.1 of the EIR concludes that operation of the Project will not conflict with or obstruct implementation of relevant air quality policies in the adopted AQMP. In addition, the operation of the Project will not exceed the applicable SCAQMD regional significance thresholds. Operation of the Project will not exceed the applicable SCAQMD significance thresholds for ozone precursor emissions (i.e., volatile organic compounds [VOCs] and NOX), PM10, or PM2.5, or the localized significance thresholds at off-site sensitive receptors.

With regard to carbon monoxide (CO) hotspots impacts, the Project will not cause or contribute to an exceedance of the California Ambient Air Quality Standards (CAAQS) one-hour or eight-hour CO standards of 20 or 9.0 parts per million (ppm), respectively. Operation of the Project will not include permanent sources (equipment, etc.) that will generate substantial long-term TAC emissions in excess of the health risk thresholds. Based on the analyses contained in the EIR, operation-related air quality impacts will be less than significant.

FACTS IN SUPPORT OF FINDINGS. The AQMP was prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. The Project will not generate growth beyond the range of development anticipated within the established Southern California Association of Governments (SCAG) regional forecast for Culver City nor will the Project increase or induce residential density growth not otherwise anticipated. The Project will concentrate employment growth in an area served by regional and local bus lines as well as bicycle and pedestrian facilities. As such, the Project will be consistent with SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) policies for the concentration of growth in proximity to transit. The Project will not spur additional growth other than that already anticipated for Culver City and will not eliminate impediments to growth. Consequently, the Project will not foster growth inducing impacts. The Project will not conflict with or obstruct the implementation of the AQMP.

With regard to regional air emissions, operational criteria pollutant emissions were calculated for mobile, area, and stationary sources for the Project buildout year (2024). As identified in Table 4.1-6 of the EIR, the net increase in operational-related daily emissions (Project emissions minus existing emissions) criteria and precursor pollutants (VOC, NO_X, CO, SO_X, PM10, and PM2.5) will be substantially below the SCAQMD regional thresholds of significance. Therefore, the Project will result in less than significant operational impacts relative to regional emissions.

The South Coast Air Basin (Air Basin) is currently in non-attainment under federal or state standards for ozone, PM10, and PM2.5. Future operations will generate ozone precursors (i.e., VOCs and NO_X), CO, PM10, and PM2.5, though operational emissions would be below SCAQMD significance thresholds as shown in Table 4.1-6 and Table 4.1-8 of the EIR. Therefore, the Project's incremental contribution to long-term emissions of non-attainment

pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable, and therefore the cumulative impact of the Project would be less than significant.

The potential for the Project to cause or contribute to CO hotspots was also evaluated. The analysis concludes that the Project will not cause or contribute considerably to the formation of CO hotspots and that CO concentrations at Project impacted intersections will remain well below the ambient air quality standards. As shown in Table 4.1-2 of the EIR, CO levels in the Project area are substantially below the federal and state standards. Maximum CO levels in recent years are 2.2 ppm or less (one-hour average) and 1.3 ppm or less (eight-hour average) compared to the thresholds of 20 ppm (one-hour average) and 9.0 ppm (eight-hour average). As detailed under the Section 4.1.4 of the EIR, a screening threshold of 100,000 vehicles per day is used to determine potential significance with result to intersection analysis for CO hotspots.

Based on the Project's traffic data of the studied intersections, Sepulveda Boulevard and Culver Boulevard would have peak traffic volumes of 61,180 per day, which is substantially below the 100,000 trip per day screening threshold. As a result, CO concentrations are expected to be less than those estimated in the 2003 AQMP, which would not exceed the thresholds. Thus, this comparison demonstrates that the Project would not contribute considerably to the formation of CO hotspots. The Project would result in less than significant impacts with respect to CO hotspots.

In terms of TAC emissions during operations, the Project is not anticipated to generate a substantial number of daily truck trips, nor would it result in the emission of other TACs at a level where concern would be raised regarding health risk. The minor use of TACs onsite would be consistent with, or less than, what is currently used under the existing conditions. Additionally, the emergency generator associated with the operation of the Project would be required to be permitted by the SCAQMD and therefore would not be permitted to emit TAC emissions in excess of regulatory thresholds. Therefore, the Project would not warrant the need for a health risk assessment associated with on-site operational activities, and potential TAC impacts are expected to be less than significant.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Project would remove the existing automotive repair facility and would not add a new TAC source. Minimal emissions of TAC are expected from diesel trucks (less than 100 per day) and the use of consumer products (e.g., aerosol sprays). Therefore, the Project is not expected to release substantial amounts of TACs during operational activities, and no significant impact on human health would occur.

Implementation of PDF-TRAF-1 and compliance with applicable requirements, operation-related air quality impacts will be less than significant.

Cumulative Impacts: 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 the AQMP. The Project will not conflict with or obstruct implementation of AQMP and will 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's regional and localized emissions will be below SCAQMD significance thresholds (see Table 4.2-6 and Table 4.2-8 in the EIR). Therefore, the Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, will not be cumulatively considerable. Therefore, cumulative impact of the Project will be less than significant.

ENERGY

FINDINGS. Project construction would utilize fuel-efficient equipment, comply with idling restrictions, regulations, and would comply with State measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. Thus, Section 4.3 of the EIR concludes that construction of the Project will not result in wasteful, inefficient, and unnecessary consumption of energy, and will not preempt opportunities for future energy conservation.

Project operations include sustainable design features that would comply with energy efficiency regulatory requirements. Furthermore, the Project's land use characteristics (such as proximity to transit and a variety of uses) and location would minimize vehicle trips and VMT. Thus, Section 4.3 of the EIR concludes that operation of the Project will not result in the wasteful, inefficient, and unnecessary consumption of energy and will not preempt opportunities for future energy conservation.

FACTS IN SUPPORT OF FINDINGS.

Construction Impacts: Construction of the Project would result in energy consumption from the use of heavy-duty construction equipment, on-road trucks, and construction workers commuting to and from the Project Site. Heavy-duty construction equipment would be primarily diesel-fueled; this assumption represents the most conservative scenario for maximum potential energy use during construction. The estimated total diesel fuel that would be consumed by heavy-duty construction equipment is shown in Table 4.3-4 of the EIR. Electricity would be used during construction to provide temporary power for lighting and electronic equipment and to power certain construction but would generally not result in a substantial increase in on-site electricity consumption and would be substantially less than the energy use under existing conditions. It is expected that construction electricity use would be temporary and negligible over the long-term.

Construction of the Project would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations, anti-idling regulations, and fuel requirements, and would comply with State measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. Compliance with these regulations would result in fuel savings from the use of more fuel-

efficient engines. Idling restrictions and the use of cleaner, energy-efficient equipment would result in less fuel combustion and energy consumption and thus reduce the Project's construction- related energy use. Therefore, construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Operational Impacts: The Project's estimated net operational energy demand is provided in Table 4.3-5 of the EIR. Operational energy consumption would occur as a result of the building's energy needs and the use of transportation fuels associated with vehicles traveling to and from the Project Site. Daily operation of the Project would consume energy in the form of electricity and natural gas. Building energy use factors and water demand factors from the California Emissions Estimator Model (CalEEMod), consistent with the Project analyses conducted for air quality and greenhouse emissions, are used to estimate building energy use.

The Project would install solar electric photovoltaic systems and would be designed to meet the applicable standards of the City's mandatory Green Building Program requirements such as energy-efficient appliances, water efficient plumbing fixtures and fittings, and water-efficient landscaping. Though it is anticipated that the Project would consume electricity from renewable sources and would have no impact on Southern California Edison (SCE)'s electricity generation, the Project conservatively assumes Project-related net increase in annual electricity consumption of 5,370,034 kilowatt hours (kWh) per year, representing approximately 0.006 percent of SCE's total energy sales.

With compliance with 2019 Title 24 standards and applicable CALGreen Code requirements, buildout of the Project is projected to generate a net increase in the on-site demand for natural gas totaling approximately 4,393 million British thermal units (MMBtu) per year. Natural gas supplies within Southern California Gas Company (SoCalGas)' planning area is estimated to be approximately 1,300,164,675 MMBtu in 2024; the Project would account for approximately 0.0003 percent of the 2024 forecasted consumption in SoCalGas' planning area. Operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of natural gas.

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site as well as from the operation of the emergency generator. As summarized in Table 4.3-5 of the EIR, the Project's estimated net increase in petroleum-based fuel usage would be approximately 174,487 gallons of gasoline and 40,071 gallons of diesel per year. The Project would account for 0.005 percent of County gasoline consumption and 0.02 percent of County diesel consumption (based on the available County fuel sales data for the year 2019). In accordance with the CALGreen Code, infrastructure for electric vehicle (EV) charging stations for both the residential and retail uses on the Project Site would be provided, including 132 EV capable spaces, 66 EV charging stations, and 66 EV- ready spaces. Alternative-fueled, electric, and hybrid vehicles, as purchased or utilized by residents and visitors to the Project Site, have the potential to reduce the Project's consumption of gasoline and diesel.

The Project Site is an infill location close to retail, restaurant, services, educational, and religious institutions, and in close proximity to existing public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. The Project would provide a pedestrian-friendly design, new 8-foot wide sidewalks, promote access from the nearby transit, as well as provide bicycle storage areas for Project residents, employees, and visitors. As a result, operation of the Project would provide residents, employees, and visitors with alternative transportation options. The Project would be consistent with the energy efficiency policies emphasized by and not conflict with the 2020-2045 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions.

Accordingly, the Project would minimize operational transportation fuel demand consistent with and not in conflict with State, regional, and City goals. Therefore, operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, and impacts would be less than significant.

Cumulative Impacts: Buildout of the Project, related projects, and additional forecasted growth in SCE's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. SCE total energy sales in 2019 (the latest data available) was 84,654,000 megawatt-hours (MWh) of electricity. Based on the Project's estimated net new electrical consumption of 5,370 MWh per year, the Project would account for approximately 0.006 percent of SCE's total sales in the Project's buildout year.

Natural gas consumption within SoCalGas' planning area is estimated to be approximately 3,435 million cubic feet (cf) per day in 2024 (the Project's buildout year). The Project would account for approximately 0.0003 percent of the 2024 forecasted consumption in SoCalGas' planning area. SoCalGas forecasts take into account projected population growth and development based on local and regional plans, and the Project's growth and development would not conflict with those projections.

At buildout, the Project would consume a total net increase of 174,487 gallons of gasoline and 40,071 gallons of diesel per year, representing approximately 0.005 percent of the 2019 annual on-road gasoline and 0.02 percent of the annual on-road diesel-related energy consumption in Los Angeles County, as shown in Appendix D of the EIR.

Thus, Project development would result in the use of renewable and non-renewable electricity, natural gas, gasoline, and diesel resources during construction and operation on a relatively small scale, which would be reduced by measures making the Project more energy-efficient and would be consistent with growth expectations for the area. Therefore, the Project's cumulative impacts related to wasteful, inefficient and unnecessary use of electricity, natural gas, gasoline, and diesel would be less than significant.

The Project would be generally consistent with the 2020-2045 RTP/SCS and would include some land use characteristics that would encourage alternative transportation and a reduction in overall VMT. Culver City Bus stops that travel along the Project Site frontages

provide service to UCLA, Metro C (Green) Line Station, and the Metro E (Expo) Line Light Rail, which provides service between downtown Los Angeles and Santa Monica, with connections to the Metro B (Red), D (Purple), B (Blue), and J (Silver) Lines. As a result, operation of the Project would provide residents, employees, and visitors with alternative transportation options.

In addition to providing access to the regional transit network, the Project would support statewide efforts to improve transportation energy efficiency by locating at an infill location close to shopping centers and other destinations. Siting land use development projects at infill sites is consistent with the State's overall goals to reduce VMT as outlined in the 2020-2045 RTP/SCS for the region, which seeks improved access and mobility by emphasizing "growth in areas rich with destinations and mobility options." Since the Project would be consistent with the 2020-2045 RTP/SCS, cumulative impacts due to wasteful, inefficient or unnecessary use of transportation fuel would be less than significant.

The Project's growth and development would be consistent with regional growth projections, and, the Project's incorporation of energy efficiency measures would meet applicable required City and State energy plans and standards. As such, the Project's cumulative impacts due to conflicting with or obstruction of a state or local plan for renewable energy or energy efficiency would be less than significant.

GREENHOUSE GAS EMISSIONS

FINDINGS. Section 4.4 of the EIR concludes that the Project will generate greenhouse gas (GHG) emissions due to construction and operational activities. The Project's annual direct and indirect GHG emissions will be generated from development that is located and designed to be consistent with relevant goals and actions to reduce Project emissions as much as feasibly possible, as well as consistent with the Health and Safety Code (HSC) Division 25.5 goals and California Air Resources Board (CARB) guidelines for assessing GHG emissions. Therefore, the Project's GHG emissions and associated impacts will be less than significant.

FACTS IN SUPPORT OF FINDINGS. In accordance with SCAQMD's recommendation, the Project's estimated construction GHG emissions were amortized over a 30-year period in order to include these emissions as part of the Project's annualized lifetime total emissions, so that GHG reduction measures address construction GHG emissions as part of the operational GHG reduction strategies. The emissions of GHGs associated with operation of the Project were calculated using CalEEMod, taking into account the Project's compliance with the portions of the City's Green Building Code and mandatory Green Building Program applicable to new developments. As shown in Table 4.5-7 of the EIR, the Project's GHG emissions represent a minimum of a 21.6 percent reduction in emissions as compared to a scenario without GHG reduction features and measures.

Emissions reductions from the Project's two highest GHG-emitting sources, mobile and electricity, would occur over the next decade, and beyond, ensuring that the Project's total GHG emissions will be further reduced. Emissions from electricity would decline as utility providers, including SCE, meet their Renewable Portfolio Standards obligations to provide 50 percent of their electricity from renewable electricity sources by 2030, which would achieve

additional reductions in emissions from electricity demand. Although the actual reduction will depend on the mix of fossil fuels that SCE will replace with renewables and the relative CO2 intensities of those fossil fuels. Project emissions from mobile sources will also decline in future years as older vehicles are replaced with newer vehicles resulting in a greater percentage of the vehicle fleet meeting more stringent combustion emissions standards, such as the model year 2017-2025 Pavley Phase II standards. The Project will not generate GHG emissions that may have, either directly or indirectly, a significant impact on the environment, and the impact will be less than significant.

Consistent with SCAG's 2020-2045 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would accommodate projected increases in employment and travel demand in areas that are accessible and well-served by existing transit options. The Project would be an urban infill development and would be located close to retail, restaurant, and services, educational and religious institutions, and near existing public transit stops, which would result in reduced vehicle trips and VMT compared to model default assumptions. The Project would also feature a TDM Program that would reduce Project-related VMT, including strategies to minimize VMT such as: Site Design/Pedestrian Network Improvements to encourage walking, biking, and taking transit, and amenities such as new sidewalks and street trees along the perimeter, improved street and pedestrian lighting, pedestrian network within the site. The TDM would also include a Commute Marketing Program involving the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options.

Cumulative Impacts: Given that the Project will generate GHG emissions consistent with applicable reduction plans and policies, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions will be less than cumulatively considerable, and impacts will be less than significant.

HAZARDS AND HAZARDOUS MATERIALS

FINDINGS. Section 4.6 of the EIR concludes that the Project would not create a significant hazard to the public or environment through conditions involving the release of hazardous materials with compliance with applicable regulations. While the Project would include temporary use of hazardous substances during construction within one-quarter mile of a school, the handling of such materials would occur on the Project Site and be disposed of in accordance with applicable laws and regulations. Project Site is located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, however, the Project would not create a significant hazard to the public or the environment. Accordingly, impacts would be less than significant.

FACTS IN SUPPORT OF FINDINGS. The Project would involve the demolition and removal of the existing on-site buildings where there is potential for the presence of lead based paint (LBP) and asbestos containing material (ACM). Testing of any suspected buildings or portions thereof for LBP or ACM would be conducted in accordance with regulatory requirements, including SCAQMD Rule 1403 and California Code of Regulations (CCR) Title 8, Section 1532.1. In the event that LBP and/or ACM are discovered, their removal would be subject to specific and detailed SCAQMD and California Occupational Safety and Health

Administration (Cal/OSHA) requirements to ensure the proper training, containment, handling, notification, and disposal of these materials by licensed asbestos and LBP abatement contractors. In addition, Cal/OSHA regulates worker exposure to airborne contaminants (such as those identified in the subsurface soils) during construction under Title 8, Section 5155, Airborne Contaminants, which establishes which compounds are considered a health risk, exposure limits for such compounds, protective equipment, workplace monitoring, and medical surveillance required for compliance.

The Project includes the excavation of soils to accommodate one level of subterranean vehicular parking. Soil and soil vapor samples were collected to test the soils as it relates to contamination related to the former agricultural uses, the former gasoline station and former underground storage tanks (UST), and existing hydraulic lift within the post office building. With regard to the aboveground storage tanks (ASTs) observed on the Project Site, all oil containers would be properly removed in accordance with regulatory requirements from the Project Site prior to re-development. A Phase II Environmental Site Assessment (ESA) was completed dated September 14, 2019. As it relates to the former agricultural uses, testing revealed that the concentrations of pesticides, leads, and arsenic are not of concern. In addition, as it relates to the former gasoline station and former UST as well as the hydraulic lift within the post office building, a Vapor Intrusion Human Health Risk Assessment (VIHHRA) was recommended and was completed to evaluate potential adverse health effects to future building occupants resulting from the transport of chemicals detected in subsurface soils to indoor air at the Project Site. The VIHHRA used four soil vapor samples. Potential risks were evaluated under a reasonable maximum exposure (RME) scenario consistent with the United States Environmental Protection Agency (USEPA) and the California Department of Toxic Substances (DTSC) guidance and on a sample point-by-point basis to provide a complete profile of potential cancer risks (CR) and non-cancer hazards (expressed as a Hazard Index or HI) associated with soil vapor at the Project Site. The results indicate that estimated potential cancer risks were below the benchmark of 1E-05 for commercial use properties regardless of which screening levels were used. Non cancer hazards were well below the target of 1 when using either screening levels.

The Project is not located within 300 feet of an oil or gas well or 1,000 feet of a methane producing site. In addition, according to the California Department of Conversation, Geologic Energy Management Division (CalGEM)'s Well Finder, no oil or natural gas wells are located on or adjacent to the Project Site, indicating that methane is not considered to be a significant environmental concern in this area. While the Project Site is located within USEPA Radon Zone 2 where the predicted average indoor radon concentrations are between 2.0 and 4.0 picocurries per liter (pCi/L), as the Project Site has no current or proposed occupied subgrade areas, further investigation of indoor radon is not warranted. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant.

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.

Operation of the Project would not create a significant risk of exposure to hazardous materials for the public or the environment. Occupancy of the proposed residential and commercial 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. Therefore, while the Project would emit small quantities of potentially hazardous materials typical of maintenance or operational uses within one-quarter mile of an existing or proposed school, all materials would be disposed of in accordance with applicable laws and regulations, and impacts would be less than significant.

The Project Site was identified as in the Hazardous Waste Information System (HAZNET), Facility Index System (FINDS), Recovered Government Archive Leaking Underground Storage Tank (RGA LUST), Los Angeles Co. Hazardous. Materials System (HMS), Aboveground Storage Tanks (AST), Statewide Environmental Evaluation and Planning System Underground Storage Tanks (SWEEPS UST), Hazardous Substance Storage Container Database Underground Storage Tanks (HIST UST), California Facility Inventory Database Underground Storage Tanks (CA FID UST), Enforcement and Compliance History Online (ECHO), EDR Hist Auto, Resource Conservation and Recovery Act – Small Generator (RCRA)-SQG, Listing of leaking underground storage tank (LUST), Cortese, Historical "Cortese" Hazardous Waste & Substances Sites List (HIST CORTESE), California Environmental Reporting System (CERS), CERS HAZ WASTE, CERS TANKS, Hazardous Waste Tracking System (HWTS), and RCRA Nongen/NLR environmental database reports.. According to the listings, the Project Site was occupied by a gasoline service station between 1969 and 1994. There were no violations for the various HAZNET listings for the disposal of waste oil and other organic solids off-site. In addition, according to the SWEEPS UST listings, one 5,000-gallon fuel UST, two 10,000-gallon fuel USTs, and one 1,000-gallon oil UST were located on the Project Site. The Phase II ESA and VIHHRA concluded that future building occupants would not be at risk from the former gasoline service station, hydraulic lift, and soil vapor. Therefore, the Project would not create a significant hazard to the public or the environment, and impacts would be less than significant.

Cumulative Impacts: The related projects include residential or standard mixed use development which, like the Project, will not be of a type (e.g., industrial, manufacturing, power generation facilities, etc.) typically associated with the use or emission of large quantities of hazardous materials/waste. Development located within the vicinity of the Project Site will be subject to similar local, regional, State, and Federal regulations and manufacturer instructions pertaining to hazardous materials as the Project, and like the Project, will not pose a significant hazard to the Project or other existing and planned development in the area with adherence to these regulations and instructions. Cumulative impacts related to upset and accident conditions, listed hazardous materials/waste sites, and the emission of hazardous materials (including within one-quarter mile of a school) will be

less than significant. Like the Project, the cumulative projects will be evaluated on a project-by-project basis to determine consistency with applicable plans. Cumulative impacts related to hazards and hazardous materials will be less than significant.

LAND USE AND PLANNING

FINDINGS. Section 4.7 of the EIR concludes that the Project, with the approval of the requested discretionary actions, including a Comprehensive Plan, would not conflict with or impede implementation of applicable land use plans, policies, or regulations 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. Therefore, the impact would be less than significant.

FACTS IN SUPPORT OF FINDINGS. Project consistency with applicable land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect are addressed in detail in Section 4.7 of the EIR. Plans evaluated include the Culver City General Plan Land Use and Open Space Elements; Culver City Bicycle & Pedestrian Action Plan; Culver City Urban Forest Master Plan; Culver City Zoning Code; SCAG's 2020-2045 RTP/SCS, and Metro's Active Transportation Strategic Plan (ATSP).

The Project would be consistent with the Culver City General Plan, as shown in Table 4.7-1. The Project would provide a mixed-use development with 230 residential units that would encourage a variety of housing opportunities, provide affordable dwelling units, and encourage new business opportunities. It would also enhance the pedestrian amenities in the area, provide streetscape improvements, and locate desirable neighborhood serving retail in the area. By including over 66,000 sf of open space, it would provide recreational open space within walking distance of neighborhood. The Project would establish bicycle lanes along the abutting segment of Sepulveda Boulevard between Machado Road and Jefferson Boulevard, as well as contribute funds to the City towards the design and construction of bike lanes on Sepulveda Boulevard between Machado Road and the Ballona Creek Bike Path. This bicycle infrastructure link with Ballona Creek Bike Path would encourage bicycling trips to and from the Project Site and other areas of Culver City.

The Project would be consistent with the City's Bicycle and Pedestrian Action Plan. The Project would provide 71 long-term and 26 short-term bicycle parking spaces in various locations throughout the Project Site. In addition, the Project would include the installation of new 8-foot wide sidewalks along the three street frontages, Sepulveda and Jefferson Boulevards, and Machado Road.

The Project would be consistent with the City's Urban Forest Master Plan by installing new-eight foot wide sidewalks on all frontages. It would also provide several open space areas with additional trees and landscaping.

As discussed in more detail in Table 4.7-2, the Project would be consistent with the Culver City Zoning Code. The Project entitlements include a Zoning Map Amendment to establish a Planned Development Zone and a Comprehensive Plan, which allows flexibility in the application of zoning code standards to proposed development. The Comprehensive Plan

allows flexibility in design and allows deviation from the Zoning Code to the extent that the Project implements standards that differ from the Culver City Zoning Code.

The Project would be consistent with applicable 2020-2045 RTP/SCS policies. The Project would locate 230 residential units near the Westfield Culver City Transit Center and multiple regional and local bus lines, Interstate 405 (I-405) and Interstate 10 (I-10), and bicycle facilities. In addition, the Project includes the provision of bicycle and pedestrian amenities within an HQTA. As shown in Table 4.7-3, the Project would be consistent with 2020-2045 RTP/SCS goals to encourage economic prosperity; improve mobility, accessibility, reliability, and travel safety; enhance the preservation security, and resilience of the regional transportation system; increase the productivity of the transportation system, reduce GHG emissions and improvement of air quality; support healthy and equitable communities; adapt to climate change and support an integrated regional development pattern; leverage new transportation technologies and data driven solutions that result in more efficient travel; encourage development of diverse housing types; and promote conservation of natural and agricultural lands and restoration of habitats.

The Project represents infill development on an already urbanized site and would not conflict with or impede implementation of applicable land use plans, policies, or regulations 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. Therefore, the impact would be less than significant.

Cumulative Impacts: Related projects are subject to CEQA review and review by City regulatory agencies. Most notably, related projects seeking increases in permitted densities or height are subject to review by the Culver City Planning Division and other City Departments and divisions for consistency with plan provisions and other City requirements. The related projects represent infill development and as such are consistent with local and regional policies to concentrate development near public transit and encourage alternative transportation to single occupant cars. Based on this and based on the determination that the Project will be consistent with the adopted land use plans and zoning, cumulative impacts regarding consistency with the land use regulatory framework will be less than significant.

NOISE (Operational Noise, Construction and Operational Vibration)

FINDINGS. Operation of the Project will not increase noise levels at off-site noise-sensitive receptors in the Project Area in excess of the applicable thresholds. In addition, operational activities will not substantially increase the ambient noise levels in the vicinity of the Project. Thus, operational noise impacts will be less than significant. Construction and operational activities would not exceed the vibration significance thresholds. Thus, vibration impacts would be less than significant.

FACTS IN SUPPORT OF FINDINGS. The EIR analyzed operational traffic noise at the existing baseline condition and future conditions mechanical equipment noise, parking structure noise, loading dock noise and outdoor open space noise. An evaluation of the combined noise levels from the Project's various operational noise sources (i.e., composite noise level) was also conducted to conservatively ascertain the potential maximum Project-

related noise level increase that may occur at the nearest noise-sensitive receptors.

The maximum increase in Project-related traffic noise levels compared to existing traffic baseline conditions, future (2024) traffic conditions, and future (2045) traffic conditions would be below the 5 dBA increase threshold, and the increase in sound level would be lower at the remaining roadway segments analyzed. The Project-related traffic noise increases would be less than significant, and no mitigation measures are required.

The operation of mechanical equipment such as air conditioning equipment and an emergency generator may generate audible noise levels. A majority of the Project's mechanical equipment, including an emergency generator, would be located within enclosed mechanical rooms on a subterranean parking level. Mechanical equipment that would be fully shielded from nearby noise sensitive uses would avoid conflicts with adjacent uses and would not result in audible increases in noise levels. A mechanical area at the northwest corner of the building includes one mechanical unit that would be exposed on the top. The Project's mechanical equipment would be designed pursuant to PDF-NOISE-2. Pursuant to PDF-NOISE-2, exposed mechanical equipment would not exceed 55 dBA equivalent sound level (L_{eq}) from 7:00 AM to 10:00 PM and 50 dBA L_{eq} from 10:00 PM to 7:00 AM at the neighboring property lines including the north and west property lines per the sound level limits of the Culver City General Plan Noise Element. Implementation of PDF-NOISE-2 would ensure that operational noise impacts are minimal and less than significant, therefore, no mitigation measures are required.

Using the Federal Transit Administration (FTA)'s reference noise level of 92 dBA Sound Exposure Level (SEL) at 50 feet from the noise source for a parking lot, noise levels from each of the proposed parking access driveways was estimated. Table 4.8-12 of the EIR, summarizes estimated parking-related noise levels and potential increases in ambient noise at the nearest sensitive receptors. Parking related noise from individual driveways as well as the total of all three driveways would not result in significant increases in ambient noise levels.

Loading dock activities such as truck movements/idling and loading/unloading operations generate noise levels that have the potential to adversely impact adjacent land uses during long-term Project operations. Although the proposed retail loading area would be enclosed and screened from the residential uses located approximately 80 feet to the north of the Project Site, noise from trucks maneuvering into the loading area would be exposed. At a distance of 80 feet, loading truck activity would be 66 dBA L_{eq} at receptors R1 and R2. Ambient noise levels at R1 and R2 are 65.4 dBA L_{eq} and 64.9 dBA L_{eq}, respectively. During the time periods that trucks maneuver into the loading area, ambient noise level would be temporarily increased due to the contribution from trucks maneuvering, but the increase would be less than 3 dBA. In addition, loading truck activity is intermittent and would not result in permanent increase in ambient noise levels at nearby sensitive receptors.

The Project would provide a total of approximately 28,800 sf of publicly available open space on the ground level. The third floor of the building would also include residential only amenities in the form of a 24,000-square foot amenity courtyard and a 2,500-square food amenity room. As analyzed in the EIR, open space noise levels (individual spaces and total

combined), including use of permanent sound systems, would not result in a significant increase in ambient noise levels at nearby sensitive receptors.

Pursuant to Section 9.07.055 of the Culver City Municipal Code (CCMC), the operation of amplifying equipment for use on an on-going basis shall not be audible at the Project property line. According to PDF-NOISE-5, all permanent sound systems within outdoor open spaces areas would be designed and installed so as to not result in a greater than 3 dBA increase in ambient conditions, which would be considered an audible increase, at the Project property line. Therefore, the use of a permanent amplified sound would not result in an audible increase at the Project property line.

Machado Park would not include a permanent sound system that would be operated on a regular basis, though there is potential for temporary use of an amplified sound system. As shown in Table 4.8-14 of the EIR, this potential for occasional use of amplified sound at Machado Park would not result in a significant increase in ambient noise levels at nearby sensitive receptors.

As shown in Table 4.8-15 of the EIR, increases in ambient conditions due to overall Project operations would not exceed the threshold of a 5 dBA Leq increase in noise levels. As such, the composite noise level impact on the nearest sensitive receptors due to the Project's future operations would be less than significant, and no mitigation measures are required.

The peak particle vibration (PPV) velocities for several types of construction equipment that can generate perceptible vibration levels are identified in Table 4.8-16 of the EIR. Based on the information presented in Table 4.8-16, vibration velocities could range from 0.0004 to 0.011 in/sec PPV at 100 feet from the source of activity which would be below the structural damage significance threshold of 0.2 in/sec PPV. Therefore, impacts would be less than significant with respect to structural damage and no mitigation measures are required.

The Project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would be passenger vehicle circulation within the proposed parking area. Groundborne vibration generated by each of the above-mentioned activities would generate approximately up to 50 decibel notation (VdB) adjacent to the Project Site. The potential vibration levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold of 80 VdB for perceptibility. As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant, and no mitigation measures are required.

Cumulative Impacts: All 27 related projects are located outside of the 1,000-foot screening distance for projects that would contribute to cumulative noise impacts. Therefore, construction of any of the related projects would not combine to cumulatively impact any of the sensitive receptors adjacent to the Project Site. With regard to off-site construction noise, construction traffic from all related projects would contribute to noise levels on major thoroughfares throughout the region, although the related projects are located in different

areas and to some extent would have varied haul routes and traffic patterns associated with their construction.

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to operation of the Project and related projects, as traffic is the greatest source of operational noise in the Project area. Cumulative traffic-generated noise impacts were assessed based on a comparison of the future cumulative base traffic volumes with the Project to the existing base traffic volumes without the Project. According to Table 4.8-17 of the EIR, the maximum cumulative noise increase from the Project plus cumulative project traffic would be 0.5 dBA CNEL, below a 5 dBA increase. Therefore, cumulative noise impacts from Project-related traffic would be less than significant, and no mitigation measures would be required.

The CCMC-required provisions that limit stationary-source noise from items such as roof-top mechanical equipment would ensure noise levels would be less than significant at the property line for each related project. In addition, all of the related projects are located greater than 1,000 feet from the Project Site and on-site noise generated by each related projects would not result in an additive increase to Project-related noise levels. Further, noise from other stationary sources, including parking structures, open space activity and loading docks would be limited to areas in the immediate vicinity of each related project. Although each related project could potentially impact an adjacent sensitive use, that potential impact would be localized to that specific area and would not contribute to cumulative noise conditions at or adjacent to the Project Site. As the Project's composite stationary-source impacts would be less than significant, the Project's cumulative stationary-source noise impacts would be less than significant.

Due to the rapid attenuation characteristics of groundborne vibration and distance from each of the related projects to the Project Site, there is no potential for cumulative construction or operational period impacts with respect to groundborne vibration. Therefore, cumulative impacts would be less than significant.

POPULATION AND HOUSING

FINDINGS. The Project would induce population growth through the direct development of proposed residential units and indirectly through the proposed mixed-use development. However, the Project would not induce substantial unplanned direct or indirect population growth and impacts would be less than significant.

FACTS IN SUPPORT OF FINDINGS. The Project would involve demolition of the existing commercial buildings on the Project Site to support a mixed-use development with residential and commercial uses. As shown in Table 4.9-2 of the EIR, the Project would increase the residential population of Culver City by introducing 230 residential units that would generate an estimated population of 529 residents at the Project Site. In addition, the Project would include approximately 66,500 sf of commercial uses, which would generate an estimated increase of approximately 206 employees on the Project Site. When taking into account the demolition of 35,011 sf of existing commercial uses on the Project Site and associated estimated employment, the Project would result in a net increase of 112 employees.

As shown in Table 4.9-3 of the EIR, and based on SCAG 2020-2045 RTP/SCS projections, the City's population, household, and employment growth is expected to increase by 1,293 persons, 862 households, and 4,137 jobs between 2020 and 2045, respectively. The Project's estimated 529 person increase in population and increase of 112 employees would fall within SCAG's growth forecast for the City for the period running from 2020 to 2045.

Cumulative Impacts: As shown in Table 4.9-5 of the EIR, the projected population, household, and employment growth for the related projects within the City of Culver City and the Project would be within the 2045 SCAG projections identified in the 2020-2045 RTP/SCS for the City. The increases in population (approximately 84 percent) and households (approximately 54 percent) show that the City is actively increasing the housing stock within the City to meet the housing growth need based on the Culver City General Plan Housing Element and the 6th Cycle Regional Housing Needs Assessment allocations. The 469 cumulative households would constitute 14 percent of the City's allocation of housing between October 2021 and October 2029 of 3,341 units. The increase in housing stock in the City provides opportunities to reduce the demand for development in lower-density areas and achieving greater efficiency in the provision and use of existing services and infrastructure.

FIRE PROTECTION SERVICES

FINDINGS. Section 4.10.1 of the EIR concludes that Project construction and operation will not require new or expanded fire protection facilities to maintain service due to compliance with City Fire Code requirements and implementation of PDF-FIRE-1, PDF-FIRE-2, and PDF-TRAF-1 that address fire safety, emergency access, emergency response times, and fire flow. Therefore, construction and operational impacts will be less than significant.

FACTS IN SUPPORT OF FINDINGS. Project construction activities will occur in accordance with California Division of Occupational Safety and Health Administration and Culver City Fire Code requirements, which have been formulated to avoid substantial fire risk during construction activities. Regarding emergency access and response times during construction, per PDF-TRAF-1, construction staging and construction worker parking associated with the Project will be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. In addition, as required by the Culver City Fire Department (CCFD) and PDF-TRAF-1, emergency access will be provided and maintained throughout construction to the Project Site, adjacent uses, and fire hydrants.

While the Project will potentially increase the number of service calls and firefighter demand, the potential calls associated with the Project will represent very small proportions (approximately 2 and 1 percent, respectively) of the total number of Citywide service calls and CCFD firefighters. Thus, it is anticipated that Fire Station 3 will be able to accommodate the additional demand associated with the Project without the need for expansion or development of a new fire station. As required by PDF-FIRE-2, plans for the proposed improvements, improved fire lane, fire hydrant locations, and associated fire prevention/suppression equipment will be submitted to the CCFD for review and approval at the building permit and plan check phases of the Project which will ensure compliance with

applicable Fire Code requirements, thereby minimizing the risk of increased operational fire safety hazards.

The Project Site is located within an urbanized area with a fully developed roadway system. Direct emergency access to the Project Site is provided by each of the three streets bordering the Project Site, including Sepulveda Boulevard, Jefferson Boulevard, and Machado Road. Within the Project Site itself, emergency access would be provided from all three street frontages surrounding the Project Site. Implementation of PDF-FIRE-2 would ensure that the CCFD would review and approve plans for the building, fire lanes and associated turnarounds, fire hydrant locations, and associated equipment, to ensure adequate access to and within the Project Site for emergency vehicles. Accordingly, emergency access would be maintained during operation of the Project. Accordingly, Project operation would not result in impacts to emergency access that would require new or expanded fire protection facilities, and the impact would be less than significant.

The Project Site is served by a loop system that connects to a 12-inch lateral in Jefferson Boulevard. Existing fire hydrants are present around the Project boundary. Although fire service lines are provided to the Project Site, additional hydrants may be required depending on the Fire Department's review of development plans. In addition, current fire regulations require that all buildings be equipped with sprinkler systems, which may also increase fire flow demand. PDF-FIRE-2 requires that building plans would be submitted to the CCFD to review and approve any fire hydrant locations. All fire hydrant requirements and fire sprinkler designs are subject to the CCFD review and approval during the Project's design and permitting phase. Any required new on- and/or off-site fire hydrants would be provided. Therefore, operational impacts to the City's domestic and fire water service facilities and infrastructure would be less than significant.

Implementation of PDF-FIRE-1, PDF-FIRE-2, and PDF-TRAF-1 would further reduce potential impacts to fire protection services to a less than significant level.

Cumulative Impacts: Although a cumulative demand for CCFD fire protection and rescue/emergency medical services (EMS) could occur, this demand will be reduced through regulatory compliance, similar to the Project. In addition, the CCFD's operating budget includes funds generated by property tax revenues which are supplemented by tax-base expansion. Tax-base revenue from Project development, together with revenues from past, present, and reasonably foreseeable future projects, will generate funding for fire protection services. As indicated in the EIR, the Project will not substantially contribute to cumulatively considerable impacts regarding fire protection. Therefore, cumulative impacts will be less than significant.

POLICE PROTECTION

FINDINGS. Section 4.10.2 of the EIR concludes that impacts on police protection services, access and emergency response times during Project construction will be temporary and less than significant. While Project construction will temporarily add on-site employees and off-site traffic, security features will be incorporated, and emergency access will be maintained.

Impacts on police protection services related to access and emergency response times during Project operation will be less than significant. While Project operation will add residents, on-site employees and off-site traffic, it would upgrade to strict security provisions at the Project Site and improve circulation and access in proximity to the Project Site. Overall, Project effects on police services will not require new or expanded police facilities.

FACTS IN SUPPORT OF FINDINGS. As there would be private security personnel during Project construction, any demand for Culver City Police Department (CCPD) services during construction is expected to be limited and addressed if needed through existing officers that patrol the area. Additionally, the implementation of PDF-POL-1 would include security fencing, lighting, and personnel during construction of the Project, which would reduce the potential for incidents that would require police responses. Construction of the Project has the potential to disrupt traffic, with Jefferson Boulevard and Sepulveda Boulevard being highly traveled major thoroughfares through Culver City, which could add to disruption of traffic flow and effect police response to calls for service.

While the Project would generate construction traffic and potentially require temporary lane closures along one or more of the streets bordering the Project Site, as discussed in Section 4.11 of the EIR, with implementation of PDF-TRAF-1, requiring implementation of a City approved Final Construction Management Plan (FCMP), disruptions to traffic flow would be minimized, emergency vehicle access to the Project Site and neighboring land uses would be maintained, and worker and construction equipment delivery would be scheduled to avoid peak traffic hours. Furthermore, pursuant to the FCMP, the CCPD would be informed in advance of any required temporary lane closures and/or alternative access routes during the construction period, which would be subject to CCPD review and approval. Therefore, in light of the temporary nature of construction, and implementation of PDF-POL-1 and PDF-TRAF-1, Project construction activities would not create the need for new or physically altered police protection facilities, construction of which could cause significant environmental impacts, and impacts during construction would be less than significant.

Operational activities associated with the Project would increase demand for police protection services. Based on the City's existing annual crime rate of 4.4 Part I crimes per 1,000 population, Project operation could result in an estimated three additional Part I crimes annually, an increase of 0.2 percent, without accounting for Project Design Features incorporated into the Project to reduce crime. The increase in population of 641 people would reduce the existing officer to daytime population ratio of 1:3,540 to 1:3,545 and would reduce the existing officer to nighttime population ratio of 1:354 to 1:360.

The Project would implement PDF-POL-2, which includes a 24-hour/seven-day a week security program, full-time on-site security personnel, controlled access to residential and office spaces, CCTV surveillance for the parking structure and other areas, security lighting, and other features. These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for CCPD services. Furthermore, pursuant to CCMC Section 17.560, Project Site plans would be submitted to the CCPD for review and approval to ensure that the site design incorporates required security and crime reduction features. Police response is typically provided from officers in patrol cars on standard beats rather than from a centralized facility, and

correspondence from CCPD indicates that while Project implementation could require additional police officers, it would not require the physical expansion of an existing police station or construction of a new police station.

Based on the above, the demand for police protection services during Project operation due to potential increases in crime and the need for police personnel would increase but would not require new or expanded police protection facilities to maintain acceptable service ratios, and therefore, impacts would be less than significant. Implementation of PDF-POL-1 and PDF-POL-2 as well as PDF-TRAF-1 would further reduce potential impacts to police services to a less than significant level.

Cumulative Impacts: While the Project and the related projects together could potentially and hypothetically generate a demand for approximately one additional CCPD sworn officer, this will represent only an approximately 0.3 percent increase over the existing 113 CCPD sworn officers in the City, with the Project's contribution to this demand (0.2 officer) representing only approximately 0.2 percent of the increase. Hence, not only will the cumulative demand for additional CCPD sworn police officers be small, but the Project's contribution to this demand will be less than cumulatively considerable given the strict security features and Project Site controls.

TRANSPORTATION

FINDINGS. The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Project would ensure that all access would be designed to the City standards and would meet the City's requirements to protect driver, bicyclist, and pedestrian safety. The Project would relocate bus stops, install a new traffic signal and pedestrian crosswalk, and eliminate seven existing driveway curb cuts, all of which would serve to reduce transportation hazards. The Project would ensure that emergency access is maintained during construction and operation. Therefore, impacts would be less than significant.

FACTS IN SUPPORT OF FINDINGS. Project consistency with applicable programs, plans, ordinances, and policies addressing transportation systems, facilities, and infrastructure are addressed in detail in Section 4.11 of the EIR. Plans evaluated include the Culver City General Plan Circulation Element, Culver City Short Range Transit Plan, Culver City Bicycle & Pedestrian Action Plan, and Complete Streets Policy.

Pedestrian access to the Project Site would be provided via new 8-foot-wide sidewalks around the perimeter of the Project Site and through pedestrian plazas/paseos accessible to the neighborhood. Residents, visitors, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. The Project's access locations would be designed to the City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety.

The Project would minimize potential conflicts with transit services and pedestrian traffic by relocating bus stops, installing marked crosswalks, and providing curb and sidewalk to

separate pedestrian movements from vehicular movements. The Project would also install a new traffic signal at the Project driveway on Sepulveda Boulevard, where it intersects with Janisann Avenue, providing a safe crossing for pedestrians accessing the Project from the Sunkist Park neighborhood across Sepulveda Boulevard.

The Project would include temporary construction activities (e.g., temporary lane closures, etc.) and traffic that could potentially affect emergency access to the Project Site and surroundings. Per PDF-TRAF-1, construction staging and construction worker parking associated with the Project would be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. Emergency vehicle access to the Project Site and neighboring land uses would be maintained, and worker and construction equipment delivery would be scheduled to avoid peak traffic hours. While the Project would generate construction traffic and potentially require off-site utility and roadway improvements and associated temporary lane closures along one or more of the three streets bordering the Project Site, Project construction contractors would coordinate with the CCPD and CCFD concerning any planned temporary lane closures and other construction activities that could affect emergency access and emergency response times, and arrange for traffic control devices and detours to minimize any potential impacts to traffic. Because of the short-term nature of the construction activities and with implementation of PDF-TRAF-1, the Project's construction activities would not require a new, or significantly interfere with an existing risk management, emergency response, or evacuation plan. The Project would not result in inadequate emergency access during construction.

Regarding Project operation, CCMC Chapter 17.540 requires that new projects would be reviewed by the CCPD to ensure that public safety and site security measures are incorporated. Furthermore, implementation of PDF-FIRE-2 would ensure that the CCFD would review and approve plans for the building, fire lanes and associated turnarounds, fire hydrant locations, and associated equipment, to ensure adequate access to and within the Project Site for emergency vehicles. Accordingly, emergency access would be maintained during operation of the Project. Therefore, Project operation would not require a new, or significantly interfere with an existing risk management, emergency response, or evacuation plan. The Project would not result in inadequate emergency access during operation.

Cumulative Impacts: Collectively, the Project and the related projects are located within a SCAG-designated High Quality Transit Area and would add development and density in an area with transit options and high levels of pedestrian activity. Therefore, the Project in combination with the related projects would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances. Furthermore, since modifications to access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not expected. Therefore, the Project's contribution to cumulative impacts associated with hazardous design conditions would not be considerable.

EXHIBIT B
MITIGATION MONITORING PROGRAM

This Mitigation Monitoring Program (MMP), which is provided, below, has been prepared pursuant to Public Resources Code (PRC) Section 21081.6 and CEQA Guidelines Section 15097 (Title 14 of the California Code of Regulations), which require adoption of an MMP for projects where the Lead Agency has adopted mitigation to avoid significant environmental effects. The City of Culver City (City) is the Lead Agency for the 11111 Jefferson Boulevard Mixed-Use Project (Project) and therefore is responsible for administering and implementing the MMP. The decision-makers must define specific reporting and/or monitoring requirements to be enforced during Project implementation prior to final approval of the Project. The primary purpose of the MMP is to ensure that the mitigation measures identified in the Initial Study (for Biological Resources), Draft EIR and Final EIR (designated by the respective environmental issue within Chapter 4, *Environmental Impact Analysis,* of the Draft EIR) are implemented, thereby minimizing identified environmental effects.

The MMP also includes Project Design Features (PDFs) identified throughout Chapter 4 the Draft EIR. The PDFs are specific design elements proposed by the Applicant that have been incorporated into the Project that serve to reduce or avoid potential environmental effects. Because PDFs have been incorporated into the Project, they do not constitute mitigation measures, as defined by CEQA Guidelines Section 15126.4. However, PDFs are included in this MMP to ensure their implementation as a part of the Project.

Final clearance shall require all applicable verification as indicated in Table 4-1. The City will have primary responsibility for monitoring and reporting the implementation of the PDFs and mitigation measures unless otherwise indicated. The PDFs and mitigation measures are identified by the impact category and number that correspond with the Initial Study, in the case of Biological Resources, and the draft EIR.

TABLE 4-1
MITIGATION MONITORING PROGRAM

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Air Quality				
Mitigation Measure AIR-1: Construction of the Project shall incorporate the following conditions: a. The Project shall use off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater and not identified under b or c. below. Such equipment will be outfitted with Best Available Control Technology (BACT) devices, including a CARB-certified Level 3 Diesel Particulate Filter or	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Current Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
equivalent. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. b. During the site preparation and excavation/grading phases, watering must be conducted a minimum of 4 times per day. Alternatively, other fugitive dust emissions practices shall be implemented that will reduce fugitive dust to at least the same level. c. On-road haul trucks, including delivery and those conveying excavated material, shall not exceed 120 truck trips (round trips, or 240 one-way trips) per day.				
Mitigation Measure AIR-2: At a minimum, the following equipment shall be electric or non-diesel fueled: concrete/industrial saws, cranes, forklifts, plate compactors, pumps, welders, and cement and mortar mixers. Additionally, onsite electricity shall be used to power the equipment to the greatest extent possible. Where grid electricity cannot be used, a non-diesel powered generator shall be used and use of the generator shall be limited to only those activities necessary.	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Current Planning Division
Biological Resources				
Mitigation Measure BIO-1: The Applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Either: 1) Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would ensure that no active nests are disturbed; or 2) If avoidance of the avian breeding season (February 15 through August 31) is not feasible, then: a. A qualified biologist shall conduct a preconstruction nesting bird survey within 15 days and again within 72 hours prior to any ground disturbing activities (staging, grading, vegetation removal or clearing, grubbing, etc.). The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code are avoided. Survey areas shall include suitable nesting habitat within 200 feet of construction site boundaries. This two-tiered survey method is intended to provide the Applicant with time to understand the potential issue and evaluate solutions if nests are present, prior to mobilizing resources. If active nests are not identified, no further action is necessary. b. If active nests are identified during pre-construction surveys, an avoidance buffer shall be demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the	Condition of Approval	Plan Check Notes, Reports, Surveys, and Field Inspections	Prior to issuance of a Demolition Permit, Grading Permit, and Building Permit.	Culver City Current Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Given the high disturbance level, general avoidance buffers include a minimum 100-foot avoidance (for smaller birds more tolerant of human disturbance) to a 250-foot avoidance buffer for passerine and a 500-foot avoidance buffer from active raptor nests, or reduced buffer distances determined at the discretion of a qualified biologist familiar with local nesting birds and breeding bird behavior within the Project area. Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the Culver City Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.				
Cultural Resources				
Mitigation Measure ARCH-1: Prior to issuance of demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist). The frequency of monitoring shall be determined based on the factors presented above, and can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Current Planning Division
Mitigation Measure ARCH-2: Prior to issuance of	Condition of	Plan Check Notes,	Prior to issuance	Culver City

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
demolition permit, the Applicant shall retain a Native American tribal monitor from a Gabrielino Tribe. The appropriate Native American tribal monitor shall be selected based on ongoing consultation under AB 52 and shall be identified on the most recent contact list provided by the Native American Heritage Commission. The Native American monitor shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall take into account the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. The frequency of monitoring shall be determined based on the factors presented above, and can be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrielino Tribe.	Approval	Reports, Surveys and Field Inspections	of Demolition Permit and On-Going during Construction	Building Safety Division, Building Safety Inspector, Public Works, Engineering and Current Planning Division
Mitigation Measure ARCH-3: In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and a Gabrielino Tribe. If the resources are Native American in origin, the Gabrielino Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall incorporate the Gabrielino Tribe's treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accept the resources, they may be donated to a	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Current Planning Division

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local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.				
Mitigation Measure ARCH-4: Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Current Planning Division
Geology and Soils				
Mitigation Measure GEO-1: Prior to issuance of demolition permit, the Applicant shall retain a qualified Paleontologist to develop and implement a paleontological monitoring program for construction excavations that would encounter older alluvial sediments. A qualified Paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology (2010). The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older alluvial sediments. Paleontological resources monitoring shall be conducted for all ground disturbing activities that exceed 10 feet in depth in previously undisturbed sediments, and are therefore likely to impact high sensitivity older alluvial sediments. Work in the upper 10 feet of the Project Site does not warrant monitoring. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, proximity to known paleontological resources or fossiliferous geologic formations (i.e., older alluvium deposits), the materials being excavated (i.e., native sediments versus artificial fill), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Paleontologist.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuance of Demolition Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Current Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Mitigation Measure GEO-2: Prior to commencement of demolition or excavation activities, the Paleontologist shall attend a pre-grade/construction meeting to conduct construction worker paleontological resources sensitivity training for construction personnel. The training session, shall be carried out by the Paleontologist and shall focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. Documentation shall be retained demonstrating that construction personnel attended the training.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to issuant of Demolition Permit, Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Current Planning Division
Mitigation Measure GEO-3: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. The Paleontologist shall establish an appropriate buffer area around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If the fossil is determined to be significant, the qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Current Planning Division
Mitigation Measure GEO-4: Prior to the release of the grading bond, the qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Current Planning Division

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Noise				
PDF-NOISE-1 (Project Construction Schedule): Prior to issuance of a building permit, notice of the Project construction schedule shall be provided to all abutting property owners and occupants. Evidence of such notification shall be provided to the Building Division. The notice shall identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).	Condition of Approval	Plan Check Notes, Reports, and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, and Current Planning Division
PDF-NOISE-2 (Mechanical Equipment Noise): All mechanical equipment and/or ventilation systems not fully enclosed will be designed, through the use of quiet fans and duct silencers or similar methods, to not exceed 55 dBA L_{eq} from 7:00 AM to 10:00 PM and 50 dBA L_{eq} from 10:00 PM to 7:00 AM at the neighboring property lines including the north and west property lines per sound level limits of the Culver City Noise Element.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of Mechanical Permit for subject mechanical equipment	Culver City Building Safety Division, Building Safety Inspector, and Current Planning Division
PDF-NOISE-3 (Construction Rules Sign): During all phases of construction, a "Construction Rules Sign" that includes contact names and telephone numbers of the Applicant, Property Owner, construction contractor(s), and the City, shall be posted on the Property in a location that is visible to the public. These names and telephone numbers shall also be made available to adjacent property owners and occupants to the satisfaction of the Planning Manager and Building Official.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, and Current Planning Division
PDF-NOISE-4 (Compliance with Noise Element): The following noise standards from Policy 2.A of the City's General Plan Noise Element shall be complied with at all times: A. No construction equipment shall be operated without an exhaust muffler, and all such equipment shall have mufflers and sound control devices (i.e., intake silencers and noise shrouds) that are no less effective than those provided on the original equipment; B. All construction equipment shall be properly maintained to minimize noise emissions; C. If any construction vehicles are serviced at a location onsite, the vehicle(s) shall be setback from any street and other property lines so as to maintain the greatest distance from the public right-of-way and from Noise Sensitive Receptors; D. Noise impacts from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) shall be minimized by proper selection of equipment and the installation of acoustical shielding as approved by the Planning Manager and the Building; and E. The Project shall not allow any delivery truck idling in the loading area. Signs shall be posted prohibiting idling.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, and Current Planning Division
PDF-NOISE-5 (Noise Control - Permanent Amplified Sound Systems): Permanent outdoor amplified sound systems that will operate on a regularly scheduled	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building

Project Design Feature (PDF) / Mitigation Measure (MM)	Implementing Action, Condition, or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
ongoing basis shall be designed so as not to result in a meaningfully perceivable increase in noise beyond the Project Site. Specifically, outdoor amplified sound systems shall not result in an increase of 3 dBA L_{eq} over existing conditions at the Project property line. All speakers shall have a minimum setback of 25 feet from the Project property line and shall be directed internally and shielding from off-site uses. A qualified noise consultant shall provide written documentation that the design of the system(s) complies with the maximum noise level.				Safety Inspector, and Current Planning Division
Mitigation Measure NOISE-1: Prior to the commencement of demolition, the Project shall provide a temporary 15-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 12 dBA along the northern and western boundaries of the Project Site, between the Project Site and the surrounding residences to the north (Heritage Park Neighborhood) and west (Studio Village Town Homes), Temple Akiba, and Circle K Motel. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptors to the north and west of the Project Site during the duration of construction activities. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and a Foundation Plan, Verified at Preconstruction Meeting with Culver City	Culver City Building Safety Division, Building Safety Inspector, and Current Planning Division
Mitigation Measure NOISE-2: Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. The construction contractor shall keep documentation onsite demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. Most of the noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA. The contractor shall use muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, and Current Planning Division
Public Services				
PDF-FIRE-1 (Fire Protection Devices): The Project would be equipped with fire alarms, fire sprinklers, and an emergency radio response system.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Building Permit	Culver City Building Safety Division, Building Safety Inspector, Fire Prevention, Fire Inspector, and Current Planning Division
PDF-FIRE-2 (Submittal of Plans to CCFD for Review/Approval): Plans for the proposed new building, fire lanes and associated turnarounds, fire hydrant	Condition of Approval	Plan Check Notes and Field	Prior to issuance of a Building Permit and	Culver City Building Safety Division, Building

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locations, and associated fire prevention/suppression equipment, will be submitted to the CCFD for review and approval.		Inspections	Ongoing during Construction	Safety Inspector, Fire Prevention, Fire Inspector, and Current Planning Division
PDF-POL-1 (Project Site Security and Access During Construction): During construction of the Project the Project Site will be enclosed with security fencing, lit with security lighting, and patrolled periodically by security personnel.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Grading Permit, Building Permit, and Ongoing during Construction	Culver City Building Safety Division, Building Safety Inspector, Police Department, and Current Planning Division
PDF-POL-2 (Project Site Security and Access During Operation): During operation, the Project will incorporate a 24-hour/seven-day security program to ensure the safety of its residents, employees, and visitors. The Project's security will include, but not be limited to, the following design features: a) Installing and utilizing a 24-hour/seven-day security program to ensure the safety of its residents and site visitors. b) Full-time security personnel. Duties of the security personnel will include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings, including parking; managing and monitoring fire/life/safety systems; and patrolling the property. The site security would regularly interface and collaborate with CCPD, as necessary. c) Staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. d) Controlled access to all residential units, lobby areas, and residential common open space areas through the use of key cards, site security and/or other means, as appropriate. e) CCTV surveillance within the parking garage, ground floor levels, and open space areas. f) Lighting of entry-ways, publicly accessible areas, parking areas, and common building and open space residential areas.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of a Certificate of Occupancy	Culver City Building Safety Division, Building Safety Inspector, Police Department, and Current Planning Division
Transportation				
PDF-TRAF-1 (Construction Management Plan): A Final Construction Management Plan (FCMP) shall be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, bicycle and public transit are minimized to the extent feasible. The FCMP shall be subject to review and approval by Culver City's Building Official, City Traffic Engineer, Civil Engineer, and Current Planning Manager, prior to issuance of any Project demolition, grading or excavation permit. The FCMP shall also be reviewed and	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 Current Planning Division, Public Works, Fire and Police Departments

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approved by City's Fire and Police Departments. The City Building Official, City Engineer, City Traffic Engineer, Civil Engineer, and Current Planning Manager, as applicable, would reserve the right to reject any engineer at any time and to require that the FCMP be prepared by a different engineer. Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector (Inspectors) of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other representatives of surrounding developments if under construction at around the same time as the Project shall be required, as determined appropriate by City staff, to ensure concurrent construction projects are managed in collaboration with one another. The FCMP shall assess project construction impacts and provide effective strategies to limit the use of the public right of way (streets and sidewalks) during peak traffic periods, and shall be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare. Prior to approval of the FCMP, 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: • Construction schedule and hours. • Framework for construction phases. • 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). • Potential location of construction parking and office trailers. • Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity). Use of Janisann Avenue to the west of the Project Site by haul trucks, material deliveries or construction worker vehicles shall be specifically prohibited. • Emergency access plan. • Demolition plan. • Staging plan for the concrete pours, material loading and removal. • Crane location(s). • Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers). • Community notification procedures: • The CMP shall at a minimum include the following: 1. The name and telephone number of a contact person who can be reached 24 hours a day regarding construction or construction traffic				

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complaints or emergency situations. 2. 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. 3. Construction plans and procedures to address: community and City notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures and best practices to reduce disturbances to adjacent and nearby land uses. 4. Procedures for the training and certification of flag persons. 5. To the extent known identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and, plans for use of protective devices, warning signs, and staging or queuing areas. 6. The location of temporary power, portable toilet and trash and materials storage locations. 7. The timing and duration of any street and/or lane closures shall be approved in advance by the City and made available in digital format for posting on the City's website and distribution via email alerts on the City's "Gov Delivery" system. The Plans shall be updated weekly during the duration of project construction, as determined necessary by the City. The FCMP shall require that review and approval of any proposed lane closures include coordination with the Fire and Police Departments to minimize potential effects on traffic flow and emergency response. 8. Provisions that staging of construction equipment and materials will be accommodated within the Project Site and that construction worker parking will be accommodated on the Project Site and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Project Site.				
Mitigation Measure TRAF-1: The Project shall implement a Transportation Demand Management (TDM) Program to reduce the VMT impacts from office uses. The TDM Program shall be reviewed and approved by the City's Planning Division, Public Works Mobility and Traffic Engineering, Division and Transportation Staff for review prior to the issuance of the first building permit for the Project. The TDM Program shall include the following	Condition of Approval	Approval of Plan	Prior to issuance of Building Permit	Culver City Traffic Engineering, Engineering/Public Works, Transportation Department and Current Planning Division

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measures and strategies: • Commute Marketing Program – This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. At a minimum, this strategy includes educational and promotional materials, and a TDM Coordinator from building management to oversee the TDM program, such as field questions, manage regular updates of transportation materials for the Project Site, and coordinate carpool and ridesharing options. • Off-Street Parking Pricing – This strategy implements parking pricing for spaces within the Project Site for office employees. This would mean that employees of the office land use would need to pay for a parking spot within the Project Site garage, separate from the cost of the lease for the office space.				