Culver CITY
PLANNING DIVISION
9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507
(310) 253-5710
•
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INITIAL STUDY

Project Title: 11111 Jefferson Boulevard Mixed-Use Project

Preliminary Project Review Number: PPR P2019-0242

Project Location: The Project Site is bounded by Jefferson Boulevard to the east, Machado Road to the north and Sepulveda Boulevard to the west in the Studio Village community. Generally located at 11111 Jefferson Boulevard, Culver City, California, 90230.

Project Sponsor: Jefferson Park LLC

Project Description: The 3.43-acre (149,553 square feet [sf]) Project Site, is located at the southern corner of the Studio Village neighborhood of Culver City (City). The Project Site is currently developed with three single-story commercial buildings, surface parking, a parking lot that serves the proximate Exceptional Children's Foundation (ECF), and landscaping. The Project would construct 230 residential dwelling units, 19 of which would be affordable to very low income households, for a total of 244,609 sf of residential area (including the residential lobby and amenity room); 55,050 sf of ground floor retail area, including a 38,600 sf market, 10,600 sf of restaurants and café, 3,900 sf of retail spaces, and a 1,950 sf gym; and 11,450 sf of second floor office uses within a five story building. The building would be constructed atop one level of subterranean vehicular parking, with parking also provided on the first and second floor of the building. There would be a total of 653 parking stalls (308 stalls for residential, 311 stalls for commercial, and 34 spaces for an off-site use, the ECF). The Project would also include private and publicly accessible open space including: a public park at the corner of Machado Road and Sepulveda Boulevard (Machado Park), a public paseo area with an interior courtyard adjacent to the ground floor retail uses at the intersection of Sepulveda Boulevard and Jefferson Boulevard (Paseo Courtyard), and an open air courtyard located at the third level of the development to serve the residential units.

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

☐ The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

☒ The Initial Study identified potentially significant effects, and an ENVIRONMENTAL IMPACT REPORT is required.

A copy of the Initial Study and any other material which constitute the record of proceedings upon which the City based its decision may be obtained at:

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

www.culvercity.org

Contact: **Michael Allen, Planning Manager, City of Culver City Planning Division**
9770 Culver Blvd, Culver City, CA 90232
(310) 253-5755 (Tel); (310) 253-5721 (Fax)

The public is invited to comment on the INITIAL STUDY during the review period, which ends **October 16, 2020, at 5:30 P.M.**

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INITIAL STUDY

ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title:	11111 Jefferson Boulevard Mixed-Use Project		
Lead Agency Name & Address:	City of Culver City, Planning Division 9770 Culver Boulevard, Culver City, CA 90232		
Contact Person & Phone No.:	Michael Allen, Planning Manager (310) 253-5755 (Tel); (310) 253-5721 (Fax)		
Project Location/Address:	The Project Site is bounded by Jefferson Boulevard to the east, Machado Road to the north and Sepulveda Boulevard to the west in the Studio Village community. Generally located at 11111 Jefferson Boulevard, Culver City, California, 90230.		
Nearest Cross Street:	Jefferson Boulevard and Sepulveda Boulevard	**APN:**	4215-001-010 4215-001-013 4215-001-016 4215-001-020
Project Sponsor's Name & Address:	Jefferson Park LLC 151 N. Franklin, Suite 300 Chicago, IL 60606		
General Plan Designation:	General Corridor Commercial	**Zoning:**	Commercial General (CG) and Single-Family (R-1)
Overlay Zone/Special District:	Not Applicable		

Project Description and Requested Action: The Project Site is currently developed with three single-story commercial buildings, surface parking, a parking lot that serves the proximate Exceptional Children's Foundation (ECF), and landscaping. The Project would construct 230 residential dwelling units, 19 of which would be affordable to very low income households, for a total of 244,609 sf of residential area including the residential lobby and amenity room); 55,050 sf of ground floor retail area, including a 38,600 sf market, 10,600 sf of restaurants and café, 3,900 sf of retail spaces, and a 1,950 sf gym; and 11,450 sf of second floor office uses within a five story building. The building would be constructed atop one level of subterranean vehicular parking, with parking also provided on the first and second floor of the building. There would be a total of 653 parking stalls (308 stalls for residential, 311 stalls for commercial, and 34 spaces for an off-site use, the ECF). The Project would also include private and publicly accessible open space including: a public park at the corner of Machado Road and Sepulveda Boulevard (Machado Park), a public paseo area with an interior courtyard adjacent to the ground floor retail uses at the intersection of Sepulveda Boulevard and Jefferson Boulevard (Paseo Courtyard), and an open air courtyard with residential amenities located at the third level of the development to serve the residential units. Requested entitlements would include: General Plan Amendment; Zoning Code/Map Amendment; Adoption of a Comprehensive Plan for the Project, which would establish the development standards for the Project Site; Community Benefits Request; Density Bonus Request; Vesting Tentative Tact Map; Certification of the EIR; Demolition Permits to remove the existing on-site structures to allow for construction of the Project; Construction Permits, including building, grading, excavation, foundation, and associated permits; Haul Route Permit, as may be required by Culver City; and other discretionary and ministerial approvals as needed and as may be required. Please refer to Attachment A, Project Description, for a detailed discussion of the proposed Project.

Existing Conditions of the Project Site: The Project Site includes four parcels from north to south. The northernmost parcel (APN 4215-001-020) consists of a surface parking lot with 34 parking spaces used by ECF as off-site parking. The Project Site includes approximately 216 existing vehicle parking spaces, including 194 regular spaces, 12 truck loading spaces, and 10 handicap spaces. The northern central parcel (APN 4215-001-016) is occupied by a United States Post Office (27,225 sf) built in the early 1960s. The next parcel to the south (APN 4215-001-010) is occupied by Coco's Casual Restaurant chain (6,064 sf) built in the late 1960s. The southernmost parcel (APN (4215-001-013) is occupied by Valvoline Instant Oil Change (1,722 sf) built in the 1990s.

Surrounding Land Uses and Setting: The Project Site is located in the Studio Village neighborhood in the southern part of Culver City. The Project Site is surrounded by the Sunkist Park neighborhood to the west and southwest, the Heritage Park and Lindberg Park neighborhoods to the north, the Studio Village Shopping Center to the east, and the Blanco Park neighborhood to the southeast. Primary regional access is provided by the San Diego Freeway (I-405) and the Marina Freeway/Expressway (SR-90), both located approximately 0.7 miles southwest of the Project Site.

Nearby land uses north of Machado Boulevard include a residential neighborhood (Heritage Park) and a private K-12 school (ECF). To the east across Jefferson Boulevard is the Studio Village Shopping Center and surface parking lot. South and west of the Project Site across Sepulveda Boulevard is a temple (Temple Akiba) and commercial uses. There are also residential uses north of Temple Akiba along Sepulveda Boulevard (Studio Village Townhomes), backing the commercial uses along Sepulveda Boulevard (Sunset Park Neighborhood), and to the south of the Studio Village Shopping Center (Blanco Park Neighborhood).

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

- Los Angeles Regional Water Quality Control Board
- South Coast Air Quality Management District
- Other agencies as needed.

Consultation with California Native American tribes: *(Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?)*

The City will comply with applicable requirements regarding consultation with California Native American tribes.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages:

- ☐ Aesthetics
- ☐ Agriculture and Forestry Resources
- ☒ Air Quality
- ☐ Biological Resources
- ☒ Cultural Resources
- ☒ Energy
- ☒ Geology /Soils
- ☒ Greenhouse Gas Emissions
- ☒ Hazards & Hazardous Materials
- ☐ Hydrology / Water Quality
- ☒ Land Use / Planning
- ☐ Mineral Resources
- ☒ Noise
- ☒ Population / Housing
- ☒ Public Services
- ☐ Recreation
- ☒ Transportation
- ☒ Tribal Cultural Resources
- ☐ Utilities / Service Systems
- ☐ Wildfire
- ☒ Mandatory Findings of Significance

ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☒ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

☐ I find that the proposed project **MAY** have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.

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

Michael Allen — September 15, 2020

Planning Manager, City of Culver City — Date

PURPOSE OF THE INITIAL STUDY

The project is analyzed in this Initial Study, in accordance with the California Environmental Quality Act (CEQA), to determine if approval of the project would have a significant impact on the environment. This Initial Study has been prepared pursuant to the requirements of CEQA, under Public Resources Code 21000-21177, of the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) and under the guidance of the City of Culver City. The City of Culver City is the Lead Agency under CEQA and is responsible for preparing the Initial Study for the proposed project.

EVALUATION OF ENVIRONMENTAL IMPACTS:

The impact columns heading definitions in the table below are as follows:

- "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

- "Less than Significant Impact with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The mitigation measures must be described, along with a brief explanation of how they reduce the effect to a less than significant level.

- "Less than Significant Impact" applies where the project creates no significant impacts, only Less Than Significant impacts. An impact may be considered "less than significant" if "project design features" would be implemented by the project or if compliance with applicable regulatory requirements or standard conditions of approval would ensure impacts are less than significant.

- "No Impact" applies where a project does not create an impact in that category. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one proposed (e.g., the project would not displace existing residences). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to toxic pollutants, based on a project-specific screening analysis).

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resource Code Section 21099, would the Project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurements methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐
IV. BIOLOGICAL RESOURCES – Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
VI. ENERGY – Would the Project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	☒	☐	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐
VII. GEOLOGY AND SOILS – Would the Project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒
X. HYDROLOGY AND WATER QUALITY – Would the Project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
XI. LAND USE AND PLANNING – Would the Project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
XII. MINERAL RESOURCES – Would the Project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
XIII. NOISE – Would the Project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise level in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c) For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the Project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☒	☐	☐	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
XV. PUBLIC SERVICES				
a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i) Fire protection?	☒	☐	☐	☐
ii) Police protection?	☒	☐	☐	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐
XVI. RECREATION				
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
XVII. TRANSPORTATION – Would the Project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☒	☐	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d) Result in inadequate emergency access?	☒	☐	☐	☐

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or	☒	☐	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐
XIX. UTILITIES AND SERVICE SYSTEMS – Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

ATTACHMENT A
PROJECT DESCRIPTION

A. INTRODUCTION

Jefferson Park LLC, the Applicant, proposes to develop a mixed-use residential and commercial project (Project) on an approximately 3.43-acre (149,553 square feet [sf]) triangular shaped site (Project Site) located in the City of Culver City (Culver City or City). The Project Site is bounded by Jefferson Boulevard to the east, Machado Road to the north and Sepulveda Boulevard to the west. The Project Site is currently developed with three single-story commercial buildings, surface parking, a parking lot that serves the proximate Exceptional Children's Foundation (ECF), and landscaping. The Project would construct 230 residential dwelling units, 19 of which would be affordable targeted to very low income households, for a total of 244,609 sf of residential area (including the residential lobby and residential amenity room); 55,050 sf of ground floor retail area, including a 38,600 sf market, 10,600 sf of restaurants and café, 3,900 sf of retail spaces, and a 1,950 sf gym; and 11,450 sf of second floor office uses within a five story building. The building would be constructed atop one level of subterranean vehicular parking, with parking also provided on the first and second floor of the building. There would be a total of 653 parking stalls (308 stalls for residential, 311 stalls for commercial, and 34 spaces for an off-site use, the ECF). The Project would also include private and publicly accessible open space including: a public park at the corner of Machado Road and Sepulveda Boulevard (Machado Park), a public paseo area with an interior courtyard adjacent to the ground floor retail uses at the intersection of Sepulveda Boulevard and Jefferson Boulevard (Paseo Courtyard), and an internal, open air courtyard with residential amenities located at the third level of the development to serve the residential units.

B. PROJECT LOCATION AND SURROUNDING USES

The Project Site is located in the Studio Village neighborhood in the southern part of Culver City. The Project Site is surrounded by the Sunkist Park neighborhood to the west and southwest, the Heritage Park and Lindberg Park neighborhoods to the north, the Studio Village Shopping Center to the east, and the Blanco Park neighborhood to the southeast. Primary regional access is provided by the San Diego Freeway (I-405) and the Marina Freeway/Expressway (SR-90), both located approximately 0.7 miles southwest of the Project Site. See **Figure A-1**, *Regional and Site Location Map*, for the location of the Project Site. See **Figure A-2**, *Aerial Photograph of the Project Site and Vicinity*, for an aerial image of the Project Site and surrounding development. As described in Section E.3, below, the Project Site is also served by multiple regional and local bus lines that run along Sepulveda and Jefferson Boulevards.

SOURCE: Mapbox, 2019.

11111 Jefferson Boulevard Mixed-Use Project

Figure A-1
Regional and Site Location Map

ESA

SOURCE: Mapbox, 2019.

11111 Jefferson Boulevard Mixed-Use Project

Figure A-2
Aerial Photograph of the Project Site and Vicinity

ESA

Nearby land uses north of Machado Boulevard include a residential neighborhood (Heritage Park) and a private K-12 school (ECF). To the east across Jefferson Boulevard is the Studio Village Shopping Center and surface parking lot. South and west of the Project Site across Sepulveda Boulevard is a temple (Temple Akiba) and commercial uses. There are also residential uses north of Temple Akiba along Sepulveda Boulevard (Studio Village Townhomes), backing the commercial uses along Sepulveda Boulevard (Sunset Park Neighborhood), and to the south of the Studio Village Shopping Center (Blanco Park Neighborhood).

C. EXISTING CONDITIONS

The Project Site is relatively flat with elevations ranging from approximately 33 to 35 feet. The Project Site includes four parcels from north to south. The northernmost parcel (APN 4215-001-020) consists of a surface parking lot with 34 parking spaces used by ECF as off-site parking. The Project Site includes approximately 216 existing vehicle parking spaces, including 194 regular spaces, 12 truck loading spaces, and 10 handicap spaces. The northern central parcel (APN 4215-001-016) is occupied by a United States Post Office (27,225 sf) built in the early 1960s. The next parcel to the south (APN 4215-001-010) is occupied by Coco's Casual Restaurant chain (6,064 sf) built in the late 1960s. The southernmost parcel (APN (4215-001-013) is occupied by Valvoline Instant Oil Change (1,722 sf) built in the 1990s.

In addition to the existing buildings and areas of surface parking, there is a mix of ornamental landscaping on the Project Site, including a number of mature eucalyptus and palm trees, with the most concentrated plantings along Machado Road. At the southern end of the Project Site there is a sparsely landscaped open space area with decomposed granite and a decorative fountain. There are also street trees along all three frontages of the Project Site and within the Machado Road landscaped median. In certain areas along the perimeter of the Project Site, there are block walls, chain link fencing and wrought iron fencing. There is monument and other signage for the Coco's Restaurant and oil change facility, as well as parking lot and landscape lighting.

D. EXISTING AND PROPOSED PLANNING AND ZONING

The General Plan Land Use designation for the Project Site is General Corridor Commercial, which allows commercial uses with an emphasis on community serving retail. Per the Culver City Zoning Code (Zoning Code), the Project Site is majority zoned Commercial General (CG). The northern most parcel (APN 4215-001-020) adjacent to Machado Road is split-zoned CG and Single-Family (R-1). The Project is proposing to change the zoning designations for the Project Site to Planned Development (PD) with adoption of a Comprehensive Plan that would serve as the overarching entitlement mechanism for the Project Site. Per the Zoning Code, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site planning and design and to support more effective responses to the settings of such properties and other environmental considerations.[1] To permit this, a Comprehensive Plan regulates permitted uses, development standards, and conditions of approval on a Project Site. The proposed PD zoning is consistent with the General Corridor Commercial land use designation, therefore, no change to the Project Site's existing General Plan designation is proposed.

[1] City of Culver City Zoning Code, Title 17, Section 17.560, Comprehensive Plans, http://library.amlegal.com/nxt/gateway.dll/California/culver/title17zoningcode/article5landuseanddevelopmentpermitproce/chapter17560comprehensiveplans?f=templates$fn=default.htm$3.0$vid=amlegal:culvercity_ca$anc=JD_17.560.005. Accessed September 3, 2020.

E. DESCRIPTION OF PROPOSED PROJECT

1. Proposed Land Uses

The Project would involve demolition of 35,011 sf of existing buildings on the Project Site to support the new mixed-use development. As shown in **Figure A-3**, *Conceptual Site Plan*, 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 sf, including all parking areas (subterranean, ground level, and above-ground) and usable building area of 311,109 sf.[2] The Project would have a 2.08 floor area ratio (FAR).[3]

As shown in **Table A-1**, *Development Program Summary*, and as further detailed below, the Project includes 244,609 sf of residential uses (including the residential lobby and amenity room) with 230 residential apartment units (including 19 affordable to very low income units); 66,500 sf 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.

As shown in **Figure A-4**, *Ground Level Plan*, the ground floor level of the building would include a 38,600 sf market, 10,600 sf of restaurants and café, 3,900 sf of retail spaces, 1,950 sf gym, a 2,500 sf residential lobby and leasing office, and 81 vehicle parking spaces for retail uses, with a significant amount of outdoor landscaped open space. As shown in **Figure A-5,** *Second Level Plan*, the second level would include 11,450 sf of office space, and 230 vehicle parking spaces for commercial uses. The office uses would wrap around the parking garage area to shield the parking from the street. As shown in **Figure A-6,** *Third Level Plan*, the third level would include 76 residential units, one residential amenity courtyard at 24,000 sf, and a 2,500 sf amenity room. The fourth level would include 77 residential units, and the fifth level would include 77 residential units. An additional 241,256 sf would be developed for parking (subterranean, ground level, and second level).

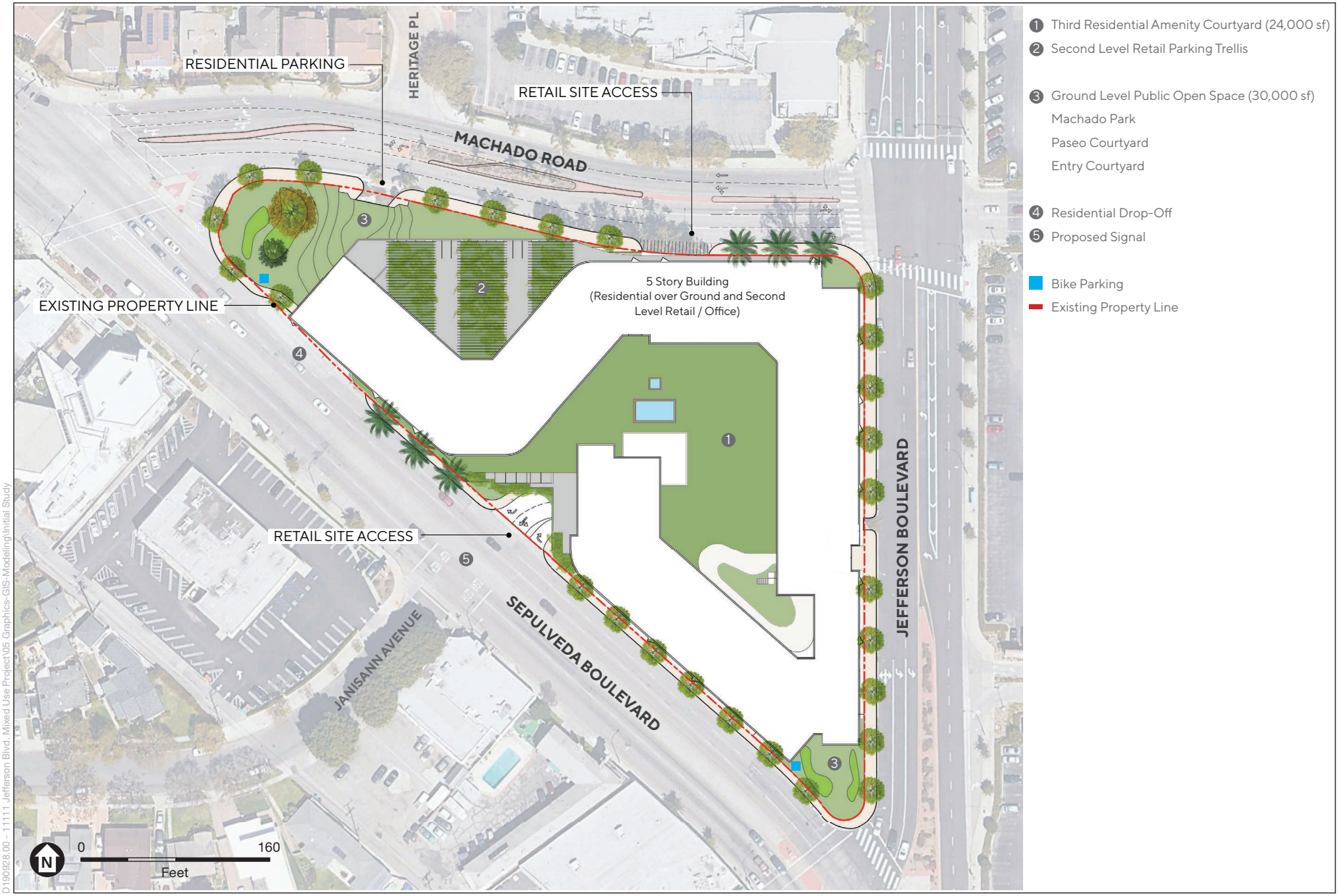
[2] The building height is measured pursuant to Culver City Municipal Code Section 17.300.025, which requires that height be measured as the vertical distance from the existing grade of the site to an imaginary plane located the allowed number of feet above and parallel to the grade. The existing grade has been established here as 34.8 feet.

[3] FAR is calculated by using the usable square footage of 311,109 sf divided by the 149,553 sf Project Site area.

Table A-1
Development Program Summary

Use	Size/Units
Site Area (sf/ac)	149,553 sf/3.43 ac
Residential Component	
Studios	54 units
1-Bedrooms	112 units
2-Bedrooms	64 units
Residential Lobby	2,500 sf
Residential Amenity (Third Level)	2,500 sf
Subtotal Residential Units	*230 units* *244,609 sf*
Commercial Component	
Market	38,600 sf
Restaurant (High Turnover Sit-Down)	3,300 sf
Restaurant (Fast Casual)	4,900 sf
Coffee & Bakery	2,400 sf
Office	11,450 sf
Retail	3,900 sf
Gym/Fitness	1,950 sf
Subtotal Commercial Square Footage	*66,500 sf*
Total Residential and Commercial Square Footage	311,109 sf
Subterranean Parking	118,680 sf
Ground Level Parking	33,916 sf
Second Level Parking	88,660 sf
Loading Dock	2,856 sf
Total Project Square Footage	**555,221 sf**
Parking	
Residential Parking	308 spaces
Commercial Parking	311 spaces
ECF Parking	34 spaces
Total Vehicle Parking Provided	*653 spaces*
Bicycle Parking Spaces (Short/Long-Term)	71 / 26 spaces
Open Space	
Publicly Accessible Open Space	
Machado Park	15,000 sf
Paseo Courtyard	13,000 sf
Entry Courtyard	2,000 sf
Subtotal Publicly Accessible Open Space	*30,000 sf*
Common Open Space (for Residents)	
Courtyard (Third Level)	24,000 sf
Private Open Space (Balconies)	13,560 sf
Total Open Space Provided	*70,060 sf*

SOURCE: 3MR Capital, 2020.



SOURCE: AO, 2020

11111 Jefferson Boulevard Mixed-Use Project

Figure A-3
Conceptual Site Plan

ESA

SOURCE: AO, 2020

11111 Jefferson Boulevard Mixed-Use Project

Figure A-4
Ground Level Plan

ESA

SOURCE: AO, 2020

11111 Jefferson Boulevard Mixed-Use Project

Figure A-5
Second Level Plan

ESA

SOURCE: AO, 2020

11111 Jefferson Boulevard Mixed-Use Project

Figure A-6
Third Level Plan

ESA

2. Open Space and Landscaping

Open space and landscaping would be provided in accordance with the CCMC. The Project would incorporate publicly accessible at-grade open space as well as indoor and outdoor common and private open space for Project residents and guests. As shown in Figure A-4 above, the Project would provide an approximately 15,000 sf Machado Park, which would be publicly accessible but privately maintained, that is expected to include such amenities as a children's play area, and terraced landscaping and seating. The City also intends to include a bicycle share facility adjacent to Machado Park, as further described below. The Machado Park would link the publicly accessible open space areas along Machado Road from Sepulveda Boulevard to Jefferson Boulevard. An approximately 13,000 sf Paseo Courtyard at the corner of Sepulveda Boulevard and Jefferson Boulevard and between the retail spaces at the southern end of the Project Site would welcome pedestrian, bike, bus and other foot traffic through and into the Project Site. An additional 2,000 sf courtyard (Entry Courtyard) at the entrance on Sepulveda Boulevard across from Janisann Avenue would also be provided to welcome patrons to enjoy both corner food offerings as well as a direct path to both the grocer entrance and the courtyard spaces internally sheltered from area traffic. 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.

As shown in Figure A-6 above, the third story of the building would offer common open space for the Project's residents in the form of a centrally located 2,500 sf amenity room and a large 24,000 sf open air courtyard. The amenity room and courtyard would include a pool and sun deck which would be set back from and screened by the building, a fitness center, BBQ area, conference room/business center, and storage facilities in the residential leasing office and parking garage. Bicycle lockers and a repair station would be provided in the subterranean parking level for residents. Balconies with a minimum size of 52 sf for studios, 62 square feet for one bedroom units, and 72 square feet for two bedroom units would be provided for the residential uses.

The landscape design would be tailored for each of the landscaped open space areas with a compatible plant palette used throughout the Project Site. Landscaping would emphasize native, Mediterranean and drought tolerant plants (e.g., Agave, Aloe, ornamental grasses, leafy groundcovers, colorful shrubs, and soft textured plans).

3. Vehicular and Bicycle Access, Circulation, and Parking

Vehicular Access

Vehicular access to the Project Site would be provided from three driveways: one on Sepulveda Boulevard at Janisann Avenue and two on Machado Road. The driveway on Sepulveda Boulevard and the east driveway on Machado Road (closer to Jefferson Boulevard) would serve retail, market, and office uses. The west driveway on Machado Road opposite Heritage Place would provide access for resident and resident guest parking, and for ECF parking all located below grade. Access for trucks and deliveries would be off of Machado Road where they would access a 2,856 sf loading dock within the Project Site via the eastern-most retail entrance. The loading dock would be set back from Machado Road and would be screened and enclosed to reduce potential noise effects on residents located north of the Project Site. A separate loading and drop-off area is planned in front of the residential lobby entrance on Sepulveda Boulevard. The Project also includes a proposed traffic signal at the intersection of Janisann Avenue and Sepulveda Boulevard.

Machado Road Improvements

Machado Road currently includes an 8-foot sidewalk, two eastbound vehicle through lanes which expand to three lanes at the intersection to accommodate the turn pockets (10 feet, 10 feet, and 13 feet wide), an eight-foot landscaped median, two westbound vehicle through lanes that transition into three lanes at the intersection to accommodate the turn pockets (10 feet, 10 feet, and 13 feet wide), and then another sidewalk.

The Project would provide new 8-foot sidewalk, curb, and street trees on the Western edge of Machado Road.

Bicycle Access

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. Separate from the Project, the City intends to implement a bicycle share facility 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.

Pedestrian Circulation

The Project Site is oriented such that visitors and residents would be able to walk through and around the Project Site. New 8-foot wide sidewalks would be installed on Sepulveda and Jefferson Boulevards, as well as on Machado Road. The ground floor retail uses at the corner of Sepulveda Boulevard and Jefferson Boulevard, along with the market, would serve as pedestrian points of interest on the Project Site. The Paseo Courtyard, located between the retail uses at Sepulveda Boulevard and Jefferson Boulevard would provide open space for people to gather and interact with the retail. People would be able to access the residential lobby through the Machado Park along Machado Road. Pedestrians would also be able to easily access the retail market from Sepulveda Boulevard or from Machado Road. Pedestrians would also be able to access the market from the Paseo Courtyard by walking past the retail uses.

Vehicle and Bicycle Parking

Structured parking containing 653 vehicular parking spaces would be provided on the Project Site with 308 spaces for residential uses, 311 spaces for commercial uses, and 34 for ECF. The subterranean parking level would include 292 parking spaces for residential tenants, 16 parking spaces for residential guests, and 34 parking spaces for ECF. The vehicle parking spaces for residential guests would be clearly identified either by specific ground painting or wall signage/decals and would be located within the residential garage in the subterranean parking level only. All subterranean parking would be secured under an access control system. The 34 vehicular parking spaces for ECF would be located within the subterranean parking level and would be identified as being fully dedicated to ECF. The ground floor parking level would include 81 vehicle parking spaces for the retail uses, and the second floor parking area would include 230 vehicle parking spaces for both ground floor retail and second level office use. There would be 71 long-term and 26 short-term bicycle parking spaces provided in various locations throughout the Project Site.

Public Transit

The Culver City Bus has multiple stops that travel along the Project Site frontages, including Line 2, which travels east/west along Jefferson Boulevard from Mar Vista to Fox Hills and the Culver City Transit Center; Line 3, which travels north/south along Sepulveda Boulevard and Jefferson Boulevard and provides service to the Los Angeles County Metropolitan Transportation Authority (Metro) E Line (Expo) Light Rail at Westwood/Rancho Park Station; Line 4, which travels north/south along Jefferson Boulevard and provides service to the Metro E-Line (Expo) Light Rail at the La Cienega Station; Line 5, which travels east/west along Braddock Drive from Culver City to Marina Del Rey; Line 6, which travels north/south along Sepulveda Boulevard from UCLA to the Metro Green Line Station; and Rapid 6, which travels north/south along Sepulveda Boulevard and provides service to the Metro E-Line (Expo) Light Rail at Expo/Sepulveda Station.

The Project includes the proposed relocation of the bus stop for Culver City Bus Line 6 on Sepulveda Boulevard. As currently proposed, the northbound bus stop would shift approximately 100 to 200 feet south from its current location at the intersection of Machado Road and Sepulveda Boulevard, to just north of the newly signalized intersection of Janisann Avenue and Sepulveda Boulevard. Additionally, the Project includes the proposed relocation of the bus stop for Culver City Bus Lines 3 and 4 on Jefferson Boulevard. As currently proposed, the southbound bus stop would shift approximately 100 to 200 feet north from its current location on Jefferson Boulevard, to just south of the signalized intersection of Machado Road and Jefferson Boulevard.

Transportation Demand Management Program

Transportation demand management (TDM) and mobility components may include a City-implemented bicycle-share parking area, traffic calming, traffic signal and pedestrian safety enhancements, employee incentives to reduce vehicular traffic to the Project Site, dedicated ride-share drop off locations, rideshare matching, and TDM education and awareness programs for residents, employees, and visitors. In accordance with the California Green Building Standards Code (CALGreen Code), infrastructure for electric vehicle (EV) charging stations would be provided.

4. Lighting and Signage

Lighting for the Project is intended to minimize light trespass and glare from buildings and the Project Site onto adjacent properties, to provide comfort, safety, and nighttime visibility through shielded, focused and directed illumination. Project materials would also be selected to avoid highly reflective surfaces that would result in adverse glare effects on motorists or adjacent uses. Signage for the Project's residential, office and market/retail uses would be provided in accordance with the CCMC. There would be wayfinding signage for Project residents, employees and visitors, as well as public signage identifying access to parking facilities. Additional signage would be available to ensure that routes to rideshare, bus stops, and other transportation is clear for those accessing and departing from the Project Site.

5. Site Security

The Project would incorporate a security program to ensure the safety of Project residents, employees, and visitors. Controlled access to the building interiors would be provided as appropriate. For example, controlled access would be provided to the residential areas of the Project Site at all times. Access to retail uses and publicly accessible open space areas would be unrestricted during business hours. Public access would be available to those who wish to use or interact with these spaces, including the Machado Park, after business

hours; however, on-site security would be available to ensure that residents and visitors are not disturbed. Facility operations would include staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. Site security would include the provision of 24-hour video surveillance and security personnel. Duties of the security personnel would 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. Project design would also include lighting of entryways, publicly accessible areas, parking areas, and common building and open space residential areas for security purposes.

6. Sustainability Features

Energy efficiency, water conservation, and the reduction of greenhouse gas emissions would be considered in the design, construction, and operation of the building and its proposed new uses. Some of the Project's proposed design features that would contribute to energy efficiency include energy-efficient appliances, water-efficient plumbing fixtures and fittings, and water-efficient landscaping. All Project components would, at a minimum, meet Culver City's mandatory Green Building Program requirements. The Project would supply 1 kilowatt (kW) of solar photovoltaic power. In accordance with the CALGreen Code, infrastructure for EV charging stations for both the residential and retail uses on the Project Site would be provided and meet local applicable Codes. The Project would include 132 EV capable spaces, 66 of which would be EV-ready and 66 of which would have full EV chargers and stations.

7. Construction Schedule/Activities

A Construction Management Plan would be prepared which defines the scope and scheduling of planned construction activities as well as the Applicant's proposed construction site management responsibilities, to ensure minimal impacts to neighboring land uses and to avoid interruption of pedestrian, vehicle, and alternative transportation modes and public transit. The Construction Management Plan, would require regular oversight by the City and would facilitate communication and coordination with residents and others in the neighborhood. A final comprehensive Construction Traffic Management Plan would be subject to review and approval by the City prior to starting of any construction activity. The Plan would include but not necessarily be limited to: name and telephone number of a contact person regarding traffic complaints or emergency situations; community notification procedures; contact information for local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity; procedures for training the flag person(s) used in implementing the plan; the location, times, and estimated duration of any temporary lane closures; managing the approved haul route plan; and a construction parking management plan.

The Project would comply with CCMC Section 9.07.035's allowable construction hours of:

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

In the event that special construction activities such as concrete pours, oversized equipment delivery, or mobile crane placement are required after permitted hours of construction, a Temporary Use Permit would be required from the City pursuant to CCMC Section 9.07.035.

The Project would require excavation to accommodate subterranean parking, building foundations, utilities and other improvements. Up to approximately 88,000 cubic yards of earthwork would be excavated and exported from the Project Site. The Project would excavate to a maximum depth of 25 feet below grade.

Project construction would occur in one phase and is anticipated to commence as early as the second quarter of 2022 and be completed by the third quarter of 2024 for a total of approximately 26 months.

F. NECESSARY APPROVALS

Discretionary entitlements, reviews, and approvals required or requested for the Project may include, but would not necessarily be limited to, the following:

- General Plan Amendment;
- Zoning Code/Map Amendment;
- Adoption of a Comprehensive Plan for the Project, which would establish the development standards for the Project Site;
- Community Benefits Request;
- Density Bonus Request;
- Vesting Tentative Tract Map;
- Certification of the EIR for the Project;
- Demolition Permits to remove the existing on-site structures to allow for construction of the Project;
- Construction Permits, including building, grading, excavation, foundation, and associated permits;
- Haul Route Permit, as may be required by Culver City; and
- Other discretionary and ministerial approvals as needed and as may be required.

ATTACHMENT B
EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS

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

Less Than Significant Impact. The Project Site is located in a highly urbanized area, with a mix of commercial and residential uses in the nearby vicinity. The topography surrounding the Project Site is relatively flat with no ocean, or notable mountain or other scenic vistas that would be affected by the Project. More specifically, the ocean is approximately 4.2 miles to the west across flat topography with intervening development, and areas of Baldwin Hills and Culver Crest which can be viewed from the Project Site and surrounding areas have been altered from their natural condition by residential and oil field development. Further, the Project Site is not located in a scenic resource area or area with protected views designated by the City. Therefore, development of the Project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

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

Less than Significant Impact. The Project Site is located in a highly urbanized area of the City and is currently developed with a three single-story commercial buildings, large areas of asphalt-paved surface parking, and landscaping. The Project Site is not located in the vicinity of a City or State-designated scenic highway. In addition, the Project Site does not contain any unique or locally recognized, natural (i.e., rock outcroppings and trees), features or designated historic buildings.[1]

In addition to street trees surrounding the Project Site, there is a mix of ornamental landscaping on the Project Site, including a number of mature eucalyptus and palm trees, with the most concentrated plantings along Machado Road. All landscaping and trees on the Project Site would be removed as part of the Project. The Project would include a substantial amount of open space, including a Machado Park, a Paseo Courtyard area at the corner of Sepulveda Boulevard and Jefferson Boulevard and between the retail spaces at the southern end of the Project Site, and an Entry Courtyard at the entrance on Sepulveda Boulevard across from Janisann Avenue. These areas would incorporate landscaping and trees that would offset the loss of landscaping on the Project Site. As discussed under Response IV.e, below, the Project would comply with the applicable provisions pertaining to the removal and replacement of street trees in the Culver City Municipal Code (CCMC) within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.220: Removal of Trees in Parkways Related to Private Improvement or Development Project. Based on the City's requirements, the Project is required to plant two new Street Right-of-Way trees or Parkway trees for each tree that is removed from the Project Site. Pursuant to CCMC Section 9.08.215, the size and location of the replacement trees would

[1] City of Culver City, Historic Preservation, https://www.culvercity.org/live/community-neighborhood/historic-preservation. Accessed September 3, 2020.

be determined by the Public Works Director based on what is appropriate for the particular Street Right-of-Way or Parkway.

Overall, based on the above, the Project would not substantially damage scenic resources, including those located within the vicinity of a scenic highway. Accordingly, impacts would be less than significant, and this issue need not be evaluated further in an EIR.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the Project is in an urbanized area, would the Project conflict with applicable zoning or other regulations governing scenic quality?

Less Than Significant Impact. The Project Site is located in an urbanized area. The aging buildings and surface parking lots within the Project Site have low aesthetic value. The Project Site includes a sparsely landscaped open space area with decomposed granite and a decorative fountain. The Project Site is surrounded by commercial and residential uses. As such, the analysis provided below analyzes whether the Project would conflict with applicable zoning and other regulations governing scenic quality. The Culver City General Plan (General Plan), CCMC, and Residential Parkway Design Guidelines include goals, objectives, and policies, that govern scenic quality.

As part of the Open Space Element of the General Plan, Objective 6 establishes an objective to protect view resources, view corridors, and scenic viewpoints. As previously discussed in Response I.a and I.b, above, development of the Project would have less than significant impacts as it relates to scenic vistas and scenic resources and therefore would not conflict with this objective. In addition, as part of the Land Use Element of the General Plan, Objective 6 establishes an objective to revitalize the physical character and economic well-being of the City's commercial corridors, and Policy 6.A encourages revitalization of commercial corridors in the City through new development and renovation of existing structures with incentives which address development standards and the project approval process. The Project would demolish three single-story commercial buildings and associated surface parking lots and landscaping, and redevelop the Project Site with a five-story mixed-use residential and commercial building with landscaping, the Machado Park, and other amenity areas. Redevelopment of the Project Site with unified high quality architecture and open space areas, as well as elimination of large areas of surface parking, would serve to revitalize the corner of Jefferson Boulevard and Sepulveda Boulevard, which is part of a General Commercial Corridor, in support of this objective and associated policy. Furthermore, as part of the Land Use Element of the General Plan, Objective 12 establishes an objective to ensure that new construction is accomplished with the highest quality of architecture and site design. As previously stated, redevelopment of the Project Site with high quality architecture, landscaping, the Machado Park, and other open space/amenity areas, would support consistency with this Objective.

Section 17.310.030, requires the preparation and submittal of a Preliminary Landscape Plan and Final Landscape Plan. The Project would comply with Section 17.310 of the CCMC regarding landscaping regulations and standards to enhance landscaping, conserve water, provide landscape area requirements, and general requirements for the type of landscaping and irrigation. The Preliminary Landscape Plan includes features such as: proposed and existing buildings and structures; proposed parking areas; proposed landscaped areas; a calculation of total hardscape and planted areas; and preliminary list of plant materials. The Final Landscape Plan identifies features such as: plant materials; hardscaped and landscaped areas; water features and fences; existing and proposed buildings and structures; planting and installation details; irrigation design; and maintenance specifications.

Additionally, the Project would be subject to CCMC Section 15.02.115, the Urban Tree Requirements, which is a component of the City's Green Building Program. This section requires that when feasible, all existing on-site trees with a trunk diameter of two inches or greater shall be preserved or replaced with trees of comparable size, per the recommendations of the City Parks Manager; and when feasible, all existing street trees with a trunk diameter of two inches or greater shall be preserved or replaced with trees of comparable size, per the recommendations of the City Engineer. Pursuant to CCMC Section 9.08.215, Removal of Trees in Parkways Related to Private Improvement or Development Project, the Project is required to plant two new street right-of-way trees or parkway trees for each street tree that is removed in the public right-of-way. The size and location of replacement trees would be determined by the Public Works Director based on the street or parkway.

CCMC Section 15.02.1100A.12, requires that all new lighting installed in a garage or parking structure shall be motion-sensor controlled and that minimum base level lighting shall be permitted. CCMC Section 17.330, Signs, provides a comprehensive system for the regulation of signs in the City in order to address community aesthetics, vehicular and pedestrian safety, property values, and the visual environment. CCMC Section 17.330.020.B, Table 3.5, and CCMC Section 17.330.025 identify the types of signs allowed in non-residential zoning districts and the corresponding maximum sign area, maximum sign height, maximum number of signs, location, and additional requirements. Section 17.330.030, General Requirements for All Signs, includes requirements for sign area measurement, sign height measurement, sigh location requirements, aesthetic design standards, sign illumination, installation, and maintenance standards.

Overall, based on the analysis provided above, the Project would not conflict with applicable zoning or other regulations governing scenic quality. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

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

Light and Glare

Less Than Significant Impact. The Project Site is currently developed with three single-story commercial buildings and associated areas of surface parking. The Project Site is located in a highly urbanized area, with a mix of low-rise commercial and residential. The Project vicinity exhibits considerable ambient nighttime illumination levels due to the densely developed nature of the area, existing buildings, and surface parking lots on the Project Site, as well as from adjacent commercial properties located south and east of the Project Site. Artificial light sources from the on-site uses and other surrounding properties include interior and exterior lighting for security, parking, architectural enhancement, incidental landscape lighting, and illuminated signage. Automobile headlights, streetlights and stoplights for visibility and safety purposes along the major and secondary surface streets contribute to overall ambient lighting levels as well.

Similar to existing surrounding uses, the Project would include low to moderate levels of interior and exterior lighting for security, parking, signage and architectural enhancement. As stated in Attachment A, Project Description, of this Initial Study, lighting for the Project would be shielded, focused and directed to avoid any substantial light trespass onto adjacent properties. All proposed lighting for the Project's residential, office and market/retail uses would be provided in accordance with CCMC Section 17.300.040, which provides the general standards for outdoor lighting to regulate lighting fixtures and design, energy use, light shielding, light intensity, and lighting placement. Additionally, the Project would comply with CCMC Section 15.02.110A.12, which requires that all new lighting installed in a garage or parking structure shall be motion-sensor controlled and that

minimum base level lighting shall be permitted. Compliance with these regulations would ensure that impacts regarding Project lighting are less than significant, and this issue need not be evaluated further in an EIR.

Glare from sunlight reflected off of reflective materials utilized in existing buildings can be substantial and have an adverse effect on motorists and other land uses. As stated in Attachment A, Project Description, of this Initial Study, Project materials would be selected to avoid highly reflective surfaces that might otherwise result in substantial glare effects on motorists or adjacent uses. To the extent some glare is experienced by adjacent uses or the occupants of vehicles on nearby streets it would be temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

Shade and Shadow

Less Than Significant Impact. Potential shading impacts could result when shadow-sensitive uses are located to the north, northwest, or northeast of new structures. Sensitive uses include "routinely usable outdoor spaces" associated with residential, recreational, or institutional uses (e.g., schools, convalescent homes), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade-sensitive uses in the Project vicinity include the backyards of the residential uses north of the Project Site and the ECF located north of the Project Site.

In order to determine the extent of shading impacts, shading diagrams of the worst case scenarios (longest shadows) have been prepared that show adjacent off-site shade-sensitive uses on an aerial photograph. The shading diagrams illustrate the shadows cast by the Project on nearby surrounding uses in **Figure B-1**, *Winter Solstice (December 21) Shadows*, during the winter solstice on December 21 from 9:00 A.M. to 3:00 P.M.; in **Figure B-2**, *Spring Equinox (March 21) Shadows*, during the spring equinox on March 21 from 9:00 A.M. to 5:00 P.M.; in **Figure B-3**, *Summer Solstice (June 21) Shadows,* during the summer solstice on June 21 from 9:00 A.M. to 5:00 P.M.; and in **Figure B-4**, *Fall Equinox (September 21) Shadows,* during the fall equinox from 9:00 A.M. to 5:00 P.M. For purposes of this analysis, a Project impact would normally be considered significant if shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October.[2]

No shadow-sensitive uses would be subject to significant new shading by the proposed building for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October. As shown in Figure B-1, during the winter solstice, an overlap of shadows would occur on the eastern side of Machado Road by the ECF. However, as the shadow overlap would only occur on the surface parking lot and on the sidewalk, rather than on the school itself, impacts would be less than significant. As a result, the Project would not significantly increase shading of adjacent shadow-sensitive uses. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

[2] Appendix G of the CEQA Guidelines does not provide screening questions that address impacts with regard to shading. The City of Culver City relies on the criteria set forth in the City of Los Angeles' CEQA Thresholds Guide (2006) to determine shade/shadow impacts on shade sensitive uses.

SOURCE: ESA, 2020; Mapbox, 2019

11111 Jefferson Boulevard Mixed-Use Project

Figure B-1
Winter Solstice (December 21) Shadows

ESA

SOURCE: ESA, 2020; Mapbox, 2019

11111 Jefferson Boulevard Mixed-Use Project

Figure B-2
Spring Equinox (March 21) Shadows

ESA

SOURCE: ESA, 2020; Mapbox, 2019

11111 Jefferson Boulevard Mixed-Use Project

Figure B-3
Summer Solstice (June 21) Shadows

ESA

SOURCE: ESA, 2020; Mapbox, 2019

11111 Jefferson Boulevard Mixed-Use Project

Figure B-4
Fall Equinox (September 21) Shadows

ESA

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

No Impact. The Project Site is located in a highly urbanized area of the City and is currently developed with three single-story commercial buildings, surface parking, and landscaping. The Project Site does not contain agricultural uses or related operations and is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[3] Furthermore, the General Plan does not identify the Project Site as an area designated for agriculture use. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impacts would occur, and this issue need not be evaluated further in an EIR.

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

No Impact. The General Plan Land Use designation for the Project Site is General Corridor Commercial and the corresponding zoning designation is Commercial General (CG) and Single-Family (R-1). Per the Culver City Zoning Code, no portion of the Project Site or surrounding land uses are zoned for agriculture and no nearby lands are enrolled under the Williamson Act. As such, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract and no impact would occur. Therefore, no impacts would occur, and this issue need not be evaluated further in an EIR.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. As discussed in the Response II.b, the Project Site is currently developed and is designated as General Corridor Commercial. No forest land or timberland zoning is present on the Project Site or in the surrounding area. As such, the Project would not conflict with existing zoning for forest land or timberland, no impact would occur, and this issue need not be evaluated further in an EIR.

[3] State of California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/dlrp/ciff/. Accessed September 3, 2020.

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

No Impact. No forest land exists on the Project Site or in the surrounding area. As such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts would occur, and this issue need not be evaluated further in an EIR.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Since there are no agricultural uses or related operations on or near the Project Site, the Project would not involve the conversion of farmland to other uses, either directly or indirectly. No impacts would occur, and this issue need not be evaluated further in an EIR.

III. AIR QUALITY

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

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

Potentially Significant Impact. The Project Site is located within the 6,600-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) together with the Southern California Association of Governments (SCAG) is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current 2016 Air Quality Management Plan (AQMP) was adopted March 3, 2017 and outlines the air pollutions control measures needed to meet Federal particular matter (PM2.5) and Ozone (O_3) standards. The AQMP also proposes policies and measures currently contemplated by responsible agencies to achieve Federal standards for healthful air quality in the Basin that are under SCAQMD jurisdiction. In addition, the current AQMP addresses several Federal planning requirements and incorporates updated emissions inventories, ambient measurements, meteorological data, and air quality modeling tools from earlier AQMPs. The Project would increase the amount of air emissions which could affect implementation of the AQMP due to increased traffic and energy consumption, including potential increases in the amounts of gas and electricity needed to support the Project. Pollutant emissions resulting from construction of the Project would also have the potential to affect implementation of the AQMP. Therefore, it is recommended that this topic be evaluated further in an EIR.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. The Project Site is located within the Basin, which is characterized by relatively poor air quality. According to the 2016 AQMP, the Basin is designated nonattainment for Federal and State ozone (O3) standards, as well as the current particulate matter (PM10 and PM2.5) standards. The Los Angeles County portion of the Basin is also designated a nonattainment area for the Federal lead (Pb) standard on the basis of source-specific monitoring at two locations, as determined by the U.S. Environmental Protection Agency (USEPA) using 2007 through 2009 data. However, all other stations in the Basin, including the near-source monitoring in Los Angeles County, have remained below the lead National Ambient Air Quality Standards (NAAQS) for the 2012 through 2015 period. SCAQMD is therefore requesting that the USEPA re-designated the

Los Angeles County portion of the basin as attainment for lead. The Project would result in increased air emissions (including the emission of criteria pollutants) from construction and operational traffic and energy consumption in the Basin, within an air quality management area currently in non-attainment of Federal and State air quality standards for O_3, PM10, and PM2.5. As such, implementation of the Project could potentially contribute to cumulatively air quality impacts, in combination with other existing and future emission sources in the Project area. Therefore, it is recommended that this topic be evaluated further in an EIR.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The Project Site is located in the Studio Village neighborhood of Culver City, which includes a low- to medium-density mix of uses, including sensitive residential uses north and northwest of the Project Site and Temple Akiba west of the Project Site. Construction activities and operation of the Project could increase localized air emissions, carbon monoxide (CO) concentrations, and toxic air contaminants (TACs) at these and other sensitive uses in the area above current levels. Therefore, it is recommended that this topic be evaluated further in an EIR.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 (Architectural Coatings) limits the amount of volatile organic compounds from architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. Odors from the combustion of diesel fuel would be minimized by complying with the CARB Air Toxics Control Measure (ATCM) that limits diesel-fueled commercial vehicle idling to five minutes at any given location, which was adopted in 2004. The Project would also comply with SCAQMD Rule 402 (Nuisance), which prohibits the emissions of nuisance air contaminants or odorous compounds. Through adherence with mandatory compliance with SCAQMD Rules and State measures, construction activities and materials would not result in other emissions that create objectionable odors. The nearest existing sensitive receptors are residences to the north of the Project Site. Construction of the Project's proposed uses would not be expected to generate emissions leading to nuisance odors that would adversely affect nearby sensitive receptors.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve elements related to these types of uses. The Project would otherwise include proper housekeeping practices for trash receptacles and other components or activities such that adverse odor impacts would be avoided similar to other like residential and commercial uses in the City. Impacts with respect to odors would be less than significant, and this issue need not be evaluated further in an EIR.

IV. BIOLOGICAL RESOURCES

Would the Project:

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

No Impact. The Project Site is located in a highly urbanized area of the City and is currently developed with commercial buildings and associated parking. No suitable habitat for candidate, sensitive, or special status species exists, and for this reason and because of the density of development and high levels of human activity in the Project area, there is no potential for the Project Site to support candidate, sensitive, or special status species on the Project Site. The Project would not have a substantial adverse effect on candidate, sensitive, or special status species, no impact would occur, and this issue need not be evaluated further in an EIR.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

No Impact. As discussed under Response IV.a, the Project Site is currently developed with urban uses. No designated riparian habitat or natural communities exist on the Project Site or in the surrounding area. The Project Site currently supports a limited amount of ornamental landscaping. As such, the Project would not have a substantial adverse effect on riparian habitat or any other sensitive natural community. The Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community and no impact would occur, and this issue need not be evaluated further in an EIR.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. As discussed under Response IV.a, the Project Site is currently developed. The Project Site does not contain any state or federally protected wetlands. As such, the Project would not have a substantial adverse effect on state or federally protected wetlands and no impact would occur, and this issue need not be evaluated further in an EIR.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?

Less Than Significant Impact With Mitigation Incorporated. The Project Site is currently developed and located in a highly urbanized area of the City. No wildlife corridors or native wildlife nursery sites are present on the Project Site or in the surrounding area. Further, due to the urbanized nature of the Project area, the potential for native resident or migratory wildlife species movement through the Project Site is negligible. Jefferson Boulevard and Sepulveda Boulevard are highly utilized streets with high levels of ambient noise and human disturbance associated with pedestrian and vehicular traffic.

Nonetheless, the Project Site currently contains ornamental trees and landscaping, and there are adjacent street trees, all of which could support raptor and/or songbird nests for native species tolerant of human disturbance.

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 Code of Federal Regulations [CFR] Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). As the Project would include the removal of existing trees on the Project Site and potentially remove adjacent street trees, the removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. Accordingly, Mitigation Measure MM-BIO-1 is provided below to reduce potential impacts to protected nesting birds consistent with the Federal MBTA. Impacts would be less than significant with mitigation incorporated and this issue need not be further analyzed in an EIR.

Mitigation Measure

MM-BIO-1: The Applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Either:

1) Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would insure that no active nests are disturbed; or

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

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

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

      Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure

that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the Culver City Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.

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

Less than Significant Impact. The Project Site supports only ornamental landscaping; there are no protected trees on site. Project implementation would result in removal of ornamental landscaping and trees, but would also include substantial areas of landscaped open space, including trees. As there are no protected trees or biological resources on the Project Site, such activities would not conflict with local policies or ordinances protecting biological resources.

Project implementation would comply with the applicable provisions pertaining to the removal and replacement of street trees in the CCMC within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.215: Removal of Trees in Parkways Related to Private Improvement or Development Project. Per the CCMC, the Project is required to plant two new street right-of-way trees or parkway trees for each street tree that is removed in the public right-of-way. The size and location of replacement trees would be determined by the Public Works Director based on the street or parkway. With compliance to the applicable street tree removal and replacement provisions of the CCMC, impacts on street trees would be less than significant, and this issue need not be evaluated further in an EIR.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. As discussed in the Response IV.b, no designated riparian habitat or natural communities exist on the Project Site or in the surrounding area. Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place for the Project Site or the City. The Project would have no impact with respect to these plans, and this issue need not be evaluated further in an EIR.

V. CULTURAL RESOURCES

Would the Project:

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

Potentially Significant Impact. A historical resource is defined in Section 15064.5 of the CEQA Guidelines as:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code Section 5024.1, Title 14 CCR, Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code.

(3) Any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, resources are considered historically significant if the resources are associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

Based on records at the Culver City Building Department, the Coco's Casual Restaurant chain (building permit issued in October 1967) and the United States Post Office (building permit issued in February 1961 and evidenced on the Project Site on 1963) are both over 45 years in age and pursuant to CEQA, they will be evaluated to determine if they qualify as historical resources. The oil change facility was constructed sometime after 1994 when aerial photographs show that the previous structure at that location had been demolished. Therefore, the oil change facility does not require evaluation under CEQA. A historic resource assessment will be conducted to determine if the United States Post office and Coco's Casual Restaurant Chain qualify for listing in the National Register of Historic Places, California Register of Historical Resources, or City of Culver City Landmarks Register, and would therefore be considered historical resources under CEQA. The assessment and the analysis provided within the Draft EIR will document the construction history and ownership/occupancy for the two buildings, provide historical background research to develop the historic context for evaluation of the buildings, and evaluate eligibility for listing in the abovementioned registers. In the event the buildings are found to qualify as historical resources, impacts associated with their demolition will be assessed as well as any potential for the Project to result in indirect impacts to other historical resources that may exist in the surrounding area. Therefore, this topic will be further analyzed in the EIR to determine potential impacts associated with historical resources.

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

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is currently developed with buildings, surface parking and ornamental landscaping. However, because grading or excavation at the time of prior construction was likely limited, the potential existence of extant archaeological resources is unknown, and as with other areas of the City, archaeological resources may be present. Project construction would require grading and excavation activities for building foundations and one level of subterranean parking that could extend into native soils and could disturb existing but as yet undiscovered archaeological resources. Therefore, it is recommended that this topic be evaluated further in an EIR.

c. Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. As previously indicated, the Project Site is fully developed. Nevertheless, the Project would require excavation that could extend into native soils, with the potential to encounter previously unknown human remains. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section

7050.5, Public Resources Code (PRC) Section 5097.98, and State CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event of the discovery of unrecorded human remains during construction, excavations shall be halted and the County Coroner shall be notified. If the human remains are determined to be Native American, the California Native American Heritage Commission (NAHC) would be notified within 24-hours and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory protocols would ensure that impacts on human remains would be less than significant, and this issue need not be evaluated further in an EIR.

VI. ENERGY

Would the Project:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Potentially Significant Impact. The Project would intensify development on the Project Site and therefore, increase energy consumption during construction and operation associated with electricity, natural gas and transportation fuel. Although the increase in energy consumption is not anticipated to be wasteful, inefficient, or unnecessary and would comply with existing energy conservation plans, it is recommended that this topic be evaluated further in an EIR.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. The Project would be required to comply with the California Green Building Standards (CALGreen Code) pursuant to Title 24, Part 11 of the California Code of Regulations (CCR). In conformance with these requirements, the Project would be designed to incorporate various energy and resource conservation measures. In addition, the Project would implement applicable energy and resource conservation measures such as those described in CARB's Assembly Bill (AB) 32 Climate Change Scoping Plan and supporting documents. However, further evaluation in an EIR is required to determine if the Project would achieve consistency with state or local plans for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS

The following geology and soils discussion is based on the Report of Geotechnical Engineering Services (Preliminary Geotechnical Report), dated April 19, 2019, which was prepared by GeoDesign, Inc. and is available for review at the Culver City Planning Division.

Would the Project:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less Than Significant Impact. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface

displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive. In addition, there are buried thrust faults, which are low angle reverse faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

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

The Project Site is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The Geotechnical Engineering Investigation conducted for the Project indicates that no currently known active or potentially active surface faults traverse the Project Site, and the Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone. The nearest fault zone to the Project Site is the Newport Inglewood Fault Zone is located approximately 1.5 miles east of the Project Site.[4] In addition, the Overland Avenue Fault is located approximately 2,000 feet east of the Project Site, along Overland Avenue. It should be noted that no Special Studies Zones have been delineated by the State of California along any portion of the Overland Avenue Fault. As such, the potential for surface rupture due to faulting occurring on the Project Site during the design life of the Project is considered low. Furthermore, Project buildings would be designed and constructed to resist the effects of seismic ground motions as provided in the Culver City Building Code and the 2019 California Building Code. Therefore, the Project would not directly or indirectly cause potential substantial adverse impacts associated with the rupture of a known earthquake fault. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The City, as with all of Southern California, is subject to strong ground shaking. As such the Project Site is located in a seismically active region. As discussed above, two nearby faults include the Newport-Inglewood Fault and Overland Avenue Fault. Earthquakes are unavoidable hazards although the resultant damage can be minimized through appropriate seismic design and engineering.

The City requires that all new construction meet or exceed the Culver City Building Code and the latest standards of the 2019 California Building Code for construction which requires structural design that can accommodate maximum ground accelerations expected from known faults. Furthermore, the Project would comply with the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provides guidance for evaluation and mitigation of earthquake-related hazards. The Project would also be required to comply with applicable seismic-related regulatory requirements. In addition, a final design-level geotechnical report must ultimately be prepared and approved by the City prior to issuance of building permits, and would be based on the final construction and building plans prepared by the Applicant. Implementation of the site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation of the final design-level geotechnical report would further ensure that seismic-

[4] California Department of Conservation, Fault Activity Map of California, 2010, http://maps.conservation.ca.gov/cgs/fam/. Accessed September 3, 2020.

related ground shaking impacts would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

iii. Seismic-related ground failure, including liquefaction?

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

According to the State of California Seismic Hazard Zone Map of the Venice Quadrangle, provided in the Preliminary Geotechnical Report , the Project Site is located within a liquefaction hazard zone. The Preliminary Geotechnical Report performed a liquefaction analysis for the Project Site based on soil conditions encountered at the Project Site and earthquake hazard mapping as well as the historic high ground water level that was determined to be 9 feet below ground surface. Based on subsurface conditions, laboratory testing, the historic high ground water level, and the analysis provided in the Preliminary Geotechnical Report, it was estimated at up to 1 inch of liquefaction-induced settlement is possible at the existing ground surface. However, the liquefaction potential reduced to negligible amounts for the considerably lower groundwater level at 38 feet to 43 feet below ground surface observed on portions of the Project Site. As there is a potential for liquefaction-induced settlement in portions of the Project Site, the final design-level geotechnical report would provide site-specific design parameters and recommendations to mitigate the effects of liquefaction. Specifically, the Preliminary Geotechnical Report recommends seismic design parameters determined in accordance with Chapter 16, Section 1613 of the California Building Code and American Society of Civil Engineers. In addition, the Project would be required to comply with applicable seismic-related regulatory requirements of the Culver City Building Code and the 2019 California Building Code. With compliance of the regulatory requirements as well as implementation of the site-specific design parameters and recommendations of the final design-level geotechnical report, seismic-related ground failure impacts, including liquefaction, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

iv. Landslides?

Less Than Significant Impact. The Project Site is relatively flat with elevations ranging from approximately 33 feet to 35 feet. According to the City's GIS Hazards map, the Project Site is located outside the areas identified as susceptible to earthquake-induced landslides.[5] Based on this information, impacts from landslides would be less than significant, and this issue need not be evaluated further in an EIR.

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

Less than Significant Impact. Soil erosion refers to the process by which soil or earth material is loosened or dissolved and removed from its original location. Erosion can occur by varying processes and may occur in a

[5] City of Culver City. Seismic Hazards, dated February 1, 2007, http://www.culvercity.org/home/showdocument?id=124. Accessed September 3, 2020.

Project area where bare soil is exposed to wind or moving water (both rainfall and surface runoff). The processes of erosion are generally a function of material type, terrain steepness, rainfall or irrigation levels, surface drainage conditions, and general land uses. Topsoil is used to cover surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms.

The Project Site is located in a highly urbanized area of Culver City and is currently developed. Negligible, if any, native topsoil is likely to occur on the Project Site as it is currently developed with three single-story commercial buildings and associated surface parking. Project construction would result in ground surface disruption during excavation, grading, and trenching that would create the potential for erosion to occur. Wind erosion would be minimized through soil stabilization measures required by the South Coast Air Quality Management District (SCAQMD) Rule 403 (Fugitive Dust), such as daily watering. Potential for water erosion would be reduced by implementation of standard erosion control measures imposed during site preparation and grading activities. Specifically, construction activities would be carried out in accordance with applicable Culver City standard erosion control practices required pursuant to the California Building Code and the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. Consistent with these requirements, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates Best Management Practices (BMPs) to control water erosion during the Project's construction period. Following Project construction, the Project Site would be covered completely by paving, structures, and landscaping, and would generate little if any soil erosion. Thus, impacts due to erosion of topsoil would be less than significant as the Project would comply with applicable regulatory requirements, and this issue need not be evaluated further in an EIR.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. As discussed in the Preliminary Geotechnical Report, subsurface conditions consist of 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 with variable fines content and medium stiff to very stiff clay with variable sand content. Soft to medium stiff, high plasticity clay was also encountered from 22 to 29 feet below ground surface in Boring B-1 and loose silty sand was encountered from 29 to 33 feet below ground surface in Boring B-4.

Impacts related to liquefaction and landslides are discussed above in Responses VII.a.iii. and VII.a.iv. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to the combination of gravity and earthquake shaking. Such movement can occur on slope gradients of as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and structures. Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e. retaining wall, slope, or channel) and to a lesser extent on ground surfaces with a very gentle slope. As noted in the Preliminary Geotechnical Report, there are no major open faces close to the Project Site. In addition, as stated in Response VII.a.iii, above, the final design-level geotechnical report would provide site-specific recommendations for Project Site preparation, excavation, foundation design, and shoring/retaining wall specifications to minimize the effects of liquefaction, which would in turn reduce the potential for lateral spreading. Furthermore, no large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at

the Project Site. Thus, there appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the Project Site.

The Project construction and design would be required to comply with the 2019 California Building Code, which is designed to assure safe construction, and implementation of the site-specific design measures including foundation design recommendations of the final design-level geotechnical report would further ensure that ground and soil stability hazards would not become unstable as a result of the Project. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Soils with shrink-swell or expansive properties typically occur in fine-grained sediments and cause damage through volume changes as a result of a wetting and drying process. Structural damage may occur over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. As discussed in the Preliminary Geotechnical Report, expansive soils were not encountered in the borings within close proximity to the existing ground surface; however, an approximately 5- to 7-foot thick layer of high plasticity clay, which would be expansive, was encountered at depths between 21.5 and 40.5 feet below ground surface. Other discontinuous zones of high plasticity play may also be present at the Project Site. As such, if high-plasticity clay is identified within the upper few feet at the site during construction, the Preliminary Geotechnical Report recommends removal and replacement of high-plasticity clay with non-expansive soil beneath foundations. As such, with the incorporation of recommendations provided in the final design-level geotechnical report, the Project would not create a substantial direct or indirect risk to life for property. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project Site is located in an urbanized area where municipal wastewater infrastructure already exists. The Project would be required to connect to the existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur, and this issue need not be evaluated further in an EIR.

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

Potentially Significant Impact. The 3.43-acre Project Site is currently developed with three single-story commercial buildings, surface parking and landscaping. Although, the Project would not directly or indirectly destroy a unique geologic feature, it would require grading and excavation for building foundations and subterranean parking that could extend into native soils and/or geologic features potentially containing paleontological resources. Therefore, it is recommended that this topic be evaluated further in an EIR.

VIII. GREENHOUSE GAS EMISSIONS

Would the Project:

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

Potentially Significant Impact. Construction and operation of the Project would generate greenhouse gas (GHG) emissions which have the potential to either individually or cumulatively result in a significant impact on the environment. In addition, the Project would generate vehicle trips that would contribute to the emission of GHGs. Therefore, it is recommended that this topic be further evaluated in an EIR.

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

Potentially Significant Impact. The Project would be required to comply with the CALGreen Code. In conformance with these requirements, the Project would be designed to reduce GHG emissions through various energy and resource conservation measures. In addition, the Project would implement applicable energy and resource conservation measures to reduce GHG emissions such as those described in CARB's AB 32 Climate Change Scoping Plan and supporting documents, which describes the approaches the State will take to reduce GHG emissions to 1990 levels by 2020. CARB adopted the 2017 Climate Change Scoping Plan in response to Senate Bill (SB) 32 that outlines the State strategy for meeting the GHG reduction target for the State of 40 percent below 1990 levels by 2030. Further evaluation in an EIR is required to determine if the Project would achieve consistency with these plans, policies and regulations.

IX. HAZARDS AND HAZARDOUS MATERIALS

The following hazardous materials discussion is based on the Phase I Environmental Site Assessment, 5350/5380 Sepulveda Boulevard and 11111 Jefferson Boulevard, Culver City, California 90230 (Phase I ESA), dated March 25, 2019, and the Phase II Environmental Site Assessment, 5350/5380 Sepulveda Boulevard and 11111 Jefferson Boulevard, Culver City, California 90230 (Phase II ESA), dated September 14, 2019, both of which were prepared by Stantec and are available for review at the Culver City Planning Division.

Would the Project:

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

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

Project operations would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, pesticides for landscaping, and chemicals for pool maintenance. These hazardous materials are commonly used and regulated by federal and state laws mandating their proper transport, use, storage and disposal in accordance with product labeling. Additionally, the use of these materials would be in small quantities and their use and storage is not considered to present a health risk when used in accordance with manufacturer specifications and with compliance to applicable regulations. As with construction emissions, any emissions from the use of such materials regarding operation of the Project would be minimal and localized to the Project Site.

Overall, based on the above, construction and operation of the Project would have a less than significant impact with regard to routine transport, use, or disposal of hazardous materials relative to the safety of the public or the environment, and this issue need not be evaluated further in an EIR.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact. Construction of the Project could potentially produce hazardous wastes associated with the use of asphalt, paint, petroleum, and other solvents. All hazardous materials would be required to be utilized and transported according to regulations. Due to the ages of the buildings that may be affected during the Project, there is likely to be potential for asbestos and lead-based paint to be encountered. Demolition would require remediation and abatement. Additionally, as discussed within the Phase II ESA, there is potential for soils impacts related to the removal of the hydraulic lift and the exceedances of the Regional Water Quality Control Board (RWQCB) environmental screening levels (ESLs) in the vapor samples taken near the former gasoline service stations. Therefore, it is recommended that this topic be further evaluated in an EIR.

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

Potentially Significant Impact. The ECF, which serves as a special education school, is located at 5350 Machado Road, north of the Project Site directly across Machado Road. In addition, El Rincon Elementary School, located at 11177 Overland Avenue, is located approximately 0.20 miles east of the Project Site. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions.

As discussed in Response IX.b, there is potential for soils impacts related to the removal of the hydraulic lift and the exceedances of the RWQCB ESLs in the vapor samples taken near the former gasoline service stations. Therefore, it is recommended that this topic be further evaluated in an EIR.

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

Potentially Significant Impact. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference

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

Based on a review of the databases, as provided in the Phase I ESA, the Project Site was identified as EZ Lube LLC, Chevron #9-3666 (FORMER), Valvoline Instant Oil Change, and Savich Ben at 5380 Sepulveda Boulevard in the HAZNET, FINDS, RGA LUST, Los Angeles Co. HMS, AST, SWEEPS UST, HIST UST, CA FID UST, ECHO, EDR Hist Auto, RCRA-SQG, LUST, and HIST CORTESE environmental database reports. According to the listings, the Project Site was occupied by a gasoline service station between 1969 and 2014. 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 underground storage tank (UST), two 10,000-gallon fuel USTs, and one 1,000-gallon oil UST were located on the Project Site.

As discussed in Response IX.b, there is potential for impacts related to the removal of the hydraulic lift and the exceedances of the RWQCB ESLs in the vapor samples taken near the former gasoline service stations. Therefore, it is recommended that this topic be further evaluated in an EIR.

e. For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?

No Impact. The Project Site is not located within an airport land use plan or within two miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately 3.15 miles northwest and 3.5 miles south of the Project Site, respectively. Therefore, the Project would not result in an airport-related safety hazard or excessive noise for people residing or working in the Project area. No impacts would occur, and this issue need not be evaluated further in an EIR.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is located in an established urban area that is well served by a roadway network. The Project Site is not located on an established disaster route. The nearest disaster route to the Project Site is Sepulveda Boulevard, beginning at the intersection of Sepulveda Boulevard and Culver Boulevard, located approximately 0.88 miles west of the Project Site.[6] While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In these instances, the Project would

[6] County of Los Angeles Department of Public Works, Disaster Route Map, https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf. Accessed September 3, 2020.

implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with Culver City requirements, the Project would develop a Construction Traffic Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the Project vicinity and would result in some modifications to access (i.e., new curb cuts for Project driveways) from the streets that surround the Project Site. However, emergency access to the Project Site and surrounding area in the case of an emergency would continue to be provided similar to existing conditions. Emergency vehicles and fire access for the Project Site would be provided at grade access from three driveways: one on Sepulveda Boulevard at Janisann Avenue and two on Machado Road. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for employees and visitors. Subject to review and approval of Project Site access and circulation plans by the Culver City Fire Department (CCFD), the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans in the case of an emergency. As such, the Project would not cause significant impediments along a designated emergency evacuation routes, and the proposed mix of uses would not impair implementation of Culver City's emergency response plan. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

g. Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is not located in an area of moderate or very high fire hazard.[7] The nearest very high fire hazard severity zone is located in Baldwin Hills, approximately 0.55 miles east of the Project Site. As the Project would involve redevelopment of an infill site within a highly urbanized area that is not proximate to wildlands or high fire hazard areas, no impacts would occur, and this issue need not be evaluated further in an EIR.

X. HYDROLOGY AND WATER QUALITY

The following impact analysis pertaining to the Project Site's underlying geology and soils is based on information contained in the Hydrology, Hydraulics, and SUSMP Report (Hydrology Report), prepared by Kimley-Horn & Associates, Inc., dated September 10, 2020, which is available for review at the Culver City Planning Division.

Would the Project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. The Project Site is relatively flat and is approximately 32 to 35 feet above mean sea level. As discussed in the Hydrology Report, there are three existing drainage areas. They are described as follows: 1) in Drainage Area 1, runoff sheet flows to various inlets located in the Project Site's western portion at a slope of approximately one percent and the runoff is then routed to various parkway and curb drains and discharged to Sepulveda Boulevard's public storm drain system; 2) in Drainage Area 2, runoff sheet flows to

[7] Culver City Fire Department, Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012, https://www.culvercity.org/home/showdocument?id=164. Accessed September 3, 2020.

various inlets located on the Project Site's eastern portion at a slope of approximately one percent and the runoff is then routed to various curb drains and discharged to Jefferson Boulevard's public storm drain system or the runoff sheet flows directly to the Jefferson Boulevard public storm drain system; and 3) in Drainage Area 3, runoff is predominately roof drain runoff that flows through a downspout system and sheet flows to the Machado Road public storm drain system or connects to a parkway drain and is charged to Machado Road.

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

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

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

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

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

The Project would be subject to existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with the requirements of the NPDES General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. Best Management Practices (BMPs) to minimize pollutant runoff during the Project's construction period would be incorporated by preventing the off-site movement of potential contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides.

As discussed under Response VII.a.iii, above, according to the Preliminary Geotechnical Report, groundwater was encountered during exploration at depths between 38 feet to 43 feet below the ground surface. According to the Seismic Hazard Zone Map of the Venice Quadrangle, the historic high groundwater level for the Project Site was approximately 9 feet below the surface. As such, construction activities, which would require excavations down to 20 feet below ground surface could encounter groundwater. Typically, groundwater removed from a construction site is disposed of in the storm drain system. Should the samples exceed the NPDES requirements, the developer must submit a Notice of Intent to discharge groundwater generated from dewatering operations during construction in accordance with the requirements of this Permit.[8] The treatment and disposal of the dewatered water would occur in accordance with the requirements of LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, including sampling of groundwater that may be contaminated and treatment and disposal of contaminated groundwater in compliance with applicable regulatory requirements. Written verification from the LARWQCB of approval of a dewatering plan completion shall be submitted to the Culver City Planning Division, Building Safety Division, and Department of Public Works prior to issuance of grading permit. Any removed groundwater that would exceed acceptable water quality regulatory standards of the LARWQCB or other appropriate agencies would be subject to a dewatering plan and would be treated and disposed of in compliance with applicable regulatory requirements. Therefore, compliance with applicable stormwater and groundwater requirements (LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties and the NPDES Construction General Permits) would ensure that impacts to water quality during the Project's construction activities would be less than significant.

With regard to long-term water quality impacts, per the applicable requirements of Chapter 5.05, Stormwater and Urban Runoff Pollution Control, Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects, of the CCMC, the Project would require a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. The preliminary concept for the site drainage and stormwater treatment implements several rainwater harvesting systems including a stormwater capture and use detention structure. The surface drainage would be relayed to these structures via roof drains. The Project would also consider combination of pre-treatments upstream of the rainwater harvesting system, potentially including flow-through planters, fossil filter inserts for catch basins, and/or flow treatment systems such as a Continuous Deflective Separation (CDS) hydrodynamic separator. Once the required treatment volume is stored in the rainwater harvesting system, the excess water for a higher rain event would overflow to the existing storm drain system in the surrounding streets via a high flow bypass system prior to the storage device or internal bypass outlet. The stormwater runoff captured and stored within the rainwater harvesting system would be reused for irrigation of proposed on-site landscape areas. As discussed in the Hydrology Report, the proposed storage volume of the rainwater harvesting system would be 10,081 cubic feet, which provides an excess storage of 719 cubic feet. The stormwater system would be subject to review and approval by the City to ensure that it would adequately comply with applicable water quality regulations.

Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations. The Project would not interfere with the implementation of NPDES water quality regulations and standards. Compliance with applicable SUSMP and long-term water quality

[8] Los Angeles Regional Water Quality Control Board, Order No. R4-2018-0125, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, September 13, 2018, http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/permits/general/npdes/r4-2013-0095/Dewatering%20Order.pdf. Accessed September 3, 2020.

requirements would be reviewed by the Culver City Department of Public Works during the plan check phase of the Project. Compliance with applicable stormwater requirements would ensure that development of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The Project Site is located in a highly urbanized area of the City and is currently developed with a three single-story commercial buildings and associated surface parking. As stated in the Hydrology Report, 87 percent of the Project Site under existing conditions is impervious.[9] As such, the Project Site does not currently provide a substantial opportunity for recharge of groundwater. Furthermore, the Project does not propose to use groundwater or to development long-term groundwater production wells, which would lead to decreased groundwater supplies. Given the temporary nature of construction activities, while some dewatering could be necessary during construction activities, such dewatering activities would not be of an extent that would substantially alter groundwater supplies due to shallow depth of excavation and the lower groundwater levels, and the treatment and disposal of the dewatered water would occur in accordance with the requirements of LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.. In addition, with development of the Project, impervious areas on the Project Site would be reduced to 80 percent, which would serve to promote groundwater recharge and improve the existing conditions. Therefore, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Currently, the 3.43-acre area of the Project Site is currently 87 percent impervious and 13 percent pervious. No streams or rivers occur on-site. With development of the Project, impervious surfaces would be reduced to 80 percent and pervious surface would increase to 20 percent. Site-generated surface water runoff would continue to flow into the City's storm drain system following on-site treatment. Furthermore, the Project would include appropriate drainage improvements on Project Site to direct stormwater flows to the local drainage systems, similar to existing conditions. The current requirement for the City of Culver City's SUSMP follows closely to the Los Angeles County's Low Impact Development (LID) guidelines. The County LID manual states the following:

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

[9] Kimley Horn and Associates, Inc., Hydrology, Hydraulics, and SUSMP Report, dated September 10, 2020, page 2.

As discussed under Response X.a, the preliminary concept for the site drainage and stormwater treatment implements several rainwater harvesting systems including a stormwater capture and use detention structure. The surface drainage would be relayed to these structures via roof drains. The Project will also consider a combination of pre-treatments upstream of the rainwater harvesting system, potentially including flow-through planters, fossil filter inserts for catch basins, and/or flow treatment systems such as a CDS hydrodynamic separator. Once the required treatment volume is stored in the rainwater harvesting system, the excess water for a higher rain event would overflow to the existing storm drain system, in the surrounding streets via high flow bypass system prior to the storage device or internal bypass outlet. The stormwater runoff captured and stored within the rainwater harvesting system would be reused for irrigation of proposed on-site landscape areas. As discussed in the Hydrology Report, the proposed storage volume of the rainwater harvesting system would be 10,800 cubic feet, which provides an excess storage of 719 cubic feet. The proposed drainage facilities would capture and treat the design storm for which the SWQDv is calculated, which for the Project Site is the 85th percentile. With the proposed drainage system in place, the existing off-site drainage patterns would be maintained.

With the Project Site entirely developed, paved, or landscaped, the potential for erosion or siltation would be minimal. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

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

As discussed in Responses X.a and X.c.i, above, the preliminary concept for the site drainage and stormwater treatment implements several rainwater harvesting systems including a stormwater capture and use detention structure. The 3.43-acre are of the Project Site is currently 87 percent impervious and 13 percent pervious. As the Project would decrease impervious surfaces to 80 percent and increase pervious surfaces to 20 percent, the analysis provided in the Hydrology Report indicates that the overall runoff flow rate would decrease from 7.72 cubic feet per second in the existing condition to 6.64 cubic feet per second under the Project condition. Therefore, development of the Project, would not result in substantial increases in surface water runoff quantities. Additionally, with implementation of the Project, overall existing drainage patterns would be maintained, and the Project would include appropriate on-site drainage improvements to convey anticipated stormwater flows. Final plan check by the City would ensure that adequate capacity is available in the storm drain system in surrounding streets prior to Project approval. The Applicant would be responsible for providing the necessary on-site storm drain infrastructure to serve the Project Site, as well as any connections to the existing system in the area. Furthermore, the Project would not alter the course of any stream or rivers. Because runoff would not significantly increase over existing conditions, and rain harvesting systems would be implemented to capture and treat runoff, the Project would not result in on- or off-site flooding. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

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

Less Than Significant Impact. As discussed in Response X.c.i, above, the 3.43-acre Project Site is currently 87 percent impervious and 13 percent pervious. As the Project would decrease impervious surfaces to 80 percent and increase pervious surfaces to 20 percent, the analysis provided in the Hydrology Report indicates that the overall runoff flow rate would decrease from 7.72 cubic feet per second in the existing condition to 6.64 cubic feet per second under the Project condition. Runoff will ultimately discharge to the existing Jefferson Boulevard storm drain system and be conveyed to the south, similar to existing conditions. As such, development of the Project not create new potential for runoff water to exceed the capacity of existing stormwater drainage systems. In addition, the proposed drainage facilities would capture drainage from the proposed roof drain system and catch basins/area drains and treat the design storm for which the SWQDv is calculated, which for the Project Site is the 85th percentile, within the proposed stormwater treatment system and associated overflow structure.[10] Therefore, stormwater flows from the Project Site would not increase due to the Project. In terms of polluted runoff, the Project's proposed uses would be typical of residential and commercial uses and would not introduce substantial sources of polluted water that a use such as an industrial use would generate, for example. Moreover, the Project will also consider combination of pre-treatments upstream of the rainwater harvesting system, potentially including flow-through planers, fossil filter inserts for catch basins, and/or flow treatment systems such as a CDS hydrodynamic separator, which would serve to address any potential polluted runoff generated by the Project. Therefore, the Project would not create or contribute additional runoff water that would exceed the capacity of the existing stormwater system or provide substantial sources of polluted runoff. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

iv. Impede or redirect flood flows?

Less Than Significant Impact. As discussed in Response X.c.i, above, impervious surface areas on the Project Site would be reduced from 87 percent impervious under the existing condition to 80 percent impervious under the Project. In addition, runoff from the Project Site would be directed to existing drainage facilities. Furthermore, the Project Site is mapped by the Federal Emergency Management Agency (FEMA) as located within an "Area of Minimal Flood Hazard".[11] The Project Site is also not is not located in a 100-year or 500-year flood zone as delineated by the City of Los Angeles or Culver City.[12] Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or area in a manner which would impede or redirect flood flows. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

d. In a flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

Less Than Significant Impact. A seiche is an temporary disturbance or oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes.

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[10] Kimley Horn and Associates, Inc., Hydrology, Hydraulics, and SUSMP Report, dated September 10, 2020, page 3.

[11] FEMA Flood Map Service Center. FEMA Flood Map 06037C1760F, effective on 09/26/2008, https://msc.fema.gov/portal/search?AddressQuery=11111%20Jefferson%20Boulevard%20Culver%20City#searchresultsanchor. Accessed September 3, 2020.

[12] Culver City, Natural Hazards – Fire and Flooding Map, February 1, 2007, https://www.culvercity.org/home/showdocument?id=126. Accessed September 3, 2020.

As discussed in Response X.c.iv, the Project Site is mapped by FEMA as an "Area of Minimal Flood Hazard". As such, the Project would have a less than significant impact related to risk of pollutants for a project within a flood hazard zone.

According to the Tsunami Inundation Map for Emergency Planning, State of California, County of Los Angeles Venice Quadrangle, the Project Site is not located within mapped tsunami inundation boundaries.[13] Therefore, the Project would not be subject to flooding hazards associated with tsunamis.

As provided in the Culver City Natural Hazards – Fire and Flooding Map, the Project Site is within the inundation area for the Mulholland Dam, Silverlake Dam, and the Stone Canyon Dam. Additionally, the Los Angeles County's General Plan indicates that a large portion of Culver City, including the Project Site, is located within the potential inundation area.[14] However, a breach of the dam facilities is very unlikely. The Project Site is located approximately 9.1 miles away from the Mulholland Dam/Stone Canyon Dam and 9.9 miles from the Silver Lake Dam with a variety of development, hills, and terrain that would slow and limit any impacts of dam failures on the Project Site and surrounding area. In addition, the National Dam Safety Act of 2006 authorized a program to reduce the risks to life and property from dam failure by establishing a safety and maintenance program. The program requires regular inspection of dams to reduce the risks associated with dam failures. Reservoir water, were it to reach the Project Site, would generally flow along roadways adjacent to or within the vicinity of the Project Site. Thus, during the unlikely failure of the dams, impacts regarding flooding hazards associated with seiches would be less than significant.

Based on the above, the Project would not release of pollutants due to Project inundation. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As required by Section 303(d) of the Clean Water Act, the State and the Regional Water Boards assess water quality data for California's waters every two years to determine if they contain pollutants at levels that exceed protective water quality criteria and standards.[15] The LARWQCB most recently prepared a list of impaired waterbodies in the region as part of the 2016 assessment cycle. This list is referred to as the 303(d) list. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). The nearest water body to the Project Site that has been identified as an impaired water body is Ballona Creek Reach 2, located between National Boulevard and Centinela Avenue, approximately 0.75 miles west of the Project Site. Impairment for Ballona Creek Reach 2 include trash, toxic pollutants, bacteria, metals, and sediment.

As previously discussed, in terms of polluted runoff, the Project's proposed uses would be typical of residential and commercial uses and would not introduce substantial sources of polluted water that a use such as an industrial use would generate, for example. Moreover, the Project will also consider combination of pre-treatments upstream of the rainwater harvesting system, potentially including flow-through planers, fossil filter

[13] Tsunami Inundation Map for Emergency Planning, State of California, County of Los Angeles, Venice Quadrangle, dated March 1, 2009, https://www.conservation.ca.gov/cgs/Documents/Tsunami/Maps/Tsunami_Inundation_Venice_Quad_LosAngeles.pdf. Accessed September 3, 2020.

[14] Los Angeles County General Plan, Safety Element, December 6, 1990, Plate 6 – Flood and Inundation Hazards, http://planning.lacounty.gov/assets/upl/project/gp_web80-tech-plates-01-to-08.pdf. Accessed September 3, 2020.

[15] State Water Resources Control Board, Impaired Water Bodies, https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml. Accessed September 3, 2020.

inserts for catch basins, and/or flow treatment systems such as a CDS hydrodynamic separator, which would serve to address any potential polluted runoff generated by the Project. With implementation of the rainwater harvesting system and implementation of the pre-treatments, polluted runoff would be minimized under the Project Site and would provide an improvement in the surface water quality runoff as compared to the existing conditions. As such, the Project would not conflict with or obstruct any water quality control plans for Ballona Creek Reach 2. No other water quality control plans or sustainable groundwater management plans would be affected by development of the Project. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

XI. LAND USE AND PLANNING

Would the Project:

a. Physically divide an established community?

Less than Significant Impact. The Project Site is currently developed with three commercial buildings, including a United States Post Office, a Coco's Bakery Restaurant, and a Valvoline Instant Oil Change. The Project Site also currently includes associated surface parking and ornamental landscaping. The Project vicinity is highly urbanized and generally built out, is characterized by a blend of commercial, residential, restaurant, office, and includes a fully developed roadway system. As such, the Project would represent redevelopment and infill development of an already fully developed site, with some combination of residential, retail, market, and office uses, in keeping with the varied character of the surrounding area. Furthermore, the Project would not close any public streets or otherwise notably alter established infrastructure in the area. In fact, the Project would improve the Machado Road right-of-way adjacent to the current northern property boundary, develop the Machado Park to provide north-south connections through the Project Site and to link the Project Site's publicly accessible open space areas along Machado Road from Sepulveda Boulevard to Jefferson Boulevard. The Project would encourage multiple modes of travel by providing bicycle access from all three Project frontages and by providing bicycle racks for visitors 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. Separate from the Project, the City intends to implement a bicycle share facility adjacent to the Machado Park. The bicycle share facility would allow for multimodal connections to the future proposed bike lanes along Jefferson Boulevard and Sepulveda Boulevard that are proposed as part of the City's Bicycle & Pedestrian Action Plan. Lastly, the Project would provide improved pedestrian environment and circulation by including publicly accessible open space and landscaped pedestrian corridors that provide pedestrian access through the Project Site, streetscape improvements along all street frontages, and other amenities which would increase access through/along the Project Site and encourage community use of the Project Site. For all these reasons, the Project would not physically divide an established community, the impact would be less than significant, and this issue need not be evaluated further in an EIR.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The Project proposes a Zone Change from CG and R-1 to Planned Development (PD) and General Plan Amendment. A Comprehensive Plan is proposed as the overarching entitlement mechanism for the Project Site. Per Section 17.560 of the CCMC, a Comprehensive Plan is appropriate for large-scale development as it allows flexibility in the application of zoning code standards to encourage innovation in site

planning and design and to support more effective responses to the settings of such properties and other environmental considerations. Furthermore, as described in Attachment A, Project Description, Table 1, Development Program Summary, the Project would consist of 230 residential units; 38,600 sf of market; 10,600 sf of restaurants and café, 11,450 sf of office, 3,900 sf of retail, and 1,950 sf gym/fitness uses. Therefore, the Project would increase the height, density, and configuration of development at the Project Site, which could potentially conflict with City land use plans, polices, and regulations adopted for the purpose of avoiding or mitigating environmental effects. Therefore, it is recommended that this topic be evaluated further in an EIR.

XII. MINERAL RESOURCES

Would the Project:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

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

The Inglewood Oil Field (Oil Field) is located within the City and the unincorporated area of Los Angeles County known as Baldwin Hills. The current active Oil Field boundary is approximately 1,000 acres of which 100 acres are located within the City. The Oil Field is located approximately 0.90 miles northeast of the Project Site. The Project Site is located in a highly urbanized area of the City and is currently developed with three single-story commercial buildings and associated asphalt-paved surface parking lot. As such, the potential of uncovering mineral resources during Project construction is considered low. Therefore, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents nor would it result in the loss of a known mineral resource delineated on a local general plan, specific plan, or other land use plan as there are no known mineral resources or mineral resource recovery sites on or near the Project Site. No impact would occur, and this issue need not be evaluated further in an EIR.

XIII. NOISE

Would the Project result in:

a. Generation of a substantial temporary or permanent increase in ambient noise level in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Existing land uses in the Project vicinity include: nearby residential uses within the Heritage Park and Sunkist Park neighborhoods, Studio Village Townhomes, a private school K-12 (Exceptional Children's Foundation [ECF]), the Studio Village Shopping Center, and Temple Akiba. Construction of the Project could require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on a short-term basis. Operation of the Project may increase existing noise levels as a result of Project-related traffic, the operation of heating, ventilation, and air conditioning (HVAC) systems, loading and unloading of trucks, parking area noise (e.g., car alarms, slamming of car doors, etc.), and the

carrying out of outdoor activities and special events (if any). Therefore, construction and operation of the Project could generate a temporary or permanent increase in ambient noise levels in excess of applicable standards for nearby residential, hotel, and park/mortuary uses, which are considered noise-sensitive uses. Therefore, it is recommended that this issue be evaluated further in an EIR.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project may generate groundborne vibration and groundborne noise due to Project Site grading, clearing activities, and haul truck travel. In addition, Project construction may require pile driving. As such, the Project would have the potential to generate excessive groundborne vibration and groundborne noise levels during short-term construction activities. Therefore, vibration monitoring and other actions may be warranted to reduce any potential groundborne vibration and groundborne noise effects. It is recommended that this topic be further analyzed in an EIR.

Operation of the Project could potentially generate groundborne vibration or groundborne noise at levels beyond those which currently occur under the three existing buildings if increased numbers of trucks would travel to, from, and within the Project Site. Therefore, it is recommended that this topic be evaluated further in an EIR.

c. For a Project located within the vicinity of a private air strip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

No Impact. The Project Site is not located within the vicinity of a private airstrip, heliport, or helistop or within an airport land use plan or within 2 miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately 3.15 miles northwest and 3.5 miles south of the Project Site, respectively. Therefore, the Project would not expose people to excessive noise levels from such uses and no impact would occur, and this issue need not be evaluated further in an EIR.

XIV. POPULATION AND HOUSING

Would the Project:

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

Potentially Significant Impact. The Project would replace the existing commercial buildings with 230 residential units and 66,500 sf of commercial uses, including a market, gym, retail/restaurant uses and office uses. The Project proposes a General Plan Amendment, a Zone Change/Map Amendment and Comprehensive Plan. Therefore, the potential population growth that could occur will be evaluated further in an EIR.

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

No Impact. The Project Site is currently developed with three commercial buildings with no residential uses on-site. As such, Project implementation would not displace existing people or housing. Therefore, no impact would occur to local populations or existing housing such that the construction of replacement housing would be necessary, and this issue need not be evaluated further in an EIR.

XV. PUBLIC SERVICES

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

i. Fire protection?

Potentially Significant Impact. Fire protection and emergency medical services for the Project Site are provided by the CCFD. Construction activities associated with the Project could temporarily increase the demand for fire protection and emergency medical services, and could potentially involve temporary lane closures and construction traffic that slows emergency response in the Studio Village neighborhood. Project operation would increase the density of development and include some combination of residential, retail, and office uses, resulting in an increase of on-site population that would increase the demand for fire protection and emergency medical services from CCFD. Therefore, it is recommended that this topic be evaluated further in an EIR.

ii. Police Protection?

Potentially Significant Impact. Police protection services for the Project Site are provided by the Culver City Police Department (CCPD). Construction activities associated with the Project could temporarily increase the demand for police protection services to respond to calls associated with theft, graffiti, vandalism and trespassing. Project operation would increase the density of development and include a some combination of residential, retail, and office uses, resulting in an increase of on-site population that would increase the demand for police protection services from CCPD. Therefore, it is recommended that this topic be evaluated further in an EIR.

iii. Schools?

Less than Significant Impact. The Project would be served by the Culver City Unified School District (CCUSD). The CCUSD includes one high school, one continuation high school, one middle school, five elementary schools, and one adult school. The Project Site is located within the attendance boundaries of El Rincon Elementary School, Culver City Middle School, and Culver City High School. El Rincon Elementary School is located at 11177 Overland Ave, approximately 0.20 miles to the east of the Project Site. Culver City Middle School is located at 4601 Elenda Street, approximately 0.60 miles north of the Project Site. Culver City High School is located at 4401 Elenda Street, approximately 0.68 miles northwest of the Project Site.

Project construction would create temporary construction jobs, but construction workers would be drawn from an existing work pool and would work at the Project Site for only short durations. There would be no student population associated with Project construction.

Project operation would incrementally increase demand for school services. The Project includes some combination of residential, retail, and office uses, which would increase population to the Project area, both directly and indirectly, in the form of new residents and employees. If Project employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. However, if some employees with school age children choose to move closer to work, or if some new employees with children are hired from the surrounding community or another City, there could be a minor increase in the student population in the nearby schools.

The 230 residential units are estimated to generate a new student population of approximately 38 elementary school students, 11 middle school students, and 22 high school students for a total of 71 students.[16] The 66,500 sf of commercial uses on the Project Site would also generate students in the event new employees with school-aged children move into the area. The commercial units are estimated to generate an additional student population of 2 elementary school students, 2 middle school students, and 2 high school students for a total of 6 students.[17]

Project impacts related to schools would be addressed through payment of required Senate Bill 50 (SB 50) development fees pursuant to Section 65995 of the California Government Code. In accordance with SB 50, the payment of these fees is deemed to constitute full and complete mitigation for impacts to school facilities. Therefore, impacts on school services and facilities would be less than significant, and this issue need not be evaluated further in an EIR.

iv. Parks?

Less than Significant Impact. The Culver City Parks, Recreation and Community Services (PRCS) division oversees the maintenance and operations of 11 City parks totaling approximately 79 acres, a community garden, community and recreational facilities, senior centers, swimming pools, and a theater facility.[18] A joint-use partnership between the City and CCUSD provides additional open space and park facilities for use by residents of the City during non-school hours. The Project Site is located within the vicinity of three park facilities. **Table B-1**, *Culver City Park Facilities Located in the Vicinity of the Project Site*, provides information on the park/facility, location, size, park amenities/activities, and the approximate distance/direction from the Project Site.

Project operation would incrementally increase demand for park services. The Project's new residents would be expected to use the local parks. Pursuant to CCMC Section 17.400.065, each residential unit should have a minimum of 75 sf of common and/or private open space. Based on that requirement, the Project would be required to provide a minimum of 17,250 sf of common and/or private open space. The Project would provide approximately 30,000 sf of publicly accessible open space in the form of a 15,000 sf Machado Park, 13,000 sf Paseo Courtyard, and 2,000 sf Entry Courtyard. The Project would also provide a total of approximately 24,000 sf of residential common open space within a courtyard and a 2,500 sf amenity room on the third level. The amenities available to Project residents on the third floor would include would include a pool and sun deck on the southern residential courtyard, a fitness center, BBQ area, conference room/business center, and storage facilities in the residential leasing office and parking garage.

[16] Student generation rates for residential uses are taken from the Draft School Facilities Needs Analysis 2012, LAUSD, September 2012. Based on the rate for multifamily residential uses: Elementary = 0.1649; Middle School = 0.045; High School = 0.0303.

[17] Student generation for non-residential uses are taken from the Commercial/Industrial Development School Fee Justification Study 2010, LAUSD, September 2010 which provides the most recent data available for non-residential uses. Based on the rate for retail and services uses (which is applied for the Project for all commercial uses excluding the offices): Elementary = 0.0178; Middle School = 0.0089; High School = 0.0111. For the offices, the office generation rate was used: Elementary = 0.0278; Middle School = 0.0139; High School = 0.0173.

[18] City of Culver City, Culver City Parks, https://www.culvercity.org/live/community-neighborhood/parks-recreation-culture/culver-city-parks. Accessed September 3, 2020.

Table B-1
Culver City Park Facilities Located in the Vicinity of the Project Site

Park/Facility	Location	Size (acres)	Parks Amenities/Activities	Approximate Distance/Direction from Project Site[a]
El Marino Park	5301 Berryman Avenue	3.15	After school program, barbeques, child care, basketball courts, handball walls, kitchen areas, open picnic areas, playground, recreation building with room rentals, multi-purpose sports field, softball field	0.32 miles southwest
Blanco Park	5801 Sawtelle Boulevard	3.26	After school program, barbeques, child care, basketball courts, parcourse equipment, covered and open picnic areas, playgrounds, multi-purpose sports field, softball field	0.14 miles east
Lingberg Park	5041 Rhoda Way	4.39	After school program, barbeques, child care, basketball courts, tennis courts, kitchen areas, parcourse equipment, cover picnic area, playground, recreation building with room rentals, multi-purpose sports field, softball field	0.29 miles northwest

a Approximate distance/direction from Project Site in miles is a straight line distance, not a drive distance.

Source: Culver City, Culver City Parks, https://www.culvercity.org/enjoy/things-to-do/parks-recreation/culver-city-parks. Accessed September 3, 2020.

Although the Project would exceed the open space requirements, to address potential impacts related to parks the Applicant would be responsible for meeting the parkland dedication or fee requirements pursuant to Culver City's standard conditions of approval and pursuant to the Quimby Act and Title 15: Land Usage, Chapter 15.06: New Development Fees – Residential Development Park Dedication and In Lieu Parkland Fees, Section 15.06.310: Park Dedication or Payment of Fees, of the CCMC, as applicable. Therefore, with the proposed open space features and payment of applicable fees, Project demand on recreational facilities would be offset. Accordingly, the Project would not have a have a significant physical impact upon parks and impacts would be less than significant, and this issue need not be evaluated further in an EIR.

v. Other public facilities?

Less than Significant Impact. The Los Angeles County Public Library (LACPL) provides library services to Culver City. The Project Site is served by the LACPL Culver City Julian Dixon Branch Library, which is located at 4975 Overland Avenue, Culver City, approximately 0.69 miles north of the Project Site. Other nearby LACPL branches are the Lloyd Taber-Marina del Rey Library, View Park Bebe Moore Campbell Library, and Lennox Library. The Lloyd Taber-Marina del Rey Library is located at 4533 Admiralty Way, Marina del Rey, approximately 2.8 miles southwest of the Project Site. The View Park Bebe Moore Campbell Library is located at 3854 West 54th Street, Los Angeles, approximately 3.2 miles east of the Project Site. The Lennox Library is located at 4359 Lennox Boulevard, Lennox, approximately 4.8 miles southeast of the Project Site.

The Project would directly increase the residential population of Culver City and would, therefore, increase demand for library facilities and services. To address potential impacts to libraries, the Project applicant would

pay the required fees per the Developer Fee Program for the LACPL as provided in Los Angeles County, Code of Ordinances, Title 22: Planning and Zoning, Division 2: Additional Regulations, Chapter 22.72: Library Facilities Mitigation Fee. Compliance would offset any incremental need for funding of capital improvements to maintain adequate library facilities and service resulting from the Project by payment of development fees per the Los Angeles County Code. As such, impacts regarding library services would be less than significant.

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

XVI. RECREATION

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

b. Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact (a-b). As discussed under Response XV.d, operational activities associated with the Project would increase demand for park services. However, the Project would include the Machado Park, a gym facility and pool for resident use and other open space amenities that would reduce demand for park services, in addition to meeting parkland dedication or fee requirements, as discussed above in Checklist Question XV.iv. Therefore, with the proposed open space features and dedication or payment of parkland fees, the Project would not substantially deteriorate, or accelerate the deterioration of recreational facilities or resources. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

XVII. TRANSPORTATION

Would the Project:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Potentially Significant Impact. The Project Site is currently developed with three single-story buildings, associated surface parking, and ornamental landscaping. The Project would replace this development with 230 residential units and 66,500 sf of commercial uses (e.g., retail, restaurant, gym, and office), which would increase the on-site population and associated vehicular, bicycle, and pedestrian traffic in the Studio Village neighborhood as well as increase transit demand. Project construction would also result in a temporary increase in traffic in the Project area as the result of construction-related truck trips and worker vehicle trips, and could necessitate temporary construction-related lane closures and impede vehicular, bicycle, and pedestrian access in the Project vicinity.

The Project Site is located in an area well served by public transportation, including the Culver City Bus and Los Angeles County Metropolitan Transportation Authority (Metro), which provide an extensive system of bus lines in Culver City and links to the larger metropolitan area. Although the Project Site is well served by public transportation, and would also improve pedestrian access and include bicycle facilities and improvements, it would have potential to impact vehicular, bicycle, pedestrian, and public transportation networks during construction and operation. Therefore, it is recommended that consistency with applicable programs, plans, ordinances, and policies, such as the Bicycle and Pedestrian Action Plan and the Culver City General Plan, addressing the circulation system be evaluated further in an EIR. The analysis provided within the EIR will be based on a Transportation Impact Analysis, which will be prepared in accordance with the CEQA Guidelines and the City Council's approved Transportation Analysis Criteria and Guidelines.

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Potentially Significant Impact. As stated in Response XVII.a, development of the Project would generate additional traffic. Per CEQA Guidelines, Section 15064.3(b), the Project's transportation impacts will be evaluated in an EIR based on vehicle miles traveled analysis. The analysis provided within the EIR will be based on a Transportation Impact Analysis, which will be prepared in accordance with the CEQA Guidelines and the City Council's approved Transportation Analysis Criteria and Guidelines.

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

Potentially Significant Impact. The Project would redevelop the area along Machado Road, to support new park and landscaped areas and multimodal circulation. In addition, the Project would install a new signal at the intersection of Janisann Avenue and Sepulveda Boulevard may increase hazards due to geometric design features or incompatible uses. Therefore, it is recommended that this issue be evaluated further in an EIR. The analysis provided within the EIR will be based on a Transportation Impact Analysis, which will be prepared in accordance with the CEQA Guidelines and the City Council's approved Transportation Analysis Criteria and Guidelines.

d. Result in inadequate emergency access?

Potentially Significant Impact. Emergency access to the Project Site is currently provided along the three frontages of the Project Site. The Project could result in modification to emergency access to the Project Site by modifying the access points to the Project Site. Also, while it is expected that the majority of Project construction activities would occur on-site, short-term construction activities may temporarily affect emergency access on segments of adjacent streets during certain periods of the day. Therefore, it is recommended that the potential for Project impacts on emergency vehicle access related to construction activities and closures, proposed permanent changes in Project Site access and circulation, and Project-related increases in trip generation be evaluated further in an EIR. The analysis provided within the EIR will be based on a Transportation Impact Analysis, which will be prepared in accordance with the CEQA Guidelines and the City Council's approved Transportation Analysis Criteria and Guidelines.

XVIII. TRIBAL CULTURAL RESOURCES

a. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Potentially Significant Impact. AB 52 establishes a formal consultation process for California Native American Tribes to identify potentially significant impacts to tribal cultural resources, as defined in Public Resources Code Section 21074, as part of CEQA. As specified in Public Resources Code Section 21080.3.1 (d), within 14 days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Should any information be gained during the consultation process, it would be used to analyze impacts to tribal cultural resources in the EIR. Therefore, it is recommended that this topic be evaluated further in an EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

The following impact analysis pertaining to the Project Site's utilities and service systems is based on information contained in the Utility Infrastructure Technical Report: Water, Wastewater, Dry Utilities (Utility Report), prepared by Kimley-Horn & Associates, Inc., dated September 10, 2020, which is available for review at the Culver City Planning Division.

Would the Project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water

Less Than Significant Impact. During construction activities associated with the future development within the Project Site, there would be a temporary, intermittent demand for water for such activities as soil watering for site preparation, fugitive dust control, concrete preparation, painting, cleanup, and other short-term activities. Construction-related water usage is not expected to have an adverse impact on available water supplies or the existing water distribution system, and impacts would be less than significant.

Existing water lines are operated by the water purveyor Golden State Water Company (GSWC). There is an existing 12-inch water line along Sepulveda Boulevard, an existing 12-inch line along Jefferson Boulevard, and an existing 12-inch water line along Machado Road. With regard to fire infrastructure, there are existing fire water service serving the Project Site from Sepulveda Boulevard and Jefferson Boulevard. Additionally, there are two public fire hydrants along the Project Site frontage: one at the intersection of Sepulveda Boulevard and Jefferson Boulevard, and one at the intersection of Sepulveda Boulevard and Machado Road. There are water meters serving the existing buildings on the Project Site on the three frontages.

The Project would require new construction of water service lines to serve the proposed Project. Installation of new water infrastructure would include on-site water distribution improvements, off-site work associated with connections to the public main, new fire hydrants, and upgrades as required by GSWC and the CCFD. Prior to ground disturbance, Project contractors would coordinate with GSWC to identify the locations and depths of all lines. GSWC would be notified in advance of proposed ground disturbance activities to avoid water lines and minimize disruption of water service. A Construction Management Plan would be implemented to reduce temporary pedestrian and traffic impacts, and to ensure emergency vehicle access throughout the construction period.

The Project would propose domestic and fire water connections to the existing 12-inch water mains in both Sepulveda Boulevard and Machado Road. Fire flows have been calculated by the Fire Prevention Bureau of the CCFD, and as provided in Exhibit 6 of the Utility Report, there is available water pressure for the Project. The Project's plumbing engineer and/or fire service consultant would assess the Project water/fire service design requirements based on the preliminary pressure information provided by GSWC and CCFD. The Project would be required to comply with all CCFD and GSWC requirements.

GSWC purchases water from the West Basin Municipal Water District (WBMWD). The 2015 WBMWD Urban Water Management Plan (UWMP) provides water demand and water supply projections in five-year increments from 2020 through 2040, which are based on regional demographic data provided by SCAG, as well as billing data for each major customer class, weather, and conservation. Year 2020 WBMWD water demand is 146,105 acre-feet per year (afy) while projected year 2040 water demand is 151,922 afy; refer to **Table B-2**, *Projected West Basin Service Area Water Demand (afy)*.

Table B-2
Projected West Basin Service Area Water Demand (afy)

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

a Projections based on Metropolitan Demand Forecasting Model.

b Projections based on the Capital Improvement Plan, 2015, (excludes replenishment deliveries to the Barrier and deliveries outside service area).

Source: West Basin Municipal Water District, 2015 Urban Water Manage Plan, Table ES-1: Projected West Basin Service Area Retail Demand (AFY).

According to the water supply section of the UWMP, Year 2020 WBMWD water supply is 189,893 afy while projected 2040 water supply is 206,192 afy; refer to **Table B-3**, *Projected West Basin Service Area Water Supply (afy)*. Year 2020 has a water supply surplus of 43,788 afy while projected year 2040 has a projected water supply surplus of 54,270 afy. The WBMWD is projecting to increase current recycled water supplies as well as invest in over 20,000 afy of ocean-water desalination supply. Coupled with additional conserved water supply through water use efficiency programs, the overall imported water use is expected to be reduced significantly by 2040. According to the UWMP, the water supplies available to the WBMWD in single dry and multiple dry years, will be sufficient to meet all present and future water supply requirements within the WBWMD's service area for at least the next 20 years.

Table B-3
Projected West Basin Service Area Water Supply (afy)

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

a Groundwater production within West Basin service area only.
b Imported retail use only; does not include replenishment deliveries (i.e., Barrier).
c Recycled water does not include replenishment deliveries (i.e., Barrier) and deliveries outside the service area.
d Desalination include both brackish and ocean water.
e Conservation consistent of Active and Passive Savings according to Metropolitan's projected estimates.
Source: West Basin Municipal Water District, 2015 Urban Water Manage Plan, Table ES-3: West Basin's Service Area Projected Retail Water Supplies (AFY).

As shown in **Table B-4**, *Estimated Operational Water Consumption*, the Project would result in an estimated net total peak water demand of 47,356 gpd (approximately 53.08 afy) when fully occupied. The Project's estimated water demand does not include potential credit for the existing use and existing water demand on the Project Site, which would further reduce the demand. The estimated 53.08 afy water demand generated by the Project would constitute less than one percent of the WBMDW year 2020 for both water supply and water demand. The Project would also comply with Title 5: Public Works, Chapter 5.03: Water Conservation and Water Supply Shortage Program, of the CCMC, with regards to conservation. In addition, the Project would comply with the City's mandatory green building requirements. The Project would also comply with the WBMWD UWMP recommendations regarding drought management and water conservation.

Therefore, based on the above, the Project's water consumption would be significantly below the projected supply and demand, and implementation of the Project is not expected to measurably reduce the local infrastructure's capacity. No new or expanded water treatment facilities would be required. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

Table B-4
Estimated Operational Water Consumption

Land Use	Units	Consumption Rate (gpd)[a]	Total Water Consumption (gpd)
Existing Uses			
Institutional	27,225 sf	100/1,000 sf	2,723
Restaurant	6,064 sf	1,000/1,000 sf	6,064
Commercial	1,722 sf	100/1,000 sf	172
Total Existing Water Demand			*8,959*
Proposed Uses			
Residential	230 units	156/unit	35,880
Grocery/Market	38,600 sf	150/1,000 sf	5,790
Restaurant and Café	10,600 sf	1,000/1,000 sf	10,600
Office	11,450 sf	200/1,000 sf	2,290
Retail	3,900 sf	150/1,000 sf	585
Gym	1,950 sf	600/1,000 sf	1,170
Total Proposed Water Demand			56,315
Net Increase in Water Demand (Proposed – Existing)			47,356

a Water consumption estimates are prepared based on 100 percent of the Los Angeles County sewage generation factors for residential and commercial categories, plus water consumption generated by proposed irrigation for landscape and pool areas.

Source: Kimley-Horn & Associates, Inc., *Utility Infrastructure Technical Report: Water, Wastewater, Dry Utilities*, dated September 10, 2020.

Wastewater

Less Than Significant Impact. The City's wastewater is sent to Mesmer Pump Station and then treated at the Hyperion Water Reclamation Plan (HWRP), which treats an average daily flow of approximately 275 million gallons per day (mgd), with the capacity to treat up to 450 mgd. Therefore, the HWRP has a remaining treatment capacity of approximately 175 mgd.

During construction of the Project, a negligible amount of wastewater would be generated by construction workers. However, any such wastewater generation would be temporary, only lasting as long as Project construction activities occur, approximately 28 months. It is anticipated that portable toilets would be provided by a licensed private vendor that would dispose of the wastewater off-site. Such wastewater generation is therefore anticipated to result in either no or negligible discharges to the City's wastewater treatment conveyance systems or treatment facilities, and would not be discharged through any service connections at or near the Project Site. No such service connections would be established during Project construction to handle wastewater generated by construction workers. Such minimal wastewater flows are not expected to exceed to applicable treatment requirements of the Hyperion Water Reclamation Plant, and such wastewater would be treated prior to discharge if discharged within the City. The minimal wastewater generation during construction would not require the construction of new or expansion of existing facilities, and, given their small amount, are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems.

As shown in **Table B-5,** *Estimated Operational Wastewater Generation,* implementation of the Project would generate approximately 47,356 gpd (approximately .047 mgd) of wastewater. The Project's wastewater generation would represent less than one percent of the capacity available at the HWRP. Therefore, Project impacts on wastewater treatment facilities would be less than significant.

Table B-5
Estimated Operational Wastewater Generation

Land Use	Units	Wastewater Generation Rate (gpd)[a]	Total Wastewater Generation (gpd)
Existing Uses			
Institutional	27,225 sf	100/1,000 sf	2,723
Restaurant	6,064 sf	1,000/1,000 sf	6,064
Commercial	1,722 sf	100/1,000 sf	172
Total Existing Wastewater Generation			*8,959*
Proposed Uses			
Residential	230 units	156/unit	35,880
Grocery/Market	38,600 sf	150/1,000 sf	5,790
Restaurant and Café	10,600 sf	1,000/1,000 sf	10,600
Office	11,450 sf	200/1,000 sf	2,290
Retail	3,900 sf	150/1,000 sf	585
Gym	1,950 sf	600/1,000 sf	1,170
Total Proposed Wastewater Generation			56,315
Net Increase in Wastewater Generation (Proposed – Existing)			47,356

a Water consumption estimates are prepared based on 100 percent of the Los Angeles County sewage generation factors for residential and commercial categories, plus water consumption generated by proposed irrigation for landscape and pool areas.

Source: Kimley-Horn & Associates, Inc., *Utility Infrastructure Technical Report: Water, Wastewater, Dry Utilities*, dated September 10, 2020.

The Project proposes several sewer lateral connections to the existing sewer mains on Jefferson Boulevard and Machado Road. There available capacity in the sewer lines, and therefore, no new lines would be developed to serve the Project. Thus, construction of the Project would include all necessary on and off-site sewer pipe improvements and connections to adequately link the Project to the existing City sewer system based on the City requirements. The necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the City. Construction-related impacts would be temporary, on an intermittent basis.

Therefore, based on the above, the Project would not require or result in the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

Stormwater Drainage

Less Than Significant Impact. As discussed in detail in Response X.c.ii, the preliminary concept for the site drainage and stormwater treatment implements several rainwater harvesting systems including a stormwater capture and use detention structure. Implementation of the Project, overall existing drainage patterns would be maintained, and the Project would include appropriate on-site drainage improvements to convey anticipated stormwater flows. Final plan check by the City would ensure that adequate capacity is available in the storm drain system in surrounding streets prior to Project approval. The Applicant would be responsible for providing the necessary on-site storm drain infrastructure to serve the Project Site, as well as any connections to the existing system in the area. It is also acknowledged that there are no known deficiencies in the existing storm drain system. Impacts associated with on-site stormwater drainage facilities would be less than significant. Therefore, based on the above, the Project would not require or result in the relocation or construction of new or expanded stormwater

drainage facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

Electric Power and Natural Gas

Less Than Significant Impact. The Project Site is located in a developed and urbanized area in the City that is served by existing electrical power and natural gas services. Electricity would be provided by Southern California Edison (SCE), and natural gas would be supplied by SoCalGas. As discussed in Responses VI.a and VI.b, the Project would intensify development on the Project Site and therefore, increase energy consumption during construction and operation associated with electricity, natural gas and transportation fuel.

With regard to existing electrical distribution lines, the Project would be required to coordinate electrical infrastructure removals or relocations with SCE and comply with site-specific requirements set forth by SCE, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within SCE easements would be minimized.

Project construction would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that extensive off-site infrastructure improvements would not be needed to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be limited to shallow grading/trenching activities in order to place the lines below surface. In addition, prior to ground disturbance, project contractors would be required to notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties.

Therefore, based on the above, the Project would not require or result in the relocation or construction of new or expanded electric power or natural gas facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

Telecommunications

Less Than Significant Impact. The Project Site is located in a developed and urbanized area in the City that is served by existing telecommunication services. The Project would require installation of new underground telecommunication lines (for internet, telephone, and other services) to serve the residential and commercial uses proposed on the Project Site. Construction impacts associated with the installation of new telecommunication infrastructure would primarily involve trenching in order to place the lines below ground surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. As telecommunication providers already deliver their services to a large number of homes in in the vicinity of the Project Site, it is anticipated that existing telecommunications facilities would be sufficient to support the Project's needs for telecommunication services. As such, no upgrades to off-site telecommunications facilities are anticipated. Therefore, the Project would not require or result in the relocation or construction of new or expanded telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. As described in Response XIX.a, above, the Project would fall within the 2015 WBMWD UWMP available and projected water supplies. According to the UWMP, the water supplies available in single dry and multiple dry years would be sufficient to meet all present and future water supply requirements within the applicable service areas for at least the next 20 years, including the Project. As a result, the Project is within the capacity of the GSWC to serve the Project as well as existing and planned future water demands of its service area.

Sections 10910-10915 of the State Water Code (Senate Bill 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is: 1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 square feet of floor space; 2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 square feet of space, or 3) any mixed-use project that would demand an amount of water equal to or greater than the amount of water needed to serve a 500 dwelling unit subdivision. The Project would not meet any of the aforementioned thresholds. A typical 500 unit subdivision would typically consume 0.3 to 0.5 acre-feet of water per year per unit, or approximately 150 to 250 afy, depending upon several factors, including the regional climate.[19] As discussed under Response XIX.a, the Project would generate a water demand of approximately 53.08 afy (without accounting for water conservation features or subtracting existing on-site water demand). With implementation of water conservation measures per the requirements cited above, the Project's actual water demand would be well below the conservative amount stated above and would not require preparation of a WSA. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

c. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As indicated in the Response XIX.a, implementation of the Project would generate a peak demand of 47,356 gpd (0.047 mgd) of wastewater. The HWRP has a remaining treatment capacity of approximately 175 mgd. Given the current capacity of the HWRP, Project wastewater generation would account for a less than one percent increase in demand at the HWRP and there would be ample capacity to treat this increase. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Culver City's Public Works Environmental Programs and Operations Division collects municipal solid waste which includes, trash, recycling, organics, and construction and demolition debris from both the commercial and residential sectors. Both recyclables and organics are hauled to private processing facilities to recycle or compost material. Solid waste is disposed of in either a County or non-County landfill. Culver City operates a transfer station but, does not own or operate any landfill, recycling or composting facilities

Construction of the Project would result in generation of construction and demolition debris such as metal scrap, lumber, concrete which will be collected and diverted to a construction and demolition debris facility for materials to be recycled and /or discarded. It is anticipated that a large amount of the construction debris would be recycled.

[19] Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001, prepared by California Department of Water Resources, 2003.

Residual wastes such as trash packing materials, and plastics which could require disposal at landfill. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations. Culver City's standard conditions of approval specifically require the following:

> "Reasonable efforts shall be used to reuse and recycle construction and demolition debris, to use environmentally friendly materials, and to provide energy efficient buildings, equipment and systems. A Demolition Debris Recycling Plan that indicates where select demolition debris is to be sent shall be provided to the Building Official prior to the issuance of a demolition permit. The Plan shall list the material to be recycled and the name, address, and phone number of the facility or organization accepting the materials."

In addition, the Project would comply with Title 5: Public Works, Chapter 5.01: Solid Waste Management, of the CCMC (as required by Culver City's conditions of approval). According to the CCMC, the Project Applicant would submit a construction and demolition recycling and waste assessment plan prior to issuance of the permit. Monthly reports would be submitted throughout the construction of the Project. Further, summary reports with documentation would be submitted prior to final inspection. Therefore, the Project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste during construction.

The remaining disposal capacity for the County's Class III landfills is estimated at approximately 163.39 million tons as of December 31, 2019, the most recent data available.[20] In addition to in-County landfills, out-of County disposal facilities may also be available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the Los Angeles County Integrated Waste Management Plan (ColWMP), the County anticipates that future Class III disposal needs can be adequately met through 2033 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

As illustrated in **Table B-6**, *Projected Solid Waste Generated During Operation,* and based on solid waste generation factors from the California Department of Resources and Recycling and Recovery (CalRecycle), the Project could generate a net of approximately 2,323 lbs/day of solid waste or 424 tons per year (tpy). The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 163.39 million tons of remaining disposal capacity for the County's Class III landfills. As such, the solid waste generated by the Project could be accommodated by the County's available regional landfills.

CalRecycle is the California State Agency that promotes the importance of reducing waste and oversees California's waste management and recycling efforts. CalRecycle has issued jurisdiction waste diversion rate targets equivalent to 50 percent of the waste stream as expressing in pounds per person per day. Thus, it is important to note that the estimate of solid waste generated by the Project is conservative, in that the amount of solid waste that would need to be landfilled would likely be less than this forecast based on the City's implementation of solid waste diversion targets. Therefore, the Project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste during operation. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

[20] County of Los Angeles, Countywide Integrated Waste Management Plan, 2018 Annual Report, December 2019, page 32, https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF. Accessed September 3, 2020.

Table B-6
Projected Solid Waste Generated During Operation

Land Uses	Quantity	Factor[a]	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Existing Land Uses					
Office	27,225 sf	6 lbs/1,000 sf/day	163	0.0817	30
Restaurant	6,064 sf	0.05 lbs/sf/day	303	0.1516	55
Commercial	1,722 sf	2.5 lbs/100 sf/day	43	0.0215	8
		Total	**510**	**0.2548**	**93**
Proposed Land Uses					
Residential	230 du	4 lbs/du/day	920	0.4600	168
Market	38,600 sf	3.12 lb/100 sf/day	1,204	0.6022	220
Restaurant	10,600 sf	0.05 lbs/sf/day	530	0.2650	97
Office	11,450 sf	6 lbs/1,000 sf/day	69	0.0344	13
Retail	3,900 sf	2.5 lbs/100 sf/day	98	0.0488	18
Gym	1,950 sf	6 lbs/1,000 sf/day	12	0.0059	2
		Total	**2,832**	**1.4161**	**517**
		Net Increase (Proposed - Existing)	**2,323**	**1.1613**	**424**

sf = square feet; lbs. = pounds; du = dwelling units.

a Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed September 3, 2020.

Source: ESA, 2020.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. All local governments, including the City, are required under AB 939, the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the City's solid waste exceeds the target, the City would be required to pay fines or penalties from the State for not complying with AB 939. The waste generated by the Project would be incorporated into the waste stream of the City, and diversion rates would not be substantially altered. The Project does not include any component that would conflict with state laws governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

a. **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

b. **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?**

c. **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

d. **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

No Impact (a-d). As discussed in Response IX.g, the Project Site is not located in or near a VHFHSZ. In addition, the Project Site is not located in or near a State Responsibility Area.[21] The Project would not require the installation or maintenance of associated infrastructure that could exacerbate fire risk. The Project would be the redevelopment of an infill site within an urbanized area. Therefore, no impacts related to wildfires are anticipated, and this issue need not be evaluated further in an EIR.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

a. **Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Potentially Significant Impact. As discussed throughout this Initial Study, the Project would have the potential to degrade the quality of the environment in terms of the following environmental topics: Air Quality, Cultural Resources (historic resources and archaeological resources), Energy, Geology and Soils (paleontological resources), Greenhouse Gas Emissions, Hazards and Hazardous Materials (release of hazardous materials, hazardous materials by schools, and creating significant hazard to the public or the environment), Land Use and Planning (conflict with a land use plan), Noise (all except airport noise), Population and Housing (unplanned population growth), Public Services (fire protection and police protection), Transportation, and Tribal Cultural Resources. It is recommended that Project impacts for the above topics be evaluated further in an EIR.

[21] California Board of Forestry and Fire Prevention, State Responsibility Area Viewer, http://www.fire.ca.gov/firepreventionfee/sraviewer_launch. Accessed September 3, 2020.

As discussed in Response IV, the Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endanger plant or animal.

As discussed in Responses V and VII.f, the Project could potentially adversely affect examples of California history and prehistory (archaeological and paleontological resources). Therefore, it is recommended that Project impacts on historic, archaeological, and paleontological resources be evaluated further in an EIR.

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

Potentially Significant Impact. Environmental topics for which the determinations in this Initial Study were “No Impact” or “Less Than Significant Impact” have been determined not to have the potential for significant cumulative impacts as the Project would not contribute considerably to cumulative impacts in terms of these topics. These topics include: Aesthetics, Agricultural and Forestry Resources, Air Quality (odors), Biological Resources, Cultural Resources (human remains), Geology and Soils (all except paleontological resources), Hazards and Hazardous Materials (routine transport, use, or disposal of hazardous materials; airport hazards and noise; emergency response plan; and wildland fires), Hydrology and Water Quality, Land Use and Planning (physically divide an established community), Mineral Resources, Noise (aircraft noise), Population and Housing (displacement), Public Services (schools, parks, and libraries), Recreation, Utilities and Service Systems, and Wildfire. The cumulative impacts of the Project in terms of these topics need not be evaluated further in an EIR.

Environmental topics for which the determination in this Initial Study is “Potentially Significant Impact” have been determined to have the potential for significant cumulative impacts as the Project could potentially contribute considerably to cumulative impacts in terms of these topics. These topics include: Air Quality (all except odors), Cultural Resources (all except human remains), Energy, Geology and Soils (paleontological resources), Greenhouse Gas Emissions, Hazards and Hazardous Materials (release of hazardous materials, hazardous materials by schools, and creating significant hazard to the public or the environment), Land Use and Planning (conflict with a land use plan), Noise (all except aircraft noise), Population and Housing (unplanned population growth), Public Services (fire protection and police protection), Transportation, and Tribal Cultural Resources. It is recommended that the potential cumulative impacts of the Project related to these topics be evaluated further in an EIR.

c. Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As discussed throughout this Initial Study, the Project could result in potentially significant environmental impacts in terms of the following environmental topics: Air Quality, Cultural Resources (historic resources and archaeological resources), Energy, Geology and Soils (paleontological resources), Greenhouse Gas Emissions, Hazards and Hazardous Materials (release of hazardous materials, hazardous materials by schools, and creating significant hazard to the public or the environment), Land Use and Planning (conflict with a land use plan), Noise, Population and Housing (unplanned population growth), Public Services (fire protection and police protection), Transportation, and Tribal Cultural Resources. These impacts could have potentially adverse effects on human beings, and it is therefore recommended that these topics be evaluated further in an EIR.