Culver CITY
PLANNING DIVISION
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9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

PROPOSED MITIGATED NEGATIVE DECLARATION

Project Title and Culver City File No.: 11469 Jefferson Boulevard Project
P2019-0194-SPR
P2019-0194-CUP
P2019-0194-AUP

Project Location: 11469 Jefferson Boulevard, Culver City, CA 90230

Project Sponsor: Jefferson Boulevard Associates, LLC c/o Sandstone Properties, Inc.

Project Description: The Project would redevelop a 33,813 square foot (SF) (0.78-acre) property located in the northwest corner of the intersection at Jefferson Boulevard and Slauson Avenue. The existing single-story commercial (retail/restaurant) building and associated asphalt-paved surface parking lot would be removed as part of the Project. The Project includes the development of a new, five-story, 175-room boutique hotel building with food and beverage amenities and a two level, below-grade parking garage. A pool and roof top bar would be located on the fifth floor. The 111,000 SF building would be up to 56 feet in height (with the elevator shaft reaching 69 feet and 6 inches in height) and surrounded by landscaped areas located on site and within the public right of way. Parking for the proposed uses would be provided on site within a subterranean parking structure that would accommodate a minimum of 138 parking spaces.

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

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

☒ The Initial Study identified potentially significant effects, but:

1. Revisions in the project plans or proposals made by, or agreed to by the applicant before this proposed MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY was released for public review would avoid the effects or mitigate the effects or mitigate the effects to a point where clearly no significant effects would occur, and

2. There is no substantial evidence before the agency that the project as revised may have a significant effect on the environment.

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

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

www.culvercity.org

Contact: Lisa Edwards, Contract Planner (310) 253-5710 or Lisa.Edwards@culvercity.org

The public is invited to comment on the proposed MITIGATED NEGATIVE DECLARATION during the review period, which begins on January 21, 2021 and ends on February 11, 2021.

Culver CITY

Table of Contents

ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL DETERMINATION EC-1

ATTACHMENT A. PROJECT DESCRIPTION A-1

A. Introduction A-1
B. Project Location and Surrounding Uses A-1
C. Planning and Zoning A-1
D. Existing Conditions A-4
E. Description of Proposed Project A-4
F. Necessary Approvals A-22

ATTACHMENT B. EXPLANATION OF CHECKLIST DETERMINATIONS B-1

I. Aesthetics B-1
II. Agriculture and Forest Resources B-4
III. Air Quality B-5
IV. Biological Resources B-16
V. Cultural Resources B-19
VI. Energy B-23
VII. Geology and Soils B-27
VIII. Greenhouse Gas Emissions B-33
IX. Hazards and Hazardous Materials B-47
X. Hydrology and Water Quality B-53
XI. Land Use and Planning B-59
XII. Mineral Resources B-60
XIII. Noise B-61
XIV. Population And Housing B-76
XV. Public Services B-77
XVI. Recreation B-85
XVII. Transportation B-85
XVIII. Tribal Cultural Resources B-107
XIX. Utilities and Service Systems B-108
XX. Wildfires B-117
XXI. Mandatory Findings of Significance B-117
XXII. Earlier Analysis B-132
References B-132

ATTACHMENT C. MITIGATION MONITORING PROGRAM C-1

List of Figures

A-1 Regional and Project Vicinity Locations....A-2
A-2 Aerial Photograph with Surrounding Land Uses....A-3
A-3 Conceptual Site Plan....A-5
A-4 Ground Floor Plan....A-6
A-5 Second Floor plan....A-7
A-6 Fifth Floor Plan....A-8
A-7 Courtyard Vignette Sections....A-11
A-8 Building Section A....A-12
A-9 Building Section B....A-13
A-10 Building Elevation – North and East....A-14
A-11 Building Elevation – South and West....A-15
A-12 Rendering - Southeasterly View from Slauson Avenue....A-16
A-13 Rendering – Northerly Aerial View from Jefferson Boulevard/Slauson Avenue Intersection....A-17
A-14 Rendering - Courtyard....A-18
B-1 Noise Measurements and Existing Noise Sensitive Locations....B-65
B-2 Study Intersections and Study Residential Street Segments....B-89
B-3 Locations of Related Projects....B-121

List of Tables

A-1 Proposed Project Land Use Summary....A-9
B-1 Maximum Unmitigated Regional Construction Emissions (pounds per day)....B-9
B-2 Maximum Regional Operational Emissions (pounds per day)....B-10
B-3 Maximum Localized Construction Emissions (pounds per day)....B-12
B-4 Maximum Unmitigated Localized Operational Emissions (pounds per day)....B-13
B-5 Maximum Unmitigated Health Impacts for Off-Site Sensitive Receptors....B-14
B-6 Project Construction Fuel Usage....B-24
B-7 Project Operational Energy Usage....B-25
B-8 Construction Greenhouse Gas Emissions....B-36
B-9 Annual Greenhouse Gas Emissions....B-39
B-10 Project Consistency with Applicable Culver City Green Building Program Requirements....B-41
B-11 Project Consistency with Applicable Greenhouse Gas Reduction Strategies....B-43
B-12 Culver City Interior and Exterior Noise Standards....B-61
B-13 Noise and Land Use Compatibility Matrix – California....B-63
B-14 Summary of Ambient Noise Measurements....B-64
B-15 Predicted Existing Vehicular Traffic Noise Levels....B-66
B-16 Estimated Construction Noise Levels at Existing Off-Site Sensitive Receptors....B-67
B-17 Off-site Traffic Noise Impacts – Existing Baseline Conditions....B-70
B-18 Off-site Traffic Noise Impacts – Future 2024 Conditions....B-71
B-19 Off-site Traffic Noise Impacts – Future (2024) Cumulative Increase....B-72
B-20 Human Response to Transient Vibration....B-73
B-21 Groundborne Vibration Impact Criteria for Structure Damage....B-73
B-22 Vibration Source Levels for Typical Construction Equipment....B-74
B-23 CCFD Response Times....B-79
B-24 Culver City Park Facilities Located in the Vicinity of the Project Site....B-84
B-25 Study Intersections and Study Residential Street Segments....B-88
B-26 Critical Movement Volume Ranges for Determining Level of Service....B-90
B-27 Level of Service Definitions for Signalized Intersections....B-90
B-28 Existing (2018) Intersection Level of Service Analysis....B-91
B-29 Estimated Project Trip Generation....B-92

List of Tables (continued)

B-30 Summary of Intersection Level of Service Analysis B-93
B-31 Summary of Intersection Level of Service Analysis B-97
B-32 Caltrans Freeway Impact Screening Analysis – Traffic Volume Contributions to Freeway Mainline B-99
B-33 Caltrans Freeway Impact Screening Analysis – Traffic Volume Contributions to Off-Ramp Facilities B-100
B-34 Freeway Off-Ramp Impact Analysis B-100
B-35 Residential Street Analysis: Existing (2018) and Future (2024) Conditions B-101
B-36 Unnamed Alley, Segrell Way, and Culver Park Drive Queuing/Delay Summary B-103
B-37 Projected West Basin Service Area Water Demand (AFY) B-109
B-38 Projected West Basin Service Area Water Supply (AFY) B-110
B-39 Estimated Wastewater Generation B-112
B-40 Projected Solid Waste Generated During Operation B-116
B-41 List of Related Projects B-118

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INITIAL STUDY
ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title:	11469 Jefferson Boulevard Project		
City of Culver City Case Nos:	P2019-0194-SPR P2019-0194-CUP P2019-0194-AUP		
Lead Agency Name & Address:	City of Culver City, Planning Division 9770 Culver Boulevard, Culver City, CA 90232		
Contact Person & Phone No.:	Lisa Edwards, Contract Planner (310) 253-5710		
Project Location/Address:	11469 Jefferson Boulevard, Culver City, CA 90230		
Nearest Cross Street:	Jefferson Boulevard and Slauson Avenue	**APN:**	4216-028-023
Project Sponsor's Name & Address:	Jefferson Boulevard Associates, LLC c/o Sandstone Properties, Inc. (the Applicant) 14724 Ventura Boulevard, 3rd Floor Sherman Oaks, California 91403		
General Plan Designation:	General Corridor	**Zoning:**	Commercial General (CG)
Overlay Zone/Special District:	Commercial Zero Setback Overlay Zone		

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

The Project would redevelop a 33,813 square foot (SF) (0.78-acre) property located in the northwest corner of the intersection at Jefferson Boulevard and Slauson Avenue. The existing single-story commercial (retail/restaurant) building and associated asphalt-paved surface parking lot would be removed as part of the Project. The Project includes the development of a new, five-story, 175-room boutique hotel building with destination food and beverage amenities and a two level, below-grade parking garage. A pool and roof top bar would be located on the fifth floor. The 111,000 SF building would reach up to 56 feet in height (with the elevator shaft reaching 69 feet and 6 inches in height) and would be surrounded by landscaped areas located on site and within the public right of way. Parking for the proposed uses would be provided on site within a subterranean parking structure that would accommodate a minimum of 138 parking spaces.

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

Existing Conditions of the Project Site:
The Project Site is currently improved with an approximately 13,000 SF main single-story, wood-framed commercial shopping center which includes both retail and restaurant uses. The remainder of the site consists of an asphalt-paved surface parking lot and ornamental landscaped areas. Ingress/egress to the Project Site is available via a driveway from Jefferson Boulevard and a driveway from Slauson Avenue.

Surrounding Land Uses and Setting: *(Briefly describe the project's surrounding)*
The Project Site is located at the south-end of the commercial corridor that runs along Jefferson Boulevard perpendicular to Interstate 405 (I-405) freeway within the Fox Hills area of Culver City. Downtown Los Angeles is approximately eight (8) miles east of the Project Site. The Project Site is bounded by the intersection at Jefferson Boulevard and Slauson Avenue with commercial uses directly north of the Project Site and a public alley adjacent to the western Project boundary with residential uses just beyond the alley. Commercial uses are also located east and south of the Project Site across Jefferson Boulevard and Slauson Avenue. Both the I-405 and State Route 90 (SR-90) freeways are located less than 400 feet west and south of the Project Site.

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

- City of Culver City construction-related permits (i.e., demolition permit, haul route permit, building permit, grading permit, etc.)
- South Coast Air Quality Management District
- Other agencies as needed

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

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 REPO**RT 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 — 1/21/2021

Michael Allen, Planning Manager, 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 – 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 point.) If the project is 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 of and the Forest Legacy Assessment Project; and forest carbon measurements methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
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 as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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 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, based on any applicable threshold of significance?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency 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?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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 surface 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 off-site?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels 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 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?	☐	☐	☒	☐
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:				
Fire protection?	☐	☒	☐	☐
Police protection?	☐	☒	☐	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycles, 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?	☐	☐	☒	☐
XVIII. TRIBAL CULTURAL RESOURCES– Would the project:				
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.	☐	☒	☐	☐

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
XIX. WILDFIRES – 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?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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?	☐	☒	☐	☐

Culver CITY

ATTACHMENT A
PROJECT DESCRIPTION

A. INTRODUCTION

Jefferson Boulevard Associates, LLC c/o Sandstone Properties, Inc. (the Applicant) proposes to redevelop an approximately 33,813 square foot (SF) (0.78-acre) property located at 11469 Jefferson Boulevard northwest of the intersection at Jefferson Boulevard and Slauson Avenue in Culver City (Project Site). The proposed commercial development (Project) would include the development of a boutique hotel with destination food and amenities. The Project Site is currently developed with an approximately 13,000 SF main single-story, wood-framed commercial shopping center which includes both retail and restaurant uses and an asphalt-paved surface parking lot and ornamental landscaped areas. All existing site uses would be demolished and removed to support development of the Project.

A detailed discussion of the Project is provided below.

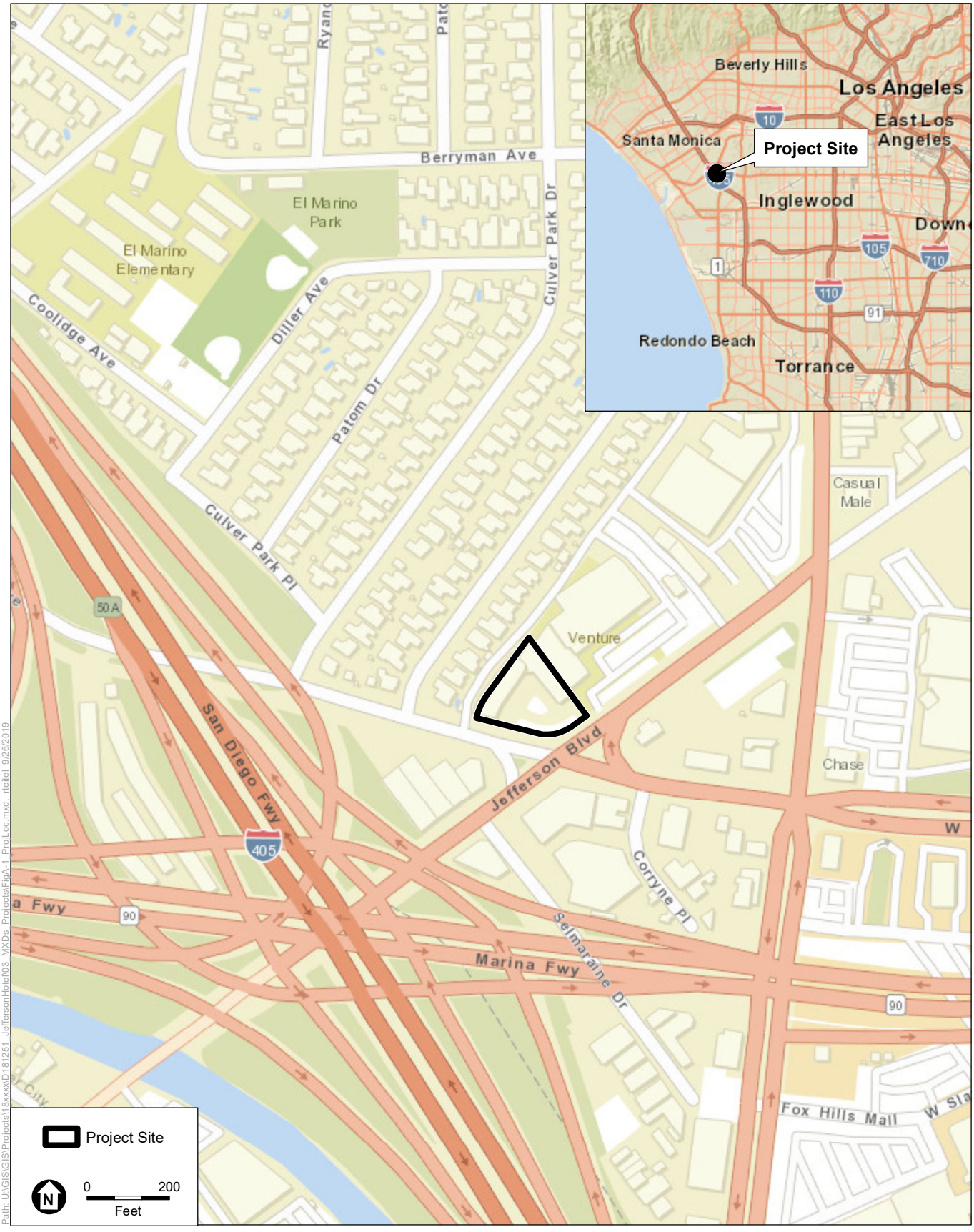
B. PROJECT LOCATION AND SURROUNDING USES

The Project Site is located at the south-end of the commercial corridor that runs along Jefferson Boulevard perpendicular to Interstate 405 (I-405) freeway within the Fox Hills area of Culver City. Downtown Los Angeles is approximately eight (8) miles east of the Project Site. **Figure A-1**, *Regional and Project Vicinity Locations*, illustrates the location of the Project Site from a regional and local perspective. The Project Site is bounded by the intersection at Jefferson Boulevard and Slauson Avenue with commercial uses directly north of the Project Site and a public alley adjacent to the western Project boundary with residential uses just beyond the alley. Commercial uses are also located east and south of the Project Site across Jefferson Boulevard and Slauson Avenue. Both the I-405 and State Route 90 (SR-90) freeways are located less than 400 feet west and south of the Project Site. **Figure A-2**, *Aerial Photograph with Surrounding Land Uses,* illustrates the surrounding uses.

C. PLANNING AND ZONING

The Culver City General Plan designation for the Project Site is General Corridor which allows for a range of small to medium scale commercial uses with an emphasis on community serving retail, office, and service uses along major corridors. The General Corridor designation is intended to support desirable existing and future neighborhood and community serving commercial uses and housing opportunities that are compatible with nearby residential neighborhoods. No changes to the Project Site's existing General Plan designations are proposed by the Project.

The Project Site's existing zoning designation is Commercial General (CG) and the Project Site is within a Commercial Zero Setback Overlay Zone. The CG Zoning District identifies areas that are long major corridors appropriate for small- to medium-scale commercial uses, emphasizing community-serving retail, office, and service uses. The CG Zoning District is consistent with the General Corridor land use designation of the General Plan. The Commercial Zero Setback Overlay Zone is intended to preserve the reinforce a traditional city streetscape and create a more pedestrian-friendly environment. As required under this overlay zone, the first story of proposed buildings that exceed 750 SF shall have a zero setback from the street-facing property of any street listed in Subsection 17.260.020.B. (i.e., Jefferson Boulevard and Slauson Avenue). No changes to the Project Site's existing Zoning designations are proposed by the Project.

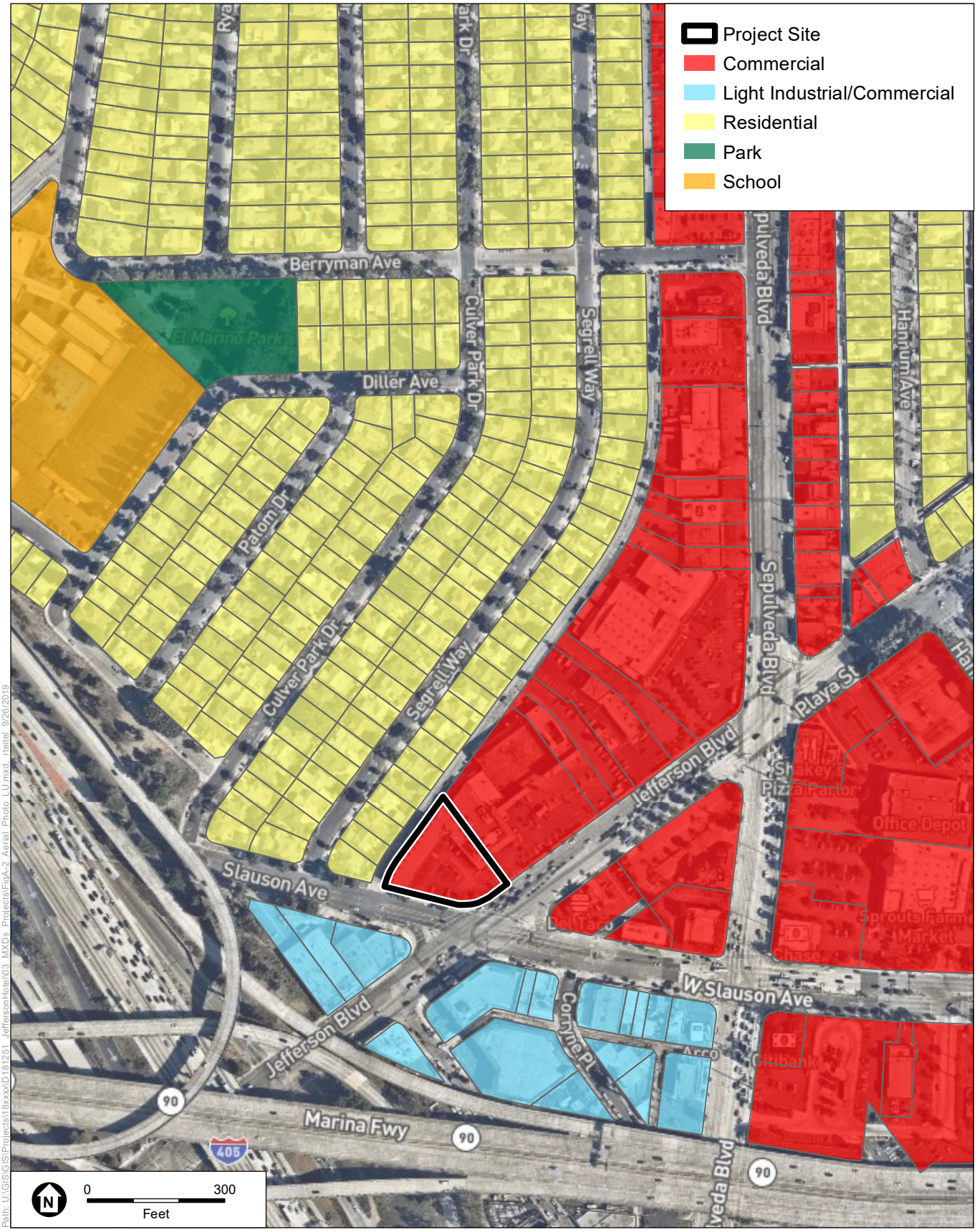


SOURCE: ESRI, 2019; ESA, 2019

11469 Jefferson Boulevard Project

Figure A-1
Regional and Project Vicinity Location

ESA



SOURCE: Open Street Map, 2019.

11469 Jefferson Boulevard Project

Figure A-2
Aerial Photograph with Surrounding Land Uses

ESA

D. EXISTING CONDITIONS

The Project Site is currently improved with an approximately 13,000 SF single-story, wood-framed commercial shopping center which includes both retail and restaurant uses. The remainder of the Project Site consists of an asphalt-paved surface parking lot and ornamental landscaped areas. Ingress/egress to the Project Site is available via a driveway from Jefferson Boulevard and a driveway from Slauson Avenue.

E. DESCRIPTION OF PROPOSED PROJECT

1. Project Uses

The Project is proposing the development of a new, five-story, 175-key boutique hotel building over subterranean parking (parking discussed below). The hotel ground floor lobby would include food and beverage amenities, including a destination bar and restaurant, a business tech center, and meeting spaces. A light well, evoking the design of a cenote, would provide natural light and a view of the landscaped courtyard. The fifth level would include a roof deck area with a swimming pool, and food and beverage amenities, including a destination sky bar. The second floor guest rooms and meetings rooms would be organized around the landscaped courtyard. The third through fifth floors would feature a fitness center and guest rooms overlooking the courtyard, surrounding cityscape and landscaped terraces. The 175-keysproposed under the Project would include a mix of king rooms, double queen rooms, and suites. **Figure A-3**, *Conceptual Site Plan,* illustrates the general site plan of the Project; **Figure A-4**, *Ground Floor Plan*, illustrates the ground floor for the Project; **Figure A-5**, *Second Floor Plan*, illustrates the second floor for the Project; and **Figure A-6**, *Fifth Floor Plan*, illustrates the fifth floor for the Project. The uses proposed by the Project are described in detail below and a summary of the Project is provided in **Table A-1**, *Proposed Project Land Use Summary*. As shown in Table A-1, the Project would provide a total of approximately 67,030 SF in 175 hotel rooms, 8,536 SF of back of- house, 14,783 SF of hotel amenities, 630 SF of bicycle parking and 18,842 SF of circulation, and 1,119 SF of loading area for a total building area of 111,000 gross SF. In addition, 15,450 SF of open space area would be provided, as well as 56,300 SF of subterranean parking area.

2. Building Heights and Elevations

Consistent with the Commercial Zero Setback Overlay Zone, the Project has been designed with zero setbacks along Jefferson Boulevard and Slauson Avenue. The building can be described by its elevations: the south and west elevations, the north elevation, and the interior elevation. The south and west elevations front the southside of the Project Site at Jefferson Boulevard and Slauson Avenue, while the north elevation runs adjacent to the public alley, and the interior elevation that occupies the vertical walls of the internal courtyard. Each elevation is described further below.

The south and west elevations include a glass facade[1] that wraps the length of the south-facing corner of the proposed building at the intersection of Jefferson Boulevard and Slauson Avenue. The glass facade would be designed as a sculptural skin composed of steel and glass and is intended to reflect the surroundings of the Project Site.

[1] *Glass used for the curtain-wall would be low-reflective glass, consistent with City requirements.*

0 128
Feet

LAX\18xxxx\D181251.01 - 11469 Jefferson Blvd MND\05 Graphics-GIS-Modeling\Illustrator

SOURCE: Nakada + Associates, 2019

11469 Jefferson Boulevard Project

Figure A-3
Conceptual Site Plan

ESA

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SOURCE: Nakada + Associates, 2020

11469 Jefferson Boulevard Project

Figure A-4
Ground Floor Plan

ESA

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SOURCE: Nakada + Associates, 2020

11469 Jefferson Boulevard Project

Figure A-5
Second Floor Plan

ESA

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SOURCE: Nakada + Associates, 2020

11469 Jefferson Boulevard Project

Figure A-6
Fifth Floor Plan

ESA

Table A-1
Proposed Project Land Use Summary

Hotel (175 rooms)	67,030 SF
Back-Of-House	8,536 SF
Hotel Amenities	
Restaurant	2,900 SF
Rooftop Bar	413 SF
Meeting Rooms	4,570 SF
Lounge (ground floor)	5,000 SF
Lobby	1,200 SF
Fitness Room	700 SF
Hotel Amenities subtotal	*14,783 SF*
Bicycle Parking	630 SF
Circulation (Stairs/Elevators)	18,842 SF
Loading Area	1,119 SF
Total Project SF	**111,000 SF**
Open Space Area	**15,450 SF**
Passenger Vehicle Parking SF	**56,300[a]**
Site Area	**33,800 SF**

SF = square feet

[a] *56,300 SF of parking assumes 2 subterranean parking levels for 138 spaces.*

Source: Nakada, 2020.

The north elevation that faces the residential uses (the Sunkist Park neighborhood) provides a softer visual aesthetic as compared to the south elevation. The north elevation features landscaped terraces with vertical gardens that step back from the neighborhood and provide a greater distance from the hotel. Along with the stepped terraces, high planters have been placed at the edge of each floor-slab to cut-off any possible sight-lines to and from the hotel guest rooms. The proposed building has also been designed with a slight bend such that all openings on the guest room floors are diverted away from the residences. This bend would passively direct all views away from the neighborhood to further reduce any possible sightlines to and from the hotel rooms.

As with the north elevation, the interior elevation also features landscaping. The trees that would be included in the interior of the hotel provide for a dense garden and can be viewed by the public from a portal opening along Jefferson Boulevard.

The proposed building would reach up to 56 feet in height (with the elevator shaft reaching 69 feet and 6 inches in height) and would not exceed the maximum allowed height for the Project Site of 56 feet. Roof mounted mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts, etc.) would be screened from public view from adjoining public streets and rights-of-way. The method of screening would be architecturally compatible with other on-site development in terms of colors, materials, and architectural style as approved by the City's Planning Manager.

Sections for the courtyard vignettes are illustrated in **Figure A-7**, *Courtyard Vignette Sections*. Building sections are shown in **Figure A-8,** *Building Section A*, and **Figure A-9,** *Building Section B*. Building section locations A and B are shown on the floor plans. Building elevations for the Project are illustrated in **Figure A-10,** *Building*

Elevation - North and East, **Figure A-11,** *Building Elevation – South and West*. Renderings of the proposed building are also provided in **Figure A-12,** *Rendering - Southeasterly View from Slauson Avenue*, **Figure A-13**, *Rendering – Northerly Aerial View from Jefferson Boulevard/Slauson Avenue Intersection*, and **Figure A-14**, *Rendering - Courtyard*.

3. Parking and Access

(a) Parking

The parking demand analysis included as part of the Project's Traffic Impact Study included shared parking and empirical parking demand analyses, the latter of which is based on parking demand data collected recently at nearby and similar hotel sites. Per the Project parking demand analysis, the Project is expected to have a maximum peak parking demand of 138 parking spaces, which would occur midday on a weekday. Therefore, the Traffic Study indicates 138 spaces in two subterranean levels would be sufficient to meet the demands of the Project. However, the final parking count will be determined in consultation with the City based on the results of the Project's parking demand analysis. Regardless, parking requirements are not considered impacts under CEQA, however, for purposes of this MND, to provide a conservative assessment of construction-related impacts associated with excavation activities, it is assumed that 35 feet of excavation would be required.

The Project's subterranean parking would be designed to accommodate vehicles through a combination of standard, tandem and ADA parking spaces. The Project Site would include valet-assist parking on each subterranean parking level in order to maintain safe and efficient use of the tandem spaces.

The first floor of the subterranean parking structure would offer ample parking for low emission vehicles (i.e., hybrid, alternative fuel and electrical automobiles) and carpool vehicles as required by the California Green Building Code (CGBC) (Section 5.106.5.3.3, Electric Vehicle (EV) charging space calculation). In total, the Project would provide 56 EV-Parking spaces (including 28 EV-Capable, 14 EV-Ready and 14 EV-Functioning spaces), per CCMC Section 17.320.035.O.3.

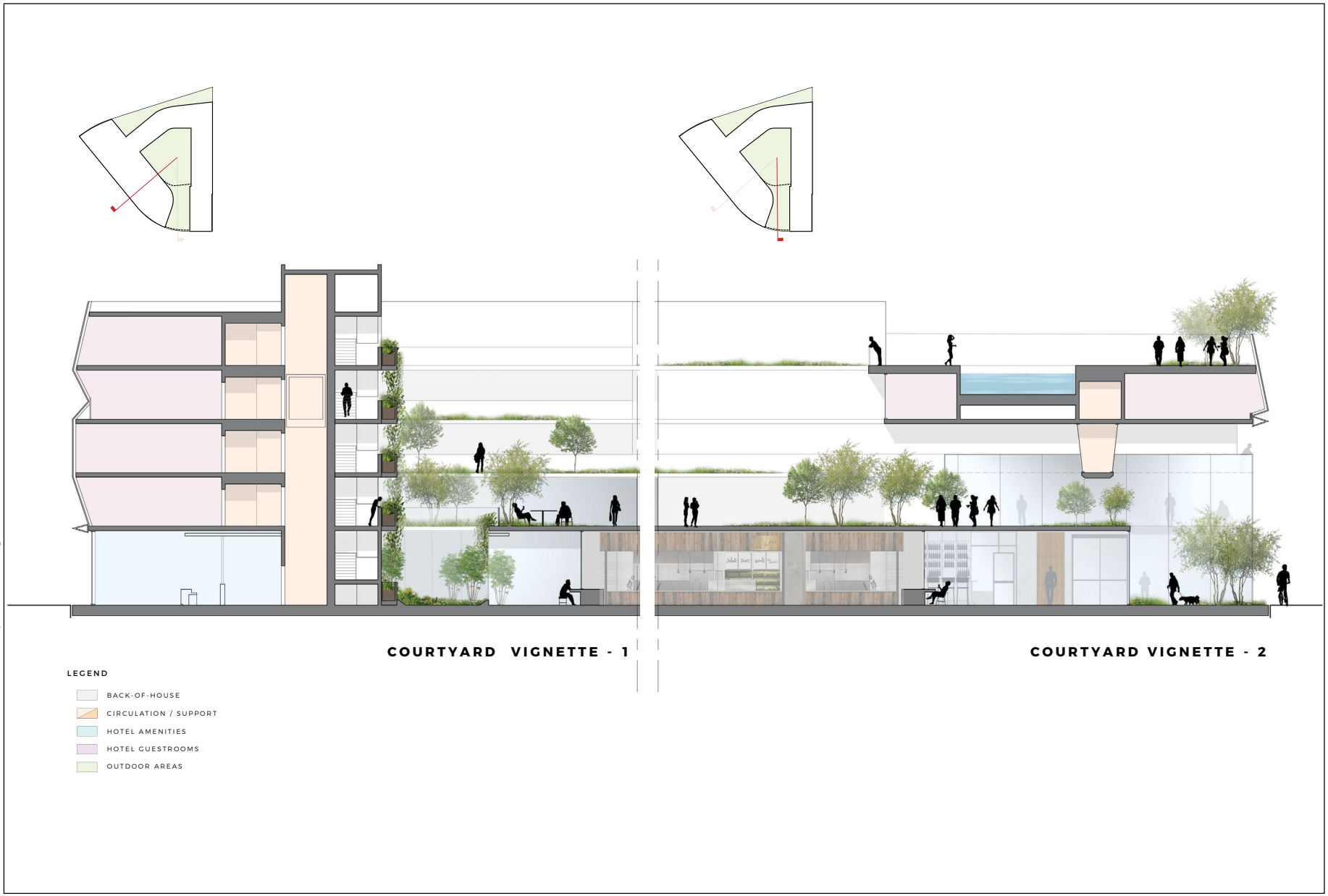
As shown in Figure A-4, direct vehicular access to the parking area would be provided from an inbound-only driveway on Slauson Avenue in the western portion of the Project Site, which would include two entry drive aisles. The drive aisle closer to the hotel would serve as a passenger drop-off and pick-up area. The second drive aisle would allow entering vehicles to access the parking ramp down to the two subterranean parking levels. Access to the subterranean parking garage would not be gate controlled. There would be two driveway exits onto the adjacent unnamed alley to egress onto the surrounding roadway system. One exit driveway would be provided directly off of the dual drive aisles (which would merge into a single aisle approaching the alley), while the second exit would provide egress for vehicles exiting the subterranean parking garage. Exiting vehicles would be allowed to travel north or south along the public alley toward Berryman Avenue or Slauson Avenue, respectively.

(b) Bicycle Parking

The Project would provide a total of 62 bicycle spaces, which would be 20 spaces above the City's Bicycle and Pedestrian Master Plan (BPMP) requirements. The Project would provide 52 long-term secure indoor bicycle parking spaces within the ground floor. In addition, 10 short-term bicycle parking spaces would be located within the landscaped area at the corner of Slauson Avenue and the public alley.

(c) Pedestrian Access

As shown on Figure A-4, pedestrian access would be provided from a pedestrian entrance on Jefferson Boulevard that would lead to the hotel lounge and restaurant area. Pedestrian access would also be provided from the ride share drop-off and accessed from Slauson Avenue. This would lead to the hotel lobby.



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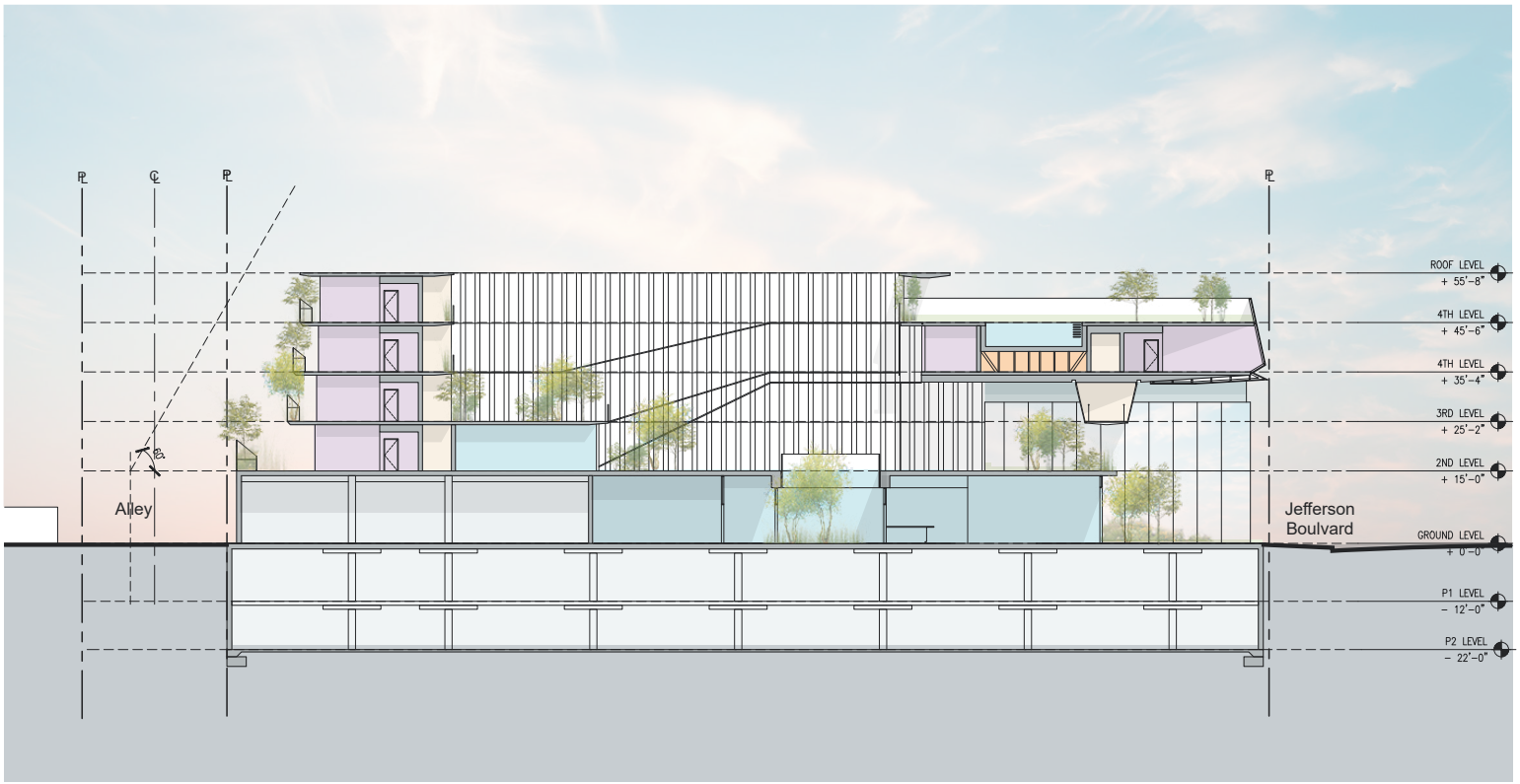
SOURCE: Nakada + Associates, 2019

11469 Jefferson Boulevard Project

Figure A-7
Courtyard Vignette Sections

ESA



LEGEND

- BACK-OF-HOUSE
- CIRCULATION / SUPPORT
- HOTEL AMENITIES
- HOTEL GUESTROOMS
- OUTDOOR AREAS

0 64
Feet

LAX\18xxxx\D181251.01 - 11469 Jefferson Blvd MND\05 Graphics-GIS-Modeling\Illustrator

SOURCE: Nakada + Associates, 2019

11469 Jefferson Boulevard Project

Figure A-8
Building Section A

ESA

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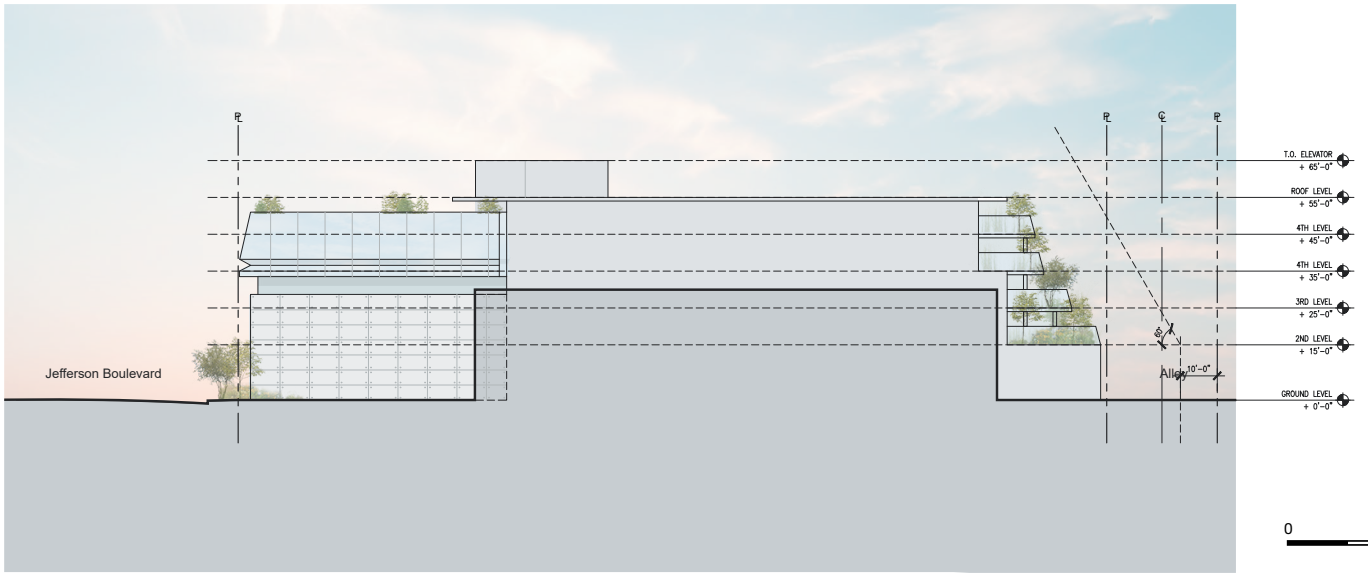
SOURCE: Nakada + Associates, 2019

11469 Jefferson Boulevard Project

Figure A-9
Building Section B

ESA

North Elevation



East Elevation

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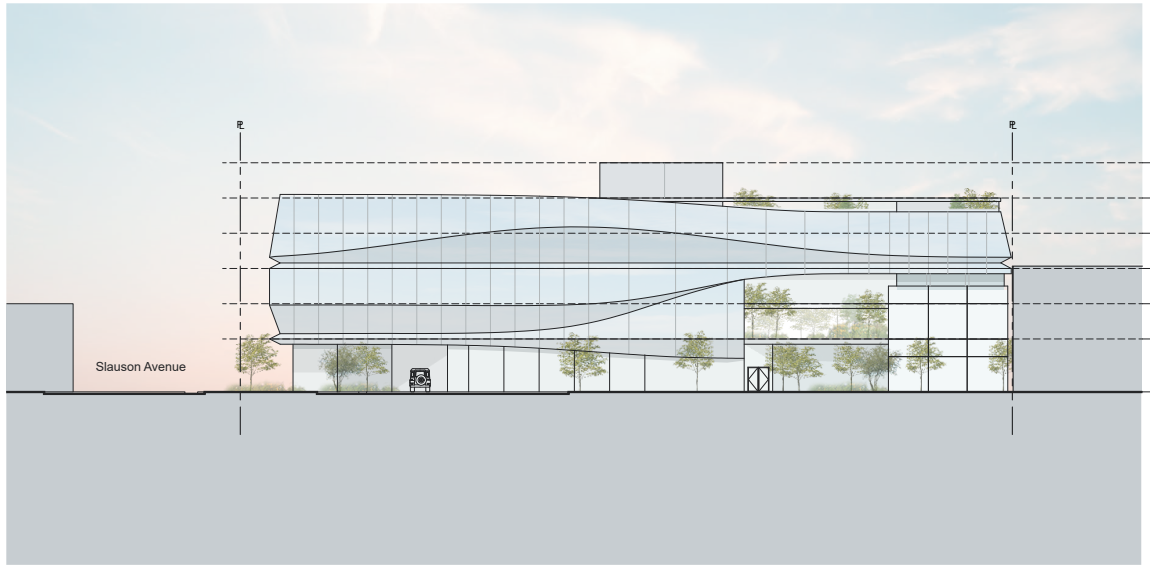
SOURCE: Nakada + Associates, 2019

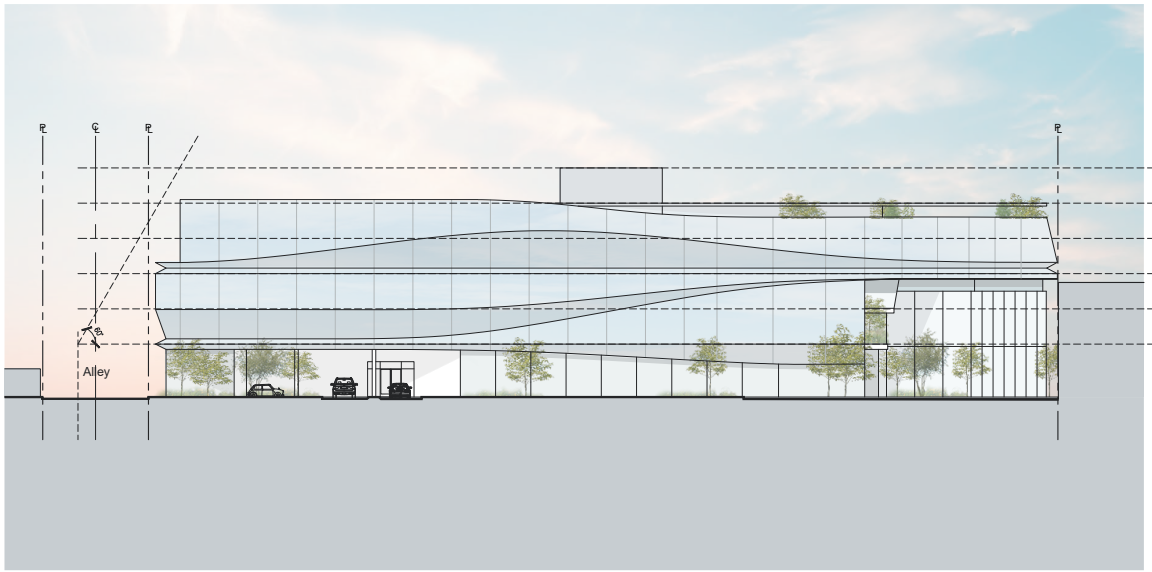
11469 Jefferson Boulevard Project

Figure A-10
Building Elevation - North and East

ESA



South Elevation



West Elevation

0 64
Feet

LAX\18xxxx\D181251.01 - 11469 Jefferson Blvd MND\05 Graphics-GIS-Modeling\Illustrator

SOURCE: Nakada + Associates, 2019

11469 Jefferson Boulevard Project

Figure A-11
Building Elevation - South and West

ESA

LAX\18xxxx\D181251.01 - 11469 Jefferson Blvd MND\05 Graphics-GIS-Modeling\Illustrator

SOURCE: Nakada + Associates, 2019

11469 Jefferson Boulevard Project

Figure A-12
Rendering - Southeasterly View from Slauson Avenue

ESA

LAX\18xxxx\D181251.01 - 11469 Jefferson Blvd MND\05 Graphics-GIS-Modeling\Illustrator

SOURCE: Nakada + Associates, 2019

11469 Jefferson Boulevard Project

Figure A-13
Rendering - Northerly Aerial View from Jefferson Boulevard/Slauson Avenue Intersection

ESA

LAX\18xxxx\D181251.01 - 11469 Jefferson Blvd MND\05 Graphics-GIS-Modeling\Illustrator

SOURCE: Nakada + Associates, 2020

11469 Jefferson Boulevard Project

Figure A-14
Rendering - Courtyard

ESA

4. Open Space, Landscaping and Amenities

The Project would include a total of approximately 15,450 SF of open areas, which would include a small 250 SF courtyard and a 500 SF outdoor dining area on the ground floor, a 2,800 SF terrace on the second floor, a larger 4,800 SF courtyard on the second floor, and an 2,000 SF pool deck and 5,100 SF lounge on the fifth floor. The courtyard areas on the ground, second, and third floors as well as the dining area on the ground floor and the pool deck on the fifth floor would be accessible to the public.

As discussed above, and consistent with the Commercial Zero Setback Overlay Zone, the Project has been designed with zero setbacks along Jefferson Boulevard and Slauson Avenue, which would encourage public access to ground floor restaurant and lounge. The sidewalks along Jefferson Boulevard and Slauson avenue would be well landscaped with street trees, landscape planters, tree grates, benches, bicycle racks, and trash receptacles to activate the pedestrian environment. In addition, along Jefferson Boulevard, the Project would also provide outdoor dining as a component of the restaurant located on ground floor.

5. Lighting and Signage

Site signage would be used for Project identity, building identification, pedestrian wayfinding, and security markings. It would be designed and located to be compatible with the architecture and landscaping of the Project. No off-site signage is proposed. All signage would be provided consistent with a Master Sign Program pursuant to zoning code section 17.330.050.D.2. All hotel and restaurant signage would be limited to the commercial elevation along the Jefferson Boulevard commercial corridor. The residential elevation would not include any signage.

Pedestrian areas would be well lit for security. The proposed buildings would include accent lighting to complement the building architecture. Lensed light-emitting diode (LED) downlights would be integrated into the architectural canopies to provide appropriate light levels. Façade lighting is intended to reinforce the architecture of the building and to provide a nighttime presence for the Project. Fixtures would be designed to prevent light trespass on adjacent properties. Recessed LED fixtures would be designed to eliminate unwanted glare and set to limit all light pollution into the sky. Surface mounted LED fixtures would be integrated into planters. In grade LED fixtures would provide focused uplight on the site trees along the perimeter of the site.

6. Sustainability Features

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

<u>Conservation and Energy Efficiency</u>

1. Recycling or salvaging at least 65 percent of non-hazardous construction and demolition debris.
2. Using local manufactures and recycled products where possible.
3. Stormwater filtration and capture systems.
4. Permeable exterior paving surfaces to reduce stormwater runoff.
5. Installation of electric vehicle supply equipment (EVSE) or EV charging stations.
6. Installation of a photovoltaic system equivalent to at least one percent of the Project's electricity demand and at least one kilowatt (kW) of solar photovoltaics per 10,000 SF of new development.
7. Water saving fixtures in all locations including waterless urinals in public restrooms and water saving landscaping.

8. Incorporation of low-water and drought tolerant plants in the landscape plan.
9. Irrigation using captured stormwater.
10. Irrigation timers with rain sensors.
11. Dual and triple low emissivity glazing.
12. High reflective roof material.
13. High efficiency heating and air conditioning systems.
14. Reliance on fluorescent, LED or other type of high efficiency systems for all interior and exterior lighting. New lighting installed in parking structures and all common areas shall be motion sensor controlled;
15. Natural ventilation and lighting.
16. On-site recycling collection facilities

Carbon Emission Reduction

1. Bicycle racks along the Slauson Avenue adjacent.
2. Other bicycle oriented facilities include safe lockable storage areas for hotel use.

Mobility Features

The Project's central location within Los Angeles County and proximity near multi-modal facilities including local and regional bus transit stops, and bike lanes or facilities presents an opportunity to enhance mobility. In addition, the features described above, some specific initiatives include:

1. Access to multi-modal transit with connecting bike and bus routes. There is direct access to eight bus routes and bicycle lanes/routes.
2. Bike friendly design with bicycle parking for hotel guests and employees.
3. Designated parking for low-emission/zero-emission vehicles.
4. The perimeter of the site area will incorporate the City's approved Streetscape plan which will create an attractive and inviting walkable environment.

7. Site Security

The Project would incorporate a 24-hour/seven-day video surveillance security program to ensure the safety of its hotel guests, employees, and visitors. Site security features would include building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. The Project design would include lighting of entry-ways and public areas for site security purposes.

8. Loading and Trash Removal

Loading for large deliveries for the hotel and restaurant uses would occur in a designated loading area located on site on the ground floor north of the subterranean parking structure entrance, as shown Figure A-4. This loading area would be accessed from public alley.

A scout service, or an employee of the City's Environmental Programs and Operation (EPO) Division, would collect all trash bins serving the Project from the dedicated trash rooms located adjacent to the loading dock, as shown in Figure A-4.

9. Construction Schedule/Activities

A Construction Management Plan would be developed by the general contractor and their traffic management contractor in consultation with the Project's traffic engineer as necessary, and approved by the City of Culver City Engineer prior to issuance of a demolition permit. This plan would document how the Project's construction management team would implement and conduct its site management responsibilities during the construction phase of the Project The plan would include: name and telephone number of a contact person regarding traffic complaints or emergency situations; 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 construction parking management plan.

The Project would comply with Culver City's allowable construction hours of (Chapter 9.07: Noise Regulations, Section 9.07.035 Construction):

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

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

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

A series of permits would be required for Project phases including demolition, excavation, subterranean and above-ground construction. These approvals may include contingencies requiring additional design and submittals that must be approved before work can begin. Some anticipated items requiring further approval might include, but not be limited to: Final Construction Traffic Management Plan; Erosion and Sediment Control Plan; and Shoring and Excavation Plan. The Final Construction Traffic Management Plan would include measures to minimize traffic impacts associated with any concurrent construction activities occurring in the Project vicinity.

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

It is anticipated that construction activities would commence as early as the first quarter of 2022 with full build-out occurring in 2024, for a total of 30 months of construction.

F. NECESSARY APPROVALS

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

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

ATTACHMENT B
EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS

Would the project:

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

Less Than Significant Impact. The Project Site is located in a highly urbanized area, with a mix of commercial and residential uses in the nearby vicinity. The topography surrounding the Project Site is flat with no notable ocean, mountain or other scenic vistas that would be affected by the Project. In addition, although the Project proposes building heights reaching up to 56 feet in height (with the elevator shaft reaching 69 feet and 6 inches in height), the immediate surrounding area consists of a range of low- to mid-rise buildings. As such, given the flat topography in the area, the proposed buildings would not substantially obstruct views not already obscured or blocked by other buildings and structures in the area. 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.

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

No Impact. The Project Site is located in a highly urbanized area of the City and is currently developed with a single-story commercial (retail) building and associated asphalt-paved surface parking lot.

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

Vegetation on the Project Site is largely confined to ornamental landscaped trees, all of which would be removed as part of the Project, including the removal of two street trees (African fern pine). 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. The size and location of the replacement trees would 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 located within the vicinity of a scenic highway. No impacts would occur.

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 point.) If the project is an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project Site is considered to be located in an urbanized area. The aging buildings and features within the Project Site have low aesthetic value. Interstate 405 (I-405) is located to the west of the Project Site, the Marina Freeway (SR-90) is located south of the Project Site, and 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) and CCMC 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 would be consistent 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 economic well-being of the City's commercial corridor 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 proposes to demolish a single-story commercial (retail) building and associated asphalt-paved surface parking lot and replace them with a mid-rise boutique hotel with destination food and amenities and would serve to revitalize the corner of Jefferson Boulevard and Slauson Avenue, which is part of a 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 and renovation of existing residential and non-residential buildings and streetscapes are accomplished with the highest quality of architecture and site design. As discussed in Attachment A, Project Description, of this Initial Study/Mitigated Negative Declaration (IS/MND), the Project's contemporary design includes a custom, glass curtain-wall that wraps the length of the south-facing corner of the proposed building at the intersection of Jefferson Boulevard and Slauson Avenue. The curtain-wall is designed as a sculptural skin composed of steel and glass and is intended to reflect the surroundings of the Project Site. The Project would also include stepped terraces and high planters as well as interior landscaping that can be viewed by the public, which would further enhance the character of the proposed building, in support of this objective.

With regard to the CCMC, the Project is within a Commercial Zero Setback Overlay Zone, which is intended to preserve and reinforce a traditional city streetscape, and create a more pedestrian-friendly environment. As required under this overlay zone, the first story of any proposed buildings that exceed 750 SF shall have a zero setback from the street-facing property of any street listed in Subsection 17.260.020.B, which includes Jefferson Boulevard. The proposed building would be consistent with the requirements of the Commercial Zero Setback Overlay Zone as well as all other setback and design requirements established in the CCMC.

Overall, the 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.

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

Light and Glare

Less Than Significant Impact. The Project Site is currently developed with a single-story commercial (retail) building and associated asphalt-paved surface parking lot. The Project Site is located in a highly urbanized area, with a mix of low-rise commercial and residential. The Project Site is bounded by the intersection at Jefferson Boulevard and Slauson Avenue to the south.

The Project vicinity exhibits considerable ambient nighttime illumination levels due to the densely developed nature of the area, existing building and parking lot on the Project Site, as well as from adjacent commercial properties located north, east and south 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 Project Site and surrounding uses, the Project would include low to moderate levels of interior and exterior lighting for security, parking, signage and architectural enhancement. Soft accent lighting used for signage, and architectural enhancement would be directed to permit visibility of the highlighted elements but, would not be so bright as to cause substantial light spillover. All proposed signage and outdoor lighting would be subject to applicable regulations contained within the CCMC. Compliance with these regulations would ensure that impacts regarding Project lighting are less than significant.

Glare occurs from sunlight reflected from reflective materials utilized in existing buildings along the adjacent roadways and from vehicle windows and surfaces. Glare-sensitive receptors include motorists on the roadways surrounding the Project Site. As glare is a temporary phenomenon that changes with the movement of the sun, receptors other than motorists are generally less sensitive to glare impacts than to light impacts. A custom, glass curtain-wall that would wrap the length of the south-facing corner of the proposed building at the intersection of Jefferson Boulevard and Slauson Avenue would have low-reflectivity values (no mirror-like tints or films), minimizing off-site glare, which would be consistent with City requirements. To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets it would be temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Impacts would be less than significant.

Shade and Shadow

Less Than Significant Impact. Shading impacts were addressed in the Project's *Shade/Shadow Report* prepared by ESA (November 2020), which is available for review at the Culver City Planning Division. Potential shading impacts could result when shadow-sensitive uses are located to the north, northwest, or northeast of new structures. Shade sensitive uses in the Project vicinity include the backyards, pools, and solar collectors associated with the single-family residential uses to the west of the Project Site.

For purposes of this analysis, a Project impact would normally be considered significant if shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October.[1] As analyzed within the *Shade/Shadow Report*, 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

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

between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October.[2] As a result, the addition of the Project would not significantly increase the shading of adjacent shadow-sensitive uses based on the significance thresholds stated above. Impacts would be less than significant.

II. Agriculture and Forest Resources

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

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

No Impact. The Project Site is located in a highly urbanized area of the City and is currently developed with a single-story commercial (retail) building and an associated asphalt-paved surface parking lot. The Project Site does not contain agricultural uses or related operations and is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring 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.

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

No Impact. The Project Site's existing Zoning designation is Commercial General (CG) and the Project Site is within a Commercial Zero Setback Overlay Zone. The Project does not propose to change the Zoning designations. No portion of the Project or surrounding land uses are zoned for agriculture and no nearby lands are enrolled under the Williamson Act. As such, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impacts would occur.

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

No Impact. As discussed under Response II.b, above, the Project Site's existing Zoning designation is Commercial General (CG) and the Project Site is within a Commercial Zero Setback Overlay Zone. 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 impacts would occur.

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[2] *ESA, Shade/Shadow Report for the Jeff Hotel Project, Culver City, CA, June 2019.*

[3] *State of California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/dlrp/ciff/, accessed October 2019.*

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.

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

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

III. AIR QUALITY

The following impact analysis pertaining to air quality impacts is based on information contained in the Project's Air Quality Technical Report prepared by ESA, dated November 2020, which is available for review at the Culver City Planning Division.

As part of the Project, the following Project Design Features (PDFs) would be implemented and are assumed within the analyses below. The PDFs would be incorporated into the Project development as conditions of approval and included in the Mitigation Monitoring Program, included as Attachment C within this IS/MND.

Project Design Features

PDF-AIR-1: **Construction Features:** Construction equipment operating at the Project Site shall be subject to a number of requirements. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. Construction measures would include, but are not limited to the following:

- The Project shall require all off-road diesel construction equipment greater than 50 horsepower (hp) that will be used an aggregate of 40 or more hours to meet the U.S. Environmental Protection Agency Tier 4 Final off-road emission standards. A copy of each unit's certified tier specification or model year specification and California Air Resources Board or South Coast Air Quality Management District operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. This construction feature would allow for a reduction in diesel particulate matter and NO_X emissions during construction activities.

PDF-AIR-2: **Design Elements:** In accordance with CALGreen Building Standards, the Project shall incorporate the following mandatory energy and emission saving features:

- The Project shall recycle and/or salvage at least 65 percent of non–hazardous construction and demolition debris.
- The Project shall include easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings).
- The Project shall include efficient heating, ventilation, and air conditioning (HVAC) systems.
- The Project shall install low-flow water fixtures that are consistent with U.S. Environmental Protection Agency WaterSense specifications.

PDF-AIR-3: **Voluntary Design Elements:** The Project shall incorporate many operational energy and emission saving features including the following:

- The Project design would meet criteria for the LEED Silver or equivalent certification level.
- The Project shall install a solar photovoltaic power system equivalent to at least 1 percent of the Project's electricity demand and at least 1 kilowatt (kW) of solar photovoltaics per 10,000 square feet of new development.

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?

Less Than Significant Impact. The Project Site is located within the 6,745-square-mile South Coast Air Basin (Air Basin). Air quality planning for the Air Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Project would be subject to the SCAQMD's Air Quality Management Plan (AQMP), which contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). As part of the analysis for this checklist question, the SCAQMD recommends that lead agencies demonstrate that a project would not directly obstruct implementation of an applicable air quality plan and that a project be consistent with the assumptions (typically land-use related, such as resultant employment or residential units) upon which the air quality plan is based.

Construction

As discussed in the Air Quality Technical Report, the Project would result in an increase in short-term employment compared to existing conditions. Although the Project will require workers over the construction process, these jobs are temporary in nature. Construction jobs under the Project would not conflict with the long-term employment projections upon which the AQMP is based. Control strategies in the AQMP with potential applicability to short-term emissions from construction activities include strategies denoted in the AQMP as MOB-08 and MOB-10, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. Consistent with the Project, trucks and other vehicles in loading and unloading queues would be parked with engines off to reduce vehicle emissions during construction activities. Furthermore, the Project would utilize off-road diesel equipment greater than 50 horsepower that meet United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emission standards, as per PDF-AIR-1. Additionally, the Project would comply with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment. The Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403.

Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Because the Project would not conflict with the control strategies intended to reduce emissions from construction equipment, the Project would not conflict with or obstruct implementation of the AQMP.

Operation

As discussed in Attachment A, Project Description, of this IS/MND, the Project Site is located in Culver City and is currently zoned as Commercial General (CG) based on the City's Zoning Map. The Project would be

replacing the existing low-level commercial buildings totaling 13,301 square feet and a surface parking lot totaling 20,516 square feet and developing a five-story, 175-room boutique hotel, which would comprise a total building area of approximately 111,000 square feet within a 0.78 acre (33,800 square feet) parcel that would be consistent with the current zoning designation. The Project would also be consistent with the Circulation Element of the General Plan. The Project is committed to providing strong pedestrian connections to nearby recreational uses and nearby transit options. The Project Site is located approximately a quarter mile from the Westfield Culver City shopping mall and served by various bus routes operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and Culver City Bus with bus stops located in close proximity to the Project Site, including the Culver City Transit Center Bus Station that is located approximately 900 feet southeast of the Project Site that is served by the Culver City bus routes 3,4 and 6 and the Metro bus routes 108, 110 and 217. The Metro Expo Line Culver City light rail station is approximately two and three quarter miles north of the Project Site. The Project would concentrate recreational uses and employment growth in an area served by the local bus lines. As such, the Project would not conflict with SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) policies for the concentration of growth in proximity to transit.

The Project would generate indirect growth associated with hotel employees. Based on a building area of approximately 111,000 square feet, the Project would generate approximately 130 employees.[4] According to SCAG, Culver City is forecasted to have an employment growth of 8,900 jobs between 2012 and 2040.[5] As such, the estimated 130 hotel employees generated by the Project are within SCAG's employment growth assumptions of Culver City. As such, the Project would not generate growth beyond the range of development anticipated within the established SCAG regional forecast for Culver City. The Project would not increase or induce residential density growth not otherwise anticipated. Any indirect population growth by the Project within Culver City and/or neighboring cities would be nominal and would not materially affect forecasted SCAG growth assumptions. Therefore, based on the above analysis, the Project would not spur additional growth other than that already anticipated for Culver City and would not eliminate impediments to growth. Consequently, the Project would not foster growth inducing impacts in conflict with the assumptions in the AQMP.

Overall, the Project would not conflict with the AQMP during construction and operation. Impacts would be less than significant.

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?

Less Than Significant Impact. As indicated above, the Project Site is located within the Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Air Basin, including those monitoring stations nearest to the Project location. The Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and Project occupancy (long-term).

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[4] *108,100 SF hotel X 0.00113 employees per average SF (per the Lodging factor from Table 14 of the 2018 Developer School Fee Justification Study, LAUSD, March 2018) = 122 employees. Also, 2,900 SF restaurant X 0.00271 (per the Neighborhood Shopping Centers factor from Table 14 of the 2018 Developer School Fee Justification Study, LAUSD, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202018%20FINAL.pdf, March 2018) = 8 employees. Thus, there would be a total of 130 employees on the Project Site*

[5] *Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Demographic and Growth Forecast Appendix, Table 11, Jurisdictional Forecast, page 23, April 2016. While the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy has been adopted, the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy forms the basis of the growth projections in the currently applicable 2016 AQMP.*

Construction

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

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

The Project's maximum daily construction emissions were calculated as pounds per day for each construction phase by year. Some Project construction phases would overlap and the maximum daily emissions account for the overlapping activities. In addition, construction contractors are required to comply with the applicable provision of SCAQMD Rule 403 for controlling fugitive dust emissions. Applicable fugitive dust control measures are incorporated into the construction emissions modeling within the SCAQMD-approved CalEEMod software and include the application of water (or non-toxic soil stabilizer) to disturbed areas and unpaved road surfaces and limiting vehicle speeds to 15 miles per hour on unpaved surfaces. The estimated maximum daily values do not represent the emissions that would occur for every day of construction. Due to variability in day-to-day construction activities, emissions could be lower on any given day, particularly on days when overlapping construction activities are not occurring. Results of the criteria pollutant calculations are presented in **Table B-1**, *Maximum Unmitigated Regional Construction Emissions*, along with the regional significance thresholds for each air pollutant.[7] As shown therein, construction-related daily emissions for the criteria and precursor pollutants (VOC, NO_X, CO, SO_X, PM10, and PM2.5) would be below SCAQMD significance thresholds. Therefore, impacts related to regional construction emissions would be less than significant.

[6] *South Coast Air Quality Management District, Air Quality Significance Thresholds, (April 2019), http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf, accessed October 2019.*

[7] *Construction emissions included in Table B-1 assume construction of the Project starts in 2020. In doing so, the analysis is conservative in that emissions would be reduced in future years due to less pollutant emitting construction equipment, which is accounted for in the CalEEMod software.*

Table B-1
Maximum Unmitigated Regional Construction Emissions (pounds per day)[a]

Regional Emissions	VOC	NO_x	CO	SO_2	PM_{10} [b]	$PM_{2.5}$ [b]
Demolition - 2020	<1	3	13	<1	1	<1
Excavation - 2020	1	24	20	<1	5	2
Foundations - 2020	<1	2	10	<1	<1	<1
Continuous Concrete Pour - 2020	2	45	18	<1	5	2
Building Construction - 2021	1	4	11	<1	1	<1
Building Construction - 2022	1	4	11	<1	1	<1
Paving - 2021	<1	2	13	<1	<1	<1
Architectural Coating - 2022	15	<1	3	<1	<1	<1
Overlapping Phases[c]						
2020						
Foundations + Continuous Concrete Pour	2	47	28	<1	5	2
2021						
Building Construction + Paving	1	6	24	<1	1	1
2022						
Building Construction + Architectural Coatings	15	4	14	<1	1	<1
Maximum Daily Construction Emissions	**15**	**47**	**28**	**<1**	**5**	**2**
SCAQMD Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in the Air Quality Technical Report.
[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
[c] Analysis accounted for emissions from overlapping phases.

Source: ESA, 2020.

Operation

The SCAQMD has separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term Project operations. Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to operational emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOCs, (2) 55 pounds per day for NO_X, (3) 550 pounds per day for CO, (4) 150 pounds per day for SO_X, (5) 150 pounds per day for PM10, and (6) 55 pounds per day PM2.5.[8] Regional air pollutant emissions associated with Project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., electricity generation and natural gas consumption) are classified by the SCAQMD as regional stationary source emissions.

The Project would be designed to meet the standards for Leadership in Energy and Environmental Design (LEED) Silver level by the U.S. Green Building Council (USGBC) through the incorporation of green building techniques and other sustainability features. The Project also would be designed and operated to meet or exceed

[8] *South Coast Air Quality Management District, Air Quality Significance Thresholds, http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2, accessed October 2019.*

the applicable requirements of the State of California Green Building Standards Code and the Culver City Green Building Program (as required by the City's standard conditions of approval). Some of the Project's "green building measures" as part of its design to reduce Project-related criteria pollutant emissions would include efficient heating, ventilation, and air conditions (HVAC systems), installation of low-flow water fixtures, and installation of a solar photovoltaic power systems equivalent to at least one percent of the Project's electricity demand and at least 1 kilowatt (kW) of solar photovoltaics per 10,000 SF of new development, as further described in the project design features listed below (see PDF-AIR-1 through PDF-AIR-3, below).

Operational criteria pollutant emissions were calculated for mobile, area, and stationary sources for the Project buildout year (conservatively assumed as 2022). Daily trip generation rates for the Project were provided by the Project's Traffic Study and include trips associated with the proposed hotel uses.[9] Results of the criteria pollutant calculations are presented in **Table B-2**, *Maximum Unmitigated Regional Operational Emissions*, along with the regional significance thresholds. The net increase in operational-related daily emissions (Project emissions minus existing emissions) for the criteria and precursor pollutants (VOC, NO_X, CO, SO_X, PM10, and PM2.5) would be substantially below the SCAQMD thresholds of significance. Therefore, Project-related operational emissions would result in a less than significant impact.

Table B-2
Maximum Regional Operational Emissions (pounds per day)[a]

Source	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	3	<1	<1	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile Sources	5	5	36	<1	7	2
Total Project Operational Emissions	*8*	*5*	*37*	*<1*	*7*	*2*
Existing Site Emissions Removed	*2*	*1*	*9*	*<1*	*1*	*<1*
Net Maximum Regional Operational Emissions	**6**	**4**	**27**	**<1**	**6**	**2**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in the Air Quality Technical Report.

Source: ESA, 2020.

The SCAQMD's approach for assessing cumulative impacts related to operations or long-term implementation is based on attainment of ambient air quality standards in accordance with the requirements of the federal Clean Air Act (CAA) and California Clean Air Act. As discussed earlier, the SCAQMD has developed a comprehensive plan, the AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or California non-attainment pollutant. Because the Los Angeles County portion of the Air Basin is currently in non-attainment for ozone, NO_2, PM10, and PM2.5, cumulative projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, Section 15064(h)(3) of the CEQA

[9] *Crain & Associates, Jefferson Hotel Project Traffic Study, 2020.*

Guidelines provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

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

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted the AQMP. As discussed above in Section 5.1, Consistency with Air Quality Management Plan, the Project would not conflict with or obstruct implementation of AQMP and would be consistent with the growth projections in the AQMP.

Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. The Project's regional emissions would be below SCAQMD significance thresholds. In particular, non-attainment pollutant emissions of ozone precursors and particulate matter would not exceed the SCAQMD significance thresholds. The formation of ground-level ozone is a complex process due to photochemical reactions of precursor pollutants (i.e., VOC and NO_X emissions) in the atmosphere in the presence of sunlight. Meteorological factors, such as wind, would result in dispersive effects of pollutants, including ozone precursor and particulate matter emissions, that are dispersed horizontally downwind and through vertical mixing. It is unlikely that the Project's emissions, which would not exceed the SCAQMD significance thresholds, would result in a substantial measurable increase in the respective pollutant concentrations in the Air Basin to a degree that clearly predictable and identifiable heath impacts would specifically result from this Project's emissions. Therefore, the Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable. Impacts would be less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

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

Localized - Construction

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized daily significance threshold ("LST") methodology. Daily localized emissions caused by the Project were compared to the LSTs in the SCAQMD's

look-up tables to determine whether the emissions would cause violations of ambient air quality standards.[10] The Project Site is located in the SCAQMD SRA 2 and would generally disturb up to 0.78 acres on a given day. The off-site air quality sensitive receptors would be the residential uses located within 25 meters to the north and west of the Project Site. Using the Localized Significance Threshold Methodology, the results of the analysis determined localized Project-related construction emissions would be below the SCAQMD thresholds of significance. Results of the pollutant calculations are presented in **Table B-3**, *Unmitigated Localized Construction Emissions*.[11] The emissions for increase in construction-related daily emissions for the criteria and precursor pollutants (NO_X, CO, PM10, and PM2.5) would be substantially below the SCAQMD thresholds of significance. Therefore, Project-related localized construction emissions would result in a less than significant impact.

Table B-3
Maximum Localized Construction Emissions (pounds per day)[a]

Regional Emissions	NO_x	CO	PM_{10} [b]	$PM_{2.5}$ [b]
Demolition - 2020	1	12	0.3	0.1
Excavation - 2020	1	16	2.4	1.3
Foundations - 2020	1	10	<0.1	<0.1
Continuous Concrete Pour - 2020	1	12	<0.1	<0.1
Building Construction - 2021	2	9	0.1	0.1
Building Construction - 2022	2	9	0.1	0.1
Paving - 2021	2	12	0.1	0.1
Architectural Coating - 2022	<1	2	0.0	<0.1
Overlapping Phases[c]				
2020				
Foundations + Continuous Concrete Pour	2	22	0.1	0.1
2021				
Building Construction + Paving	4	21	0.2	0.2
2022				
Building Construction + Architectural Coatings	2	11	0.1	0.1
Maximum Daily Construction Emissions	**4**	**22**	**2**	**1**
SCAQMD Localized Significance Thresholds [c]	**103**	**562**	**2**	**1**
Exceed Threshold?	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling. Detailed emissions calculations are provided in the Air Quality Technical Report.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

[c] Analysis accounted for emissions *from overlapping phases.*

Source: ESA, 2020.

[10] *LSTs are only applicable to the following criteria pollutants: NO_X, carbon monoxide ("CO"), PM10, and PM2.5.*

[11] *Construction emissions included in Table B-3 assume construction of the Project starts in 2020. In doing so, the analysis is conservative in that emissions would be reduced in future years due to less pollutant emitting construction equipment, which is accounted for in the CalEEMod software.*

Localized - Operation

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized daily significance threshold ("LST") methodology. Daily localized emissions caused by the Project were compared to the LSTs in the SCAQMD's look-up tables to determine whether the emissions would cause violations of ambient air quality standards.[12] The Project Site is located in the SCAQMD SRA 2 and would generally disturb up to 0.78 acres on a given day. The off-site air quality sensitive receptors would be the residential uses located within 25 meters to the north and west of the Project Site. Using the Localized Significance Threshold Methodology, the results of the analysis determined localized Project-related construction emissions would be below the SCAQMD thresholds of significance. The maximum daily increase in localized emissions and localized significance thresholds are presented in **Table B-4**, *Unmitigated Localized Operational Emissions*. As shown therein, the increase in maximum localized operational emissions for sensitive receptors would be substantially below the localized thresholds for NO_X, CO, PM10, and PM2.5. Therefore, with respect to localized operational emissions, impacts would be less than significant.

Table B-4
Maximum Unmitigated Localized Operational Emissions (pounds per day)[a]

Source	NO_X	CO	PM_{10}	$PM_{2.5}$
Area	**<1**	**<1**	**<0.1**	**<0.1**
Energy	**1**	**1**	**<0.1**	**<0.1**
Total Localized Project Operational Emissions	*1*	*1*	*<0.1*	*<0.1*
Localized Existing Site Emissions Removed	*<1*	*<1*	*<0.1*	*<0.1*
Net Localized (On-Site) Emissions	**1**	**1**	**<0.1**	**<0.1**
SCAQMD Numeric Indicators	**103**	**562**	**1**	**1**
Exceeds Thresholds?	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Air Quality Technical Report.

Source: ESA, 2020.

Carbon Monoxide Hotspots

The potential for the Project to cause or contribute to CO hotspots is evaluated by comparing Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

As discussed further in the Air Quality Technical Report, CO levels in the Project area are substantially below the federal and state standards. Maximum CO levels in recent years are 3 ppm (one-hour average) and 1.8 ppm (eight-hour average) compared to the thresholds of 20 ppm (one-hour average) and 9.0 ppm (eight-hour average). CO levels decreased dramatically in the Air Basin with the introduction of the catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Air Basin for some time and the Air Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Thus, it is not

[12] *LSTs are only applicable to the following criteria pollutants: NO_X, carbon monoxide ("CO"), PM10, and PM2.5.*

expected that CO levels at Project-impacted intersections would rise to the level of an exceedance of these standards.

Additionally, SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin: (1) Wilshire Boulevard and Veteran Avenue; (2) Sunset Boulevard and Highland Avenue; (3) La Cienega Boulevard and Century Boulevard; and (4) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to I-405 in West Los Angeles. The evidence provided in the 2003 AQMP (Table 4-10 of Appendix V) shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing background CO concentrations, the screening values would be 7.6 ppm (one-hour average) and 5 ppm (eight-hour average).

Based on the Project's Traffic Study, under future operational year plus Project conditions, the intersection of Centinela Avenue and Sepulveda Boulevard had the highest peak traffic volume with approximately 77,460 per day.[13] As a result, CO concentrations are expected to be less than those estimated in the 2003 AQMP, which would not exceed the thresholds. Thus, this comparison demonstrates that the Project would not contribute considerably to the formation of CO hotspots and no further CO analysis is required. The Project would result in less than significant impacts with respect to CO hotspots.

Toxic Air Contaminants – Construction

The greatest potential for toxic air contaminants (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. In addition, incidental amounts of toxic substances such as oils, solvents, and paints would be used. As part of the Air Quality Technical Report, heal risk calculations were performed using a spreadsheet tool consistent with the OEHHA guidance, which incorporates the algorithms, equations, and a variable described above as well as in the OEHHA guidance, and incorporates the results of the AERMOD dispersion model. **Table B-5**, *Maximum Unmitigated Health Impacts for Off-Site Sensitive Receptors, summarizes the cancer risk and non-cancer impacts for the maximum impacted sensitive receptors.*

Table B-5
Maximum Unmitigated Health Impacts for Off-Site Sensitive Receptors

Sensitive Receptor	Maximum Cancer Risk (# in one million)	Hazard Index
Residential Land Use	9.2	0.01
Maximum Health Impact Thresholds	10	1.0
Exceeds Thresholds?	**No**	**No**

Source: ESA, 2019.

The cancer risk from DPM emissions from construction of the Project is estimated to result in a maximum cancer risk of approximately 9.1 per million, below the SCAQMD's significance threshold. As shown below, the Project would not result in a chronic hazard index greater than 1.0; therefore, chronic health risks would be less than significant. The maximum impacts would occur at a residential property across the service alley. As discussed previously, the lifetime exposure under OEHHA guidelines takes into account early life (infant and children)

[13] *Crain & Associates, Jefferson Hotel Project Traffic Study, 2020.*

exposure. The calculated cancer risk is estimated for outdoor exposure and assumes that sensitive receptors (residential uses) would not have any mitigation such as mechanical filtration and that residential uses would have continuously open windows. As the maximum cancer risk and non-cancer impacts would be less than the SCAQMD significance thresholds, impacts would be less than significant.

The process of assessing health risks and impacts includes a degree of uncertainty, which is dependent on the availability of data and the extent to which assumptions are relied upon in cases where the data are incomplete or unknown. All HRAs rely upon scientific studies to reduce the level of uncertainty; however, it is not possible to completely eliminate uncertainty from the analysis. Where assumptions are used to substitute for incomplete or unknown data, it is standard practice in performing HRAs to err on the side of health protection to avoid underestimating or underreporting the risk to the public by assessing risk on the most sensitive populations, such as children and the elderly. As shown in Table B-5, cancer risk for nearby sensitive receptors would remain below significance thresholds. These short-term emissions would not substantially contribute to a significant construction health risk. No residual emissions and corresponding individual cancer risk are anticipated after Project construction. Therefore, the Project would result in a less than significant impact related to construction TAC emissions.

Toxic Air Contaminants – Operation

SCAQMD recommends that health risk assessments be conducted for substantial sources of DPM emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions. The Project is not anticipated to generate a substantial number of daily truck trips. Under existing conditions, trucks currently make deliveries from the service alley to the northwest of the Project Site. With implementation of the Project, delivery truck loading and unloading would be moved to the interior of the Project Site in dedicated loading areas, creating greater separation between trucks and off-site sensitive receptors. Furthermore, typical sources of hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). Based on this, the Project is not expected to release substantial amounts of TACs.

Therefore, based on the limited activity of TAC sources and TAC concentrations at off-site sensitive receptors relative to existing conditions, the Project would not warrant the need for a health risk assessment associated with on-site activities, and potential TAC impacts would be less than significant.

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. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. 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 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 create objectionable odors. Construction of the Project's proposed uses would not be expected to generate nuisance odors at nearby sensitive receptors.

Results of the construction related criteria pollutant calculations are presented in Table B-1 (regional) and Table B-3 (localized). The daily emissions for criteria pollutants would be below SCAQMD significance thresholds. Since implementation of the Project would not exceed the regional or localized significance thresholds for attainment or non-attainment pollutants, the Project is not anticipated to contribute to health impacts related to these pollutants specifically because these thresholds were established at levels considered safe to protect public health, including the health of sensitive populations.

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 include various trash receptacles associated with the proposed development. On-site trash receptacles used by the Project would be covered and properly maintained to prevent adverse odors. With proper housekeeping practices, trash receptacles would be maintained in a manner that promotes odor control, and no adverse odor impacts are anticipated from the uses. Impacts with respect to odors would be less than significant.

Results of the operational related criteria pollutant calculations are presented in Table B-2 (regional) and Table B-4 (localized). The daily emissions for criteria pollutants would be below SCAQMD significance thresholds. Since implementation of the Project would not exceed the regional or local significance thresholds for attainment or non-attainment pollutants, the Project is not anticipated to contribute to health impacts related to these pollutants specifically because these thresholds were established at levels considered safe to protect public health, including the health of sensitive populations.

IV. BIOLOGICAL RESOURCES

Would the project:

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

No Impact. The Project Site is located in a highly urbanized area of Culver City and is currently developed with a single-story commercial (retail) building and an associated asphalt-paved surface parking lot. The Project Site does not include suitable habitat for candidate, sensitive, or special status species. Due to high levels of human activity and density of development in the Project area, there is no potential for sufficient natural habitat to support candidate, sensitive, or special status species on the Project Site. As such, the Project would not have a substantial adverse effect on candidate, sensitive, or special status species. No impacts would occur.

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

No Impact. As discussed under Response IV.a, above, the Project Site is currently developed with urban uses. No designated riparian habitat or natural communities exist on the Project Site or in the surrounding area. The Project Site is paved with ornamental landscaping and two street trees (African fern pine) are located along Slauson Avenue. The Project Site and surrounding area does not include any vegetation that constitutes a plant community. As such, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impacts would occur.

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 and located within an urbanized area. It does not contain any state federally protected wetlands as defined by Section 404 of the Clean Water Act. As such, the Project would not have a substantial adverse effect on federally protected wetlands. No impacts would occur.

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

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

Nonetheless, the Project area does include ornamental trees that could support nesting bird habitat. As discussed under Response IV.b, the Project Site is paved with ornamental landscaping and two street trees (African fern pine) are located along Slauson Avenue. Jefferson Boulevard and Slauson Avenue are highly utilized streets with high levels of ambient noise and human disturbance resulting from pedestrian and vehicular traffic. Species tolerant of human disturbance have the potential to nest within these ornamental trees or shrubs contained within or adjacent to the Project Site.

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. While the urbanized nature of the Project area limits the potential for native resident or migratory wildlife species movement through the Project Site, the Project would implement MM-BIO-1, below, which would be consistent with the Federal MBTA to reduce potential impacts to protected nesting birds. Impacts would be less than significant with mitigation incorporated.

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 does not support protected tree species. Vegetation within the Project area is largely confined to ornamental landscaping. All vegetation on the Project Site would be removed as part of the Project, including the removal of two street trees (African fern pine). 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.

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

No Impact. As discussed above, no designated riparian habitat or natural communities exist on the Project Site or in the surrounding area. Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place for the Project Site or the City. No impacts would occur.

V. CULTURAL RESOURCES

The following impact analysis pertaining to the Project Site's cultural resources is based on information contained in the Cultural Resources Assessment, prepared by ESA, dated June 2019, which is available for review at the Culver City Planning Division.

Would the project:

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

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

A project with an effect that may cause substantial adverse change in the significance of a historical resource is a project that may have a significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.[14] Direct impacts are those that cause substantial adverse physical change to a historical resource. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historical resource such that the significance of a historical resource would be materially impaired.

A records search for the Project was conducted on January 10, 2019, at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. The records search included a review of all recorded archaeological resources and previous studies within the Project Site and a 1-mile radius, and historic architectural resources within or immediately adjacent to (within approximately 50 feet of) the Project Site. The records search also included a review of California Points of Historical Interest, California Historical Landmarks, the California Register, the National Register, the Archaeological Determinations of Eligibility, and the California State Historic Resources Inventory. Historic maps and aerial photographs were also examined to provide historical information about the Project Site. In addition to the SCCIC records search, additional archives were reviewed to establish any significant events or persons that might be associated with the gas station, remnants of which could be located subsurface in the Project Site. This included a review of the Los Angeles Public Library digital archives, Newpapers.com, and Ancestry.com.

The records search results indicate that 49 cultural resources studies have been previously conducted within a 1-mile radius of the Project Site. Of the 49 previous studies, none have included the Project Site and it does not appear to have been previously surveyed. The records search results indicate that eight archaeological resources have been recorded within the 1-mile radius and includes six prehistoric archaeological sites and two multicomponent archaeological sites. None of these resources are located within or adjacent to (within 50 feet

[14] *California Code of Regulations, Title 14, Chapter 3, Article 5, Section 15064.5 (b) (1)*

of) the Project Site. No historic architectural resources have been previously recorded within the Project Site or adjacent parcels.

Review of the 1927, 1938, 1947, 1948, and 1952 aerial photographs indicate that the Project Site was undeveloped/vacant land. The 1953 and 1963 aerial photographs show a small structure located within the middle portion of the Project Site. The 1963 aerial photograph also depicts a rectangular building in the west portion of the Project Site (on a north-south alignment). The 1972 and 1980 aerial photographs depict the same conditions as present in 1963. The small structure located within the middle portion of the Project Site is no longer present in 1994, and the existing structures had been constructed by this time. No additional improvements or substantial changes have occurred to the Project Site since 1994.

Based on a review of historical archives, it appears that one significant individual was associated with this property: Ferdy Sant. However, Sant appears to have been important in local Arizona history as a pharmacist and business owner, but not in relation to this property or other properties in California. Nothing in the record indicates that other individuals were important persons. Archival research did not reveal that significant events have occurred at this location. There were no newspaper accounts of historical events or trends that have made a significant contribution to the history or development of Culver City, California, or the United States associated with the gas or service station.

The Project Site was subject to historic-period land uses dating back to the early 1950s, including a gasoline station and automotive repair shop. This suggests that the Project Site could also have some potential to contain historical resources. However, based on historical research that failed to identify a significant association with important events or individuals, it is unlikely that remnants of these previous uses would be eligible as historical resources since they are unlikely to yield information important in history.

Because the current building on the Project Site is not a historical resource, the Project would have no direct impact on historical resources. Furthermore, the Project would result in no indirect impacts to historical resources in the vicinity of the Project Site as the historic setting in the area around the Project Site is already eroded by contemporary development. Pursuant to CEQA, the Project would not result in direct or indirect impacts to historical resources.

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

Less Than Significant Impact With Mitigation Incorporated. As noted in the historical resources analysis above, no cultural resources (including archaeological resources) have been previously identified within the Project area. The Project Site is currently developed with a single-story commercial (retail) building and associated asphalt-paved surface parking lot. As discussed above, the records search results indicate that eight archaeological resources have been recorded within the 1-mile radius, which included six prehistoric archaeological sites and two multicomponent archaeological sites.

As discussed in the Cultural Resources Assessment, based on the factors used to determine the potential of encountering prehistoric archaeological deposits, the Project Site appears to have the potential to contain prehistoric archaeological resources. In addition, areas within the Project Site that appear to have been subject to fewer disturbances include an area west and south of the existing on-site building. This area is currently a paved parking lot. Parking lots have the potential to cap and preserve archaeological resources below the surface as excavations for parking lots are typically shallow and would therefore not disturb or displace deeper archaeological resources, and the asphalt pavement could have served as a barrier that could have prevented further impacts to any such resources. As such, there is a high to moderate possibility to encounter potentially significant intact subsurface prehistoric archaeological resources or human remains during ground-disturbing

activities in this area. There is also a moderate to low potential for subsurface prehistoric archaeological resources in areas where buildings previously or currently are developed on the Project Site. As such, and as provided in the Cultural Resources Assessment, since the Project includes ground disturbance up to 35 feet in depth and there are some areas of the Project Site that may contain potentially significant intact prehistoric or Native American archaeological resources, MM-CUL-1 to MM-CUL-4 are prescribed to ensure that potentially significant impacts to previously unknown archaeological resources that might be unexpectedly discovered during Project implementation are reduced such that the Project would not cause a substantial adverse change in the significance of an archaeological resource. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM-CUL-1: Prior to issuance of demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. Full-time monitoring shall be conducted in areas of high to moderate potential (as shown on Figure 14 of the Cultural Resources Assessment) to a depth of 10 feet (depth at which archaeological sensitivity decreases). Full-time monitoring of initial ground disturbance in areas of moderate to low sensitivity (also as shown on Figure 14) shall be conducted to determine if full-time or periodic monitoring is warranted in these areas, as determined by the Qualified Archaeologist. Full-time monitoring in any area can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist, based on field observations. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

MM-CUL-2: Prior to issuance of demolition permit, the Applicant shall retain a Native American tribal monitor from the Gabrieleno Tribe. The appropriate Native American monitor shall be selected based on ongoing consultation under AB 52 and shall be identified on the most recent contact list provided by the Native American Heritage Commission. The Native American Monitor shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall take into account the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrielino Tribe.

MM-CUL-3: In the event that archaeological resources (e.g., Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All prehistoric or Native American archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist and a Gabrielino Tribe. If the resources are Native American in origin, the Gabrielino Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources to ensure cultural values ascribed to the resources, beyond those that are scientifically important, are considered. If a resource is determined

by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist, preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If preservation in place is not feasible, the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources and that provides for the adequate recovery of the scientifically consequential information contained in the resources along with subsequent laboratory processing, analysis, evaluation, and reporting. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources, and shall incorporate the Gabrielino Tribe's treatment and curation recommendations. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material, and/or the Gabrielino Tribe. If no institution nor the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

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

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

Less Than Significant Impact With Mitigation Incorporated. As discussed above in Responses V.b, above, and as discussed further in the Cultural Resources Assessment, there is a high to moderate possibility to encounter potentially significant intact subsurface prehistoric archaeological resources or human remains during ground-disturbing activities in this area. As a result, in the event that previously unknown human remains may be encountered during construction excavations, MM-CUL-5 is prescribed to ensure that potentially significant impacts to them are reduced such that the Project would not disturb any human remains, including those interred outside of dedicated cemeteries. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM-CUL-5: If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their

recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

If the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the facility property in a location not subject to further and future subsurface disturbance.

VI. ENERGY

The following impact analysis pertaining to energy is based on information contained in the Project's Energy Technical Report prepared by ESA, dated November 2020, which is available for review at the Culver City Planning Division.

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?

Less Than Significant Impact. The Project would consume energy during construction activities primarily from the use of heavy-duty construction equipment, on-road trucks, and workers commuting to and from the Project Site. Project operations would consume energy in the form of electricity for lighting, and water conveyance, natural gas for heating, and fossil fuels for employee and student trips. Operation of the Project would require energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs; transportation-fuels, primarily gasoline, for vehicles traveling to and from the Project; and diesel for the maintenance and testing of emergency generators.

Electricity transmission to the Project Site is provided and maintained by Southern California Edison (SCE) through a network of utility poles and underground utility lines. Natural gas service is provided to the Project Site by the Southern California Gas Company (SoCalGas).

Construction

As discussed above, the Project would consume energy during construction activities primarily from the use of heavy-duty construction equipment, on-road trucks, and workers commuting to and from the Project Site. The

analysis below includes the Project's energy requirements and energy use efficiencies by energy type for each stage of the Project.

Electricity used during construction to provide temporary power for lighting and electronic equipment (e.g., computers, etc.) and to power certain construction equipment (e.g., hand tools or other electric equipment) would generally not result in a substantial increase in on-site electricity use. Electricity use during construction would be variable depending on lighting needs and the use of electric-powered equipment and would be temporary for the duration of construction activities. It is expected that construction electricity use would generally be considered as temporary and negligible over the long-term.

Construction activities typically do not involve the consumption of natural gas.

The estimated fuel usage for off-road equipment is based on the number and type of equipment that would be used during construction activities, hour usage estimates, the total duration of construction activities, and hourly equipment fuel consumption factors. It is estimated that a maximum of approximately 10,679 one-way truck trips would be required to haul the material to off-site reuse and disposal facilities over the approximately 26-month construction period. The Project is estimated to generate approximately 14,222 one-way vendor truck trips for the delivery of building materials and supplies to the Project Site over the construction period. The Project would comply with anti-idling and emissions regulations, which would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy, as well as implementation of PDF-AIR-1, which would require trucks and other vehicles to have their engines off while in loading and unloading queues, which would further reduce emissions and fuel consumption. As calculated in the Energy Technical Report, construction of the Project would use a total of approximately 46,602 gallons of diesel fuel for haul truck and vendor delivery trips. On an annual average basis, haul trucks and vendor delivery trips associated with Project construction would use approximately 21,509 gallons of diesel fuel per year during the 26-month construction period.

The number of construction workers that would be required would vary based on the phase of construction and activity taking place. Assuming construction worker automobiles have an average fuel economy consistent with the EMFAC2017 model and given the total vehicle miles traveled for construction workers, based on engineering estimates provided in CalEEMod used for the air quality and GHG emissions assessment, workers would travel a total of approximately 513,324 miles. Based on the information described above, the total gasoline fuel was estimated as 19,419 gallons. Construction fuel usage for heavy-duty construction equipment, haul trucks, vendor trucks, and worker trips is shown in **Table B-6**, *Project Construction Fuel Usage*.

Table B-6
Project Construction Fuel Usage

Source	Total Gallons of Diesel Fuel	Total Gallons of Gasoline Fuel
Construction:		
Heavy-Duty Construction Equipment	56,360	—
Haul Trucks	33,578	—
Vendor Trucks	13,025	—
Worker Trips	—	19,419
Total	**102,962**	**19,419**

Source: ESA, 2020.

For comparison purposes, the Project's construction energy demand from transportation fuel is compared to the Los Angeles County transportation fuel sales. Calculations, as presented in the Energy Technical Report, illustrate that the Project would represent a very small fraction of the County's total fuel consumption (i.e., 0.008 percent of the County's diesel fuel usage and 0.0002 percent of the County's gasoline fuel usage. Furthermore, construction of the Project would result in short-term and temporary energy demand lasting approximately 26 months. As such, the Project would not increase the need for new energy infrastructure.

Based on the above, construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure. Impacts would be less than significant.

Operation

Project operations would consume energy in the form of electricity for lighting, and water conveyance, natural gas for heating, and fossil fuels for employee and student trips. Operation of the Project would require energy in the form of electricity and natural gas for building heating, cooling, cooking, lighting, water demand and wastewater treatment, consumer electronics, and other energy needs; transportation-fuels, primarily gasoline, for vehicles traveling to and from the Project; and diesel for the maintenance and testing of emergency generators. **Table B-7**, *Project Operational Energy Usage*, provide a summary of the electricity, natural gas, and transportation fuel usage during operation of the Project.

Table B-7
Project Operational Energy Usage

	Energy Usage
Electricity (kWh)	
Project Net Total	0.96
Natural Gas (million cf)	
Project Net Total	2.8
Transportation Fuel (Gallons Per Year)	
Project Net Gasoline Fuel Total	106,690
Project Net Diesel Fuel Total	19,620

Source: ESA, 2020.

As shown in Table B-7, the Project would result in a net total of 0.96 million kilo Watt hours (kWh), which includes electricity usage for building lighting and equipment as well as electricity consumed for the conveyance and treatment of water, wastewater, and disposal of solid waste off-site. The Project would install solar electric PV systems, as required by the City's Green Building Code Solar Ordinance. As shown further in the Energy Technical Report, this electricity usage would be 0.001 percent of the SCE electricity sales. In addition, as shown in Table B-7, net Project consumption of natural gas would total 2.8 million cubic foot (cf), which includes energy consumption. Incorporation of similar Green Building Code measures would further reduce usage of natural gas. As also shown in the Energy Technical Report, natural as would be 0.0003 percent of the SoCalGas natural gas sales in 2017. As the Project would achieve greater than required energy efficiency, it would not result in the wasteful, inefficient, and unnecessary consumption of building energy or transportation energy usage.

Table B-7 also provides the Project's net total gasoline and diesel fuel usage per year during operation of the Project. As shown in Table B-7, Project net gasoline fuel usage was estimated to be 106,690 gallons per year and Project net diesel fuel usage was estimated to be 19,620 gallons per year. This would be approximately

0.003 percent and 0.003 percent of the Los Angeles County gasoline and diesel fuel usage in 2017. The Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. By locating commercial uses at an infill location in close proximity to existing off-site commercial, residential, and retail destinations and in close proximity to many public transit routes. In particular, the Project Site is located in the Sunkist Park Neighborhood in the central portion of the City and is within one-half-mile of existing public transit stops, as well as being within a reasonable walking distance from the Westfield Culver City shopping mall. The Project would create a pedestrian-friendly environment with direct access to the Westfield Culver City shopping mall and clear linkages to regional and local transportation systems. The Project would promote alternate modes of transit as it is within walking distance of several bus stops, including the Culver City Transit Center Bus Station that is located approximately 900 southeast of the Project Site that is served by the Culver City bus routes 3,4 and 6 and the Metro bus routes 108, 110 and 217. In addition, the Project would be consistent with the 2020-2045 RTP/SCS strategies to promote active transportation and supports improvements in local bike networks as the Project promotes the use of bicycles as it is located close to many Culver City bike paths.

Given that the Project Site are located in a transit-rich area such that vehicle trips and vehicle miles traveled (VMT) would be minimized, the Project would be consistent with and support the goals and benefits of the 2020-2045 RTP/SCS, which seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them."[15] The density of housing, restaurants, shopping, and recreation amenities in the Sunkist Park Neighborhood, combined with the plentiful bike lanes, pedestrian paths and public transportation options in the District, supports the expectation that that projects located in the area would have a substantially greater level of transportation efficiency when compared to the Citywide and statewide averages. The Project would therefore be consistent with the 2020-2045 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. As such, the Project would be consistent with regional plans to reduce VMT and would not cause wasteful, inefficient, or unnecessary use of energy.

Based on the above, operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not increase the need for new energy infrastructure. Impacts would be less than significant.

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

Less Than Significant Impact. As discussed above in Response VI.a, and as discussed further in the Energy Technical Report, the Project would incorporate green building design features such as solar electric PV systems consistent with the energy efficiency standards in the City's Green Building Code and CALGreen Code. The Project promotes the use of bicycles as it is located close to many Culver City bike paths and would CALGreen Code required number of bicycle parking spaces, which have the potential to reduce fuel consumption, as well as criteria pollutant and GHG emissions. The Project would also provide showers and clothes lockers for employees which has the potential to reduce secondary trips. The Project Site is also within a relatively short distance of existing transit stops. The Project would be designed to meet criteria for the LEED Certification level which would meet or exceed the current Title 24 Energy standards. The Project would incorporate project design features (refer to PDF-AIR-2 and PDF-AIR-3, above under Response II.b) that provide opportunities for improved energy efficiency that would exceed the regulatory standards. Overall, the Project's features would support and promote the use of renewable energy and energy efficiency and would not conflict with or obstruct any applicable

[15] *Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, (2016) p16.*

renewable energy or energy efficiency plan, which emphasize energy efficiency and the use of renewable energy. Impacts would be less than significant.

VII. GEOLOGY AND SOILS

The following impact analysis pertaining to the Project Site's underlying geology and soils is based on information contained in the Geotechnical Engineering Investigation, prepared by Geotechnologies, Inc., dated November 7, 2017, which is available for review at the Culver City Planning Division.

Analysis for the paleontological resources topic (see Response VII.f, below) is based on information contained in the Cultural Resources Assessment, prepared by ESA, dated June 2019, which 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 established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones, which extend from 200 to 500 feet on each side of a known active fault, identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures.

The Project Site is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The Geotechnical 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 1.6 miles east of the Project Site.[16] In addition, the Overland Avenue Fault is located approximately 2,000 feet east of the Project Site, along Overland Avenue.[17] It should be noted that no Special Studies Zones have been delineated by the State of California along any portion of the Overland Avenue

[16] *California Department of Conservation, Fault Activity Map of California (2010), http://maps.conservation.ca.gov/cgs/fam/, accessed October 2019.*

[17] *California Department of Conservation, Fault Activity Map of California (2010), http://maps.conservation.ca.gov/cgs/fam/, accessed October 2019.*

Fault. In addition, the 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.

ii. Strong seismic ground shaking?

Less Than Significant Impact With Mitigation Incorporated. 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, implementation of the site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation of the Final Geotechnical Engineering Investigation per MM-GEO-1 would further ensure that seismic-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 with mitigation incorporated.

Mitigation Measures

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

iii. Seismic-related ground failure, including liquefaction?

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

According to the State of California Seismic Hazard Zone Map of the Venice Quadrangle, provided in the Geotechnical Engineering Investigation, the Project Site is located within a liquefaction hazard zone. This determination is based on groundwater depth records, soil types, and distance to faults capable of producing a substantial earthquake. According to the Geotechnical Engineering Investigation, groundwater was encountered during exploration at depths between 24 and 24.5 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 10 feet below ground surface.

To further evaluate the potential for liquefaction hazards, a site-specific liquefaction analysis was conducted following the Recommended Procedures for Implementation of the California Geologic Survey Special Publication 117A, Guidelines for Analyzing and Mitigation Seismic Hazards in California, and the EERI Monograph. Liquefaction analyses were performed utilizing the Standard Penetration Test data and the laboratory testing of the soil samples collected from exploratory borings, and supplemented by Cone Penetration Test soundings data. While the Standard Penetration Test liquefaction analysis determined that the soils on the Project Site would not be considered liquefiable, the Cone Penetration Test, which would provide a more accurate liquefaction assessment of the Project Site, determined that the soils on the Project Site are potentially liquefiable. As such, the Project would implement MM-GEO-1, which will provide site-specific design parameters and recommendations to mitigate the effects of liquefaction. Specifically, the Geotechnical Engineering Investigation recommends ground improvement methods, such as stone columns, to improve the underlying soft and saturated soils for support of the proposed foundation system. 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 requires as well as implementation of the site-specific design parameters and recommendations of the Final Geotechnical Engineering Investigation per MM-GEO-1 to be implemented during construction, 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 with mitigation incorporated.

Mitigation Measures

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

iv. Landslides?

No Impact. The Project Site is relatively flat and is approximately 15 feet above sea level across the property. The Project Site is located in a highly urbanized area of Culver City and is currently developed with a single-story commercial (retail) building and associated asphalt-paved surface parking lot. According to the Geotechnical Engineering Investigation, the probability of seismically induced landslide occurring on the Project Site is considered to be low due to the general lack of elevation difference slope geometry across or adjacent to the Project Site. Thus, the Project would not be subject to, or result in, landslides. No impacts would occur.

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

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

The Project Site is currently developed with a single-story commercial (retail) building and associated asphalt-paved surface parking lot. Negligible, if any, native topsoil is likely to occur on the Project Site as it is currently developed with structures and surface parking. Project construction would result in ground surface disruption during excavation and grading that would create the potential for erosion to occur. Wind erosion would be minimized through soil stabilization measures required by the SCAQMD Rule 403 (Fugitive Dust), such as daily watering. Potential for water erosion would be reduced by implementation of standard erosion control measures imposed during site preparation and grading activities. As discussed in more detail under Response X.a, the Project would be subject to all existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with applicable Culver City standard erosion control practices required pursuant to the 2019 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. Best Management Practices (BMPs) to control water erosion during the Project's construction period would be implemented. Following Project construction, the Project Site would be covered completely by paving, structures, and landscaping. Therefore, with compliance with applicable regulatory requirements, the Project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant.

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

Less Than Significant Impact With Mitigation Incorporated. As discussed in the Geotechnical Engineering Investigation, fill materials underlying the Project Site consist of sandy to silty clays and fill thickness on the order of three feet was encountered in the exploratory borings. Native soils consist of younger alluvial deposits to depths between 30 and 35 feet and consist primarily of sandy to silty clays. Older Alluvium was generally encountered below a depth of 35 feet and consist of sands to gravelly sands.

Impacts related to liquefaction and landslides are discussed above in Responses VI.a.iii. and VI.a.iv. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to the combination of gravity and earthquake shaking. Such movement can occur on slope gradients of as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and structures. Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e. retaining wall, slope, or channel) and to a lesser extent on ground surfaces with a very gentle slope. As stated in Response VI.a.iii, according to the site-specific liquefaction analysis within the Geotechnical Engineering Investigation, the soils on the Project Site are potentially liquefiable. As such, the Project would implement MM-GEO-1 to mitigate 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 Geotechnical Engineering Investigation per MM-GEO-1 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 with mitigation incorporated.

Mitigation Measures

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

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

Less Than Significant Impact With Mitigation Incorporated. Soils with shrink-swell or expansive properties typically occur in fine-grained sediments and cause damage through volume changes as a result of a wetting and drying process. Structural damage may occur over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. As discussed in the Geotechnical Engineering Investigation, the on-site geologic materials are in the moderate to high expansion range. The Expansion Index was found to be between 58 and 90. As such, the Geotechnical Engineering

Investigation recommends reinforcement for the proposed slabs. As such, with the incorporation of the site-specific design measures including foundation design slabs on grade recommendations of the Final Geotechnical Engineering Investigation per MM-GEO-1, the Project would not create a substantial direct or indirect risk to life for property. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

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

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

No Impact. The Project Site is located in an urbanized area where municipal wastewater infrastructure already exists. The Project would be required to connect to the existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. No impacts would occur.

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

Less Than Significant Impact With Mitigation Incorporated. A paleontological records search was commissioned through the Natural History of Museum of Los Angeles to determine potential impacts of the Project on paleontological resources. Results of the records search indicated that no vertebrate fossil localities have been documented within the Project Site, but that localities do occur nearby in sedimentary deposits similar to those found within the Project Site.

As discussed in the Cultural Resources Assessment, the known fossil localities from older alluvial sediments are located with an approximate 3-mile radius of the Project Site. Included within these fossil localities is LACM 4232 (also known Los Angeles Man) which is located approximately 2.6 miles northeast of the Project Site (near the intersection of La Cienega Boulevard and Rodeo Road) and yielded the remains of a fossil human at a depth of 12 to 13 feet below ground surface. Other sites have produced a fossil horse and remains of a fossil mammoth at an unknown depth. Additional fossil localities are located along the Southern Pacific Railway and Rodeo Road, and between Crenshaw Boulevard and Ballona Creek. These fossil localities were collected during excavations for the Outfall Sewer area in the 1920s. Most of these fossil localities did not record the depth at which the specimens were recovered, and yielded remains of a fossil camel, fossil mastodon, and sabretooth cat. A fossil human was yielded at a depth of 19 to 23 feet below ground surface, while a fossil horse was yielded at a depth of 6 feet below ground surface.

Paleontological sensitivity was assigned as low-to-high sensitivity within the younger alluvium soils present on the Project Site, and the sensitivity increases with depth. As such, based on a review of geologic maps and fossil discoveries in the vicinity of the Project Site, there is a potential to encounter significant paleontological resources below a depth of 10 feet. Since the Project includes ground disturbance up to 35 feet in depth, the Project would implement MM-GEO-2 through MM-GEO-5 in order to reduce potential impacts to previously unknown paleontological resources. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM-GEO-2: Prior to issuance of a demolition permit, the Applicant shall retain a Qualified Paleontologist to develop and implement a paleontological monitoring program for construction excavations that exceed 10 feet in depth. A Qualified Paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology (SVP). The Qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Qualified Paleontologist during construction excavations exceeding 10 feet in depth. Paleontological resources monitoring shall be conducted for all ground disturbing activities that exceed 10 feet in depth in previously undisturbed sediments, and are therefore likely to impact high sensitivity alluvial sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, proximity to known paleontological resources or fossiliferous geologic formations (i.e., older alluvium deposits), the materials being excavated (i.e., native sediments versus artificial fill), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist.

MM-GEO-3: Prior to commencement of demolition or excavation activities, the Qualified Paleontologist shall attend a pre-grade/construction meeting to conduct construction worker paleontological resources sensitivity training for construction personnel. The training session, shall be carried out by the Qualified Paleontologist and shall focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. Documentation shall be retained demonstrating that construction personnel attended the training.

MM-GEO-4: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area (usually 50 feet) shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If the fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure.

MM-GEO-5: Prior to the release of the grading bond, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

VIII. GREENHOUSE GAS EMISSIONS

The following impact analysis pertaining to greenhouse gas (GHG) impacts is based on information contained in the Project's Greenhouse Gas (GHG) Technical Report prepared by ESA, dated November 2020, which is available for review at the Culver City Planning Division.

Would the project:

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

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

Less Than Significant Impact. State regulated GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). CO_2 is the most abundant GHG in the atmosphere. Not all GHGs exhibit the same ability to induce climate change; as a result, GHG contributions are commonly quantified in equivalent mass of CO_2, denoted as CO_2e. Mass emissions are calculated by converting pollutant specific emissions to CO2e emissions by applying the proper global warming potential (GWP) value. These GWP ratios are available from the U.S. Environmental Protection Agency (USEPA) and are published in the California Climate Action Registry (CCAR) General Reporting Protocol. By applying the GWP ratios, Project related CO_2e emissions can be tabulated in metric tons per year.

The City has not yet adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emission. When no guidance exists under CEQA, the lead agency may look to and assess general compliance with comparable regulatory schemes.[18] In its January 2008 CEQA and Climate Change white paper, the California Air Pollution Control Officer's Association (CAPCOA) identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents. In its white paper, CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency.

The Office of Planning and Research released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily

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

be found to contribute to a significant cumulative impact on the environment."[19] Furthermore, the technical advisory states that "CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project."[20]

Amendments to Section 15064.4 of the CEQA Guidelines were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. If a qualitative analysis is used, in addition to quantification, this section recommends certain qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (see Section 15064.7(c)). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see Section 15064(h)(3)).[21]

Although GHG emissions can be quantified, CARB, SCAQMD, and the City of Culver City have not adopted project-level significance thresholds for GHG emissions that would be applicable to the Project. The Governor's Office of Planning and Research (OPR) released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."[22] Furthermore, the technical advisory states that "CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project."[23]

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[24] To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement,

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

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

[21] *See generally California Natural Resources Agency, Final Statement of Reasons for Regulatory Action (December 2009), pp. 11-13, 14, 16. http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf, accessed November 2019; see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009. Available at http://www.valleyair.org/Programs/CCAP/documents/Transmittal_LetterOPRApril2009.pdf, accessed November 2019.*

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

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

[24] *14 CCR § 15064(h)(3).*

interpret, or make specific the law enforced or administered by the public agency.[25] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."[26] Thus, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions.[27]

In the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if the Project is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures discussed within CARB's Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, and City of Culver City polices established for the purpose of increasing energy efficiency and reducing GHG emissions for new developments and the City's Green Building Code.

The California Supreme Court recently considered the CEQA issue of determining the significance of GHG emissions in its decision, Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming (CBD vs. CDFW). The Court questioned a common CEQA approach to GHG analyses for development projects that compares project emissions to the reductions from BAU that will be needed statewide to reduce emissions to 1990 levels by 2020, as required by AB 32. The court upheld the BAU method as valid in theory, but concluded that the BAU method was improperly applied in the case of the Newhall project because the target for the project was incorrectly deemed consistent with the statewide emission target of a percent below BAU for the year 2020 as specified in the AB 32 Scoping Plan. In other words, the court said that the percent below BAU target specified in the AB 32 Scoping Plan is intended as a measure of the GHG reduction effort required by the State as a whole, and it cannot necessarily be applied to the impacts of a specific project in a specific location. The Court provided some guidance to evaluating the cumulative significance of a proposed land use project's GHG emissions, but noted that none of the approaches could be guaranteed to satisfy CEQA for a particular project. The Court's suggested four "pathways to compliance", as described further in the Greenhouse Gas Technical Report. However, the Court did not list the pathways in order of importance or intentional sequence, nor require that they be relied upon in an analysis. However, the Greenhouse Gas Technical Report considers the potential GHG emissions associated with the Project within the context of the Court's suggested pathways to compliance.

For purposes of this analysis, it was considered reasonable, and consistent with criteria pollutant calculations, to consider GHG emissions resulting from direct Project-related activities, including, e.g., use of vehicles, electricity, and natural gas, to be new emissions. These emissions include Project construction activities such as demolition, hauling, and construction worker trips, as well as operational emissions. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions were

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[25] *14 CCR § 15064(h)(3).*

[26] *14 CCR § 15064(h)(3).*

[27] *See, for example, San Joaquin Valley Air Pollution Control District (SJVAPCD), CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR-2025 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ABR's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Furthermore, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO$_2$e/yr significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See SCAQMD, Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project, SHC No. 2012041014 (October 2014); SCAQMD Final Negative Declaration for Phillips 99 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014); SCAQMD Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014); and SCAQMD Final Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (August 2015).*

calculated on an annual basis. As discussed in the Greenhouse Gas Technical Report, the Project would remove existing structures and associated GHG emissions. Emissions removed would be applied as a credit toward the new emissions and the Project would be evaluated on its net (Project minus Existing) increase.

GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod) (Version 2016.3.2), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.

Construction

Construction emissions were forecasted by assuming a conservative estimate of construction activities from each phase of the Project and incorporated PDF-AIR-1. Construction emissions are estimated using the CalEEMod (Version 2016.3.2) software, an emissions inventory software program recommended by the SCAQMD. CalEEMod is based on outputs from OFFROAD and EMFAC, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including off- and on-road vehicles. CalEEMod outputs construction-related GHG emissions of CO_2, CH_4, and CO_2e. It has been assumed that construction equipment would meet USEPA Tier 4 Final emissions standards and that the Project would implement dust control measures pursuant to SCAQMD Rule 403. The output values used in the Greenhouse Gas Technical Report were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction subphasing assumptions used in the Air Quality Technical Report to generate GHG emissions values for each construction year. The results are shown in **Table B-8**, *Construction Greenhouse Gas Emissions*. Although construction-related GHGs are one-time emissions, any assessment of Project emissions should include construction emissions. The SCAQMD recommends that a project's construction-related GHG emissions be amortized over the project's 30-year lifetime in order to include these emissions as part of the project's annualized lifetime total emissions, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. As indicated in Table B-8, Project construction emissions during the three-year construction period would generate an estimated 1,125 $MTCO_2e$, or 37 $MTCO_2e$ amortized over a 30-year period. A complete listing of the equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets provided in the Greenhouse Gas Technical Report.

Table B-8
Construction Greenhouse Gas Emissions

Emission Source	CO_2e (Metric Tons)[a]
Construction Year 1	558
Construction Year 2	369
Construction Year 3	198
Total	**1,125**
Annual (Amortized over 30 years)	**37**

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

Source: ESA, 2020.

Operation

Operational impacts were assessed for the Project buildout year (i.e., conservatively assumed to be 2022 assuming construction begins in 2020). CalEEMod was used to estimate operational GHG emissions from electricity, natural gas, solid waste, water and wastewater, and landscaping equipment. CalEEMod was used to estimate mobile source emissions where emissions factors from CARB's updated version of the on-road vehicle emissions factor (EMFAC) model were input into CalEEMod to calculate mobile GHG emissions. The most recent version is EMFAC2017, which "represents CARB's current understanding of motor vehicle travel activities and their associated emission levels."[28] CalEEMod generated the VMT from Project uses based on the trip rates in the Traffic Study.[29] Conservatively, the Project's Traffic Study did not include transit credit from public transit stops and from walking and biking trips and used default trips rates in the Institute of Transportation Engineers, *Trip Generation, 10th Edition*.[30]

With regard to energy demand, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Energy demand rates were estimated based on specific square footage of the new commercial uses, as well as predicted water supply needs for these uses. The Project electricity demands are supplied by SCE. Since the Project's first operational year was conservatively modeled for Year 2022 (would be less energy used for future years), the default CO_2 intensity factor in CalEEMod for SCE was linearly adjusted from 2020 to account for 42.4 percent renewable energy for 2022 based on the required renewables from year 2024 under SB 100. For 2012, SCE had 20.6 percent renewables and this was used to back calculate a CO_2 intensity factor where SCE had zero percent renewable. This value was then adjusted to reflect a CO_2 intensity factor with 42.4 percent renewables.

Emissions of GHGs from solid waste disposal were also calculated using CalEEMod software. The emissions are based on the waste disposal rate for the land uses, the waste diversion rate, and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for CH4, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. In addition, it was assumed 75 percent of solid waste will be diverted from landfills as AB 341 directs CalRecycle to develop and adopt regulations for mandatory commercial recycling and sets a Statewide goal for 75 percent disposal reduction by the year 2020.

Emissions of GHGs from water and wastewater result from the required energy to supply and distribute the water and treat the wastewater. Wastewater also results in emissions of GHGs from wastewater treatment systems. Emissions were calculated using CalEEMod and were based on the water usage rate for the land uses, the electrical intensity factors for water supply, treatment, and distribution and for wastewater treatment, the GHG emission factors for the electricity utility provider, and the emission factors for the wastewater treatment process.

Other sources of GHG emissions from operation of the Project include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod software uses landscaping equipment GHG emission factors from the CARB OFFROAD model and the CARB Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003).

Emissions calculations for the Project include credits or reductions for GHG reducing measures that are required by regulation, such as reductions in energy and water demand from the current Title 24 standards and the

[28] *California Air Resources Board, Mobile Source Emissions Inventory. Available at https://ww2.arb.ca.gov/node/3052/about, accessed November 2019.*

[29] *Crain & Associates, Jefferson Hotel Project Traffic Study, 2020.*

[30] *Crain & Associates, Jefferson Hotel Project Traffic Study, 2020.*

California Green Building Standards (CALGreen) Code as well as the Project's compliance with the portions of the City's Green Building Code and mandatory Green Building Program applicable to new developments. Physical and operational Project characteristics for which sufficient data is available to quantify the reductions from building energy and resource consumption have been included in the quantitative analysis, and include but are not limited to the following features: the City has adopted a Photovoltaic Requirement which requires 1 kilowatt (kw) of photovoltaic power installed per 10,000 square feet of new development. Based on the Project size, the Project's photovoltaic system is estimated to generate 21,771 kwh of electricity annually. As described above, the analysis assumes 75 percent of solid waste would be diverted from landfills. In accordance with the City's Green Building Program, the Project would be designed to meet criteria for the LEED Silver or equivalent certification level.

As previously stated operational GHG impacts are assessed based on the Project-related incremental increase in GHG emissions compared to baseline conditions and incorporation of emissions reduction strategies.

The results of the analysis for operational emissions are presented in **Table B-9**, *Annual Greenhouse Gas Emissions*. As shown, the net GHG emissions associated with the Project would be an estimated 1,537 metric tons of CO_2e without GHG reduction characteristics, features and measures. With the implementation of the Project's green building measures, the Project would achieve GHG reductions for electricity and water as compared to a scenario without GHG reducing features and measures and net GHG emissions would total 1,392 metric tons of CO_2e, a reduction of 144 metric tons of CO_2e. Emissions calculation worksheets for the existing operations, proposed Project operations without GHG reductions characteristics, features and measures, and Project operations are provided in the Greenhouse Gas Technical Report.

Project operational-related GHG emissions would decline in future years as emissions reductions from the State's Cap-and-Trade program are fully realized. Emissions reductions from the Project's two highest GHG-emitting sources, mobile and electricity, would occur over the next decade, and beyond, ensuring that the Project's total GHG emissions would be further reduced. Emissions from electricity would decline as utility providers, including SCE, meet their Renewables Portfolio Standard obligations to provide 60 percent of their electricity from renewable electricity sources by 2030 consistent with SB 100, which would achieve additional reductions in emissions from electricity demand although the actual reduction will depend on the mix of fossil fuels that SCE will replace with renewables and the relative CO2 intensities of those fossil fuels. Project emissions from mobile sources would also decline in future years as older vehicles are replaced with newer vehicles resulting in a greater percentage of the vehicle fleet meeting more stringent combustion emissions standards, such as the model year 2017-2025 Pavley Phase II standards.

Table B-9
Annual Greenhouse Gas Emissions

Emissions Sources	CO_2e (Metric Tons per Year) [a] Project
Existing Operational	
Area (Landscaping Equipment)	<1
Electricity and Natural Gas	50
Mobile Sources	253
Waste	6
Water	3
Existing Subtotal	**314**
Proposed Project Operational – Without GHG Reduction Characteristics	
Electricity[b]	359
Natural Gas	157
Mobile Sources	1,223
Solid Waste	48
Water	26
Area	<1
Proposed Subtotal	**1,813**
Net Operational	**1,499**
Construction (Amortized)	37
Total Annual Emissions	**1,537**

[a] Totals may not add up exactly due to rounding in the modeling calculations.
[b] For the purposes of estimating GHG emissions in the GHG Technical Report, the emissions analysis conservatively assumes Project would not switch electricity providers from SCE to the Clean Power Alliance (i.e., does not take any credit for 36%, 50%, or 100% renewable electricity, depending on the selected Clean Power Alliance plan). Should the Project switch electricity providers from SCE to the Clean Power Alliance, the Project's electricity-related emissions would be lower than disclosed in the GHG Technical Report.

Source: ESA, 2020.

Consistency with State Plan, Policies, or Regulations

The Project's GHG emissions are also evaluated by assessing the Project's consistency with applicable GHG reduction strategies and actions adopted by the State and City. As discussed previously, the City has adopted strategies and polices to reduce GHG emissions through its Green Building Program.

In the latest CEQA Guidelines amendments, which went into effect on March 18, 2010, the Office of Planning and Research encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. The City does not have a programmatic mitigation plan to tier from, such as a Greenhouse Gas Emissions Reduction Plan as recommended in the relevant amendments to the CEQA Guidelines. However, the City has adopted the Green Building Program and Green Building Code that encourage and require applicable projects to implement energy efficiency measures. In addition, the California CAT Report provides recommendations for specific emission reduction strategies for reducing GHG emissions and reaching the targets established in HSC Division 25.5. Thus, if the Project is designed in accordance with these policies and regulations, it would result in a less than significant impact, because it would be consistent with the overarching State regulations on GHG reductions.

Project Consistency with AB 32

In support of AB 32, the state has promulgated specific laws aimed at GHG reductions applicable to the Project. The heating, ventilation, and air conditioning (HVAC) system would be sized and designed in compliance with the CALGreen Code and the City's Green Building Program to maximize energy efficiency caused by heat loss and heat gain. The Project Site is also located in an established commercial area with access to public transportation, which minimizes trips and trip lengths reducing mobile source GHG emissions. Therefore, the Project would be consistent with State efforts to reduce motor vehicle emissions and congestion. The Project would generate GHG emissions due to construction and operational activities; however, its annual GHG emissions, would be generated due to development located and designed to be consistent with relevant goals and actions designed to encourage development that results in the efficient use of public and private resources.

Project Consistency with Regional and Local Trip and VMT Reduction Goals, Actions, and Recommendations

The significance of the Project's GHG emissions was first evaluated based on whether the emissions would be generated in connection with development located and designed consistent with relevant regional and local goals, actions, and recommendations designed to encourage development to reduce trips and VMTs. Transportation-related GHG emissions are the largest source of GHG emissions from the Project. This Project characteristic is consistent with the assumption in many regional plans, such as the SCAG RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions.

Consistent with SCAG's RTP/SCS alignment of transportation, land use, and housing strategies, the Project would accommodate projected increases in travel demand by implementing smart land use strategies. As discussed previously, the Project would result in a commercial development with commercial uses located in close proximity to existing public transit stops, which would result in reduced VMT, as well as being within a reasonable walking distance from the Westfield Culver City shopping mall. The Project would create a pedestrian-friendly environment with direct access to the Westfield Culver City shopping mall and clear linkages to regional and local transportation systems. Within walking distance of several bus stops, including the Culver City Transit Center Bus Station that is located approximately 900 southeast of the Project Site that is served by the Culver City bus routes 3,4 and 6 and the Metro bus routes 108, 110 and 217, the Project would promote alternate modes of transit. In addition, the Project would be consistent with the 2020-2045 RTP/SCS strategies to promote active transportation and supports improvements in local bike networks as the Project promotes the use of bicycles as it is located close to many Culver City bike paths. Conservatively, the Project's Traffic Study did not include transit credit from public transit stops and from walking and biking trips and used default trips rates in the Institute of Transportation Engineers, Trip Generation, 10th Edition.

SCAG's 2020-2045 RTP/SCS states that 38 percent of all trips in the region are less than 3 miles. The RTP/SCS intends to decrease these trips by extending local bikeway networks. The Project would be consistent with this RTP/SCS goal by installing the CALGreen Code required number of bicycle parking spots. Therefore, the Project would be consistent with the SCAG 2020-2045 RTP/SCS regional and local trip and VMT reduction goals.

Project Consistency with City Goals and Actions

The significance of the Project's GHG emissions is also evaluated based on whether they would be generated in connection with a design that is consistent with relevant City of Culver City goals and actions designed to encourage development that results in the efficient use of public and private resources. **Table B-10**, *Project Consistency with Applicable Culver City Green Building Program Requirements*, contains mandatory items the Project would implement that would increase energy efficiency and reduce energy consumption, thus reducing Project GHG emissions. As discussed in Table B-10, the Project is consistent with the applicable requirements. Therefore, the Project's GHG emissions would be generated in connection with a development located and designed to be consistent with the applicable City goals and actions for GHG emission reductions.

Table B-10
Project Consistency with Applicable Culver City Green Building Program Requirements[a]

Source	Category / Description	Consistency Analysis
Culver City Green Building Program	Requires all new buildings of 10,000 or more of gross floor area to install 1kW of solar photovoltaic systems per 10,000 square feet of gross floor area	**Consistent:** The Project would consist of approximately 111,000 sf of new construction and would install a solar photovoltaic system that meets criteria for the LEED Silver or equivalent certification level and City requirements.
	Requires all new construction, additions, and major renovations of 50,000 square feet and greater of affected area are required to comply with Category 2 requirements, excluding single family and two family structures, where prior to the issuance of a construction permit, the permit applicant shall submit the following: 1. Evidence that a LEED-AP (Leadership in Energy and Environmental Design Accredited Professional) is one of the members of the project design team. 2. Evidence that the project has been registered with the appropriate USGBC (United States Green Building Council) LEED program. 3. A copy of the appropriate LEED checklist, which demonstrates that the project meets the appropriate LEED rating system at a "Certified" performance level or higher. 4. A signed declaration from the LEED-AP member of the project design team, stating that the plans and details have been reviewed for conformance with the appropriate LEED program and that the project meets the intent of the criteria for certification of the selected LEED program at the "Certified" performance level or higher. 5. Qualifying projects shall comply with a USGBC "3 point margin of error" for a minimum LEED "Certified" performance level. 6. The construction permit applicant shall submit to the Building Safety Division copies of all submissions and correspondence between the project team and the USGBC regarding the qualifying project.	**Consistent:** The Project would provide evidence that a LEED-AP (Leadership in Energy and Environmental Design Accredited Professional) is one of the members of the Project design team. The Project would provide evidence that the project has been registered with the appropriate USGBC LEED program. The Project would be designed to meet criteria for the LEED Silver or equivalent certified level. The Project would provide a signed declaration from the LEED-AP member of the Project design team, stating that the plans and details have been reviewed for conformance with the appropriate LEED program and that the project meets the intent of the criteria LEED Silver or equivalent certified level. The Project applicant shall submit to the Building Safety Division copies of all submissions and correspondence between the Project team and the USGBC.

[a] This table lists applicable City of Culver City requirements for Category 2 projects.

Source: ESA, 2020.

Project Consistency with Plans, Policies, Regulations, or Recommendations to Reduce GHG Emissions

The Project would also be consistent with statewide, regional and local plan, policies, regulations, and recommendations to reduce GHG emissions from development. The primary focus of many of the statewide and regional mandates, plans, policies and regulations is to address worldwide climate change. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective." Due to the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's annual GHG emissions would cause a measurable change in global GHG emissions sufficient to create a significant Project level impact on global climate change. Newer construction materials and practices, energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. The GHG emissions of the Project alone is not expected to cause a direct physical change in the environment. It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone. Because of the lack of evidence indicating that the Project's GHG emissions would cause a measurable change in global GHG emissions sufficient to create a significant project-level impact on global climate change, and the fact that the Project incorporates physical and operational Project characteristics that would ensure its consistency with City goals and actions, Project emissions are not anticipated to contribute considerably to global climate change. The Project is also considered to be consistent with the GHG reduction goals of HSC Division 25.5 and associated GHG reduction plans such as SCAG's RTP/SCS, and it is not expected that Project development would impede their goals. In fact, as discussed above, the Project's location and development comply with the recommendations in these documents and would meet their goals.

As discussed in the Greenhouse Gas Technical Report, the Project is located in close proximity to existing public transit stops, which would result in reduced VMT, as well as being within a reasonable walking distance from the Westfield Culver City shopping mall. The Project would create a pedestrian-friendly environment with direct access to the Westfield Culver City shopping mall and clear linkages to regional and local transportation systems. Within walking distance of several bus stops, including the Culver City Transit Center Bus Station that is located approximately 900 southeast of the Project Site that is served by the Culver City bus routes 3,4 and 6 and the Metro bus routes 108, 110 and 217, the Project would promote alternate modes of transit. In addition, the Project would be consistent with the 2020-2045 RTP/SCS strategies to promote active transportation and supports improvements in local bike networks as the Project promotes the use of bicycles as it is located close to many Culver City bike paths. This would be consistent with regional plans to reduce transportation-related GHG emissions as part of the overall statewide strategy under AB 32. The Project would be consistent with and support the goals of the 2020-2045 RTP/SCS, which seeks improved access and mobility by placing destinations closer together, thereby decreasing the time and cost of traveling between them and has "strategies to prioritize areas for new development, like near destinations and mobility options."[31] According to SCAG, expanding transportation choices "may shift trips to less environmentally damaging modes, minimize negative environmental impacts associated with current vehicle use, increase system efficiency, improve safety, and reduce auto-related collisions and fatalities."[32]

Table B-11, *Project Consistency with Applicable Greenhouse Gas Reduction Strategies*, contains a list of statewide GHG emission reduction strategies and describes the Project's consistency. Furthermore, not only is the Project consistent with currently applicable GHG emission reduction strategies, but the Project also would not conflict with or impede the future statewide GHG emission reductions goals. CARB has outlined a number of potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels. These potential strategies include renewable resources for 60 percent of the State's electricity by 2030, increasing the fuel

[31] *Southern California Association of Governments (SCAG), 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), September 2020, page 47.*

[32] *SCAG, 2020-2045 RTP/SCS, page 41.*

economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting and other alternative transportation options, and use of high efficiency appliances, water heaters, and HVAC systems. The Project would benefit from statewide and utility-provider efforts toward increasing the portion of electricity provided from renewable resources. The Project would also benefit from statewide efforts toward increasing the fuel economy standards of vehicles. The Project would be consistent with reducing the rate of growth in VMT by providing on-site bicycle parking facilities, being located in close proximity to public transit, and being located in an area with other commercial, retail, and residential land uses within walking distance. The Project would utilize energy-efficient lighting and equipment and would reduce its building energy consumption via compliance with City Green Building Program and the CALGreen Code.

Table B-11
Project Consistency with Applicable Greenhouse Gas Reduction Strategies

Source	Category / Description	Consistency Analysis
AB 1493 (Pavley Regulations)	Reduces greenhouse gas emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model year 2017-2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	**Consistent.** The Project would be consistent with this regulation and would not conflict with implementation of the vehicle emissions standards.
SB 1368	Establishes an emissions performance standard for power plants within the State of California.	**Consistent.** The Project would be consistent with this regulation and would not conflict with implementation of the emissions standards for power plants.
Low Carbon Fuel Standard	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	**Consistent.** The Project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards.
California Green Building Standards Code Requirements	All bathroom exhaust fans shall be ENERGY STAR compliant.	**Consistent.** The Project would meet or exceed the energy standards in the Title 24 Building Energy Efficiency Standards.
	HVAC Systems will be designed to meet ASHRAE standards.	**Consistent.** The Project would utilize energy efficient equipment and would meet or exceed the energy standards in ASHRAE 90.1-2013, Appendix G and the Title 24 Building Energy Efficiency Standards.
	Energy commissioning shall be performed for buildings larger than 10,000 square feet.	**Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code.
	Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	**Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code.
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles.	**Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code.
	Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips.	**Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code.
	Indoor water usage must be reduced by 20% compared to current California Building Code Standards for maximum flow.	**Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code by using low-flow water fixtures.

Table B-11
Project Consistency with Applicable Greenhouse Gas Reduction Strategies

Source	Category / Description	Consistency Analysis
	All irrigation controllers must be installed with weather sensing or soil moisture sensors.	**Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code and would use water efficient techniques, such as drip irrigation.
	Wastewater usage shall be reduced by 20 percent compared to current California Building Standards.	**Consistent.** The Project would meet or exceed this requirement as part of its compliance with the CALGreen Code by installing infrastructure for future grey water uses.
	Requires a minimum of 65 percent recycle or reuse of nonhazardous construction and demolition debris.	**Consistent.** The Project would meet or exceed this requirement as part of its compliance with the CALGreen Code.
	Requires documentation of types of waste recycled, diverted or reused.	**Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code.
	Requires use of low VOC coatings consistent with AQMD Rule 1168.	**Consistent.** The Project would be consistent with this regulation and would meet or exceed the low VOC coating requirements.
	100 percent of vegetation, rocks, soils from land clearing shall be reused or recycled.	**Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code.
	Requires installation of electrical conduit for future uses of electric vehicle charging parking spaces up to 6% of total parking spaces.	**Consistent.** The Project would meet this requirement as part of its compliance with the CALGreen Code.
Climate Action Team	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction	**Consistent.** CALGreen Code implements this goal, and the Project would be consistent with the requirements.
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	**Consistent.** CALGreen Code implements this goal, and the Project would be consistent with the requirements.
	The California Energy Commission updates building energy efficiency standards that apply to newly constructed buildings and additions to and alterations to existing buildings. Both the Energy Action Plan and the Integrated Energy Policy Report call for ongoing updating of the standards.	**Consistent.** CALGreen Code implements this goal, and the Project would be consistent with the requirements.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development	**Consistent.** CALGreen Code implements this goal, and the Project would be consistent with the requirements.
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors, and implementing intelligent transportation systems.	**Consistent.** The Project would be located in an infill location in proximity to existing residential and commercial businesses, which would minimize trip lengths and associated emissions.

Source: ESA, 2020.

Because the Project's location, land use characteristics, and design render it consistent with statewide and regional climate change mandates, plans, policies, and recommendations, and with the City's Green Building Program and CAL Green Code, the Project would be consistent with and would not conflict with any applicable plan, policy, regulation or recommendation to reduce GHG emissions.

Project Consistency with Executive Orders S-3-05 and B-30-15

At the state level, Executive Orders S-3-05 and B-30-15 establish goals for reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as AB 32. As analyzed above, the Project would be consistent with AB 32. Therefore, the Project does not conflict with the 2020 component of Executive Orders S-3-05 and B-30-15.

The Executive Orders S-3-05 and B-30-15 also establish goals to reduce GHG emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050. These goals have not yet been codified by the Legislature. However, studies have shown that, to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its Climate Change Scoping Plan, CARB acknowledged that the "measures needed to meet the 2050 goal are too far in the future to define in detail." In the First Update, however, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately." Due to the technological shifts required and the unknown parameters of the regulatory framework and market conditions in 2030 and 2050, as well as uncertainties regarding the exact regulations that CARB will ultimately adopt for achieving the 2030 and 2050 reduction goal, quantitatively analyzing the Project's impacts further relative to the 2030 and especially the 2050 goals currently is speculative for purposes of CEQA.

Despite thorough investigation, due to the uncertainties regarding specific state and local actions and regulations that will be adopted to achieve the 2030 and 2050 GHG emission reduction targets, such as future Title 24 building energy standards and future vehicle emission standards beyond vehicle model year 2025, calculating Project emissions levels for 2030 and 2050 would be highly speculative. Nonetheless, statewide efforts are underway to facilitate the State's achievement of those goals and it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the First Update and strategies in the 2017 Scoping Plan are refined and implemented, and other technological innovations occur. Stated differently, the Project's emissions total at buildout represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the Executive Orders' goals.

The Climate Change Scoping Plan recognizes that HSC Division 25.5 establishes an emissions reduction trajectory that will allow California to achieve the more stringent 2050 target: "These [greenhouse gas emission reduction] measures also put the state on a path to meet the long-term 2050 goal of reducing California's greenhouse gas emissions to 80 percent below 1990 levels. This trajectory is consistent with the reductions that are needed globally to stabilize the climate." Also, CARB's First Update provides that it "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below

1990 levels by 2050," and many of the emission reduction strategies recommended by CARB would serve to reduce the Project's emissions level to the extent applicable by law:

- Energy Sector: Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the Project's emissions level. Additionally, further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.
- Transportation Sector: Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level.
- Water Sector: The Project's emissions level will be reduced as a result of further enhancements to water conservation technologies.
- Waste Management Sector: Plans to further improve recycling, reuse, and reduction of solid waste will beneficially reduce the Project's emissions level.

Under AB 398, the Cap-and-Trade Program has been extended to 2030. The Cap-and-Trade Program extension is built on the "recommended action" in the First Update to the Climate Change Scoping Plan for the Cap-and-Trade Program, which was to: "Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target."

In addition to CARB's First Update, in January 2015 during his inaugural address, Governor Jerry Brown expressed a commitment to achieve "3 ambitious goals" that he would like to see accomplished by 2030 to reduce the State's GHG emissions: (1) increasing the State's Renewables Portfolio Standard from 33 percent in 2020 to 50 percent in 2030; (2) cutting the petroleum use in cars and trucks in half; and (3) doubling the efficiency of existing buildings and making heating fuels cleaner. These expressions of Executive Branch policy may be manifested in adopted legislative or regulatory action through the state agencies and departments responsible for achieving the State's environmental policy objectives, particularly those relating to global climate change. As discussed previously, the Governor signed into law SB 350 (Chapter 547, Statues of 2015), which increased the Renewables Portfolio Standard to 50 percent by 2030 and included interim targets of 40 percent by 2024 and 45 percent by 2027. The utility provider for the Project Site, SCE, has committed providing an increasing percentage of electricity from renewable sources in compliance with the Renewables Portfolio Standard with 41.4 percent by 2020. The Project would also include the installation of on-site solar photovoltaic systems consistent with City requirements to increase energy efficiency and reduce GHG emissions.

Further, the State's existing and proposed regulatory framework can allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050. According to the 2017 Scoping Plan (adopted in December 2017), reductions needed to achieve the 2030 target are expected to be achieved by targeting specific emission sectors, including those sectors that are not directly controlled or influenced by the Project, but nonetheless contribute to Project-related GHG emissions. For instance, the Project itself is not subject to the Cap-and-Trade regulation; however, Project-related emissions would decline pursuant to the regulation as utility providers and transportation fuel producers are subject to renewable energy standards, Cap-and-Trade, and the LCFS. The 2017 Scoping Plan also calls for the doubling of the energy efficiency savings, including demand-response flexibility for 10 percent of residential and commercial electric space heating, water heating, air conditioning and refrigeration. The strategy is in the process of being designed specifically to accommodate existing residential and commercial uses under the CEC's Existing Building Energy Efficiency Action Plan. This strategy requires the CEC in collaboration with the CPUC to establish the framework for the energy savings target setting outlines the necessary actions that will need to occur in future years, including workforce education and training institutions engaging with the building industry, mapping industry priorities for efficiency to major occupations that will provide services, identifying workforce competency gaps,

and quantifying the work needed to build a workforce to implement high-quality efficiency projects at scale. Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.

For the reasons described above, the Project's emissions trajectory is expected to follow a declining trend, consistent with the establishment of the 2030 and 2050 targets. Therefore, given the Project's GHG emissions efficiency and the Project's consistency with applicable GHG plans, policies and regulations adopted for the purpose of reducing GHG emissions, impacts regarding GHG emissions and reduction plans would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

The following hazardous materials discussion is based on the Remedial Action Plan (RAP), prepared by Stantec, dated July 15, 2014, which is available for review at the Culver City Planning Division. The RAP summarizes previous environmental site assessments dating back to 2007.

Would the project:

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

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

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

Overall, based on the above, construction and operation of the Project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials relative to the safety of the public or the environment. Impacts would be less than significant.

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

Less Than Significant With Mitigation Incorporated. As documented in the RAP, the Project Site was occupied by a former gasoline and service station that operated from 1953 through the early 1980's. According to historical records, an automotive repair facility was also located at the Project Site in association with the service station, with the last several years potentially only operating as an automotive repair station. The station building was demolished in 1985 and the current existing retail buildings were constructed in 1985.

Hazardous substances and petroleum products are typically associated with auto body and auto repair operations. Several underground storage tanks (USTs) were installed during operation of the gasoline and service station. All of the USTs appear to be removed by 1975 based on review of the historical records and a geophysical survey of the site in 2007 did not reveal the presence of any potential USTs. However, it cannot be determined with absolute certainty that no previously undocumented USTs occur beneath the site. No soil sample results are known to occur in association with the removed USTs.

In 2007 and 2008, initial borings were installed within the Project in the vicinity of the former service station to determine if soils and groundwater beneath the site were impacted by petroleum hydrocarbons, volatile organic compounds (VOCs), and metals. The borings revealed elevated concentrations of total petroleum hydrocarbons (TPH) typically associated with gasoline, diesel and oil constituents. As a result, numerous follow-up borings and groundwater monitoring wells were drilled and installed at the site up to 2013 to determine the extent of contamination beneath the site. The additional wells and borings confirmed that soils and groundwater beneath the site were adversely affected by petroleum hydrocarbons, as well as chlorinated hydrocarbons. Because of the site contamination, the Los Angeles Regional Water Quality Control Board (LARWQCB) required a Remediation Action Plan in 2014 to evaluate alternatives to clean-up or remediate such that petroleum hydrocarbon are reduced to a point where concentrations meet the State Water Resources Control Board (SWRCB) Low-Threat UST Tank Closure Policy (LTCP) criteria or are decreasing such that applicable LTCP criteria are met within a reasonable timeframe. The 2014 RAP identified a preferred remedial alternative involving a series of total fluids extraction (TFE) events that would directly remove, treat and dispose of contaminated soils and groundwater, and in some cases soil vapor. Since 2014, while monitoring at the site has continued, soils and groundwater beneath the site have yet to be fully remediated and the site remains an active remediation site with the LARWQCB.

At the time of the RAP preparation th site was occupied by its current uses and no new future development was contemplated at the project site. Thus, no direct, substantial excavation activities were contemplated in the RAP so as to retain the current retail operations and associated infrastructure improvements on the site. However, the Project would include subterranean parking, which by its nature would involve excavation of soils for the proposed 2-level parking structure. Therefore, with the Project, direct excavation and removal of contaminated soils and groundwater can occur in a manner that was not previously contemplated in the RAP.

Under the Project, site remediation would occur following the abatement and demolition of existing on improvements. This would include the excavation of hydrocarbon-impacted soils, and other groundwater management associated with remediation. During remediation activities, the site would be remediated to applicable commercial use regulatory standards. Based on the extent of contamination identified in the RAP, it is anticipated that approximately 1,000 cubic yards of hydrocarbon-impacted soil would be exported from the site as part of remediation activities, which is less than 2% of the anticipated excavation. However, the ultimate extent of such impacted would not be determined until the actual excavation activities are completed.

Because of the contaminated soils, groundwater and potentially vapors to occur beneath the Project Site, project implementation could result in a potentially significant impact or hazard to the public or the environment during excavation activities. Furthermore, other undocumented remnant steel structures, and possibly, USTs, may still be located on the subsurface of the project site that were associated with historic on-site automobile-related services and activities. To address potential hazards associated contaminated soils, groundwater, soil vapors and remnant steel structures, and possibly USTs, Mitigation Measure MM-HAZ-1 is required for the Project, which requires preparation of a Soils Management and Remediation Plan (SMRP) for the entire Project Site. The SMP would establish policy and requirements for the management and disposal of soils and groundwater, as well as for any steel structures, including USTs, should they be encountered, during soil-disturbing activities performed at the Project Site (i.e., excavation, grading, trenching, utility installation or repair, and other human activities) that may disturb potentially contaminated soils or groundwater. The SMRP would describe specific soil-, groundwater- and UST-handing controls required to comply with local, State, and Federal overseeing agencies; prevent unacceptable exposure to contaminated soils, groundwater or vapors during construction or operation; and prevent the improper disposal of contaminated soils, groundwater or steel structures. Implementation of this mitigation measure would reduce soil contamination-related impacts to a less than significant level.

The location of the landfill sites used for soil disposal would depend on the disposal classification of the soil. Although not anticipated to be generated, Class 1 contaminated soils are hazardous and could be disposed at the Buttonwillow, California facility. Class 2 soils are contaminated, but non-hazardous, and could be disposed of at local landfills including Chiquita Canyon facility near Santa Clarita or the Waste Management Thermal Remediation Solutions facility located in Azusa, California.

In addition, Cal-OSHA regulates worker exposure to airborne contaminants (such as those identified in the subsurface soils) during construction under Title 8, Section 5155, Airborne Contaminants, which establishes which compounds are considered a health risk, exposure limits for such compounds, protective equipment, workplace monitoring, and medical surveillance required for compliance. Cal-OSHA also regulates worker exposure to airborne contaminants (such as those identified in the subsurface soils) during operation, requiring administrative or engineering controls, where required, to meet exposure limits, and implementation of written health and safety programs, worker training, emergency response training, and medical surveillance.

The Project would involve the demolition and removal of the existing on-site building. The current commercial structure on was constructed in 1985, which was after lead based paint (LBP) was banned in California in 1978. Thus, LBP is not assumed present a hazard at the project site. However, it is possible that asbestos containing materials (ACM) are present in the building, as ACM was not banned until 1989. If released into the environment, ACM could pose a significant hazard to construction workers or the public. Implementation of MM-HAZ-2 would require a comprehensive survey of the existing building prior to demolition in accordance with applicable regulations—including the National Emissions Standards for Hazardous Air Pollutants standards, SCAQMD Rule 1403, and California Division of Occupational Safety and Health (Cal/OSHA)—to verify the presence or absence of ACM. If ACM is encountered, MM-HAZ-2 requires remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences. Adherence with this mitigation measure would reduce risks associated with ACM to acceptable levels and associated impacts would be less than significant.

As discussed in Response IX.a, operation of the Project would not create a significant risk of exposure to hazardous materials towards the public or the environment through the routine transport, use, or disposal of hazardous materials. Types of hazardous materials to be used in association with the Project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The potential for creation of a significant

hazard through routine transport of hazardous materials or the release of hazardous materials into the environment is considered less than significant.

Overall, implementation of MM-HAZ-1 and MM-HAZ-2 and compliance with applicable standards and regulations would ensure that potentially significant construction-related impacts associated with hazardous materials releases or accident conditions would be reduced to a less than significant level. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM-HAZ-1: The Applicant shall retain a qualified environmental consultant to prepare a Soil Management and Remediation Plan for review and approval by the Culver City Building Safety Division and LARWQCB, as necessary, prior to the commencement of excavation and grading activities. The plan would include measures to remove and/or treat/remediate the impacted soils and groundwater to a level determined acceptable per applicable regulatory standards, under supervision of a certified environmental consultant licensed to oversee such remediation. Upon completion of the Soil Management and Remediation Plan, the Applicant shall contact the LARWQCB to obtain a closure letter that states no further soils testing or remediation is required on the Project Site.

MM-HAZ-2: Prior to the issuance of any permit for the demolition or alteration of the existing on-site buildings, a comprehensive ACMs survey of the buildings shall be performed. If no ACMs are found, the Applicant shall provide a letter to the Culver City Building Safety Division from a qualified asbestos abatement consultant indicating that no ACMs are present in the on-site buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

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

Less Than Significant With Mitigation Incorporated. El Marino Elementary School, located at 11450 Port Rd, is located approximately 0.17 miles northwest 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, remediation at the former gasoline and service station/automotive repair facility will be necessary to clean-up impacted soils and groundwater. All remediation would occur in adherence with MM-HAZ-1. Also, project demolition activities could involve the removal of ACM. However, any such removal would occur in adherence with MM-HAZ-2. The Project's remediation activities and demolition activities would be implemented pursuant to strict regulatory requirements, would be localized to the Project Site, and existing schools are sufficient distance from the Project Site to preclude impacts from the remediation and demolition activities. Implementation of the prescribed mitigation measures would reduce risks associated with remediation activities and LBPs and ACMs to acceptable levels and associated impacts would be less than significant.

Operation of the Project would not create a significant risk of exposure to hazardous materials for the public or the environment, including the schools. Occupancy of the proposed hotel and restaurant uses would not cause hazardous substance emissions or generate hazardous waste. Types of hazardous materials to be used in association with the Project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping would be contained, stored, and used in accordance

with manufacturers' instructions and handled in compliance with applicable standards and regulations. The Project would not emit hazardous emissions or handle hazards or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

Refer to MM-HAZ-1 and MM-HAZ-2. No additional mitigation measures are necessary.

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

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

Based on a review of the databases, the Project Site is identified on the list of Open Active Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker database.[33] As discussed in Response IX.b, the Project Site has the potential to contain hazards related to the former gasoline and service station and the automotive repair facility, which could create a significant hazard to the public or the environment during construction and operation of the Project. However, with implementation of MM-HAZ-1 provided under Response IX.b, potentially significant impacts regarding hazardous materials with the existing Project Site would be reduced to a less than significant level. Further, no off-site facilities were listed on the databases reviewed that would appear to present an environmental concern for the Project Site. Therefore, while the Project Site is located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, development of the Project would not create a significant hazard to the public or the environment. Impacts would be less than significant with mitigation incorporated.

[33] *State Water Resources Control Board, Geotracker website, https://geotracker.waterboards.ca.gov/search?PAGE=8&CMD=search&business_name=&main_street_number=&main_street_name=&city=&zip=&county=&branch=&status=Open%2COpen+-+Active%2COpen+-+Assessment+%26+Interim+Remedial+Action%2COpen+-+Eligible+for+Closure%2COpen+-+Inactive%2COpen+-+Referred%2COpen+-+Remediation%2COpen+-+Reopen+Case%2COpen+-+Site+Assessment%2COpen+-+Verification+Monitoring&site_type=LUFT&cleanup_type=&npl=&reporttype=&reporttitle=PROJECT+SEARCH+RESULTS&federal_superfund=&state_response=&voluntary_cleanup=&school_cleanup=&permitted=&corrective_action=&spec_prog=&national_priority_list=&senate=&assembly=&critical_pol=&business_type=&case_type=&gwbasin=&display_results=&pub=&watershed=&ORDER BY=city&excludenc=False&next=Next+50). Accessed December 6, 2019.*

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 3.4 miles northwest and 2.5 miles to the 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.

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 Centinela Avenue, located approximately 0.4 mile south of the Project Site.[34] While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In these instances, the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with Culver City requirements, the Project would develop a Construction Traffic Management Plan (see MM-PS-1), which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the Project vicinity and would result in some modifications to access (i.e., new curb cuts for Project driveways) from the streets that surround the Project Site. However, emergency access to the Project Site and surrounding area would continue to be provided similar to existing conditions. Emergency vehicles and fire access for the Project Site would be provided at grade access from Slauson Avenue. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for employees and visitors. Subject to review and approval of Project Site access and circulation plans by the Culver City Fire Department (CCFD), the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. 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.

[34] *County of Los Angeles Department of Public Works. https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf, accessed October 2019.*

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.[35,36] The nearest state responsibility area is located approximately 11 miles northwest of the Project in the City of Malibu[37] and the nearest very high fire hazard severity zone is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately 2.3 miles northeast of the Project Site. In addition, the Project Site is surrounded by urban development and is not adjacent to any wildlands. The Project would not require the installation or maintenance of associated infrastructure that could exacerbate fire risk. The Project would involve the redevelopment of an infill site within an urbanized area. No impacts would occur.

X. HYDROLOGY AND WATER QUALITY

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 With Mitigation Incorporated. The Project Site is relatively flat and is approximately 15 feet above sea level across the property. Surface water at the Project Site consists of direct precipitation onto the Project Site. Much of this water drains as sheet flow to low-lying areas, area drains, off-site and/or to the street. In particular, surface water from Jefferson Boulevard flows to two existing catch basins along the frontage of the Project Site, and Slauson Avenue has three existing catch basins along the frontage of the Project Site.

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

- Excess fertilizers, herbicides and insecticides from agricultural lands and residential areas;
- Oil, grease, and toxic chemicals from urban runoff and energy production;

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

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

[37] *Board of Forestry and Fire Protection, State Responsibility Area Viewer, https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/, accessed November 2019.*

- 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 Geotechnical Engineering Investigation, groundwater was encountered during exploration at depths between 24 and 24.5 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 10 feet below the surface. As such, construction activities, which would require excavations down to 35 feet below ground surface could encounter groundwater. Typically, groundwater removed from a construction site is disposed of in the storm drain system. However, if any removed groundwater contain contaminates that exceed acceptable water quality regulatory standards of the LARWQCB or other appropriate agencies, this could be a potentially significant impact. As such, MM-HYD-1 is prescribed to address this potential impact, which requires implementation and completion of a dewatering plan that would dispose of contaminated groundwater in compliance with applicable regulatory requirements. Implementation of MM-HYD-1, along with MM-HAZ-1, would ensure that potentially significant impacts regarding groundwater contamination during dewatering activities on the Project Site are reduced to a less than significant level.

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

With regard to long-term water quality impacts, per the applicable requirements of Chapter 5.05, Stormwater and Urban Runoff Pollution Control, Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects, of the CCMC, the Project would require a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. The preliminary concept for the site drainage and stormwater treatment implements several rainwater harvesting systems to be constructed either within the subterranean parking structure or the ground level of the Project Site. The surface drainage would be relayed to these structures via roof drains and podium deck area drains. The Project would also consider combination of pre-treatments upstream of the rainwater harvesting system, including flow-through planters, fossil filter inserts for catch basins, and/or flow treatment systems. 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. 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 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 with mitigation incorporated.

Mitigation Measures

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

b. Substantially 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 Culver City and is currently developed with a single-story commercial (retail) building and associated asphalt-paved surface parking lot. As such, the Project Site does not currently provide a substantial opportunity for recharge of groundwater. Furthermore, the Project does not propose the development of long-term groundwater production wells. Given that the Project Site is less than one acre and the temporary nature of construction activities, while some dewatering could be necessary during construction activities, such dewatering activities would not be of an extent that would substantially alter groundwater supplies. Therefore, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

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 surface in a manner which would:

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

Less Than Significant Impact. Currently, the Project Site is almost entirely developed with impermeable surfaces, however, there are small areas of exposed landscaped and disturbed soils. No streams or rivers occur on-site. The Project would not substantially change the amount of impervious surface area on the Project given

the proposed above ground and subterranean structure. In addition, 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."

As discussed under Response X.a, the preliminary concept for the site drainage and stormwater treatment implements several rainwater harvesting systems to be constructed either within the subterranean parking structure or the ground level of the Project Site. The surface drainage would be relayed to these structures via roof drains and podium deck area drains. The Project will also consider a combination of pre-treatments upstream of the rainwater harvesting system, including flow-through planters, fossil filter inserts for catch basins, and/or flow treatment systems. 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. 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, 24-hour rain event. 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.

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, Project implementation would implement the use of rain harvesting systems to capture and treat stormwater. With the proposed drainage system in place, the Project would not substantially change the amount of impervious surface area on-site and, thus, would not result in substantial increases in surface water runoff quantities. Additionally, with implementation of the Project, overall existing drainage patterns would be maintained, and the Project would include appropriate on-site drainage improvements to convey anticipated stormwater flows. Final plan check by the City would ensure that adequate capacity is available in the storm drain system in surrounding streets prior to Project approval. The 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 no BMPs are currently located on the Project Site and there are no known deficiencies in the existing storm drain system. Furthermore, the Project would not alter the course of any stream or rivers. Because runoff would not 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.

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 Project is almost entirely developed with impermeable surfaces. The Project would not substantially change the amount of impervious surface area on the Project given the proposed above ground and subterranean structure. As such, the Project would maintain the existing percentage of impervious surfaces within the Project Site and would, therefore, not create new potential for runoff water to exceed the capacity of existing stormwater drainage systems. In addition, 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, 24-hour rain event. 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 a hotel and restaurant use 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, including flow-through planers, fossil filter inserts for catch basins, and/or flow treatment systems, 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.

iv. Impede or redirect flood flows?

Less Than Significant Impact. As discussed in Response X.c.i, above, the Project is almost completely developed with impermeable surfaces. The Project would not substantially change the amount of impervious surface area on the Project given the proposed above ground and subterranean structure. 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".[38] 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.[39] 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.

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

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

Aa discussed in Response X.c.iv, the Project Site is mapped by FEMA as an "Area o 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.

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[38] *FEMA Flood Map Service Center. FEMA Flood Map 06037C1760F, effective on 09/26/2008. https://msc.fema.gov/portal/search?AddressQuery=11469%20Jefferson%20Boulevard%20Culver%20City#searchresultsanchor, accessed October 2020.*

[39] *Culver City, Natural Hazards – Fire and Flooding Map, February 1, 2007, https://www.culvercity.org/files/assets/public/documents/information-technology/maps/culver_city_natural_hazards_map.pdf, accessed October 2020.*

According to the Tsunami Inundation Map for Emergency Planning, State of California, County of Los Angeles Venice Quadrangle, the Project Site is not located within the mapped tsunami inundation boundaries.[40] 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. However, a breach of the dam facilities is very unlikely. The Project Site is located approximately 9.43 miles away from the Mulholland Dam/Stone Canyon Dam and 10.39 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.

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.[41] As such, 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 2.8 miles north 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 a hotel and restaurant use 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, including flow-through planers, fossil filter inserts for catch basins, and/or flow treatment systems, 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.

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[40] *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 October 2019.*

[41] *State Water Resources Control Board, Impaired Water Bodies, https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml, accessed October 2019.*

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 a single-story commercial (retail) building and associated asphalt-paved surface parking lot. The Project vicinity is highly urbanized and generally built out. The local Project vicinity is characterized by a blend of commercial uses to the north, east, and south of the Project Site and low-rise residential uses west of the Project Site. The Project proposes the development of a 175-room hotel with restaurant uses located on the ground floor. As such, the Project would be an infill project providing uses in keeping with the commercial character of the surrounding area. The Project would not physically separate or otherwise disrupt an existing residential use on or adjacent to the Project Site. All proposed development would occur within the boundaries of the Project Site as it currently exists. Given the type of uses in the Project vicinity, and the infill character of the Project, the Project would not physically divide an established community. Impacts would be less than significant.

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?

Less Than Significant Impact.

General Plan

The General Plan designation for the Project Site is General Corridor which allows for a range of small to medium scale commercial uses with an emphasis on community serving retail, office, and service uses along major corridors. The General Corridor designation is intended to support desirable existing and future neighborhood and community serving commercial uses and housing opportunities that are compatible with nearby residential neighborhoods. The Project is consistent with the General Corridor designation as it is proposing a hotel use with restaurant uses on the ground floor. No amendment to the Project Site's existing general plan designations are proposed by the Project. As such, the Project would have a less than significant impact with respect to the General Plan.

Zoning

The Project Site's existing Zoning designation is Commercial General (CG) and the Project Site is within a Commercial Zero Setback Overlay Zone. The CG Zoning District identifies areas that are long major corridors appropriate for small- to medium-scale commercial uses, emphasizing community-serving retail, office, and service uses. The Commercial Zero Setback Overlay Zone is intended to preserve the reinforce a traditional city streetscape and create a more pedestrian-friendly environment. As required under this overlay zone, the first story of proposed buildings that exceed 750 SF shall have a zero setback from the street-facing property of any street listed in Subsection 17.260.020.B. (i.e., Jefferson Boulevard and Slauson Avenue). No changes to the Project Site's existing Zoning designations are proposed by the Project. The Project is consistent with the General Corridor designation as it is proposing a hotel use with restaurant uses on the ground floor, a medium-scale use, along Jefferson Boulevard, a major corridor. In addition, proposed setbacks under the Project would be consistent with the Commercial Zero Setback Overlay Zone. The maximum building height for the CG zone is 56 feet, based on CCMC Section 17.220, Table 2-6. As noted in the CCMC, in non-residential zones, such as with the Project, architectural features that are non-habitable design elements, such as spires, turrets, bell towers, cupolas, and similar design elements shall be allowed up to a maximum of 13 feet and six inches of

height of a building and are limited to 15 percent of the total roof area. As discussed in Attachment A, Project Description, the proposed building would reach up to 56 feet in height (with the elevator shaft reaching 69 feet and 6 inches in height), which would be within the height requirements for projects in non-residential zones as stated in Section 17.220 of the CCMC. As such, the Project would have a less than significant impact with respect to the Zoning Code.

Other

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

Conclusion

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

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 (SMARA) requires that all cities address significant mineral resources, classified by the State Geologist and designated by the State Mining and Geology Board, in their General Plans.

The Inglewood Oil Field (Oil Field) is located within Culver City and the unincorporated area of Los Angeles County known as Baldwin Hills. The current active Oil Field boundary is approximately 1,000 acres of which 100 acres are located within Culver City. The Oil Field is located approximately 1.28 miles northeast of the Project Site. The Project Site is located in a highly urbanized area of Culver City and is currently developed with a single-story commercial (retail) building 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 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.

XIII. NOISE

The following impact analysis pertaining to noise and vibration impacts is based on information contained in the Project's Noise and Vibration Technical Report prepared by ESA, dated November 2020, which is available for review at the Culver City Planning Division.

Would the project result in:

a. Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels 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?

Less Than Significant Impact.

Applicable Noise Regulations

The City's noise standards are developed from those of several Federal and State agencies including the Federal Highway Administration (FHA), the Environmental Protection Agency (EPA), the Department of Housing and Urban Development (HUD), the American National Standards Institute (ANSI), and the State of California Department of Health Services. These standards set limits on the noise exposure level for various land uses. **Table B-12**, *Culver City Interior and Exterior Noise Standards*, lists interior and exterior noise level standards and the type of occupancy to which they should be applied.

Table B-12
Culver City Interior and Exterior Noise Standards

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

Source: Culver City Noise Element.

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

amplifying equipment is to be used. The commercial and noncommercial use of sound amplifying equipment shall be subject to the following restrictions:

a. The only sounds permitted shall be either music or human speech, or both.

b. The operation of sound amplifying equipment shall occur only between the hours of:

8:00 AM through 8:00 PM Monday through Thursday,

8:00 AM through 10:00 PM Friday,

10:00 AM through 10:00 PM Saturday, and

10:00 AM through 8:00 PM Sunday and City specified holidays.

Table B-13, *Noise and Land Use Compatibility Matrix - California,* illustrates land use compatibility with regard to noise. These standards and criteria will be incorporated into the land use planning process to reduce future noise and land use incompatibilities. This table is the primary tool that allows the City to ensure integrated planning for compatibility between land uses and outdoor noise. Community Noise Equivalent Level (CNEL) for specific land uses are classified into four categories: (1) "Clearly Compatible" (2) "Compatible with Mitigation" (3) "Normally Incompatible" and (4) "Clearly Incompatible".

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

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

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

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

Table B-13
Noise and Land Use Compatibility Matrix – California

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

NA = Not Applicable

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

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

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

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

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

Thresholds of Significance

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

- Project construction activities occur between the hours of 8:00 PM and 8:00 AM Monday through Friday; 7:00 PM and 9:00 AM Saturdays; and 7:00 PM and 10:00 AM Sundays;

- The Project-related operations would cause ambient noise levels to increase by 5 dBA Leq or more.

Existing Conditions

The predominant existing noise source surrounding the Project Site is traffic noise from I-405 and from Slauson Avenue to the south, and Jefferson Boulevard to the southeast. Secondary noise sources include general commercial-related activities, such as loading dock/delivery truck activities, trash compaction, and refuse service activities, from the surrounding commercial land uses.

Existing noise sensitive uses within 500 feet of the Project Site include:

- Residential Uses: Existing one- and two-story single-family residences are located across the service alley to the north and west of the Project Site.

Figure B-1, *Noise Measurements and Existing Noise Sensitive Locations*, presents locations of noise measurements taken within and near the Project Site relative to the location of existing noise sensitive receptors. The results of ambient sound measurements taken to establish the existing environmental setting are summarized in **Table B-14**, *Summary of Ambient Noise Measurements*. As shown in Table B-14, daytime noise levels ranged from 59 dBA to 67 dBA Leq and nighttime noise levels ranged from 58 dBA to 67 dBA Leq.

Table B-14
Summary of Ambient Noise Measurements

Site ID	Monitoring Date(s)	Start Time	End Time	Daytime (7 a.m. to 10 p.m.) Hourly Leq	Daytime Average Hourly Leq	Nighttime (10 p.m. to 7 a.m.) Hourly Leq	Nighttime Average Hourly Leq
R1	1/26-1/24/19	12:00	12:00	59-64	62	58-66	62
R2	1/23-1/24/19	11:00	11:00	61-64	63	59-67	65
R3	1/23/19	11:03	11:18	67	--	--	--

[a] Detailed measured noise data, including hourly L_{eq} levels, are included in the Noise and Vibration Technical Report.

Source: ESA, 2020.

Existing roadway CNEL noise levels were calculated for nine roadway segments located in the vicinity of the Project Site. The roadway segments selected for analysis are considered to be those that are expected to be the most directly impacted by Project-related traffic, which, for the purpose of this analysis, includes the roadways that are located near and immediately adjacent to the Project Site.

The noise levels along these roadway segments are presented in **Table B-15**, *Predicted Existing Vehicular Traffic Noise Levels*. The calculated CNEL (at a distance of between 40 and 50 feet from the roadway right-of-way) from actual existing traffic volumes on the analyzed roadway segments ranged from 62.6 dBA to 69.5 dBA for residential areas and commercial areas.

Construction

The below assessment include construction noise impacts to the noise sensitive receivers in the vicinity of the Project Site due to the operation of construction equipment (on-site construction activities) and due to haul truck activities (off-site construction activities).

SOURCE: ESA, 20019; Open Street Map, 2019

The Jeff Hotel

Figure B-1
Noise Measurements and Existing Noise Sensitive Locations

ESA

Table B-15
Predicted Existing Vehicular Traffic Noise Levels

Roadway Segment	Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-way
Jefferson Boulevard	
Between Mesmer Ave and I-405 Southbound Ramp	69.5
Between I-405 Southbound Ramp and I-405 Northbound Ramp	67.8
Between I-405 Northbound Ramp and Slauson Ave	68.2
North of Slauson Ave	67.4
Slauson Avenue	
West of Jefferson Blvd	62.6
Between Jefferson Blvd and Sepulveda Blvd	62.9
Between Sepulveda Blvd and SR-90 On-ramp	66.3
Sepulveda Blvd	68.7
North of Slauson Ave	68.5

Source: ESA, 2020.

On-Site Construction Activities

Noise impacts from construction activities are generally a function of the noise generated by construction equipment, equipment locations, the sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Construction would be completed in seven stages: (1) demolition; (2) shoring/excavation; (3) foundations/footings; (4) concrete pour, (5) building construction, (6) paving, and (7) architectural coatings. The Project would be constructed using typical construction techniques; no blasting or impact pile driving would be used.

Project construction would require the use of mobile heavy equipment with high noise-level characteristics. Individual pieces of construction equipment expected to be used during Project construction could produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in Table B-8 of the Noise and Vibration Technical Report.

A summary of the construction noise impacts at the existing nearby sensitive receptors is provided in **Table B-16,** *Estimated Construction Noise Levels at Existing Off-Site Sensitive Receptors*. As shown in Table 10, construction noise levels are estimated to reach a maximum of 70 dBA at the off-site receptor location R1, 70 dBA at the receptor locations R2, and 63 dBA at the receptor location R3.

Project construction activities would not occur between the hours of 8:00 P.M. and 8:00 A.M. Monday through Friday; 7:00 P.M. and 9:00 A.M. on Saturdays; 7:00 P.M. and 10:00 A.M. on Sundays. Therefore, on-site construction noise impacts would be less than significant.

Table B-16
Estimated Construction Noise Levels at Existing Off-Site Sensitive Receptors

Noise Sensitive Receptor	Construction Phases	Distance between Nearest Receptor and Construction Site, feet	Estimated Construction Noise Levels at Noise Sensitive Receptor by Construction Phase,[a,b] Hourly Leq (dBA)
R1 Northern property line near Single-family residential uses to the north and west	Demolition	50	69
	Shoring/Excavation	50	69
	Foundations/Footings	50	64
	Continuous Concrete Pour	50	63
	Construction/Paving/ Architectural Coatings	50	70
R2 Western property line near single-family residential uses to the north	Demolition	50	69
	Shoring/Excavation	50	69
	Foundations/Footings	50	64
	Continuous Concrete Pour	50	63
	Construction/Paving/ Architectural Coatings	50	70
R3 At the corner of Slauson Ave and Segrell Way near single-family residential uses.	Demolition	50	60
	Shoring/Excavation	50	61
	Foundations/Footings	50	53
	Continuous Concrete Pour	50	57
	Construction/Paving/ Architectural Coatings	50	63

[a] Estimated construction noise levels represent the worst-case condition when noise generators are located closest to the receptors and are expected to last the entire duration of each construction phase.

[b] Noise levels include a 10 dBA reduction from acoustic barrier implemented under Policy 2.A of the City's Noise Element

Source: ESA, 2020.

Although no significant impacts are identified related to Project construction activities, Policy 2.A of the Noise Element requires noise reduction techniques be implemented to ensure that noise levels are reduces to the maximum extent feasible. Therefore, in accordance with Policy 2.A, the Project would be required to implement the following noise reduction measures, as applicable:

- Noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses, such as schools, hospitals, convalescent homes, and libraries.

- Temporary sound barrier installation at construction site if construction noise is impacting nearby noise sensitive land uses.
- Noise abatement and acoustical design criteria for construction and operation of any new development.

The measures identified above are included in the construction noise levels calculated in Table B-16 and represent a 10 dBA reduction from the installation of noise barriers.

Off-Site Construction Activities

Delivery and haul truck trips would occur throughout the construction period, although no truck trips would occur between 8:00 PM and 8:00 AM Monday Through Friday, before 9:00 AM or after 7:00 PM on Saturday, or before 10:00 AM and 7:00 PM on Sunday. Haul trucks would be anticipated to access the Project Site from Slauson Avenue to remove demolition materials and provide deliveries to the Project Site during construction activities. Therefore, off-site construction noise impacts would be less than significant.

Peak hour traffic volumes for Slauson Avenue, west of Jefferson Boulevard, are close to 800 vehicles, based on data from the Traffic Impact Analysis prepared by Crain & Associates.[42] The foundations pour phase has the highest volume of haul trucks (232 trips per day) and therefore has the highest potential to cause a noise impact. The addition of 232 haul truck trips per day would result in a negligible noise level increase and would not increase noise levels by a "clearly noticeable" increase of 5 dBA over the ambient condition. The 232 truck trips would be spread out of the entire day and would result in approximately 29 truck trips per hour. The addition of 29 truck trips per hour along Slauson Avenue would result in a noise level of 60.4 dBA Leq which would not exceed the 68 dBA Leq threshold for the nearest receptor. Additionally, the 232 truck trips per day would occur only for six days. During the remainder of the construction activities the maximum number of trucks accessing the Project Site would be 66 per day. Therefore, based on this additional supporting evidence, noise impacts from off-site construction traffic would be less than significant and no mitigation measures are required.

Operation – On-site

The existing noise environment in the Project vicinity is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. Long-term operation of the Project would have a minimal effect on the noise environment in proximity to the Project Site. Noise generated by the Project would result primarily from normal operation of the building mechanical equipment, outdoor/open space activities, parking garage, loading docks and refuse collection, and off-site traffic. Each is discussed separately below.

Fixed Mechanical Equipment

The operation of mechanical equipment such as air conditioning equipment may generate audible noise levels. However, mechanical equipment would be shielded from nearby noise sensitive uses to attenuate noise and avoid conflicts with adjacent uses. It is not anticipated that the mechanical equipment would be significantly different than the mechanical equipment that is currently present. In addition, the Project's mechanical equipment would need to comply with the City's noise standards, which establish maximum permitted noise levels from mechanical equipment. Project compliance with the City's noise standards would ensure that operational noise impacts are minimal.

Outdoor/Open Space Activities

There is an outdoor deck provided for the use of the hotel guests. The deck would serve as a potential noise source for the R1, R2, and R3 sensitive receptors. The pool deck and bar area face Jefferson Boulevard and

[42] *Crain & Associates, Jefferson Hotel Project Traffic Study, 2020.*

are shielded from the sensitive receptors by the building envelope. Additionally, the pool deck and bar are elevated off of street level and ambient noise levels on Jefferson Boulevard would dominate the noise environment at street-level. Therefore, the pool deck and bar's distance, elevation, and location opposite of the sensitive receptors would likely be imperceptible from the sensitive receptors and would not result in a substantial increase in ambient noise levels, and impacts would be less than significant.

Parking Garage

The parking garage would consist of two subterranean levels accessed from the north of the Project Site. The entrance would be adjacent to the alleyway, but would include a barrier extending along its length to prevent noise from vehicles entering. All cars visiting the Project Site would enter from the southwest corner driveway on Slauson Avenue. Based on the Project's Traffic Study, the peak hour traffic volume would be 102 vehicles.[43] Using FTA's calculation for noise generated by parking lot traffic, the entering vehicles would create noise levels up to 46.5 dBA.[44] This value would be less than the measured daytime and nighttime ambient noise levels at R1 (62 dBA day/night) and R2 (63 dBA day/night). It should also be noted that the existing concrete block and wooden wall on the north side of the service alley would further attenuate noise from the Project Site at the residential sensitive receptors to the north and the actual noise levels at the residences would be expected to be lower than described above. Therefore, based on this conservative analysis, the noise impacts from the parking garage would be less than significant.

Loading Dock and Refuse Collection

The loading dock and refuse collection area for the Project would be located at the northern end of the Project Site along the service alley. The area would be completely enclosed and shielded from surrounding sensitive uses. Based on a noise survey that was conducted at a loading dock and trash collection facilities by ESA, loading dock activity (namely idling semi-trucks and backup alarm beeps) and trash compactors could generate noise levels of approximately 70 dBA L_{eq} and 66 dBA L_{eq}, respectively, at a reference distance of 50 feet.[45] Loading dock/trash collection noise levels have been calculated at each sensitive receptor accounting for a 20 dBA reduction in noise level provided by the enclosure.[46] Loading dock activity and trash compaction would be reduced to 50 dBA L_{eq} and 46 dBA L_{eq} at the closest noise sensitive receptors (R1 and R2), respectively. Furthermore, as discussed above, the existing concrete block and wooden wall on the north side of the service alley would further attenuate noise from the Project Site at the residential sensitive receptors to the north and the actual noise levels at the residences would be expected to be lower than described above. Therefore, the noise levels from the Project's loading dock and refuse collection area would be below the ambient noise levels captured at both R1 and R2 and impacts would be less than significant.

Operation – Off-site

Existing Traffic Baseline Conditions

Existing roadway noise levels were calculated along various roadway segments near to the Project Site. Roadway noise attributable to Project development was calculated using the traffic noise model previously described and was compared to baseline noise levels that would occur under the "No Project" condition.

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[43] *Crain & Associates, Jefferson Hotel Project Traffic Study, 2020.*

[44] *FTA, Transit Noise and Vibration Impact Assessment. September, 2018, Tables 4-13 and 4-14.*

[45] *The loading dock facility noise measurements were conducted at a loading dock facility at a Wal-Mart store using the Larson-Davis 820 Precision Integrated Sound Level Meter ("SLM") in May 2003. The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately 5 feet above the local grade.*

[46] *Federal Highway Administration. Noise Barrier Design Handbook, Section 3.4.2.*

Project impacts are shown in **Table B-17**, *Off-Site Traffic Noise Impacts – Existing Baseline Conditions,* presents the change in traffic volumes under the existing baseline conditions resulting from Project implementation. As shown therein, the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 0.3 dBA, CNEL, which would occur along Slauson Avenue, west of Jefferson Boulevard. This increase in noise level would be well below a "clearly noticeable" increase of 5.0 dBA CNEL in an area characterized by normally acceptable noise levels, and the increase in sound level would be substantially lower at the remaining roadway segments analyzed. Therefore, Project-related noise increases would be less than the applicable threshold and therefore less than significant, and no mitigation measures would be required.

Table B-17
Off-site Traffic Noise Impacts – Existing Baseline Conditions

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA)			Exceed Threshold?
	Existing[a] (A)	Existing with Project[b] (B)	Project Increment (B - A)	
Jefferson Boulevard				
Between Mesmer Ave and I-405 Southbound Ramp	69.5	69.5	0	No
Between I-405 Southbound Ramp and I-405 Northbound Ramp	67.8	67.8	0	No
Between I-405 Northbound Ramp and Slauson Ave	68.2	68.2	0	No
North of Slauson Ave	67.4	67.4	0	No
Slauson Avenue				
West of Jefferson Blvd	62.6	62.9	0.3	No
Between Jefferson Blvd and Sepulveda Blvd	62.9	63.0	0.1	No
Between Sepulveda Blvd and SR-90 On-ramp	66.3	66.4	0.1	No
Sepulveda Boulevard				
North of Slauson Ave	68.7	68.7	0	No
Between Slauson Ave and Centinela Ave	68.5	68.5	0	No

Source: ESA, 2020.

Future Traffic Conditions

Future (2024) roadway noise levels were also calculated along various roadway segments near the Project to establish future baseline traffic noise levels that would occur with implementation of the related projects, to which the Project's off-site traffic noise during operations could be added. Project impacts are shown in **Table B-18**, *Off-Site Traffic Noise Impacts – Future 2024 Conditions.* As shown therein, the maximum increase in Project-related traffic noise levels over the future traffic noise levels would be 0.2 dBA CNEL, which would occur along Slauson Avenue, west of Jefferson Boulevard. This increase in noise level would be less than a "clearly noticeable" increase of 5.0 dBA CNEL in an area characterized by normally acceptable noise levels, and the increase in noise would be substantially lower at the remaining roadway segments analyzed. Therefore, Project-related noise increases, when measured against the 2024 conditions, would be less than the applicable threshold and therefore less than significant.

Table B-18
Off-site Traffic Noise Impacts – Future 2024 Conditions

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA) Existing (A)	Future No Project (B)	Future with Project [a] (C)	Future Project Increment [b] (C-B)	Exceed Threshold?
Jefferson Boulevard					
Between Mesmer Ave and I-405 Southbound Ramp	69.5	70.2	70.2	0	No
Between I-405 Southbound Ramp and I-405 Northbound Ramp	67.8	68.5	68.5	0	No
Between I-405 Northbound Ramp and Slauson Ave	68.2	68.7	68.8	0.1	No
North of Slauson Ave	67.4	68.0	68.0	0	No
Slauson Avenue					
West of Jefferson Blvd	62.6	63.4	63.6	0.3	No
Between Jefferson Blvd and Sepulveda Blvd	62.9	63.7	63.8	0.1	No
Between Sepulveda Blvd and SR-90 On-ramp	66.3	67.2	67.2	0	No
Sepulveda Boulevard					
North of Slauson Ave	**68.7**	**69.7**	**69.7**	0	No
Between Slauson Ave and Centinela Ave	68.5	69.6	69.6	0	No

[a] Include future growth plus related (cumulative) projects and project traffic.
[b] Increase due to project-related traffic only at project build-out.

Source: ESA, 2020.

Cumulative Traffic Noise

Cumulative off-site traffic-generated noise impacts were assessed based on a comparison of the future cumulative base traffic volumes with the Project to the existing base traffic volumes without the Project. The results of that comparison are provided in **Table B-19**, *Off-Site Traffic Noise Impacts – Future (2024) Cumulative Increase*. The maximum cumulative noise increase from the Project plus related Project traffic would be 1.1 dBA CNEL, which would occur along Sepulveda Boulevard, between Slauson Avenue and Centinela Avenue. This increase in sound level would not exceed the significance thresholds of an increase of 5 dBA CNEL. As a result, cumulative off-site traffic-related noise impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

Table B-19
Off-site Traffic Noise Impacts – Future (2024) Cumulative Increase

	Calculated Traffic Noise Levels dBA CNEL[a]			
Roadway Segment	Existing (A)	Future with Project (B)	Cumulative Increment (B-A)	Exceed Threshold?
Jefferson Boulevard				
Between Mesmer Ave and I-405 Southbound Ramp	69.5	70.2	0.7	No
Between I-405 Southbound Ramp and I-405 Northbound Ramp	67.8	68.5	0.7	No
Between I-405 Northbound Ramp and Slauson Ave	68.2	68.8	0.6	No
North of Slauson Ave	67.4	68.0	0.6	No
Slauson Avenue				
West of Jefferson Blvd	62.6	63.6	1.0	No
Between Jefferson Blvd and Sepulveda Blvd	62.9	63.8	0.9	No
Between Sepulveda Blvd and SR-90 On-ramp	66.3	67.2	0.9	No
Sepulveda Boulevard				
North of Slauson Ave	68.7	69.7	1.0	No
Between Slauson Ave and Centinela Ave	68.5	69.6	1.1	No

[a] Based on noise levels at property lines of adjacent uses along roadways.

Source: ESA, 2020.

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

Less Than Significant Impact.

Ground-Borne Vibration Guidelines

Culver City has not adopted policies or guidelines relative to ground-borne vibration. However, California Department of Transportation (Caltrans) has developed a guidance manual for evaluating potential vibration impacts ("Transportation and Construction Vibration Guidance Manual" dated September 2013). The manual gathers data from multiple sources including the Federal Transit Administration (FTA).

The threshold of vibration impact for human annoyance would apply for residential uses since commercial uses are not considered vibration sensitive uses.[47] This FTA document is used to identify the impacts for this Project. **Table B-20**, *Human Response to Transient Vibration*, and **Table B-21**, *Groundborne Vibration Impact Criteria for Structure Damage*, includes the vibration impacts criteria for human annoyance and for structure damage.

[47] *Transportation and Construction Vibration Manual, Caltrans, 2013.*

Table B-20
Human Response to Transient Vibration

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

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

Table B-21
Groundborne Vibration Impact Criteria for Structure Damage

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

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

Thresholds of Significance

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

- Potential building damage – Project construction activities cause ground-borne vibration levels to exceed 0.2 inch-per-section PPV at the nearest buildings.
- Potential human perception - Project construction activities cause ground-borne vibration levels to exceed 0.035 inch-per-second PPV at the nearest residential buildings.

Construction

Construction activities can generate varying degrees of groundborne vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the

lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibration from construction activities rarely reaches levels that damage structures. The Caltrans guidance manual incorporates FTA standard vibration velocities for construction equipment operations (Table 18 of the Caltrans guidance manual). The PPV for construction equipment pieces anticipated to be used during Project construction are listed in **Table B-22**, *Vibration Source Levels for Typical Project Construction Equipment*.

Table B-22
Vibration Source Levels for Typical Construction Equipment

Equipment	Approximate PPV (in/sec) at 25 feet	Approximate PPV (in/sec) at 50 feet
Large Bulldozer	0.089	0.031
Hoe Ram	0.089	0.031
Caisson Drilling	0.089	0.031
Loaded Trucks	0.076	0.027
Jackhammer	0.035	0.012
Small Bulldozer	0.003	0.001

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

Structure Damage

Construction of the Project would generate groundborne construction vibration during site clearing, grading and shoring activities. Based on the vibration data provided in Table B-22, vibration velocities from operation of construction equipment would range from approximately 0.001 to 0.031 inches per second PPV at 50 feet from the source of activity.

The nearest single-family residential buildings across the service alley (R1 and R2) are located approximately 50 feet from the Project Site. This value would not exceed the 0.2 inch per second PPV significance threshold for potential residential building damage. Impacts would be less than significant.

Oil Pipeline

Vibration impacts were also analyzed at the existing oil line that runs beneath the center of the service alley located approximately 18 feet (horizontal distance) from the closest edge of the Project Site. At a distance of 18 feet, construction activities associated with the Project, including from excavation activities would generate vibration levels at the pipeline up to approximately 0.146 inches per second PPV. Caltrans analyzed the effects of blasting on a variety of different vibration-sensitive sources including buried pipelines in its Transportation and Construction Vibration Manual (2013) and concluded that "buried pipelines can survive rather high-vibration intensities because they are constrained by the soil and bedding materials surrounding them."[48] Specifically, buried pipelines located near blasting activities could experience vibration levels between 25 and 150 inches per sec PPV without any discernible damage.[49] The Project would not require any blasting and construction activity would be a fraction of the vibration levels cited by Caltrans. Furthermore, construction of the Project would not require excavation of the buried oil pipeline or the soil and bedding materials surrounding the pipeline. In other words, the buried oil pipeline would continue to be constrained by the soil and bedding materials surrounding it

[48] *California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013, Page 76.*

[49] *California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013, Table 22.*

during excavation activities from construction of the Project. Therefore, the Project's construction would not cause any damage or rupture the existing oil line and impacts would be less than significant.

Human Annoyance

Sensitive uses are defined as residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks. Off-site non-residential uses such as retail and commercial uses are not considered vibration sensitive receptors for human annoyance under CEQA. The only uses in the Project vicinity that are sensitive uses are residential uses. The nearest existing off-site residential structure is located across the service alley from the Project Site approximately 50 feet north of the construction site, with other residential structures at greater distances to the north. These structures could be exposed to groundborne noise from construction activities that would range from approximately from 0.001 to 0.031 inch per second PPV during construction, when construction activities occur near the property line. The vibration from construction equipment would not exceed the 0.04 inch per second PPV significance threshold for human annoyance and therefore, impact would be less than significant.

Operation

Structure Damage

The Project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Groundborne vibration generated by each of the above-mentioned activities would generate approximately up to 0.005 inches per second PPV adjacent to the Project Site. The potential vibration levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold of 0.2 inch per second PPV significance threshold for potential residential building damage. As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.

Human Annoyance

Groundborne noise generated by operational activities would generate approximately up to 0.001 inch per second PPV adjacent to the Project Site.[50] The potential groundborne noise levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold of 0.04 inch per second PPV for perceptibility. As such, groundborne noise impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.

As discussed above, operation of the Project would result in vibration levels substantially less than the significance threshold for groundborne vibration at vibration-sensitive receptors. For typical buildings, groundborne vibration results in groundborne noise levels approximately 25 to 40 decibels lower than the velocity level.[51] Given that the vibration level would be much lower than the perceptibility threshold at vibration-sensitive uses, and given that groundborne noise would be approximately 25 to 40 decibels lower than the velocity level, operational groundborne noise impacts would also be less than significant at vibration-sensitive uses.

[50] *This vibration estimate is based on data presented in the USDOT Federal Transit Administration, 2018.*

[51] *Federal Transit Administration, Noise and Vibration Manual, 2018, Page 120.*

c. For a project located within 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 an airport land use plan or within two miles of an airport. The nearest airports are the Santa Monica Municipal Airport and LAX, located approximately 3.4 miles northwest and 2.5 miles to the south of the Project Site, respectively. Therefore, the Project would not expose people in the Project vicinity to excessive noise levels from airport use and no impact would occur. No impacts would occur.

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)?

Less Than Significant Impact. The Project does not include any residential uses that would directly increase in the population growth in the area. However, the Project proposes a new hotel use that will provide accommodations for visitors to the City, but would not provide long-term housing opportunities. The proposed building includes the development of a 111,000 SF (175 room) hotel, of which 2,900 SF restaurant uses would be provided on the ground floor. Any indirect population growth by the Project within Culver City and/or neighboring cities would be nominal and would not materially affect forecasted City or SCAG growth assumptions.

Based on a building area of approximately 111,000 square feet, the Project would generate approximately 130 employees.[52] According to SCAG, Culver City is forecasted to have an employment growth of 8,900 jobs between 2012 and 2040.[53] As such, the estimated 130 hotel employees generated by the Project are within SCAG's employment growth assumptions of Culver City. As such, the Project would not generate growth beyond the range of development anticipated within the established SCAG regional forecast for Culver City. In addition, it is anticipated that some of the employment opportunities offered by the Project would be filled by persons already residing in the vicinity of the Project Site and the potential growth associated with the Project employees who many relocate their place of residence would not be substantial. Furthermore, the Project would be located in an area already served by existing infrastructure and anticipated within applicable Culver City infrastructure plans (i.e., roadways, utility lines, etc.). As such, the Project would not induce substantial population growth in the area either directly or indirectly. Impacts would be less than significant.

[52] *108,100 SF hotel X 0.00113 employees per average SF (per the Lodging factor from Table 12 of the 2018 Developer School Fee Justification Study, LAUSD, March 2018) = 122 employees. Also, 2,900 SF restaurant X 0.00271 (per the Neighborhood Shopping Centers factor from Table 12 of the 2018 Developer School Fee Justification Study, LAUSD, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202018%20FINAL.pdf, March 2018) = 8 employees. Thus, there would be a total of 130 employees on the Project Site.*

[53] *Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Demographic and Growth Forecast Appendix, Table 11, Jurisdictional Forecast, page 23, April 2016.*

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

No Impact. Existing uses on the Project Site include commercial (retail) uses and surface parking along Jefferson Boulevard and Slauson Avenue, all of which would be demolished and removed to support development of the Project. As such, Project implementation would not displace existing housing or people. Therefore, development of the Project would not displace substantial numbers of existing local populations or housing such that construction of replacement housing would be necessary. No impacts would occur.

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:

a. Fire protection?

Less Than Significant Impact With Mitigation Incorporated. Fire protection and emergency medical services for the Project Site are provided by the Culver City Fire Department (CCFD), which is supported, as required, by the fire departments of the Cities of Los Angeles, Santa Monica, and Beverly Hills, and by the Los Angeles County Fire Department, through mutual aid agreements. The first responder is dispatched based on department availability and nearest unit to the Project Site during the time of the call for service.

The CCFD provides Paramedic Advanced Life Support Services, Fire Suppression Community Risk Reduction and Education programs to a 5.26-square-mile area, and an existing population of approximately 39,214 persons.[54] The CCFD is made up of a total of approximately 72 employees who are housed at three fire stations. Each fire station is equipped with unique equipment (e.g., three engines, one ladder truck, two paramedic rescues, one Basic Life Support ambulance and one battalion chief command vehicle) and a minimum staffing of 18 fire suppression personnel at all times.[55] The City is divided into three fire districts, two rescue/emergency medical services (EMS) districts, and 15 fire management zones. The fire districts and EMS districts are evenly distributed by population served and centerline miles (i.e., total length of all the roads in the City, excluding the size and number of lanes on each road). The fire management zones are defined by occupancies within a given geographical area that share common risk. The City includes three fire stations, including Fire Station 1 (located at 9500 Culver Boulevard), Fire Station 2 (located at 11252 Washington Boulevard, and Fire Station 3 (6030 Bristol Boulevard).

The Project Site is located within Fire District 3 and would be served by Fire Station 3, which is the closest fire station to the Project Site (approximately 0.62 miles southeast of the Project Site). Fire Stations 1 and 2 would provide back-up service. If all three of these fire stations are busy, response is provided by available units belonging to the mutual aid agreement agencies. According to the CCFD, no new fire stations are planned at this time.[56] However, the Fire Department needs to add a third rescue, which would be housed at Station 2, which would consist of six (6) paramedic/firefighters. This addition is not based solely on the development of this Project, but overall need in the City.

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[54] *U.S. Census Bureau, QuickFacts – Culver City, https://www.census.gov/quickfacts/fact/table/culvercitycitycalifornia,US/PST045218, accessed October 2019.*

[55] *Culver City, Community Risk Assessment, Standards of Cover. Available at: https://www.culvercityfd.org/files/sharedassets/fire/crasoc_website_20190618.pdf. Accessed on October 14, 2019.*

[56] *Culver City Fire Department Correspondence from Chief Jeremy Debie, December 8, 2020.*

The Project Site is not located in an area of moderate or very high fire hazard. The nearest state responsibility area is located approximately 11 miles northwest of the Project in the City of Malibu and the nearest very high fire hazard severity zone is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately 2.3 miles northeast of the Project Site. In addition, the Project Site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required.

Construction activities associated with the Project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. In addition, fire suppression equipment specific to construction would be maintained on the Project Site. As applicable, construction activities would be required to comply with the 2019 California Building Code, the 2019 California Fire Code, and Title 9: General Regulations, Chapter 9.02: Fire Prevention, of the CCMC.

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

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

Operational activities associated with the Project would incrementally increase the demand for fire protection and emergency medical services. As discussed under Response XIV.a, the Project could result in a nominal indirect population increase within the City. As mentioned above, up to three CCFD fire stations would provide fire protection and emergency medical services to the Project area. According to the CCFD, Fire Station 3 would provide primary fire protection services to the Project Site.

In 2018, the CCFD responded to a total of 6,791 incidents, including fire, rescue, hazardous materials, and others.[57] The CCPD's response time standards differentiate between the type of an emergency response call

[57] *Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 25.*

(e.g., fire suppression, EMS, technical rescue, hazardous materials emergency response) and then by the type of risk (e.g., high, moderate, and low risk). The CCFD reports their response times based on the first due-in staff and the Effective Response Force (ERF). The first due-in staff is the first unit to arrive at the incident and has the responsibility of establishing command at the scene, evaluating the need for additional resources, and providing initial emergency response services. The ERF includes the total number of personnel necessary to address an emergency and/or terminate an incident.[58] **Table B-23**, *CCFD Response Times,* shows the response time goals, for 90 percent of the time, and the five-year aggregate response times from 2015 to 2019.

Table B-23
CCFD Response Times[a]

Incident Type	CCFD Goal	Aggregate 2015-2019 Response Time
High Risk Fire Incident		
First Due-In Unit	7:00	10:02
ERF	14:00	n/a
Moderate Risk EMS Incident		
First Due-In Unit	6:20	8:13
ERF	9:50	10:35
Moderate Risk Technical Rescue Incidents		
First Due-In Unit	7:30	9:40
ERF	12:00	N/A
Moderate Risk Hazardous Materials Incident		
First Due-In Unit	8:00	10:02
ERF	9:00	N/A

[a] Goals and response data provided by CCFD, Fire Chief Jeremy DeBie, correspondence dated December 8, 2020.

Per the CCFD, a rough estimate of response times to the Project Site, based on previous response times, would deliver the 1st due unit to the scene in 9:55 (9 minutes and 55 seconds) with the ERF arriving within 10:16 90% of the time.[59] The CCSD response time goal would remain at 7 minutes for the first-in unit 90% of the time; and 14-minutes for the EFR. While precise response times cannot be predicted, this information suggests that the first due-in unit response goal of 7 minutes might not be achieved, but that the goal for arrival of the total number of personnel necessary to address an emergency and/or terminate an incident would be well under the 14-minute goal for the EFR. The third rescue, as discussed above, would help to reduce response times overall in the City. Also, the CCFD is further looking to reduce response times via: alarm handling improvements with its new dispatch center; use of turnout timers in stations to better monitor turnout times; and use of HAAS alerting systems in new engines that send messages to drivers and connected vehicles that are predicted to be in the most probable path of the emergency vehicles as they are preparing to approach or arrive on-scene. Furthermore, emergency vehicles and fire access for the Project Site would be provided from the public alley. Project operation would increase traffic in the area, which could adversely affect CCFD emergency response times. However, the Project Site is located in an area that is well served by the surrounding roadway network, and multiple alternative routes exist for emergency vehicle access to the Project Site. Furthermore, pursuant to CVC Section 21806, emergency response is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple

[58] *Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, pages 25 and 26.*

[59] *Culver City Fire Department Correspondence from Chief Jeremy Debie, December 8, 2020.*

station response such that adequate CCFD emergency response would be maintained with implementation of the Project. Based on the above and the close proximity of multiple fire stations, including the nearest station at 0.62 mile from the Project Site, and availability of current Fire Department resources, development of the Project is not anticipated to result in substantial adverse effects to the fire department's existing average response times.

The Project would be subject to compliance with fire protection design standards, as necessary, per the 2019 California Building Code, 2019 California Fire Code, the CCMC, and the CCFD, to ensure adequate fire protection. Culver City's standard conditions of approval generally require that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the CCFD. Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards. The ability of the water service provider to provide water supply to the Project Site is discussed below in Section XVIII, *Utilities and Service Systems*. As discussed therein, adequate water supply would be available to serve the Project Site, including minimum fire flow requirements.

As stated above, the However, the Fire Department needs to add a third rescue, which would be housed at Station 2. This addition is not based solely on the development of this Project, but overall need in the City. Consistent with *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection services is the responsibility of the City. Through the City's regular budgeting efforts, CCFD's resource needs, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, CCFD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or other projects in the service area.

Overall, given the moderate rate of population growth in Culver City, the Project's conformance to expected growth scenarios for the City, the existing number of Fire staff, and the Project's planned on-site fire protection design features consistent with the applicable regulatory requirements of the 2019 California Building Code, 2019 California Fire Code, the CCMC, and the CCFD, the Project is not expected to be beyond the scope of available fire services. Accordingly, the CCFD's response times would not be substantially changed such that response time objectives are compromised in any significant manner. Further, according to the CCFD, Project implementation would not require the physical expansion of an existing fire station or a new fire station or require additional staffing to the fire protection facilities servicing the Project Site.[60] Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

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

[60] *Culver City Fire Department Correspondence from Chief Jeremy Debie, December 8, 2020.*

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

The Construction Traffic Management Plan shall identify, at a minimum, the following to the satisfaction of the City:

- The name and telephone number of a contact person who can be reached 24 hours a day regarding construction traffic complaints or emergency situations.
- An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties.
- Procedures for the training and certification of the flag persons.
- The location, times, and estimated duration of any roadway closures, traffic detours, use of protective devices, warning signs, and staging or queuing areas.
- The location and travel routes of off-site staging and parking locations.
- The location of temporary power, portable toilet and trash and materials storage locations.
- The timing and duration of all street and/or lane closures and shall be made available to the City in digital format for posting on the City's website and distribution via email alerts on the City's "Gov Delivery" system. The Plans shall be updated weekly during the duration of Project construction, as determined necessary by the City Department of Public Works or designee determined appropriate by Public Works.
- Prior to approval of the Plan, the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community:
    1) Construction schedule and hours.
    2) Framework for construction phases.
    3) Identify traffic diversion plan by phase and activity.
    4) Potential location of construction parking and office trailers.
    5) Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity).
    6) Emergency access plan.
    7) Demolition plan.
    8) Staging plan for the concrete pours, material loading and removal.
    9) Crane location(s).
    10) Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).

b. Police protection?

Less Than Significant Impact With Mitigation Incorporated. Police protection for the Project Site is provided by the Culver City Police Department (CCPD). In addition, it is acknowledged that the CCPD has mutual aid agreements with the Beverly Hills Police Department, Santa Monica Police Department, Los Angeles Police Department, and Los Angeles County Sheriff's Department on an as needed basis. The CCPD serves a nighttime population of approximately 40,000 persons and a daytime population of approximately 300,000 persons.[61] The CCPD consists of 153 full time employees, which includes 113 sworn officers, 14 reserve officers, 40 professional staff and 19 volunteers in patrol.[62] The CCPD is divided into three bureaus (Administration Bureau, Investigations and Traffic Bureau, and Operations Bureau) and five police car districts. The Project is located in Car District 4. The CCPD station is located at 4040 Duquesne Avenue, located approximately 2.2 miles north of the Project Site.[63]

During construction, equipment and building materials could be temporarily stored on the Project Site, which could result in theft, graffiti, and vandalism. However, the Project Site is located in an area with high vehicular activity from Jefferson Boulevard and Slauson Avenue. In addition, the construction site would be fenced along the perimeter, with the height and fence materials subject to review approval by Culver City's Engineer and Planning Manager, as required by Culver City's standard conditions of approval. As discussed above, temporary lane closures may be required for right-of-way frontage improvements and utility construction. However, these closures would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the Project Site would be maintained. All temporary lane closures would be coordinated so that they do not occur during peak periods of traffic congestion, to the extent feasible. Such events would be coordinated with neighboring construction projects, as necessary. Emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Further, as discussed above, a Final Construction Traffic Management Plan for the Project would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours (MM-PS-1). Given the visibility of the Project Site from adjacent roadways and surrounding properties, existing police presence in Culver City, maintained emergency access, and construction fencing, the Project is not expected to increase demand on existing police services to a meaningful extent. Therefore, with the incorporation of the Project's Construction Traffic Management Plan (MM-PS-1), the Project would have a less than significant temporary impact on police protection during the construction phases.

Operational activities associated with the Project would incrementally increase demand for police protection services. As discussed under Response XIV.a, the Project could result in a nominal indirect population increase within the City. Implementation of the Project could also indirectly increase the need for police protection by permitting up to 111,000 square feet of hotel and restaurant uses which would increase the daytime population in the Project area given the new employees and hotel guests/patrons. As discussed in Attachment A, *Project Description*, of this IS/MND, the Project would incorporate comprehensive safety and security features to enhance public safety and reduce the demand for police services, including a 24-hour/seven-day video surveillance security program to ensure the safety of its hotel guests, employees, and visitors. Site security features would include building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. The Project design would include lighting of entry-ways and public areas for site security purposes.

Patrol routes in the area currently include the Project Site and would continue to do so in a similar manner as under existing conditions. To ensure that police protection considerations are incorporated into the Project design, prior

[61] *Culver City Police, About CCPD, https://www.culvercitypd.org/Office-of-the-Chief-of-Police/About-CCPD, accessed October 2020.*

[62] *Culver City Police, About CCPD, https://www.culvercitypd.org/Office-of-the-Chief-of-Police/About-CCPD, accessed October 2020.*

[63] *Culver City Police, Culver City CCPD Districts Map, https://www.culvercitypd.org/files/assets/police/images/maps/police-car-districts.jpeg?w=1561&h=1011, accessed October 2020.*

to the issuance of a building permit for the Project, the CCPD would be provided the opportunity to review and comment upon improvement plans in order to facilitate opportunities for improved emergency access and response; ensure the consideration of design strategies that facilitate public safety and police surveillance; and other specific design recommendations to enhance public safety and reduce potential demands upon police protection services. Per the CCPD, development of the Project could result in the need for additional police officers to handle the increase in call volume related to the Project. However, consistent with *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. Through the City's regular budgeting efforts, CCPD's resource needs, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, CCPD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or other projects in the service area. Given the overall moderate rate of population growth in Culver City, the Project's conformance to expected growth scenarios for the City, and the Project's planned on-site security measures, the Project is not expected to be beyond the scope of available police services. Additionally, the Project's on-site security would minimize the need for police services on the Project's public open space and public parking space areas. Accordingly, the CCPD's response times would not be substantially changed such that response time objectives are compromised in any significant manner. Also, per the CCPD, no new or expanded police facilities would be constructed as a result of the Project.[64] Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

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

c. Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Culver City Unified School District (CCUSD). The CCUSD includes one high school, one continuation high school, one middle school, five elementary schools, and one adult school. The Project Site is located within the attendance boundaries of the El Rincon Elementary School, Culver City Middle School, and Culver City High School. El Rincon Elementary School is located at 11177 Overland Ave, approximately 0.55 mile to the northeast of the Project Site. Culver City Middle School is located at 4601 Elenda Street, approximately 1.13 miles north of the Project Site. Culver City High School is located at 4401 Elenda Street, approximately 0.92 miles north of the Project Site.

Project operation would incrementally increase demand for school services due to nominal indirect population growth. If Project employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. However, if some employees with school age children choose to move closer to work, or if some new employees with children are hired from the surrounding community or another City, there could be a negligible increase in student population in the nearby schools. 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, as applicable. In accordance with SB 50, the payment of these fees are deemed to provide full and complete mitigation for impacts to school facilities. As such, the Project is not anticipated to result in substantial adverse physical impacts to schools that would alter existing school facilities or result in the need for new facilities, construction of which could cause significant environmental impacts. Impacts would be less than significant.

[64] *Culver City Police Department Correspondence from Assistant Chief Jason Sims, November 18, 2020.*

d. Parks?

Less Than Significant Impact. The Culver City Parks, Recreation and Community Services (PRCS) division oversees the maintenance and operations of 14 City parks totaling approximately 91.5 acres, a community garden, community and recreational facilities, senior centers, swimming pools, and a theater facility. A joint-use partnership between Culver City and CCUSD provides additional open space and park facilities for use by residents of Culver City during non-school hours. The Project Site is located within the vicinity of four park facilities. **Table B-24**, *Culver City Park Facilities Located in the Vicinity of the Project Site*, provides information on the park/facility, location, size, park amenities/activities, and the approximate distance/direction from the Project Site.

Table B-24
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	3.2	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	0.2 miles northwest
Blanco Park	5801 Sawtelle Boulevard	3.3	After school program, barbeques, child care, basketball courts, parcourse equipment, covered and open picnic areas, playgrounds, multi-purpose sports field, softball field	0.49 miles northeast
Fox Hills Park	Green Valley Circle & Buckingham Parkway	10	Barbeques, basketball courts, tennis courts, volleyball courts, parcourse equipment, open picnic area, playground, recreation hut, multi-purpose sports field, softball field, walking/jogging path	0.70 miles southeast
Lingberg Park	5041 Rhoda Way	4.4	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	0.84 miles north

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

Source: Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, pages 4 and 5.

Project operation would incrementally increase demand for park services. The Project would not generate a new direct residential population as no residential uses are proposed. As discussed under Response XIV.a, the Project could result in a nominal indirect population increase within the City.

Despite the incremental indirect population increase, most hotel and restaurant employees are not expected to use local parks given limited lunch time hours, and to the extent they do use local parks it would likely be for passive recreation (walking or eating lunch) on weekdays when use of these parks is not considered at peak (i.e., peak usage of parks often occurs on weekends when the office uses are not in operation). In addition, although there is the possibility that hotel guests may utilize local parks and recreational facilities, the demand is also expected to be negligible since hotel guests would likely utilize the recreation amenities provided within the hotel, including the pool uses that would be provided on the roof. As such, the Project is not anticipated to result in substantial adverse physical impacts to parks that would alter existing park facilities or result in the need for new facilities, construction of which could cause significant environmental impacts. Impacts would be less than significant.

e. Other public facilities?

Less Than Significant Impact. The Los Angeles County Public Library (LACPL) provides library services to Culver City. The Project Site is served by the LACPL Culver City Julian Dixon Branch Library, which is located at 4975 Overland Avenue, Culver City, approximately 1.20 miles north of the Project Site. Other nearby LACPL branches are the Lloyd Taber-Marina del Rey Library, View Park Library, and Lennox Library. The Lloyd Taber-Marina del Rey Library is located at 4533 Admiralty Way, Marina del Rey, approximately 2.65 miles west of the Project Site. The View Park 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 4.34 miles southeast of the Project Site. Similar to park services, the introduction of new daytime employees and a nominal indirect population increase would not substantially affect the provision of library services.

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

Based on the above, the Project is not anticipated to result in substantial adverse physical impacts to other public facilities that would alter existing public facilities or result in the need for new facilities, construction of which could cause significant environmental impacts. Impacts would be less than significant.

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 XIV.d, the use of existing parks is not expected to substantially increase as a result of the Project, given limited lunch time hours and minimal number of hotel and restaurant employees. In addition, although there is the possibility that hotel guests may utilize local parks and recreational facilities, the demand is also expected to be negligible since hotel guests would likely utilize the recreation amenities provided within the hotel, including the pool uses that would be provided on the roof. Impacts would be less than significant.

XVII. TRANSPORTATION

The following discussion is based, in part, on the Traffic Study for the Jeff Hotel Project Proposed at 11469 Jefferson Boulevard, Culver City (herein referred to as the "Traffic Study"), prepared by Crain & Associates, 2020, which is available for review at the Culver City Planning Division. The Traffic Study was conducted using procedures and criteria adopted by the Los Angeles Department of Transportation (LADOT) and Culver City staff, and addresses the Project's trip generation and potential impacts to the surrounding roadway network. The Traffic Impact Analysis evaluates four Project scenarios: 1) Existing (2018) Conditions, 2) Existing (2018) Plus Project Conditions, 3) Future (2024) Without Project Conditions, and 4) Future (2024) With Project Conditions.

Future conditions take into account the potential development of 32 related projects in the general Project vicinity, as identified by the City of Los Angeles and Culver City.

Would the project:

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

Less Than Significant Impact With Mitigation Incorporated. Construction of the Project has the potential to increase traffic through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. In addition, the proposed uses would have the potential to contribute to an increase in peak-hour traffic in the Project vicinity. An analysis of potential impacts to transit facilities, roadway facilities, bicycle facility, and pedestrian facilities.

Transit Facilities

As previously discussed, the Project Site is served by various bus routes operated by Metro and Culver City Bus with bus stops located in close proximity to the Project Site, including the Culver City Transit Center Bus Station that is located approximately 900 feet southeast of the Project Site that is served by the Culver City bus routes 3,4 and 6 and the Metro bus routes 108, 110 and 217. The Metro Expo Line Culver City light rail station is also located approximately two and three quarter miles north of the Project Site.

As there are no bus stops adjacent to the Project Site, no temporary impacts to transit facilities are expected during construction of the Project.

Analysis of operational impacts to transit facilities is provided in the Traffic Study. As discussed therein, the Project during operation would generate approximately seven person trips per hour during both the AM and PM peak hours. Compared to the service capacity of 1,680 persons per peak hour for those transit services within the vicinity of the Project Site, the Project person trips would represent less than one-half percent of this capacity during each peak hour. This amount of transit usage by the Project would not result in a significant transit impact. Therefore, impacts would be less than significant.

Bicycle Facilities

As discussed in the Traffic Study, there are no existing bicycle facilities within the City near the Project Site, except for short bicycle lane segments along the west and east sides of Sepulveda Boulevard, south of Centinela Avenue. These short sections are located in the City of Los Angeles and join the existing bicycle lanes to the south along Sepulveda Boulevard.

In the future, the City's Bicycle & Pedestrian Action Plan proposes to install Class II bicycle lanes on the following segments in the general Project study area:

- Berryman Avenue, between Hayter Avenue and Sepulveda Boulevard;
- Centinela Avenue, between Mesmer Avenue and Sepulveda Boulevard; and
- Hannum Avenue, between Playa Street and Slauson Avenue.

Class IV separated bikeways are proposed on the following roadway segments:

- Centinela Avenue, between Sepulveda Boulevard and Green Valley Circle;
- Jefferson Boulevard, between the City limit and Sepulveda Boulevard; and
- Sepulveda Boulevard, between the Ballona Creek Bike Path and Centinela Avenue.

A Class III bicycle roadway is proposed on the following roadway segment:

- Hannum Avenue, between Sawtelle Boulevard and Playa Street;

As discussed in the Traffic Study, the City of Los Angeles Mobility Plan 2035 identifies facilities as part of its Bicycle Enhanced Network (BEN), including bicycle paths and protected bicycle lanes, to be completed by 2035. As part of these BEN facilities, Sepulveda Boulevard is a Tier 1 Protected Bicycle Lane facility, south of Centinela Avenue to Manchester Avenue. Centinela Avenue is identified as a Tier 1 Protected Bicycle Lane improvement, from Mesmer Avenue to its intersection with Jefferson Boulevard which transitions to Inglewood Boulevard until it terminates at the Ballona Creek Bike Path.

The Project access driveway on Slauson Avenue would be required to conform to Culver City standards, and would be designed to provide adequate sight distance. Street trees and other potential impediments to adequate visibility would be minimal. The Project entrance-only and exit-only driveway connections to Slauson Avenue and the site-adjacent unnamed alley, respectively, would provide the most direct connection to and from the bicycle parking located on the Project's ground floor. The one-way operation of the Project's internal drive would have less potential for vehicle-bicycle conflicts than a two-way internal drive, providing enhanced safety for bicyclists accessing/egressing the Project.

Based on the above, the Project would not affect the ability of the City of Culver City or the City of Los Angeles to implement their bicycle plans or result in bicycle access impacts. Impacts to bicycle facilities would be less than significant.

Pedestrian Facilities

As discussed in Attachment A, Project Description, of this IS/MND, pedestrian access would be provided from a pedestrian entrance on Jefferson Boulevard that would lead to the hotel lounge and restaurant area. Pedestrian access would also be provided from the ride share drop-off and accessed from Slauson Avenue. This would lead to the hotel lobby. The pedestrian access locations at the Project Site would be designed to City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian and bicyclist safety. Impacts would be less than significant.

Roadway Facilities

Seven (7) study intersections and three (3) study residential street segments were selected for evaluation in consultation with LADOT and Culver City based on Project-related traffic patterns; refer to **Table B-25**, *Study Intersections and Study Residential Street Segments*. An intersection level of service (LOS) analysis was performed at the study intersections to assess significant impacts resulting from the Project. **Figure B-2**, *Study Intersections and Study Residential Street Segments,* illustrates the location of each study area intersection.

Methodology

The traffic analysis was performed through the use of the Critical Movement Analysis (CMA) methodology. The analysis and evaluation of traffic operations at each signalized study intersection is based on procedures outlined in the Transportation Research Board Circular 212, Interim Materials on Highway Capacity. In the discussion of the CMA for signalized intersections, procedures were developed for determining operating characteristics of an intersection in terms of the "Level of Service" (LOS) provided for different levels of traffic volume and other variables, such as the number of traffic signal phases. The CMA methodology is also consistent with the Los Angeles County Congestion Management Program (CMP) procedures for transportation impact analyses.

Table B-25
Study Intersections and Study Residential Street Segments

No.	Intersection
Study Intersections	
1	Jefferson Boulevard & Mesmer Avenue[a]
2	Jefferson Boulevard & I-405 Southbound Ramps[b]
3	Jefferson Boulevard & I-405 Northbound Ramps[b]
4	Jefferson Boulevard & Slauson Avenue[c]
5	Slauson Avenue & Sepulveda Boulevard[c]
6	Slauson Avenue & SR-90[d]
7	Centinela Avenue & Sepulveda Boulevard[a]
Study Residential Street Segments	
1	Segrell Way, north of Slauson Avenue
2	Culver Park Drive, north of Slauson Avenue
3	Slauson Avenue, west of Segrell Way

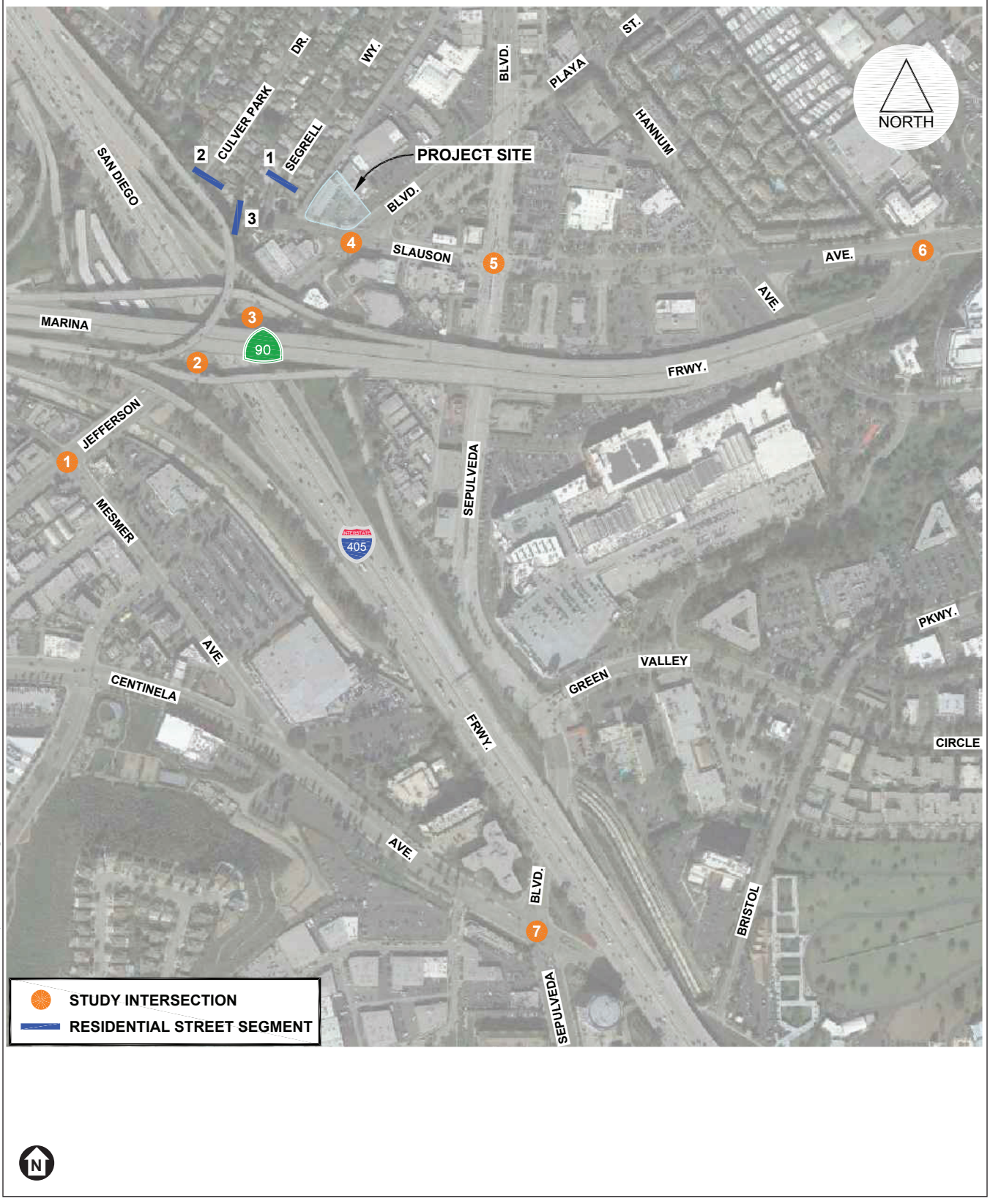
[a] Indicates an intersection shared between the City of Culver City and the City of Los Angeles.
[b] Indicates an intersection shared between the City of Culver City, the City of Los Angeles, and Caltrans.
[c] Indicates an intersection within the City of Culver City.
[d] Indicates an intersection shared between the City of Culver City and Caltrans.

Source: Crain & Associates, 2020.

LOS is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS "A" to overload conditions at LOS "F". LOS "D" is typically recognized as the minimum acceptable LOS in urban areas. A determination of the LOS at an intersection can be obtained through a summation of the critical movement volumes, on a per lane basis, at that intersection. One the sum of the critical movement volumes has been obtained, the values in **Table B-26**, *Critical Movement Volume Ranges for Determining Level of Service*, can be used to determine the appropriate LOS. Capacity is the total maximum hourly volume of vehicles in the intersection critical lanes that has reasonable expectation of passing through the intersection under the prevailing roadway and traffic conditions, The CMA volume-to-capacity (V/C) ratio used in this study were calculated by dividing the sum of the critical movement volumes by the appropriate capacity value for the type of signal control present or proposed at the subject intersections. A description of the different LOS and their corresponding V/C value sis shown in **Table B-27**, *Level of Service Definitions for Signalized Intersections*. All of the study intersections are signalized.

These standard CMA calculations are also adjusted to account for signal enhancements not considered in the CMA methodology, including the effects of intersections operating under the City of Los Angeles's Automated Traffic Surveillance and Control (ATSAC) system or the upgraded Adaptive Traffic Control System (ATCS), as well as the City of Culver City's ATSAC-like system. Per City of Culver LADOT policies, the standard V/C ratios were decreased by 0.070 where only the ATSAC or the ATSAC-like systems are in effect and by 0.100 where the ATCS is in effect.

Based on discussions with LADOT staff, all three study intersections operated by the City of Los Angeles currently function under the upgraded ATCS system [i.e., Intersection No. 1 (Jefferson Boulevard & Mesmer Avenue), Intersection No. 2 (Jefferson Boulevard & I-405 Southbound Ramps), and Intersection No. 3 (Jefferson Boulevard & I-405 Northbound Ramps)]. The Culver City-operated study intersections [i.e., Intersection No. 4 (Jefferson Boulevard & Slauson Avenue), Intersection No. 5 (Slauson Avenue & Sepulveda), Intersection No. 6 (Slauson Avenue & SR-90), and Intersection No. 7 (Centinela Avenue & Sepulveda Boulevard)] all operate under the City's ATSAC-like system.



SOURCE: Craine & Associates, 2019

11469 Jefferson Boulevard Project

Figure B-2
Study Intersections and Study Residential Street Segments

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Table B-26
Critical Movement Volume Ranges for Determining Level of Service

	Maximum Sum of Critical Volumes (Vehicles per Hour)		
Level of Service	**Two Phase**	**Three Phase**	**Four or More Phases**
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	Not Applicable	Not Applicable	Not Applicable

Source: Transportation Research Board, Highway Capacity; Crain & Associates, 2020.

Table B-27
Level of Service Definitions for Signalized Intersections

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

Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980; Crain & Associates, 2020.

Although both Project study area jurisdictions (Cities of Culver City and Los Angeles) utilize the CMA methodology for intersection LOS analyses, the City of Los Angeles maintains its own proprietary analysis spreadsheet, with adjustment factors and assumption override options unique to the City of Los Angeles. Therefore, a supplemental analysis, using the proprietary spreadsheet and all staff-recommended adjustments, was also made for the four study intersections located partially within the City of Los Angeles system [i.e., Intersection No. 1 (Jefferson Boulevard & Mesmer Avenue), Intersection No. 2 (Jefferson Boulevard & I-405 Southbound Ramps), Intersection No. 3 (Jefferson Boulevard & I-405 Northbound Ramps), and Intersection No. 7 (Centinela Avenue & Sepulveda Boulevard)].

Existing (2018) Conditions

Applying the above-mentioned analysis procedures, the CMA V/C ratios and corresponding LOS can be calculated for each study intersection for Existing (2018) Conditions. These results are provided in **Table B-28**, *Existing (2018) Intersection Level of Service Analysis*. Table B-28 indicates the existing V/C ratio during the morning and evening peak hours and the corresponding LOS at the study intersections. As illustrated in Table B-28, four of the seven study intersections would operate at LOS C or better during both peak hours. Two study intersections would operation at LOS D or better during both peak hours. The remaining location below is operating at LOS "E" or "F":

- Jefferson Boulevard & I-405 Freeway Northbound Ramps: AM Peak Hour – LOS "F" and PM Peak Hour – LOS "E"

Table B-28
Existing (2018) Intersection Level of Service Analysis

		Existing (2018) Conditions			
		AM Peak Hour		PM Peak Hour	
No.	Intersection	V/C or Delay	LOS	V/C or Delay	LOS
1.	Jefferson Boulevard & Mesmer Avenue[a]	0.569	A	0.501	A
2.	Jefferson Boulevard & I-405 Southbound Ramps[a]	0.877	D	0.653	B
3.	Jefferson Boulevard & I-405 Northbound Ramps[a]	1.051	F	0.972	E
4.	Jefferson Boulevard & Slauson Avenue[b]	0.368	A	0.439	A
5.	Slauson Avenue & Sepulveda Boulevard[b]	0.485	A	0.495	A
6.	Slauson Avenue & SR-90[b]	0.729	C	0.613	B
7.	Centinela Avenue & Sepulveda Boulevard[a]	0.894	D	0.879	D

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

[a] Analysis results based on City of Los Angeles CMA methodology and assumptions.
[b] Analysis results based on City of Culver City CMA methodology.

Source: Crain & Associates, 2020.

Project Trip Generation

To determine the Project's impacts on area intersections, the Traffic Study calculated the number of vehicle trips generated by the Project using the trip generation rates outlined in the Institute of Transportation Engineers (ITE) handbook titled *Trip Generation, 10th Edition*. Trip generation rates and the resulting trips that would be generated by the Project are presented in **Table B-29**, *Estimated Project Trip Generation.* The Project is

estimated to generate approximately 1,087 net daily trips of which 72 trips would occur during the morning peak hour and 67 trips during the evening peak hour.[65]

Table B-29
Estimated Project Trip Generation

Proposed Project	Size	Daily	A.M. Peak Hour IN	A.M. Peak Hour OUT	A.M. Peak Hour TOTAL	P.M. Peak Hour IN	P.M. Peak Hour OUT	P.M. Peak Hour TOTAL
Hotel	175 rooms	1,463	48	34	82	54	51	105
Proposed Project Trips		*1,463*	*48*	*34*	*82*	*54*	*51*	*105*
Existing Uses (to be removed)								
Shopping Center	13,301 square feet	502	8	5	13	24	27	51
Pass-By (25%) Trip Reduction		(126)	(2)	(1)	(3)	(6)	(7)	(13)
Existing Project Trips		*376*	*6*	*4*	*10*	*18*	*20*	*38*
Project Net Trip Generation Total		**1,087**	**42**	**30**	**72**	**36**	**31**	**67**

Source: Crain & Associates, 2020.

Existing (2018) Plus Project Traffic Volumes

The existing (2018) traffic volumes were combined with the Project-only traffic volumes to obtain the Existing (2018) Plus Project Conditions traffic volume forecasts. The Existing (2016) Plus Project Conditions traffic volumes during both AM and PM peak hours are presented in Figures 9(a) and 9(b) of the Traffic Study.

Existing (2018) Plus Project Conditions

The Existing (2018) Plus Project Conditions peak hour traffic volumes were analyzed using the CMA procedures at each of the study intersections to determine the V/C ratio and corresponding LOS. **Table B-30**, *Summary of Intersection Level of Service Analysis*, presents the results of the Existing (2018) Plus Project Conditions. As illustrated in Table B-30, four of the seven study intersections would continue to operate at LOS C or better during both peak hours. Two study intersections [Intersection No. 2 (Jefferson Boulevard & I-405 Southbound Ramps) and Intersection No. 7 (Centinela Avenue & Sepulveda Boulevard)] would continue to operate at LOS D or better during both peak hours. Lastly, Intersection No. 3 (Jefferson Boulevard & I-405 Northbound Ramps) would continue to operate at LOS F and LOS E during the AM and PM peak hours, respectively. However, the Project caused a significant impact at Intersection No. 3 (Jefferson Boulevard & I-405 Northbound Ramps), which is located in the City of Los Angeles.

[65] *The number of net daily trips subtracts the existing trips generated on the Project Site from the Project's new trips. See Table 5 in the Traffic Study for further detail.*

Table B-30
Summary of Intersection Level of Service Analysis

No.	Intersection	Peak Hour	Existing (2018) Conditions		Existing (2018) Plus Project Conditions		Project Increase in V/C	Significant Project Impact	Future (2024) Without Project Conditions		Future (2024) Plus Project Conditions		Project Increase in V/C	Significant Project Impact
			V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	
1.	Jefferson Boulevard & Mesmer Avenue[a]	AM	0.569	A	0.572	A	0.003	No	0.695	B	0.697	B	0.002	No
		PM	0.501	A	0.502	A	0.001	No	0.572	A	0.573	A	0.001	No
2.	Jefferson Boulevard & I-405 Southbound Ramps[a]	AM	0.877	D	0.879	D	0.002	No	1.062	F	1.064	F	0.002	No
		PM	0.653	B	0.658	B	0.005	No	0.779	C	0.783	C	0.004	No
3.	Jefferson Boulevard & I-405 Northbound Ramps[a]	AM	1.051	F	1.068	F	0.017	Yes	1.145	F	1.163	F	0.018	Yes
		PM	0.972	E	0.988	E	0.016	Yes	1.182	F	1.198	F	0.016	Yes
4.	Jefferson Boulevard & Slauson Avenue[b]	AM	0.368	A	0.393	A	0.025	No	0.425	A	0.451	A	0.026	No
		PM	0.439	A	0.446	A	0.007	No	0.515	A	0.521	A	0.006	No
5.	Slauson Avenue & Sepulveda Boulevard[b]	AM	0.485	A	0.488	A	0.003	No	0.606	B	0.609	B	0.003	No
		PM	0.495	A	0.501	A	0.006	No	0.657	B	0.659	B	0.002	No
6.	Slauson Avenue & SR-90[b]	AM	0.729	C	0.732	C	0.003	No	0.799	C	0.802	D	0.003	No
		PM	0.613	B	0.613	B	0.000	No	0.700	B	0.700	B	0.000	No
7.	Centinela Avenue & Sepulveda Boulevard[a]	AM	0.894	D	0.896	D	0.002	No	0.957	E	0.959	E	0.002	No
		PM	0.879	D	0.881	D	0.002	No	1.109	F	1.110	F	0.001	No

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

[a] Analysis results based on City of Los Angeles CMA methodology and assumptions.

[b] Analysis results based on City of Culver City CMA methodology.

Source: Crain & Associates, 2020.

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Future (2024) Base Traffic Projections

The Future (2024) Base traffic projections reflect growth in traffic from two primary sources: (1) the background or ambient growth to reflect the effects of overall area-wide regional growth both within and outside the study area; (2) traffic generated by specified related (cumulative) projects located within, or in the vicinity of, the study area.

The traffic in the vicinity of the study area was estimated to increase at a rate of approximately one percent per year. Future increases in background traffic volumes due to regional growth and development are expected to continue at this rate. With the assumed completion date of year 2024, the Existing 2018 traffic volumes were adjusted upward by a factor of approximately six percent to reflect this area-wide regional growth.

In addition, to ambient traffic growth, related projects in the study area could also contribute to traffic volume increases on the local roadway system. Related or cumulative projects are those developments that are planned and expected to be in place within the same timeframe as the Project. Data describing related projects in the area was solicited from Culver City and the City of Los Angeles. Thirty-two (32) related projects were identified within the study area and are listed in Table B-41, *Related Project List*, below, and within Table 7 of the Traffic Study. The locations of these projects are shown in Figure B-3, Location of Related Projects, below, and Figure 10 of the Traffic Study.

The trip generation estimates for the related projects were based on different sources including environmental sources, and, in the absence of other available data, trip generation rates contained in the ITE's Trip Generation Manual, 10th Edition. As summarized in Table 7 of the Traffic Study, the related projects are expected to generate approximately 73,898 total trips, including 6,477 trips during the morning peak hour and 7,602 trips during the evening peak hour. The geographic distribution and the traffic assignment of the related projects were performed and the results are shown in Figures 11(a) and 11(b) of the Traffic Study.

Future (2024) Base Traffic Volumes

The related project's traffic estimates were added to the Existing Plus Ambient Growth traffic to obtain the Future (2024) Base traffic volumes. Figures 12(a) and 12(b) of the Traffic Study, provides the Future (2024) Base traffic volumes at each of the analysis intersections during both AM and PM peak hours. These volumes represent Future (2024) Without Project Conditions.

Future (2024) Without Project Conditions

The Future (2024) Without Project Conditions peak hour traffic volumes were analyzed using the CMA procedures at each of the study intersections to determine the V/C ratio and corresponding LOS. Table B-30 presents the results of the Future (2024) Without Project Conditions. As illustrated in Table B-30, traffic operations are expected to degrade when compared with existing conditions due to ambient and related project traffic growth. Under Future (2024) Without Project conditions, four intersections are projected to operate at LOS C or better during both peak hours. Intersection No. 2 (Jefferson Boulevard & I-405 Southbound Ramps) would degrade to LOS F during the AM peak hour and LOS C during the PM peak hour, while Intersection No. 3 (Jefferson Boulevard & I-405 Northbound Ramps) would degrade to LOS F during the PM peak hour. Intersection No. 7 (Centinela Avenue & Sepulveda Boulevard) would degrade to LOS E and LOS F conditions during the AM and PM peak hours, respectively.

Future (2024) With Project Traffic Volumes

Utilizing the Project-only traffic estimates developed for both AM and PM peak hours, traffic forecasts for the Future (2024) With Project Conditions were developed. The Future (2024) Without Project traffic volume forecasts were combined with the Project-only traffic volumes to obtain the Future (2024) With Project traffic

volume forecasts. The Future (2024) With Project traffic volumes during both AM and PM peak hours are presented in Figures 13(a) and 13(b) of the Traffic Study.

Future (2024) With Project Conditions

The Future (2024) With Project peak hour traffic volumes were analyzed to determine the V/C ratio and corresponding level of service at each of the analyzed intersections. The results of this analysis are also summarized on Table B-30. As in indicated in Table B-30, six of the seven study intersections would maintain the same LOS as the Future (2024) Without Project Condition scenario during both peak hours. The one intersection that would see a worsening LOS is Intersection No. 6 (Slauson Avenue & SR-90), which would degrade from LOS C (0.799 V/C ratio) to LOS D (0.802 V/C ratio) during the AM peak hour. Three intersections would continue to operate at LOS C or better during both peak hours. Intersection No. 2 (Jefferson Boulevard & I-405 Southbound Ramps), Intersection No. 3 (Jefferson Boulevard & I-405 Northbound Ramps), and Intersection No. 7 (Centinela Avenue & Sepulveda Boulevard) would continue to operate at LOS F during one or both peak hours.

Table B-30 identifies the individual impacts during both AM and PM peak hours at each of the analysis locations. Using the specified significant impact criteria, the Project would cause a potentially significant impact at Intersection No. 3 (Jefferson Boulevard & I-405 Northbound Ramps) under Future (2024) With Project Conditions and mitigation would be necessary to reduce this significant impact.

As discussed in the Traffic Study, two mitigation measures are identified to address the potentially significant impact at Intersection No. 3 (Jefferson Boulevard & I-405 Freeway Northbound Ramps). Mitigation Measure MM-TRANS-1 requires the Project to develop a Transportation Demand Management Plan (TDM Plan). The TDM Plan would include measures that would prioritize, to the extent possible, the reduction of Project vehicle trips, which would align with the requirements of the CCMC and the goals of the Circulation Element of the General Plan. The CCMC includes required measures such as a bulletin board, display case, or kiosk which to display current maps, routes, and schedules for public transit routes serving the Project Site, telephone numbers for referrals on transportation information, and bicycle route and facility information, among other information; reserved employee parking spaces that are close to employee for potential carpool and vanpool vehicles; and bicycle parking would also be provided above the City's required 20 percent by providing a total of 58 spaces (10 short-term and 48 long-term bicycle parking spaces) and long-term bicycle parking storage would be located in a bicycle room, among other required measures. In addition to the CCMC required TDM Measures, additional TDM Plan measures may also include: new employee orientation which would introduce employees to TDM and the resources available to all employees; annual employee orientation, which would review the resources available to employees and address current strength and shortcomings of the plan; commuter matching services; and bicycle tool and repair stand; and free on-site shared bicycles, to be used by Project employees, patrons, and visitors, among other measures. Although the implementation of the above-mentioned TDM plan would result in a reduction in Project vehicle trips, no percent decrease in Project vehicle trips was assumed in the Traffic Study to provide a more conservative mitigation analysis

Mitigation Measure MM-TRANS-2 requires the Project to contribute funding to support the installation of closed-circuit television (CCTV) cameras at Intersection No. 3 (Jefferson Boulevard & I-405 Freeway Northbound Ramps) in order to observe traffic operations and respond rapidly to traffic incidents that can interrupt vehicle flow and transit service. **Table B-31**, *Future (2024) With Project Mitigation Level of Service Analysis*, provides the results of the LOS analysis with implementation of Mitigation Measures MM-TRANS-1 and Mitigation Measure MM-TRANS-2. As shown therein, with implementation of mitigation measures, the Project's impacts at Intersection No. 3 (Jefferson Boulevard & I-405 Freeway Northbound Ramps) would be reduced to a less-than-significant level.

Table B-31
Summary of Intersection Level of Service Analysis

No.	Intersection	Peak Hour	Future (2024) Without Project		Future (2024) With Project With Mitigation		Project Increase in V/C	Significant Project Impact
			V/C	LOS	V/C	LOS		
1.	Jefferson Boulevard & Mesmer Avenue[a]	AM	0.695	B	0.697	B	0.002	No
		PM	0.572	A	0.573	A	0.001	No
2.	Jefferson Boulevard & I-405 Southbound Ramps[a]	AM	1.062	F	1.064	F	0.002	No
		PM	0.779	C	0.783	C	0.004	No
3.	Jefferson Boulevard & I-405 Northbound Ramps[a]	AM	1.145	F	1.153	F	0.008	No
		PM	1.182	F	1.188	F	0.006	No
4.	Jefferson Boulevard & Slauson Avenue[b]	AM	0.425	A	0.451	A	0.026	No
		PM	0.515	A	0.521	A	0.006	No
5.	Slauson Avenue & Sepulveda Boulevard[b]	AM	0.606	B	0.609	B	0.003	No
		PM	0.657	B	0.659	B	0.002	No
6.	Slauson Avenue & SR-90[b]	AM	0.799	C	0.802	D	0.003	No
		PM	0.700	B	0.700	B	0.000	No
7.	Centinela Avenue & Sepulveda Boulevard[a]	AM	0.957	E	0.959	E	0.002	No
		PM	1.109	F	1.110	F	0.001	No

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

[a] Analysis results based on City of Los Angeles CMA methodology and assumptions.
[b] Analysis results based on City of Culver City CMA methodology.

Source: Crain & Associates, 2020.

Congestion Management Program Impact Analysis

Congestion Management Program (CMP) is a State-mandated program enacted by the State legislature to address the impacts that urban congestion has on local communities and the region as a whole. The traffic impact guidelines of the current 2010 CMP for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed.

The CMP arterial monitoring intersections within three miles from the Project Site including the following:

- Sepulveda Boulevard & Manchester Avenue
- Overland Avenue & Venice Boulevard
- La Cienega Boulevard & Centinela Avenue

Based on the incremental Project trip generation estimates described above and the Project trip distribution patterns, the Project is expected to contribute minimal traffic volumes to these CMP monitoring intersections during the weekday AM and PM peak hours. Further, it is expected that Project traffic volume contributions to more distant CMP arterial monitoring locations would be even lower, given that Project traffic would disperse

across an increasing number of roadways when farther from the Project Site. With Project traffic contributions well below the 50-trip threshold, no significant Project impacts to CMP arterial monitoring locations are forecast and no additional arterial intersection analysis is necessary.

With regard to the CMP freeway monitoring segment analysis, a review of Project's trip generation indicates that the Project would not generate more than 42 net directional (inbound or outbound) trips during either peak hour. Therefore, the Project would contribute well below the 150 directional-trip threshold to all CMP freeway monitoring segments, no significant Project impacts to CMP freeway monitoring locations are forecast, and no additional freeway analysis is necessary.

Caltrans Freeway Impact Screening Analysis

A freeway impact screening analysis was performed for the Project based on the criteria set forth in the October 2013 Agreement Between City of Los Angeles and Caltrans District 7 on Freeway Impact Analysis Procedures and the December 2015 First Amendment to the Agreement between LADOT and Caltrans District 7 on Freeway Impact Analysis Procedures. As per the criteria provided by the agreement and amendment, if the Project meets any of the following criteria, the Project Applicant would be directed to work with Caltrans to prepare a freeway impact analysis, utilizing Caltrans' "Guide for the Preparation of Traffic Impact Studies":

- The Project's peak hour trips would result in a one percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS "E" or "F" (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The Project's peak hour trips would result in a two percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS "D" (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The Project's peak hour trips would result in a one percent or more increase to the capacity of a freeway off-ramp operating at LOS "E" or "F" (based on an assumed ramp capacity of 1,500 vehicles per hour per lane); or
- The Project's peak hour trips would result in a two percent or more increase to the capacity of a freeway off-ramp operating at LOS "D" (based on an assumed ramp capacity of 1,500 vehicles per hour per lane).

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

Project trip generation estimates were prepared in accordance with the latest version of LADOT's Traffic Study Policies and Procedures. The Project trip generation estimates as accepted by LADOT are shown in Table B-29, above. Project trip distribution patterns were also developed for the analysis based on Project uses, existing traffic patterns, characteristics of the surrounding roadway system, the geographic location of the Project Site and its proximity to freeways and major travel routes, and areas from and to which employees and patrons of the proposed hotel and existing commercial use would likely be attracted.

Freeway Mainline Segment Impact Analysis

The Mainline Segment locations analyzed included I-405, north of Jefferson Boulevard, and I-405, south of Jefferson Boulevard. A one percent trigger percentage was applied assuming LOS E/F freeway mainline operations. The Project added trips to each freeway mainline segment were compared to the trigger threshold. As shown on **Table B-32**, *Caltrans Freeway Impact Screening Analysis - Traffic Volume Contributions to Freeway Mainline*, the screening analysis determined that the screening threshold criteria would not be triggered

at the two freeway mainline segments. Further, as the Project traffic did not trigger the screening thresholds at the mainline segments most likely to be used by Project traffic, there is no need to look at segments further away. As such, a freeway impact analysis is not required.

Table B-32
Caltrans Freeway Impact Screening Analysis – Traffic Volume Contributions to Freeway Mainline

Location	Peak Hour	Net Project Trips		Freeway Mainline Capacity [a]		Percentage Added by Project		Freeway Impact Analysis Required?
		SB	NB	SB	NB	SB	NB	
I-405, north of Jefferson Boulevard	AM	5.1	3.6	8,000	8,000	0.06%	0.05%	**No**
	PM	4.3	3.7	8,000	8,000	0.05%	0.05%	**No**
I-405, south of Jefferson Boulevard	AM	6.3	8.9	8,000	8,000	0.08%	0.11%	**No**
	PM	7.8	8.6	8,000	8,000	0.10%	0.11%	**No**

SB = southbound, NB = eastbound

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

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

Source: Crain & Associates, 2020.

Freeway Ramp Analysis

The Freeway Off-Ramp locations analyzed included I-405 Northbound Off-Ramp to Jefferson Boulevard and I-405 Southbound Off-Ramp to Jefferson Boulevard. A one percent trigger percentage was applied assuming LOS E/F freeway off-ramp operations. Comparing the traffic volume contributions required to trigger a freeway off-ramp impacts analysis at LOS E/F with the anticipated Project volume contributions at each location, the study determined that the threshold may be triggered for the I-405 Freeway northbound off-ramp to Jefferson Boulevard during the AM and PM peak hours, as shown in **Table B-33**, *Caltrans Freeway Impact Screening Analysis – Traffic Volume Contributions to Off-Ramp Facilities*. Thus, further analysis of this location was performed to determine existing LOS operations during the AM and PM peak hours.

Manual turning movement counts were conducted at the freeway off-ramp terminus intersection during the weekday AM and PM peak hours on November 28, 2018 and intersection county data sheets are provided in the Traffic Study. The peak-hour LOS for freeway off-ramp terminus intersection was determined using the Highway Capacity Manual (HCM) operational methodology for signalized intersections, as required by Caltrans. **Table B-34**, *Freeway Off-Ramp Impact Analysis*, provides the results of the freeway off-ramp impact analysis. As shown therein, the off-ramp approach at the I-405 Freeway northbound off-ramp to Jefferson Boulevard terminus intersection currently operates at LOS B during both AM and PM peak hours. As there is no trigger percentage for off-ramps operating at LOS A through C, no further analysis is required.

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

Table B-33
Caltrans Freeway Impact Screening Analysis – Traffic Volume Contributions to Off-Ramp Facilities

Location	Peak Hour	Net Project Trips	Freeway Off-Ramp Capacity[a]	Percentage Added by Project[b]	Off-Ramp Impact Analysis Required?
I-405 Freeway Northbound Off-Ramp to Jefferson Boulevard	AM	8.9	850	1.05%	Yes
	PM	8.6	850	1.01%	Yes
I-405 Freeway Southbound Off-Ramp to Jefferson Boulevard	AM	5.1	850	0.60%	No
	PM	4.3	850	0.51%	No

[a] The freeway off-ramp capacity is 850 vehicles per hour per lane.
[b] A 1% or more increase to the freeway off-ramp capacity for a freeway segment operating at LOS E or F would require a freeway off-ramp impact analysis.

Source: Crain & Associates, 2020.

Table B-34
Freeway Off-Ramp Impact Analysis

Location	Peak Hour	Existing Traffic Volume[a]	Existing Off-Ramp Delay[b]	Existing Off-Ramp LOS	Project Volume Contribution	Exceed Trigger?
I-405 Freeway Northbound Off-Ramp to Jefferson Boulevard	AM	848	19.1	B	8.9	No
	PM	762	14.1	B	8.6	No

[a] Existing off-ramp traffic volumes determined from manual turning movement counts conducted in November 2018.
[b] Off-ramp delay based on aggregate day for all off-ramp lane groups based on analysis results using the HCM operational methodology for signalized intersections.

Source: Crain & Associates, 2020.

Residential Street Segment Traffic Impact Analysis

As part of the Future (2024) With Project Conditions analysis, a residential street impact analysis was conducted to determine the potential impacts of Project trips to residential street segments within the nearby neighborhood of Sunkist Park. As provided above in Table B-25, study residential street segments include Segrell Way, north of Slauson Avenue; Culver Park Drive, north of Slauson Avenue; and Slauson Avenue, west of Segrell Way. The locations of the study residential street segments are provided in Figure B-2, above.

Street Segment Impact Criteria

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

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

Source: Culver City Traffic Study Criteria; Crain & Associates, 2020.

Table B-35, *Residential Street Analysis: Existing (2018) and Future (2024) Conditions*, summarizes the existing and future ADT volumes at the three study residential street segment locations. In order to develop future condition segment volumes, the existing segment volumes were adjusted upward via a one percent ambient traffic growth factor and related project traffic volumes. The combined traffic volume increases from these two sources provided the basis for the analysis of the Future (2024) Without Project Condition. Project traffic was then analyzed as an incremental addition to the Future (2024) Without Project Condition traffic volumes, forming the traffic volumes for the Future (2024) With Project Condition.

Table B-35
Residential Street Analysis: Existing (2018) and Future (2024) Conditions

Residential Street Segment	Existing ADT	Future (2024) Without Project Condition ADT	Project-Related ADT	Future (2024) With Project ADT	Project % Increase in ADT	Significant Impact?
Segrell way n/o Slauson Avenue	1,540	1,635	74	1,709	4%	No
Culver Park Drive n/o Slauson Avenue	673	714	74	788	9%	No
Slauson Avenue w/o Segrell Way	3,925	4,641	58	4,699	1%	No

Source: Crain & Associates, 2020.

As discussed in the Traffic Study, the Project is not expected to contribute appreciable traffic volumes to these residential street segments, given that inbound Project traffic must enter from westbound Slauson Avenue and outbound Project traffic would egress onto the adjacent alley. The adjacent alley would provide the most convenient path northerly through the Sunkist Park neighborhood to Berryman Avenue and Sawtelle Boulevard, as it would not require traveling south first to then head north. Although the Project is not expected to contribute noticeable traffic volumes to the three study residential street segments, in order to provide a conservative analysis, an evaluation of these street segments was performed assuming the full five percent of Project traffic expected to utilize the adjacent alley would instead use Segrell Way, Culver Park Drive, or Slauson Avenue to traverse the Sunkist Park neighborhood. As shown in Table B-35, the Project-related increases in ADT volumes would represent less than 10 percent of the Future (2024) With Project ADT volumes. Based on the street segment impact criteria described above, the Project would not significantly impact any of the street study residential street segments.

Queuing Analyses (for informational purposes)

Multiple queuing analyses were conducted for the Project based on requests from City staff and community concern. The City requested two queuing analyses as part of the Traffic Study MOU process: 1) evaluate the Future (2024) With Project Conditions for the northeast-bound Jefferson Boulevard left-turn lane at Slauson Avenue to determine if there would be spillover impacts to the Jefferson Boulevard northeast-bound through lanes; and 2) evaluate potential inbound Project traffic spillover onto westbound Slauson Avenue at the Project Site entry driveways. Additionally, the Project had its first community meeting in the Sunkist Park neighborhood on April 16, 2019. During that meeting, Sunkist Park community members expressed concern regarding existing weekday PM peak-hour conditions along and adjacent to Slauson Avenue, near the Project Site. In order to address these concerns, a queuing and delay study was conducted to determine the existing queuing and delay conditions for vehicles traveling south on the unnamed alley, Segrell Way, and Culver Park Drive and turning left to travel eastbound on Slauson Avenue.

As discussed in further detail in the Traffic Study, with regard to the Future (2024) With Project Conditions for the northeast-bound Jefferson Boulevard left-turn lane at Slauson Avenue, implementation of the Project would increase existing vehicle spillover onto the northeast-bound through lane during both the AM and PM peak hours. An increase in the Jefferson Boulevard northeast-bound left-turn storage would help alleviate the Project's contribution to queuing spillover.

The City reviewed multiple alternatives for providing additional capacity to the northeast-bound left-turn lane including:

- Extending the existing northeast-bound left-turn lane by an additional 10 feet while reducing the southwest-bound left-turn lane to Selmaraine Drive by 25 feet;
- Removing the southwest-bound left-turn lane to Selmaraine Drive in order to provide additional storage capacity for the northeast-bound left-turn lane to Slauson Avenue; and
- Providing a second northeast-bound left-turn lane by reducing several of the lane widths on Jefferson Boulevard and reducing the southwest-bound left-turn storage lane to Selmaraine Drive, along with prohibiting parking and modifying striping and signage on Slauson Avenue to provide an additional westbound receiving lane.

The City determined the most feasible design for providing sufficient left-turn storage would be to provide an additional left-turn lane for the northeast-bound left-turn movement from Jefferson Boulevard to Slauson Avenue. Based on this direction, a conceptual striping plan has been prepared to illustrate the potential reconfiguration of Jefferson Boulevard and Slauson Avenue to provide dual left-turn lanes. The dual left-turn lanes on the northeast-bound Jefferson Boulevard approach would require an additional receiving lane on westbound Slauson Avenue. Currently, there is only one receiving lane on Slauson Avenue west of Jefferson Boulevard. Per direction from City staff, the conceptual design has been developed with a striped lane drop occurring between Jefferson Boulevard and Culver Park Drive. As part of this design, parking would be prohibited on the north side of Slauson Avenue. Appendix F of the Traffic Study, includes the conceptual striping plan as described above. The dual northeastbound left-turn lanes were not included in the CMA calculations for post-Project conditions. Although the conceptual plan has been reviewed by City staff, the final design has not been approved and, therefore, it is more conservative to assume only a single left-turn lane

With regard to the Project entry driveways, a queuing analysis was conducted to determine if inbound Project traffic would spillover onto westbound Slauson Avenue. As described in further detail in the Traffic Study, spillover onto Slauson Avenue is not expected to occur given the proposed parking layout and self-park with valet-assist parking operations of the Project. Additionally, during special events or when higher-than-expected demand is experienced, Project valet staffing can be augmented to provide an adequate number of valet

attendants in order to process inbound vehicles more quickly. Therefore, spillover onto Slauson Avenue is not anticipated to occur based on the layout and operation of Project parking.

As discussed above, a queuing and delay study was conducted along Slauson Avenue, the unnamed alley, Segrell Way, and Culver Park Drive in the vicinity of the Project as a direct result of public comments provided at the first Project community meeting. Traffic volume, vehicle queue, and vehicle delay data was collected on April 25, 2019 and used as part of the queueing analysis provided in the Traffic Study. **Table B-36**, *Unnamed Alley, Segrell Way, and Culver Park Drive Queuing/Delay Summary*, summarizes the vehicle queuing and delays on the southbound approaches of the unnamed alley, Segrell Way, and Culver Park Drive.

Table B-36
Unnamed Alley, Segrell Way, and Culver Park Drive Queuing/Delay Summary

Intersection	Peak Hour	Average Delay (veh/sec)	LOS	Total Number of Delayed Vehicles	Maximum Queue Observed
Unnamed Alley & Slauson Avenue	8-9 AM	16.7	C	6 vehicles	1 vehicle
	5-6 PM	10.6	B	16 vehicles	1 vehicle
Segrell Way & Slauson Avenue	8-9 AM	10.9	B	7 vehicles	4 vehicles
	5-6 PM	8.9	A	16 vehicles	4 vehicles
Culver Park Drive & Slauson Avenue	8-9 AM	8.8	A	24 vehicles	3 vehicles
	5-6 PM	6.0	A	2 vehicles	1 vehicle

Source: Crain & Associates, 2020.

As illustrated in Table B-36, all intersections are operating at excellent-to-good levels of service (LOS A to LOS C). While there were instances of eastbound queues extending along Slauson Avenue from Jefferson Boulevard to Segrell Way as noted above, there were no occurrences when southbound left-turning vehicles were observed impeding westbound traffic on Slauson Avenue during the peak periods. This is further supported by the observations indicating that an overwhelming majority of southbound vehicles do not stop at the stop signs, which is a direct result of available gaps in Slauson Avenue traffic flow. The traffic counts and queue/delay data are provided in Appendix A of the Traffic Study.

Parking (for informational purposes)

While not required by CEQA, the Traffic Study included a parking evaluation for informational purposes only. The parking analysis was conducted for the Project to determine the anticipated overall peak parking demands and verify if the proposed parking supply would be sufficient to meet the peak demand. The parking analysis was prepared in accordance with the Alternative Parking Provisions of the CCMC, which include a shared parking option for developments with multiple non-residential land uses. The parking demand analysis was coordinated with the City. The analysis evaluated the Project's peak parking demands based on three approaches: a shared parking analysis of the Project land use components for which adequate parking must be provided based on CCMC parking ratios, a shared parking analysis of the Project land use components based on Urban Land Institute (ULI) recommended base parking ratios, and an empirically based parking demand analysis utilizing recently collected parking utilization data from three similar, nearby Culver City hotels.

Based on the peak parking demand rates developed conservatively using similar hotel parking utilization data, the Project's expected peak weekday and weekend parking demands were calculated. The Project is expected to have a maximum parking demand of 138 parking spaces, which would occur midday on a weekday. The

subterranean parking structure would be designed to accommodate vehicles through a combination of standard, tandem and ADA spaces. The Project Site would include valet-assist parking in order to maintain safe and efficient use of the tandem spaces.

The Project would remove existing on-street parking on Slauson Avenue, adjacent to the Project Site and between the unnamed alley and Jefferson Boulevard. There are a total of approximately six existing parking spaces (three on either side of the existing site driveway). Although these existing parking spaces are currently unmetered, the City of Culver City has plans to install meters in the near future. Therefore, in order to accommodate the Project's site plan design, up to six parking spaces may be removed at a loss of $1,000 per meter per year (based on the City-wide parking meter revenue average). The Project shall pay the City a total of $30,000 for five years of lost parking revenue for six lost parking spaces along Slauson Avenue caused by the Project.

Voluntary Neighborhood Traffic Intrusion and Parking Measures

At the request of the City and based on concerns from the community, the Project will fund a study to identify potential neighborhood traffic intrusion measures. These measures may include peak-period turn restrictions at certain intersections to address the cut-through traffic concerns within the Sunkist Park neighborhood. City traffic engineering staff indicated that there is a recognized cut-through traffic problem on southbound Segrell Way and Culver Park Drive, between Sawtelle Boulevard and Slauson Avenue, during the weekday PM peak period. As such, City staff indicated they would be supportive of traffic measures involving weekday PM peak-period left-turn restrictions for the southbound approaches of Segrell Way and Culver Park Drive at Slauson Avenue (and possibly right-turn restrictions for the eastbound approaches of Sawtelle Boulevard at Segrell Way and Culver Park Drive). The study would follow the Neighborhood Traffic Management Program (NTMP) process, as required for local street traffic intrusion improvements in the Sunkist Park neighborhood.

An additional Project feature may include assisting the Sunkist Park neighborhood with expanding the residential permit parking program to ensure that parking along Segrell Way and Culver Park Drive is available primarily (or exclusively) for residents/guests on those roadways. Within five years of Project occupancy, if the City determines there is an intrusion of Project parking on nearby residential streets, the Project or subsequent property owner shall be responsible to pay for a parking study to be performed by a consultant selected by the City. If the parking study determines that mitigations are needed such as the establishment of permit parking, the Project shall pay for such mitigations including the cost of signage and one year of residential parking permits to alleviate the intrusion of Project parking on those streets.

Similarly, within five years after Project occupancy, if the City observes there is an intrusion of Project traffic onto nearby residential streets, the Project or subsequent property owner shall be responsible to conduct a NTMP with input from the community to study and pay for the implementation of any traffic calming measures that will minimize or eliminate Project traffic from using the nearby residential streets. The NTMP review, design, and construction would be carried out by consultants selected by the City.

Mitigation Measures

MM-TRANS-1: The Project shall implement a TDM Plan to encourage the use of non-auto modes of transportation and reduce vehicle trips. The TDM Plan shall be reviewed and approved by the City's Planning Division, Public Works/Engineering, and Transportation Staff for review prior to the issuance of the first building permit for the Project. The TDM Plan shall include, at a minimum, measures required by the CCMC. In addition, as recommended by the Project's Traffic Study, the TDM Plan shall also include, but not be limited to measures and strategies to reduce vehicle trips via amenity Improvements supporting alternative modes of transportation and a trip reduction program.

MM-TRANS-2: To enhance the traffic signal system in the Project study area and in response to the forecast significant Project impacts, the Applicant shall contribute a fixed-fee financial contribution toward funding traffic signal upgrades, including installation of closed-circuit television (CCTV) cameras at Intersection No. 3 (Jefferson Boulevard & 1-405 Northbound Ramps). The funding contributions toward Intersection No. 3 (Jefferson Boulevard & 1-405 Northbound Ramps) shall be based on coordination with Culver City's Planning Division and Public Works/Engineering Staff, as well as LADOT, as necessary. This, and any other required financial fair-share contributions, must be guaranteed prior to the issuance of the Project's building permit and completed prior to the issuance of the Project's certificate of occupancy. Temporary certificates of occupancy may be granted in the events of any delay through no fault of the applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of the Culver City's Planning Division and Public Works/Engineering Staff, as well as LADOT, as necessary.

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

Less Than Significant Impact. CEQA Guidelines section 15064.3 describes specific considerations for evaluating a project's transportation impacts. Following the passage of Senate Bill (SB) 743, the State of California's Governor's Office of Planning and Research (OPR) was tasked with developing new guidelines for evaluating transportation impacts under CEQA. These guidelines were intended to shift the transportation performance metric from automobile delay and level of service (LOS) to one that would promote the reduction of greenhouse gas emissions and the development of multimodal and diverse transportation networks. As a result, OPR determined that, under the proposed update to the CEQA guidelines, vehicle miles traveled (VMT) would be established as the primary metric for evaluating environmental and transportation impacts.

In response to the updates to the CEQA guidelines, the City of Culver City updated its Transportation Study Criteria and Guidelines in July 2020 to conform to the requirements of SB 743. The new guidelines replaced the 2012 Traffic Study Criteria for the Review of Proposed Development Projects within the City of Culver City and shifted the performance metric for evaluating transportation impacts under CEQA from LOS to VMT for studies completed within the City. The new criteria and guidelines establish thresholds to identify development projects that would cause substantial VMT.

Under the new criteria and guidelines, the first step in performing a VMT analysis for a land use project is to perform a VMT screening analysis. A land use project that meets any of the following VMT screening thresholds is presumed to have a less-than-significant VMT impact and is therefore cleared from having to perform further VMT analysis:

1. Small land use projects that result in less than 250 daily or 25 peak-hour trips;

2. Land use projects within the 0.5-mile radius of these key Transit Priority Areas (TPAs): Metro E (Expo) Line Culver City Station, Metro E (Expo) Line La Cienega Station, Westfield-Culver City Transit Center, and Sepulveda/Venice Boulevard intersection;

3. Land use projects located within any TPA where at least 15 percent of the on-site residential units are affordable;

4. Affordable housing projects where 100 percent of the dwelling units are affordable; or

5. Local-serving retail projects with less than 50,000 square feet of floor area at a single store.

Given the Project's proximity (approximately one block) to the Westfield-Culver City Transit Center, the City considers the Project site to be in a key TPA. Therefore, based on the key TPA screening threshold, the Project is presumed to have a less-than-significant VMT impact and no further VMT analysis is required.

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

Less Than Significant Impact. The Project would result in lane restriping along Slauson and Jefferson Boulevard, as described above. However, the restriping is intended to decrease potential vehicle conflicts and improve traffic conditions. There are no existing hazardous design features such as sharp curves or dangerous intersections on-site or within the Project vicinity. The Project would also result in some modifications to access (i.e., new curb cuts for the Project driveway). As discussed in Attachment A, Project Description, direct vehicular access to the parking area would be provided from a driveway on Slauson Avenue in the western portion of the Project Site, which would include two drive aisles separated physically by a concrete column near the back-of-sidewalk. The drive aisle closer to the hotel (inner aisle) would serve as a passenger drop-off and pick-up area. The second drive aisle would allow entering vehicles to access the parking ramp down to the two subterranean parking levels. There would be two driveway exits onto the adjacent unnamed alley to egress onto the surrounding roadway systems. One exit driveway would be provided directly off of the dual drive aisles (which would merge into a single drive aisle approaching the alley), while the second exit would provide egress for vehicles exiting the subterranean parking garage. Existing vehicles would be allowed to travel north or south along the public alley towards Berryman Avenue or Slauson Avenue, respectively. All on-site roadway and site access improvements would be designed in compliance with applicable City standards. Therefore, the Project would not substantially increase hazards due to a geometric design feature or incompatible use. Impacts would be less than significant.

d. Result in inadequate emergency access?

Less Than Significant Impact. The Project Site is located in an established urban area that is well served by the surrounding roadway network. As discussed under Response IX.f, the nearest disaster route to the Project Site is Centinela Avenue, located approximately 0.4 mile south of the Project Site.[66] While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day, including during construction of potential off-site infrastructure upgrades/improvements (i.e., water and sewer lines) (discussed below in Section XIX, *Utilities and Service Systems*). However, through-access for drivers, including emergency personnel, along all roads would still be provided. In these instances, the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with Culver City requirements, as applicable, the Project would develop a Construction Traffic Management Plan (see MM-PS-1), which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the Project vicinity and would result in some modifications to access (i.e., new curb cuts for the Project driveway). However, emergency access to the Project Site and surrounding area would continue to be provided similar to existing conditions. Emergency vehicles and fire access for the Project Site would be provided at grade access from Slauson Avenue. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for employees and visitors. Subject to review and approval of Project Site access and circulation

[66] *County of Los Angeles Department of Public Works. https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf, accessed October 2019.*

plans by the CCFD, as necessary, the Project would not result in inadequate emergency access. Impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project:

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.

Less Than Significant Impact with Mitigation Incorporated. In accordance with Assembly Bill 52 (AB 52), the City submitted request to consult letters to five (5) Native American individuals and organizations on the City's Tribal Consultation List on December 5, 2019. Recipients were requested to respond within 30 days of receipt of the letter if they wished to engage in government-to-government consultation per AB 52. On December 13, 2019, the City received a letter via email from Mr. Andrew Salas, Chairman of the Kizh Nation that requested formal AB 52 consultation with the City for the Project.

The City consulted with the Kizh Nation on January 29, 2020 via conference call. The City provided an overview of the Project and the Kizh Nation provided their knowledge of the Project Site vicinity, including information about the natural environment and general history of the area, and known villages and trade routes/trails in the area. The Kizh Nation indicated that there could be archaeological resources and human remains related to prehistoric travel along trade routes, such as burials of those who may have died while on the trail. After the conference call, the Kizh Nation submitted an email to the City on January 31, 2020 that included similar information that they provided in the call.

While the Kizh Nation did not identify any known tribal cultural resources (as defined in PRC Section 21074) within the Project Site during consultation with the City, they have indicated that the Project Site has a high potential to encounter tribal cultural resources during construction given the Project Site's location near sacred villages (including the village of *Suangna*), water courses, major traditional trade routes, and its location within a cultural landscape. As a result, the Kizh Nation recommended Native American monitoring during construction of the Project. As a result, the City has required mitigation measure MM-CUL-2 which includes provisions for the Applicant to retain a Native American representative to monitor construction excavations associated with implementing the Project.

The AB 52 Native American notification letters and Mr. Salas' initial response letter are provided in the Native American Tribal Correspondence Tribal references materials to this MND. To date, no other responses from the Native American community have been received as part of the AB 52 tribal consultation effort. As a result of the

City's consultation efforts, no known tribal cultural resources have been identified within the Project Site or vicinity. Nonetheless, in the event that unknown tribal cultural resources are encountered during Project construction, mitigation measure MM-CUL-2 would ensure that the Project would not cause a significant impact to tribal cultural resources.

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?

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 City of Los Angeles Department of Water and Power (DWP) and the water purveyor Golden State Water Company (GSWC), formerly known as Southern California Water Company. Although the Project lies wholly within the City of Culver City, it is possible to have water lines from another jurisdiction to service properties within a different jurisdiction. Within Jefferson Boulevard, there are several water lines, including a 26" water line approximately 19' north of the street centerline in the street; a 12" water line approximately 23' north of the street centerline in the street; and an 8" water line under the public sidewalk along the Project frontage that turns west towards Slauson Avenue. Within Slauson Avenue, there is an 8" water line 42 feet south of the street centerline. This line is a continuation from the 8" water line from Jefferson Boulevard. With regard to fire hydrants, there is an existing fire hydrant located at the westerly side of Jefferson Boulevard adjacent to the Project Site as well as an existing fire hydrant located across the street from the Project Site at the southwest corner of Jefferson Boulevard and Slauson Avenue. There is a 1-1/2" water meter located on Jefferson Boulevard approximately 5 feet from the hydrant on the corner serving 11467 through 11499 Jefferson Boulevard.

GSWC provided water pressure for the fire hydrant located on Jefferson Boulevard, directly adjacent to the Project Site. The fire hydrant has a high water pressure at 110 psi and a low water pressure at 90 psi).[67] The Project is planned to be fire protected with a fire sprinkler system. Separate meters for domestic and fire systems are planned. A fire flow test will need to be conducted at two existing fire hydrants along Jefferson Boulevard. The flows will be used to calculate the total 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. The plumbing engineer will also need to assess the need for any booster pump for the Project in coordination with GSWC and CCFD.

All connections and water-related infrastructure improvements, including the proposed fire system designed for the Project, would be provided by the Project in consultation with the GSWC and CCFD. Further, all water line

[67] *KPFF Consulting Engineers, 2019.*

improvements and connections would be provided in consultation with the CCFD to ensure that the minimum fire flow requirements would be provided to serve the Project.

GSWC purchases water from the West Basin Municipal Water District (WBMWD). The 2015 WBMWD Urban Water Management Plan (UWMP) provides water demand and water supply projections in five-year increments from 2020 through 2040, which are based on regional demographic data provided by SCAG, as well as billing data for each major customer class, weather, and conservation. Year 2020 WBMWD water demand is 146,105 AFY while projected year 2040 water demand is 151,922 AFY; refer to **Table B-37**, *Projected West Basin Service Area Water Demand (AFY)*.

Table B-37
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), prepared by Arcadis and prepared by Westamerica Communications, dated June 2016.

According to the water supply section of the UWMP, Year 2020 WBMWD water supply is 189,893 AFY while projected 2040 water supply is 206,192 AFY; refer to **Table B-38**, *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.

The Project would result in an estimated net total peak water demand of 82,500 gpd, or 30,112,500 gallons per year (approximately 94.41 AFY) when fully occupied.[68] 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 94.41 AFY water demand generated by the Project would constitute less than one percent of the WBMDW year 2020 for both water supply and water demand. Further, the Project would comply

[68] *The water demand would be consistent with the estimated wastewater generation of the project per Table B-39, Estimated Wastewater Generation. To be conservative, 20 percent was added (to account for outdoor water use).*

Proposed: 68,750 gpd X 1.20 = 82,500 gpd. 82,500 gpd X 365 days = 30,112,500 gallons per year = 94.41 AFY estimated Project water demand.

with Title 5: Public Works, Chapter 5.03: Water Conservation and Water Supply Shortage Program, of the CCMC. In addition, the Project would comply with the Culver City mandatory green building requirements. The Project would also comply with the WBMWD UWMP recommendations regarding drought management and water conservation.

Table B-38
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), prepared by Arcadis and prepared by Westamerica Communications, dated June 2016.

Therefore, based on the above, the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

Wastewater

Less Than Significant Impact. The City's wastewater treatment and conveyance system includes four wastewater treatment and water reclamation plants operated by LA Sanitation (LASAN). LASAN provides service within two service areas: the Terminal Island Service Area and the Hyperion Service Area. The Project Site is within the Hyperion Service Area. The Hyperion Service Area includes the Hyperion Water Reclamation Plant (HWRP) in Playa del Rey, the Donald C. Tillman Water Reclamation Plant (TWRP) in the City of Van Nuys, and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP) in the City of Los Angeles. The current treatment capacity of the Hyperion Service Area is approximately 550 mgd which consists of 450 mgd at HWRP, 80 mgd at TWRP, and 20 mgd at LAGWRP. The Project Site is located within the Hyperion Service Area, and its wastewater would be conveyed to and treated at the HWRP.

On average, 275 million gallons of wastewater enters the HWRP on a typical dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the HWRP was designed to accommodate both dry and wet weather days with a maximum daily dry weather flow of 450 mgd and peak wet weather flow of 800 mgd.[69] As such, the HWRP's current remaining treatment capacity for dry weather flows is approximately 175 mgd on an average day.

[69] *LASAN, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=1186mdvh8u_393&_afrLoop=10107387348315793#!, accessed November 2019.*

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. 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.

Existing sewer lines within the City are maintained by the Culver City Department of Public Works. Existing sewer lines include a 15" sanitary sewer line in Jefferson Boulevard, a 15" sanitary sewer line in Slauson Boulevard, and a 10" sanitary sewer line in the alley. Under the Project, the proposed building would be connected to the 15" sewer line at either the Jefferson Boulevard side or Slauson Avenue side. Based on the determination by the City, an assessment for the sewer availability would be conducted. The Project proposes to utilize either one 8" main sewer line from the building or one 6" and one 5" sewer lines from the building. There are multiple utilities that will need to be crossed at the Jefferson Boulevard side, whereas there are fewer utilities to cross at the Slauson Avenue side.

As shown in **Table B-39,** *Estimated Wastewater Generation,* implementation of the Project would generate approximately 27,500 gallons per day (gpd) of wastewater. The Project would generate a peak total of 0.115 cubic feet per second (cfs) or a peak 68,750 gpd of additional sewer discharge to the existing 15" sewer line at either the Jefferson Boulevard side or Slauson Avenue side. This does not include potential credit for the existing use and sewer demand on the Project Site, which would help further reduce the proposed sewer demand.

Thus, construction of the Project would include all necessary on and off-site sewer pipe improvements and connections to adequately link the Project to the existing City sewer system based on the City requirements. The necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the City. Construction-related impacts would be temporary, on an intermittent basis, and within the scope of impacts evaluated in this MND. Further, a Construction Traffic Management Plan (MM-PS-1) for the Project would be prepared in order to minimize disruptions to through traffic flow, which would consider any off-site utility improvements, as necessary. See Response XV.a above, for further discussion of the Project's Construction Traffic Management Plan.

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.

Table B-39
Estimated Wastewater Generation

Land Use	Quantity	Factor[a]	Average Daily Flow (gpd)
Existing Land Uses			
Commercial	13,000 sf	80 gpd/1,000 sf	1,040 gpd
		Existing Total	*1,040 gpd*
Proposed Land Uses			
Hotel	175 rooms	130/room	22,750 gpd
Restaurant	193 seats	30/seat	5,790 gpd
		Project Total	*28,540 gpd*
		Net Total GPD	**27,500**
		Net Total CFS	**0.046**
		Net Total Peak GPD[c]	**68,750**
		Net Total Peak CFS[c]	**0.115**

sf = square feet; gpd = gallons per day; cfs = cubic feet per second

[a] The generates rates are based on the City of Los Angeles Bureau of Sanitation sewage generation factors.

[b] To calculate the number of seats, 1 sear per 15 square feet was assumed (2,900 sf/15 sf/seat = approximately 193 seats).

[c] Peak factor of 2.5 was used.

Source: ESA, 2019.

Stormwater Drainage

Less Than Significant Impact. As discussed in detail in Response X.c.ii, the Project would include proposed site drainage facilities and stormwater treatment which would implement several rainwater harvesting systems to be constructed either within the subterranean parking structure or the ground level of the Project Site. The surface drainage would be relayed to these structures via roof drains and podium deck area drains. The Project will also consider combination of pre-treatments upstream of the rainwater harvesting system, including flow-through planers, fossil filter inserts for catch basins, and/or flow treatment systems. Once the required treatment volume is stored in the rainwater harvesting system, the excess water for a higher rain event would overflow to an 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. 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, 24-hour rain event. Environmental impacts associated with development of the Project, including on-site drainage facilities, have been evaluated throughout this document. As concluded in this document, all potentially significant impacts associated with development of the Project, including on-site stormwater drainage facilities, would be less than significant. Therefore, 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.

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 SCE, which currently obtains 36 percent of its energy from renewable resources.[70] In addition, natural gas would be supplied by SoCalGas. As part of the Project, the proposed building developed on the Project Site would incorporate

[70] *Southern California Edison, 2018 Power Content Label, July 2019.*

energy efficient features and design elements aimed at reducing energy consumption, as detailed further in PDF-AIR-2 and PDF-AIR-3, described above in Response III.b. Some of the Project's "green building measures" as part of its design to reduce Project-related criteria pollutant emissions would include efficient HVAC systems, installation of low-flow water fixtures, and installation of a solar photovoltaic power systems equivalent to at least 1 percent of the Project's electricity demand and at least 1 kilowatt (kW) of solar photovoltaics per 10,000 SF of new development. As discussed above in Response VI.a, SCE and SoCalGas both would have sufficient capacity to serve the Project's operational electricity and natural gas demand. Existing off-site electricity and natural gas infrastructure would not have to be expanded and new infrastructure would not be required to provide electrical or natural gas service to the Project during construction or operation of the Project.

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.

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 hotel and restaurant 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.

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 [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is: 1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 square feet of floor space; 2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 square feet of space, or 3) any mixed-use project that would demand an amount of water equal to or greater than the amount of water needed to serve a 500 dwelling unit subdivision. A typical 500 unit subdivision would typically consume 0.3 to 0.5 acre-feet of water per year, or approximately 150 to 250 AFY, depending upon several factors, including the regional climate.[71] As discussed under Response XIX.a, the Project would generate a water demand of approximately 94.41 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.

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 68,750 gpd of wastewater. The HWRP is designed to treat 450 mgd with an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available. Given the current capacity of the 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.

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

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

to be recycled and /or discarded. It is anticipated that a large amount of the construction debris would be recycled. 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. Additionally, as discussed in Attachment A, Project Description, of this IS/MND, the Project would recycle or salvage at least 65 percent of non-hazardous construction and demolition debris. 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 167.60 million tons as of December 31, 2017, the most recent data available.[72] 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 2032 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-40**, *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 approximately 130 lbs/day of solid waste, or approximately 71 lbs/day of solid waste beyond existing conditions. The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 167.60 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.

[72] *County of Los Angeles, CoIWMP 2017 Annual Report, page 34.*

Table B-40
Projected Solid Waste Generated During Operation

Land Uses	Quantity	Factor[a]	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Existing Land Uses					
Commercial	13,000	2.5 lbs/sf/day	325	0.1625	59
		Total	**325**	**0.1625**	**59**
Proposed Land Uses					
Hotel	175 rooms	4 lbs/room/day	700	0.35	128
Restaurant	2,900 sf	0.005 lbs/sf/day	14.5	0.00725	3
		Total	**714.5**	**0.3572**	**130**
	Net Increase (Existing/Proposed)		**390**	**0.1948**	**71**

sf = square feet; lbs. = pounds.
[a] Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates. https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, accessed November 2019.

Source: ESA, 2019.

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 Assembly Bill 939 (AB 939), the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the City's target is exceeded, the City would be required to pay fines or penalties from the State for not complying with AB 939. The waste generated by the Project would be incorporated into the waste stream of the City, and diversion rates would not be substantially altered. Also, California's Green Building Standards Code (CALGreen) requires the diversion of at least 65 percent of the construction waste generated during most "new construction" projects. Project construction would divert at least 65 of its construction waste consistent with the CALGreen diversion requirements.[73] 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.

[73] *CalRecycle, California Green Building Code, Frequently Asked Questions. https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/faq, accessed April 10, 2020.*

XX. WILDFIRES

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 XV.a, the Project Site is not located in an area of moderate or very high fire hazard. The nearest state responsibility area is located approximately 11 miles northwest of the Project in the City of Malibu and the nearest very high fire hazard severity zone is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately 2.3 miles northeast of the Project Site. In addition, the Project Site is surrounded by urban development and is not adjacent to any wildlands. 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. No impacts would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant Impact With Mitigation Incorporated. The preceding analysis does not reveal any significant unmitigable impacts to the environment. Based on these findings, the Project is not expected to degrade the quality of the environment. The existing Project Site is developed with a single-story commercial (retail) building and associated asphalt-paved surface parking lot. As discussed above in Response V.a, no impacts regarding historical resources would occur with Project implementation.

The Project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section I, and would not result in excessive light or glare. The Project Site is located within

an urbanized area with no natural habitat. The Project would not significantly impact any sensitive plants, plant communities, fish, wildlife or habitat for any sensitive species, as discussed in Section IV. Potentially significant impacts to nesting birds would be reduced to a less than significant level with implementation of MM-BIO-1. Adverse impacts to archaeological and human remains resources could occur. However, construction-phase procedures would be implemented in the event any important archaeological resources or human remains are discovered during grading and excavation activities, consistent with MM-CUL-1 through MM-CUL-4. Adverse impacts to paleontological resources could also occur as well. MM-GEO-2 through MM-GEO-5 provide construction-phase procedures that would be implemented in the event any important paleontological resources are discovered during grading and excavation activities.

This Project Site is not known to have any association with an important example of California's history or prehistory. The environmental analysis provided in Section Ill and VIII concludes that impacts related to emissions of criteria pollutants, other air quality impacts, and impacts related to climate change will be less than significant. Section X concludes that impacts related to hydrology and water quality will be less than significant after implementation of the prescribed mitigation measures, where applicable. Based on the preceding analysis of potential impacts in the responses to items I thru XIX, no evidence is presented that this Project would degrade the quality of the environment. The City hereby finds that impacts related to degradation of the environment, biological resources, and cultural resources will be less than significant with mitigation incorporated, as necessary.

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

Less Than Significant Impact With Mitigation Incorporated. A description of 35 related projects in the Project study area is provided in **Table B-41**, *List of Related Projects*, below. Related projects are mapped in **Figure B-3**, *Locations of Related Projects*. The related projects are utilized to analyze cumulative impacts associated with Project implementation. Below is a discussion of cumulative impacts associated with the Project.

Table B-41
List of Related Projects

Map No.	Project Name	Location	Description
City of Culver City			
1	West Los Angeles College Master Plan	9000 Overland Avenue	Enrollment increase of 11,675 students
2	Office and Retail Project	700-701 Corporate Pointe	281,400 square feet of general office
3	Entrada Creative Office	6161 West Centinela Avenue	281,209 square feet of general office
4	Culver West Mixed-Use Washington/Inglewood	11924 Washington Boulevard	Mixed-use development with 3,750 square feet of restaurant, 11,250 square feet of retail, and 98 residential dwelling units
5	Commercial Project	5645 Sepulveda Boulevard	Four stories of commercial uses including 4,022 square feet of general office and 38,712 square feet of medical office

Table B-41
List of Related Projects

Map No.	Project Name	Location	Description
6	Office Project	11259 Sepulveda Boulevard	4,022 square feet of general office
7	Vista Del Sol – Assistant Living Expansion	11620 Washington Boulevard	72 assisted living beds
8	Bristol Parkway Mixed Use	6201 Bristol Parkway	Mixed-use development with 20,767 square feet of restaurant, 662 residential dwelling units, and 50 live/work units
9	Shall Gas Station	11224 Venice Boulevard	Gasoline station with 3,150 square feet of convenience market uses
10	Parcel B – Culver Steps	9300 Culver Boulevard	45,000 square feet of retail/restaurant, 65,000 of general office, 10,000 square foot public plaza
11	Ivy Station Washington/National TOD	8824 National Boulevard	Mixed-use development with 10,000 square feet of high-turnover restaurant, 10,000 square feet of quality restaurant, 200 residential dwelling units, 148 room hotel, 201,000 square feet of general office, and 24,000 square feet of specialty retail
12	Synapse Office and Retail/Restaurant (ICC Site)	8888 Washington Boulevard	59,324 square feet of general office, 2,878 square feet of retail, 3,184 square feet of high-turnover restaurant
13	Market Hall – Washington Centinela	12403 Washington Boulevard	21,605 square feet of dining, 5,230 square feet of retail
14	Culver City Innovation Plan Comprehensive Plan	9336 Washington Boulevard	345,007 square feet of production space
15	ECF Mixed-Use TOD	8700 Washington Boulevard	199 residential dwelling units, 17,250 square feet of commercial live/work, 5,000 square feet of restaurant, 17,750 square feet of retail
16	Federal Express Mixed-Use TOD	3710 Robertson Boulevard	141 residential dwelling units, 64,200 square feet of creative office, 30,042 square feet of retail/restaurant
City of Los Angeles			
17	Apartment Project	6733 Sepulveda Boulevard	176 residential dwelling units, 33,484 square feet of general office
18	Charter Middle School	8540 South La Tijera Boulevard	350 middle school students
19	Office Project	12575 Beatrice Street	199,500 square feet of general office
20	ICEF Vista Charter School Expansion	4471 Inglewood Boulevard	800 high school students
21	Jandy Creative Office	5405 South Jandy Place	93,950 square feet of creative office
22	Ocean Charter School	12870 West Panama Street	532 elementary/middle school students
23	Office Project	11811 South Teale Street	10,925 square feet of general office
24	Apartment Project	6711 Sepulveda Boulevard	180 residential dwelling units

Table B-41
List of Related Projects

Map No.	Project Name	Location	Description
25	The Palms Mixed-Use Project	10601 Washington Boulevard	132 residential dwelling units, 26,000 square feet of general office, 18,000 square feet of retail
26	LMU Master Plan	1 LMU Drive	Enrollment of 7,800 students
27	Office Project	12777 West Washington Boulevard	49,950 square feet of general office
28	Marina Island	5000 Beethoven	156 residential dwelling units
29	Coffee Bean & Tea Leaf	6024 West Jefferson Boulevard	53,762 square feet of manufacturing, 50,775 square feet of warehousing, 90,054 square feet of general office, 2,200 square foot coffee shop
30	Jefferson and La Cienega Project	3321, 3351 South La Cienega Boulevard	1,218 residential dwelling units, 200,000 square feet of general office, 50,000 square foot supermarket, 30,000 square feet of retail, 20,000 square feet of restaurant
31	Howard Hughes Center	6801 Center Drive	600 residential dwelling units, 488,659 square feet of remaining development potential
32	Apartment Project	11612 West Culver Boulevard	49 residential dwelling units, 1,700 square feet of restaurant

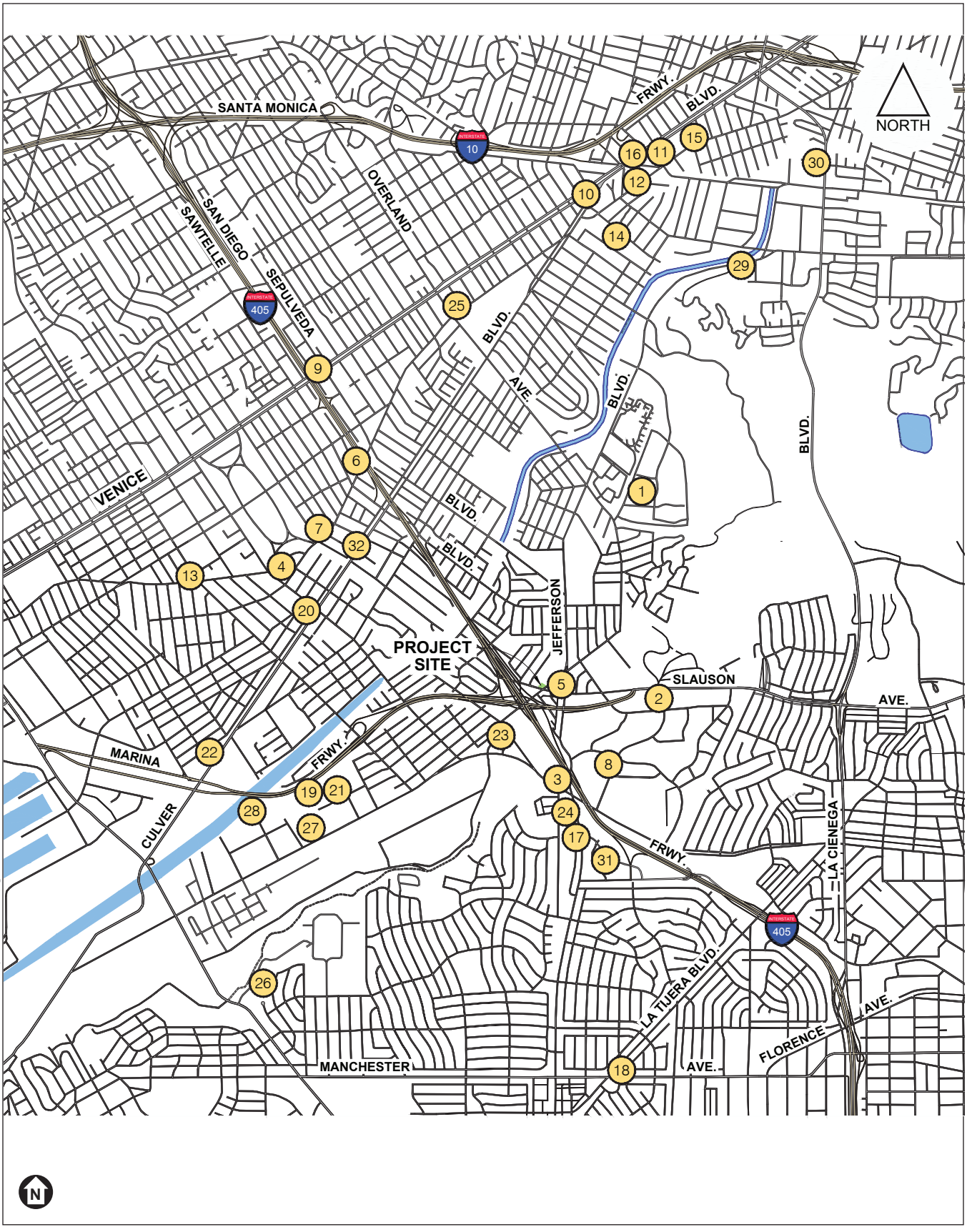
Source: Crain & Associates, 2020.

Aesthetics

Development of the Project in conjunction with the related projects would result in an incremental intensification of land uses in the heavily urbanized area of Culver City. The Project has been designed with the goal of bringing hotel and restaurant uses within a commercial corridor. New development and concentration of development, as are some of the related projects, is consistent with the objectives of the General Plan, which, under the designation for General Corridor, emphasizes the development of community serving retail, office, and service uses along major corridors.

The topography surrounding the Project Site is flat with no notable ocean, mountain or other scenic vistas that would be affected by the Project. In addition, although the Project proposes building heights up to 56 feet in height (with the elevator shaft reaching 69 feet and 6 inches in height), the immediate surrounding area consists of a range of low- to mid-rise buildings. Related projects would reach similar heights as the Project and surrounding area. As such, given the flat topography in the area, the proposed buildings of the Project and related projects would not substantially obstruct views not already obscured or blocked by other buildings and structures in the area. Further, the Project and related projects are not located in a scenic resource area or area with protected views designated by Culver City.

The Project Site and related projects are not located in the vicinity of a City or State-designated scenic highway and would, therefore, not damage any scenic resources located within a state scenic highway. In addition, the Project and related projects would be located within an urbanized area within Culver City. As related projects are located in an urban area, consistency with applicable zoning and other regulations governing scenic quality would be assessed on a project specific basis.



SOURCE: Craine & Associates, 2019

11469 Jefferson Boulevard Project

Figure B-3
Locations of Related Projects

ESA

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Cumulative light and glare effects would be consistent with the existing urban environment, which is characterized by high ambient light levels. Because lighting, including illuminated signage and outdoor lighting would be subject to regulations contained within the CCMC, compliance would ensure that impacts regarding lighting for the Project and related projects would not cause a significant cumulative adverse effect on existing uses.

Building plans for new related projects would be reviewed on a case-by-case basis by the City Building and Safety Division to ensure that new construction would avoid the use of glare-prone materials. For new development projects, the use of high-performance materials such as tinted non-reflective glass or other non-reflective surface materials, cladding, and trim is required. With the implementation of standard City building requirements, cumulative glare impacts would be less than significant.

As indicated in the impact analysis for the Project, the Project would not significantly increase the shading of adjacent shadow-sensitive uses based on the significance thresholds. Therefore, the Project would not contribute to any cumulative shading of shadow-sensitive uses, and cumulative shading impacts would be less than significant.

Agricultural and Forest Resources

As indicated in the impact analysis for the Project, the Project Site is located in a highly urbanized area of Culver City and is currently developed with a single-story commercial (retail) building and an associated asphalt-paved surface parking lot. No agricultural or forestry uses are located on the Project Site. In addition, the Project Site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the Farmland Mapping and Monitoring Program, is not zoned for agriculture or forestry use, and is not under a Williamson Act contract. The same is likely true of all the related projects given their location within urbanized Culver City and the greater Los Angeles area. However, even if some of the related projects are exceptions to the above, the Project would not convert farmland, forest land, or designated Farmland, would not conflict with existing zoning for agricultural or forestry use, and would not conflict with a Williamson Act contract. Therefore, the Project would not contribute considerably to any cumulative impacts to agricultural and forestry resources, and cumulative impacts would be less than significant.

Air Quality

There are a number of related projects in the Project area that have not yet been built or are currently under construction. Since the applicant has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. The SCAQMD recommends that Project-specific construction air quality impacts be used to determine the potential cumulative impacts to regional air quality.

With regard to Project operations, the SCAQMD's approach for assessing cumulative impacts related to operations or long-term implementation is based on attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. As discussed earlier, the SCAQMD has developed a comprehensive plan, the AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the Los Angeles County portion of the Air Basin is currently in nonattainment for ozone, NO_2, PM_{10}, and $PM_{2.5}$, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, Section 15064(h)(3) of the CEQA

Guidelines provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

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

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2012 AQMP. The Project would not conflict with or obstruct implementation of AQMP and would be consistent with the growth projections in the AQMP.

Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality.

As illustrated in Tables B-1 and B-2, regional burden emissions calculated for Project construction and operations are less than the applicable SCAQMD daily significance thresholds, which are designed to assist the region in attaining the applicable State and national ambient air quality standards. These standards apply to both primary (criteria and precursor) and secondary pollutants (ozone). Although the Project Site is located in a region that is in non-attainment for ozone and PM_{10}, the emissions associated with the Project would not be cumulatively considerable as the emissions would fall below SCAQMD daily significance thresholds. In addition, the Project would be consistent with the AQMP, which is intended to bring the Basin into attainment for all criteria pollutants. Therefore, cumulative impacts on air quality would be less than significant.

Biological Resources

With regard to cumulative biological resources impacts, the Project Site is located in an urbanized area and like the Project, other related projects would mostly occur on previously disturbed, urbanized land. The Project does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and, therefore, could not contribute to a cumulative effect in these regards. The Project would fully comply with City ordinances pertaining to tree removal, resulting in no net loss of trees from project implementation. Further, potentially significant impacts to nesting birds would be reduced to a less than significant level with implementation of the prescribed mitigation (MM-BIO-1). Related projects would also be required to comply with the City's street tree replacement requirements and implement mitigation for impacts to nesting birds. Therefore, cumulative impacts to biological resources would be less than significant.

Cultural Resources

Impacts related to cultural resources are site-specific and as such, are assessed on a site-by-site basis. As discussed previously, implementation of MM-CULT-1 through MM-CULT-5 would ensure the Project does not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines and that the Project does not adversely affect human remains. It is anticipated that comparable implementation of similar mitigation measures and/or compliance with existing regulations would be incorporated into the approval of each related project. Further, the historic setting in the area around

the Project Site is already eroded by contemporary development. Based on the above, the Project would not contribute to cumulatively considerable cultural resources impacts.

Energy

Development of the Project and related projects would increase the use of electricity, natural gas, and petroleum-based fuels. As discussed above, construction and operation of the Project would not result in wasteful, inefficient, or unnecessary consumption of energy and would not increase the need for new energy infrastructure. Related projects would similarly not be anticipated to generate a substantial increase in the demand for electricity and natural gas. In addition, as with the Project, related projects would be expected to incorporate applicable Title 24 standards and CalGreen requirements. Furthermore, as with the Project, the related projects are also expected to benefit from statewide efforts toward increasing the fuel economy standards of vehicles. Therefore, although the Project and related project development would result in the use of electricity and natural gas resources during construction and operation of the Project, the use of electricity and natural gas would be on a relatively small scale and would be consistent with the SCE and SoCalGas service areas. With regard to transportation fuel, according to the U.S. Energy Information Administration's International Energy Outlook 2017, the global supply of crude oil, other liquid hydrocarbons, and biofuels is expected to be adequate to meet the world's demand for liquid fuels through 2040, including those of the project and related projects. Therefore, the Project's contribution to cumulative impacts associated with energy would be less than cumulatively considerable.

Geology and Soils

Geological and geotechnical impacts are defined by site-specific conditions for the Project and related projects and are, therefore, typically confined to contiguous properties or to a localized area in which concurrent construction projects in close proximity could be subject to the same fault rupture system or other geologic hazard, or exacerbate erosion impacts. The Project Site is not underlain by an active earthquake fault and, thus, would not contribute to cumulative seismic rupture impacts. Although seismic shaking would occur on the Project Site as well as related project sites, applicable regulatory requirements require consideration of seismic loads in structural design for all related projects. As such, cumulative impacts associated with ground shaking would be less than significant. The Project Site is located within a State-designated hazard zone for liquefaction. However, with implementation of MM-GEO-1, which provides project-specific design parameters and recommendations to mitigate the effects of liquefaction, impacts would be less than significant. In addition, the Project Site is not prone to landslide hazards. As such, the Project would not cumulatively contribute to liquefaction or landslide impacts. While the loss of topsoil among the Project and related projects during construction could result in cumulative erosion impacts, the Project and related projects would be required to implement applicable local, regional and State regulations for grading and excavations during construction, including SWPPP requirements. As with the Project, related projects would be required to comply with approved geotechnical recommendations, the Project's contribution to potential cumulative impacts from lateral spreading, subsidence, liquefaction, collapse, and expansive soils would also be less than significant. In addition, the Project and related project sites are located in a highly urbanized area and would connect to existing wastewater infrastructure. Thus, the Project and related projects would not need to use septic tanks or alternative waste disposal systems and, as such, no cumulative impacts relative to waste disposal capacity would occur. With regard to paleontological resources, implementation of MM-GEO-2 through MM-GEO-5 would ensure that the Project does not directly or indirectly destroy a unique paleontological resource. It is anticipated that comparable implementation of similar mitigation measures and/or compliance with existing regulations would be incorporated into the approval of each related project. Because the Project would not contribute considerably to geology and soils impacts, the Project's cumulative geology and soil impacts would be less than significant.

Greenhouse Gas Emissions

GHG emissions impacts are cumulative. As such, the impact discussions included above in Responses VIII.a-b, address the Project's potential to result in a cumulatively considerable GHG impact. As discussed therein, impacts would be less than significant.

Hazards and Hazardous Materials

Many of the related projects would use, handle, store, and/or transport hazardous materials or require demolition of structures containing such materials. As with the Project, the related projects would be required to use and store all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with federal, state, and local health and safety standards and regulations. Like for the Project, compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, disposal, or handling of hazardous materials. Some of the related projects may be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, like the Project, each related project would be required to comply with existing Federal, State, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators. In addition, as with the Project, many of the related projects would also be subject to CEQA review, the need to prepare hazardous materials documentation (i.e., Phase I ESA), and the identification of mitigation measures necessary to remediate any hazardous materials concerns. Therefore, cumulative impacts with respect to creating a hazard through reasonably foreseeable upset and accident conditions involving hazardous materials would be less than significant.

Like the Project, one or more of the related projects could potentially be located within 0.25 mile of an existing school. However, with implementation of mitigation measures, the Project would not generate hazardous emissions. As such, the Project would not contribute considerably to any cumulative emission of hazardous materials within 0.25 mile of a school.

One or more of the related projects could potentially be located within the vicinity of an airport or private airstrip, or occur within a wildlands area potentially subject to wildland fires, and thus could potentially result in a safety hazard for people residing or working the Project area. However, as the Project would not be located within the vicinity of an airport or private airstrip, or within a wildlands area potentially subject to wildfires, it would not contribute considerably to any such potential cumulative impacts.

Like the Project, most if not all of the related projects are located in an established urban area with a fully developed roadway network, with multiple routes available between emergency responders and the project sites. While the Project and some of the related projects would not be located along designated disaster routes, some of the related projects could potentially be located along such routes such that their construction activities could potentially disrupt traffic on such routes during an emergency. However, related projects would be required to implement a Construction Traffic Management Plan to minimize construction traffic impacts and ensure continued emergency access on surrounding streets. Furthermore, while some of the related projects could potentially modify existing local access routes or otherwise close existing street segments, the Project would not, and any modifications of existing local access routes or closures of street segments by the related projects would be subject to Culver City or City of Los Angeles review to ensure that emergency access is maintained. Therefore, the Project and the related projects would not impair implementation or physical interfere with an adopted emergency response plan or emergency evacuation plan, and cumulative impacts in this regard would be less than significant.

Hydrology and Water Quality

The related projects would potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff within the local vicinity of the Project Site. However, as with the Project, the related projects are located within the highly urbanized areas, which are largely characterized by existing buildings and paved surfaces with limited landscaped areas. Accordingly, the potential to generate a notable amount of new impermeable surfaces is limited. Pursuant to the City's LID stormwater requirements, related projects would be required to capture and treat runoff flow during storm events similar to the Project. Further, the related projects would be subject to State NPDES permit requirements for both construction and operation. Each project greater than one-acre in size would be required to develop a SWPPP and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid or minimize impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the Culver City Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Thus, compliance with applicable regulatory requirements would avoid significant impacts on drainage/flooding conditions and the quality of water reaching the public drainage system. Cumulative impacts to hydrology and water quality would be less than significant.

Land Use and Planning

As indicated under the impact analysis for the Project, the Project would represent infill development that would provide uses in keeping with the commercial character of the surrounding area. In addition, the proposed development would occur within the boundaries of the Project Site as it currently exists. Therefore, the Project would not contribute considerably to any potential cumulative physical dividing of an established community, and cumulative impacts would be less than significant.

As discussed above, no amendment to the Project Site's existing general plan designations are proposed by the Project. No changes to the Project Site's existing Zoning designations are proposed by the Project. As with the Project, related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. As the Project would result in less than significant land use and planning impacts, the project's contribution to cumulative land use and planning impacts would be less than cumulatively considerable.

Mineral Resources

As discussed above, the Project would have no impact on mineral resources. Because of the large number and broad extent of oil drilling districts and State-designated oil fields in the greater area, some of the related projects may be located within these designated areas. However, with implementation of new methodologies, such as slant drilling, related projects would not substantially reduce extraction capabilities, impede exploratory operations, or would cumulatively result in the significant loss of availability of oil resources. Regardless, because the Project would have no incremental contribution to the potential cumulative impact on mineral resources, the Project would have no cumulative impact on such resources.

Noise

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and sound reduces significantly in magnitude as the distance from the source increases. As such, only projects expected to occur in the immediate Project area likely would contribute to cumulative noise impacts.

Construction Noise

Noise from construction of the Project and related projects would be localized, thereby potentially affecting areas immediately within 500 feet from either/both construction sites. There is one related project in the surrounding area within approximately 500 feet of the Project Site (Related Project No. 5) that could have construction concurrent with the Project. All other related projects with future potential concurrent construction are greater than 500 feet from the Project Site and would not contribute substantially to cumulative construction noise impacts. Because the timing of the construction activities for all cumulative projects cannot be defined and are beyond the control of the City and the applicant, quantitative analysis that assumes multiple, concurrent construction projects would be speculative. The cumulative noise levels would be intermittent, temporary and would cease at the end of the respective construction periods. It is not likely that maximum construction noise impacts from the cumulative projects would occur simultaneously, as sound levels vary from day to day depending on the construction activity performed that day and its location on the development site. Due to distance attenuation and intervening structures, construction noise from one site would not result in a noticeable increase in noise at sensitive receptors near the Project Site, which would preclude a cumulative noise impact. Furthermore, related projects would be required to comply with City noise standards and implement mitigation measures for identified significant impacts, as required under CEQA, similar to the Project. As such, cumulative impacts associated with construction noise would be less than significant.

Operational Noise

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and other projects in the Project vicinity. Therefore, cumulative traffic-generated noise impacts have been assessed in the analysis above based on the contribution of the Project to the future cumulative base traffic volumes in the Project vicinity. As shown in Table B-19, above, the maximum cumulative noise increase from the Project plus related Project traffic would be 1.1 dBA CNEL, which would occur along Sepulveda Boulevard, between Slauson Avenue and Centinela Avenue. This increase in sound level would not exceed the significance thresholds of an increase of 5 dBA CNEL. As such, with respect to roadway noise, there is no potential for the Project to result in a cumulatively considerable contribution when considered together with related project traffic volumes.

The Project's fixed mechanical equipment and other Project features (i.e., parking and loading areas) would be shielded from adjacent uses and/or located within the interior of the building such that noise levels would be less than significant at the property line. Noise levels for similar equipment and facilities for each related project would be subject to City noise ordinance requirements. For this reason, on-site noise produced by any related project would not result in a substantial or noticeable additive increase to project-related noise levels. As the Project's composite stationary-source and operational impacts would be less than significant, composite stationary-source and operational noise impacts attributable to cumulative development would also be less than significant.

Vibration

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

Population and Housing

The project would not generate a new residential population as no residential uses are proposed. The increase in area population and employment resulting from the project and the related projects would have a less than significant cumulative impact as these increases are anticipated to be within SCAG, Culver City, and City of Los

Angeles Subregion growth forecasts. Related projects in combination with the project would not result in the cumulative loss or reduction of housing. Therefore, cumulative impacts with respect to population and housing are considered to be less than significant.

Public Services

Fire Protection

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

Police Protection

The related projects would cumulatively generate, in conjunction with the Project, the need for additional police protection services. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the CCPD and/or the Los Angeles Police Department (LAPD) on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. Also, similar to the Project, the related projects would be required to implement a Construction Traffic Management Plan to minimize temporary lane closures and impacts to traffic, access, and emergency response times during the construction period. Even in consideration of the related projects, if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted, and was foreseeable, the Project study area is highly developed, and the site of a police station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government, and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the Project is required to mitigate. Therefore, the Project would not make a cumulatively considerable contribution to cumulative impacts associated with the construction of new police facilities.

Schools

Pursuant to California Government Code Section 65995, the payment of developer fees under the provisions of SB 50 address the impacts of new development on school facilities serving that development. Compliance with the provisions of Section 65995 is deemed to provide full and complete mitigation of school facilities impacts. The Project as well as the related projects would be required to pay these fees as applicable. Therefore, the full payment of all applicable school fees would reduce potential cumulative impacts to schools to less than significant levels.

Parks

New related projects with proposed residential uses are anticipated to provide on-site open space and recreational amenities to meet the needs of projected residents. In addition to the provision of on-site recreational amenities for related residential uses of related projects, the implementation of required developer paid parks and recreational fees would allow for land purchase and expansion of existing facilities. As such, related projects are not anticipated to result in substantial physical deterioration or accelerated deterioration of recreational and parks facilities. Cumulative impacts to parks would be less than significant.

Other governmental services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional library services. The related projects would generate revenue to the City's general funds that could be used to fund library expenditures as necessary to offset the cumulative incremental impact on library services. Similar to the Project, the related projects would pay applicable development fees based upon the projected population of the individual developments. The full payment of all applicable library fees would reduce potential cumulative impacts to libraries to less than significant levels.

The related projects' residents, employees, and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would be typical of that experienced for the highly urbanized Project vicinity. Similar to the Project, the related projects would need to pay applicable development impact fees of Culver City or the City of Los Angeles, as applicable. The full payment of all applicable fees would reduce potential cumulative impacts to other governmental services/facilities to less than significant levels.

Recreation

Refer to discussion under Parks, above.

Transportation

Cumulative construction traffic impacts (e.g., intermittent reduction in roadway and intersection operating conditions) are typically considered short-term adverse, but not significant impacts. The Project would result in a less than significant traffic impact during construction with the implementation of a Construction Traffic Management Plan which would include identification of a haul route, notification and safety procedures regarding potential temporary lane closures and detours, and requirements for traffic controls and flagmen during construction. Each related project would similarly be required to implement a Construction Traffic Management Plan, whether in the City of Culver City, unincorporated Los Angeles County, or the City of Los Angeles, and would similarly result in less than significant short-term construction traffic impacts.

Cumulative operational traffic impacts (e.g., permanent reduction in roadway and intersection operating conditions) were quantified and evaluated at seven (7) study intersections. The future (2024) service level conditions presented in Table B-31, under Response XVII.a, represent a combination of estimated trips from all

related projects, as well as incremental annual growth, and are cumulative in nature. As shown in Table B-31, cumulative operational traffic impacts would be less than significant with implementation of mitigation.

The regional transportation analysis, including transit facilities, is based on CMP procedures that have been developed to address countywide cumulative growth impacts on regional transportation facilities. The CMP Guidelines contain procedures for monitoring land use development levels and transit system performance by local jurisdictions and Metro, and are used to inform planning of infrastructure improvements to meet future needs. As indicated in the discussion of Project impacts above, the Project would not have a significant impact on transit facilities and the incremental impacts on the regional public transit system would not be cumulatively considerable. Also, while the Project would contribute trips to the freeway system, Project traffic did not trigger the screening thresholds at the ramps or freeway segments most likely to be used by Project traffic. As such, the Project would not contribute cumulatively considerable traffic to the freeway system.

With regard to impacts to pedestrian and bicycle facilities as well as hazards due to design features and emergency access, the Project would not result in a significant impact. Furthermore, each related project would be reviewed by the City during the development review process to ensure compliance with the City's requirements relative to the provision of pedestrian and bicycle facilities, ingress and egress design, and safe streets. Therefore, cumulative impacts related to these issues would be less than significant.

As discussed above under Response to Checklist Question XVII.b, under Culver City's new criteria and guidelines, the first step in performing a VMT analysis for a land use project is to perform a VMT screening analysis. Given the Project's proximity (approximately one block) to the Westfield-Culver City Transit Center, the City considers the Project site to be in a key TPA. Therefore, based on the key TPA screening threshold, the Project is presumed to have a less-than-significant VMT impact and no further VMT analysis is required. Accordingly, Project-level VMT impacts would be less than significant and the Project's contribution to cumulative VMT impacts would not be cumulatively considerable. Furthermore, as discussed in sub-sections III, Air Quality, and VIII, Greenhouse Gas Emissions, the Project would be consistent with, and would not conflict with, applicable plans, policies or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Finally, all related projects are required to consider consistency with CEQA Guidelines section 15064.3. Consistency with CEQA Guidelines section 15064.3 would be performed on a project-by-project basis and TDM measures would be implemented, as necessary, on a project-by-project basis to reduce VMT impacts consistent with CEQA Guidelines section 15064.3.

Tribal Cultural Resources

Impacts related to tribal cultural resources would be site-specific and as such, are assessed on a site-by-site basis. As discussed previously, implementation of MM-CULT-2 would ensure the Project does not cause a significant impact on tribal cultural resources. It is anticipated that comparable implementation of similar mitigation measures and/or compliance with existing regulations would be incorporated into the approval of each related project. Thus, the Project would not contribute to cumulatively considerable cultural resources impacts.

Utilities and Service Systems

Water Supply

Development of the Project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. However, like the proposed Project, each related project would be subject to City review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. Furthermore, GSWC, WBMWD and the Los Angeles Department of Water and Power (LADWP) conduct ongoing evaluations to ensure facilities are adequate, and require infrastructure system improvements. Lastly, any related project meeting the size criteria set forth in SB 610 would

be required to have a WSA prepared demonstrating that water supplies are adequate to serve the project during normal, single-dry, and multiple dry years over at least a 20-year period. Therefore, cumulative impacts on the water infrastructure and system and water supplies would be less than significant.

Wastewater

Implementation of the Project in combination with the related projects and other projects within the service area of the HWRP would generate additional wastewater that would be treated at HWRP. On average, 275 million gallons of wastewater enters the HWRP on a typical dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the HWRP was designed to accommodate both dry and wet weather days with a maximum daily dry weather flow of 450 mgd and peak wet weather flow of 800 mgd. As such, the HWRP's current remaining treatment capacity for dry weather flows is approximately 175 mgd on an average day. The City of Los Angeles has adopted an Integrated Resources Plan (IRP) that shows that the HWRP will be able to accommodate growth within its service area to the year 2025.[74] In addition, the potential need for the related projects to upgrade sewer lines to accommodate their wastewater needs is site-specific and there is minimal, if any, direct cumulative relationship between the development of the Project and the related projects. Therefore, no significant cumulative sewer infrastructure impacts are anticipated from the development of the Project and the related projects. Therefore, cumulative impacts on sewer service would be less than significant.

Stormwater Drainage

Refer to discussion under Hydrology and Water Quality, above.

Electricity, Natural Gas, and Telecommunications

As with the Project, as it relates to electricity, natural gas, and telecommunications facilities, related projects would coordinate with the appropriate service provider for any infrastructure tie-ins, removals, or relocations, and would comply with all requirements set forth by the service provider (e.g., SCE, SoCalGas, and internet and telephone providers). It is anticipated that existing electricity, natural gas, and telecommunications facilities would be sufficient to support the needs from the Project in combination with related projects. Therefore, cumulative impacts on electric power, natural gas, and telecommunication facilities would be less than significant.

Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The remaining disposal capacity for the County's Class III landfills is estimated at approximately 167.60 million tons as of December 31, 2017, the most recent data available. Thus, sufficient capacity would be available to meet the demand created by related projects. As discussed above, the Project impacts on solid waste disposal would be less than significant. In addition, similar to the Project, related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to checklist items in the City's Building Safety Division Mandatory Green Building Program, as applicable. As such, impacts to the solid waste system from cumulative development would be less than significant and thus, the Project would not contribute to a cumulatively significant solid waste impact.

[74] *Los Angeles Department of Public Works, City of Los Angeles Integrated Resources Plan – Implementation Strategy, September 2006.*

Wildfires

As previously discussed, the Project Site is surrounded by urban development and is not adjacent to any wildlands. The nearest state responsibility area is located approximately 11 miles northwest of the Project in the City of Malibu and the nearest very high fire hazard severity zone is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately 2.3 miles northeast of the Project Site. Similarly, related projects in the vicinity of the project site are also not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, cumulative impacts related to wildfire would be less than significant. As a result, the Project would not contribute to cumulative wildfire impacts.

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

Less Than Significant Impact With Mitigation Incorporated. Based on the analysis of the Project's impacts in the Responses I thru XX, there is no indication that this Project could result in substantial adverse effects on human beings. While there would be a variety of effects during construction related to air quality, noise, and traffic, these impacts would be less than significant based on compliance with applicable regulatory requirements and established impact thresholds. Long-term effects would include increased vehicular traffic, traffic-related noise, periodic on-site operational noise, minor changes to on-site drainage, and changing of the visual character of the site, with a majority of these impacts affecting adjacent roadway segments and intersections. The analysis herein concludes that direct and indirect environmental effects would be less than significant. Based on the analysis in this Initial Study, the City finds that direct and indirect impacts to human beings will be less than significant with mitigation incorporated, as necessary.

XXII. EARLIER ANALYSIS

None.

REFERENCES

1. *Shade/Shadow Report* prepared by ESA, June 2019.
2. *Air Quality Technical Report* prepared by ESA, November 2020.
3. *Cultural Resources Assessment* prepared by ESA, June 2019.
4. *Energy Technical Report* prepared by ESA, November 2020.
5. *Geotechnical Engineering Investigation* prepared by Geotechnologies, Inc., dated November 7, 2017.
6. *Greenhouse Gas Technical Report* prepared by ESA, November 2020.
7. *Noise and Vibration Technical Report* prepared by ESA, November 2020.
8. *Remedial Action Plan*, prepared by Stantec, dated July 15, 2014.
9. *Traffic Impact Study for the Jeff Hotel Project Proposed at 11469 Jefferson Boulevard, Culver City,* prepared by Crain & Associates, October 2020.
10. Culver City Fire Department Correspondence, December 2020.
11. Culver City Police Department Correspondence, November 2020.
12. Native American Tribal Consultation Letters, prepared by Culver City.

ATTACHMENT C
MITIGATION MONITORING PROGRAM

The following environmental mitigation measures and project design features (PDFs) shall be incorporated into the Project development as conditions of approval. The Project applicant shall secure a signed verification for each of the mitigation measures and PDFs which indicate that mitigation measures or PDFs have been complied with and/or implemented, and fulfills the City environmental and other requirements (Public Resources Code Section 21081.6.). Final clearance shall require all applicable verification as included in the following table. The City of Culver City will have primary responsibility for monitoring and reporting the implementation of the mitigation measures and PDFs. The mitigation measures and PDFs have been identified by impact category and numbered for ease of reference.

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
AIR QUALITY **PDF-AIR-1: Construction Features:** Construction equipment operating at the Project Site shall be subject to a number of requirements. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. Construction measures would include, but are not limited to the following: ▪ The Project shall require all off-road diesel construction equipment greater than 50 horsepower (hp) that will be used an aggregate of 40 or more hours to meet the U.S. Environmental Protection Agency Tier 4 Final off-road emission standards. A copy of each unit's certified tier specification or model year specification and California Air Resources Board or South Coast Air Quality Management District operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. This construction feature would allow for a reduction in diesel particulate matter and NO_X emissions during construction activities.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of Building Permits	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
PDF-AIR-2: Design Elements: In accordance with CALGreen Building Standards, the Project shall incorporate the following mandatory energy and emission saving features: ▪ The Project shall recycle and/or salvage at least 65 percent of non–hazardous construction and demolition debris. ▪ The Project shall include easily accessible recycling areas dedicated to the collection and storage of non-hazardous materials such as paper, corrugated cardboard, glass, plastics, metals, and landscaping debris (trimmings). ▪ The Project shall include efficient heating, ventilation, and air conditioning (HVAC) systems. ▪ The Project shall install low-flow water fixtures that are consistent with U.S. Environmental Protection Agency WaterSense specifications.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of Building Permits	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division
PDF-AIR-3: Voluntary Design Elements: The Project shall incorporate many operational energy and emission saving features including the following: ▪ The Project design would meet criteria for the LEED Silver or equivalent certification level. ▪ The Project shall install a solar photovoltaic power system equivalent to at least 1 percent of the Project's electricity demand and at least 1 kilowatt (kW) of solar photovoltaics per 10,000 square feet of new development.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of Building Permits	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

MITIGATION MONITORING PROGRAM
P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP

Project Design Feature/Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
BIOLOGICAL RESOURCES				
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	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits	Culver City Planning

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
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.				

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
CULTURAL RESOURCES				
MM-CUL-1: Prior to issuance of demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. Full-time monitoring shall be conducted in areas of high to moderate potential (as shown on Figure 14 of the Cultural Resources Assessment) to a depth of 10 feet (depth at which archaeological sensitivity decreases). Full-time monitoring of initial ground disturbance in areas of moderate to low sensitivity (also as shown on Figure 14) shall be conducted to determine if full-time or periodic monitoring is warranted in these areas, as determined by the Qualified Archaeologist. Full-time monitoring in any area can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist, based on field observations. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division
MM-CUL-2: Prior to issuance of demolition permit, the Applicant shall retain a Native American tribal monitor from the Gabrieleno Tribe. The appropriate Native American monitor shall be selected based on ongoing consultation under AB 52 and shall be identified on the most recent contact list provided by the Native American Heritage Commission. The Native American Monitor shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

MITIGATION MONITORING PROGRAM
P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP

Project Design Feature/Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
shall take into account the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrielino Tribe.				
MM-CUL-3: In the event that archaeological resources (e.g., Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All prehistoric or Native American archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist and a Gabrielino Tribe. If the resources are Native American in origin, the Gabrielino Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources to ensure cultural values ascribed to the resources, beyond those that are scientifically important, are considered. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist, preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If preservation in place is not feasible, the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources and that provides for the adequate recovery of the scientifically consequential information contained in the resources along with subsequent laboratory processing, analysis, evaluation, and reporting. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
21083.2(b) for unique archaeological resources, and shall incorporate the Gabrielino Tribe's treatment and curation recommendations. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material, and/or the Gabrielino Tribe. If no institution nor the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.				
MM-CUL-4: Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division
MM-CUL-5: If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment. If the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the facility property in a location not subject to further and future subsurface disturbance.				
GEOLOGY AND SOILS **MM-GEO-1:** Site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation shall be implemented per the Project's Final Geotechnical Engineering Investigation, subject to review and approval by the Culver City Building Safety Division.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading and Building Permits and a Foundation Plan	Culver City Building Safety Division and Building Safety Inspector

MITIGATION MONITORING PROGRAM
P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP

Project Design Feature/Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
MM-GEO-2: Prior to issuance of a demolition permit, the Applicant shall retain a Qualified Paleontologist to develop and implement a paleontological monitoring program for construction excavations that exceed 10 feet in depth. A Qualified Paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology (SVP) (SVP, 2010). The Qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Qualified Paleontologist during construction excavations exceeding 10 feet in depth. Paleontological resources monitoring shall be conducted for all ground disturbing activities that exceed 10 feet in depth in previously undisturbed sediments, and are therefore likely to impact high sensitivity alluvial sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, proximity to known paleontological resources or fossiliferous geologic formations (i.e., older alluvium deposits), the materials being excavated (i.e., native sediments versus artificial fill), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division
MM-GEO-3: Prior to commencement of demolition or excavation activities, the Qualified Paleontologist shall attend a pre-grade/construction meeting to conduct construction worker paleontological resources sensitivity training for construction personnel. The training session, shall be carried out by the Qualified Paleontologist and shall focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. Documentation shall be retained demonstrating that construction personnel attended the training.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
MM-GEO-4: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area (usually 50 feet) shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If the fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (SVP, 2010). Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
MM-GEO-5: Prior to the release of the grading bond, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division
HAZARDS AND HAZARDOUS MATERIALS **MM-HAZ-1:** The Applicant shall retain a qualified environmental consultant to prepare a Soil Management and Remediation Plan for review and approval by the Culver City Building Safety Division and LARWQCB, as necessary, prior to the commencement of excavation and grading activities. The plan would include measures to remove and/or treat/remediate the impacted soils and groundwater to a level determined acceptable per applicable regulatory standards, under supervision of a certified environmental consultant licensed to oversee such remediation. Upon completion of the Soil Management and Remediation Plan, the Applicant shall contact the LARWQCB to obtain a closure letter that states no further soils testing or remediation is required on the Project Site.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division; Building Safety Inspector; Fire Prevention; Fire Inspector; Planning Division
MM-HAZ-2: Prior to the issuance of any permit for the demolition or alteration of the existing on-site buildings, a comprehensive ACMs survey of the buildings shall be performed. If no ACMs are found, the Applicant shall provide a letter to the Culver City Building Safety Division from a qualified asbestos abatement consultant indicating that no ACMs are present in the on-site buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division; Building Safety Inspector; Fire Prevention; Fire Inspector; Planning Division

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
HYDROLOGY AND WATER QUALITY **MM-HYD-1:** If dewatering activities occur on-site during future redevelopment, samples shall be obtained from the water and analyzed for volatile organic compounds (VOCs) and oxygenates to ensure that they do not exceed applicable discharge requirements. Should the samples exceed VOC, oxygenates or any other applicable discharge requirement, a dewatering plan shall be prepared by the Project applicant for submittal to the Los Angeles Regional Water Quality Control Board (LARWQCB), Los Angeles County**,** and other appropriate agencies determined appropriate in consultation with the LARWQCB for review and approval. The plan shall include but not be limited to sampling of groundwater that may be contaminated; and treatment and disposal of contaminated groundwater in compliance with applicable regulatory requirements. Written verification from the LARWQCB of approval of a dewatering plan completion shall be submitted to the Culver City Planning Division, Building Safety Division, and Department of Public Works prior to issuance of grading permit.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	On-Going During Construction	Culver City Planning, Public Works, and Building Safety Division
PUBLIC SERVICES **MM-PS-1:** Construction Traffic Management Plan – A Construction Traffic Management Plan shall be developed by the Project contractor in consultation with the Project's traffic and/or civil engineer and approved by Culver City's Building Official, Engineer and/or Planning Manager, as applicable, prior to issuance of any Project demolition, grading or excavation permit. The Final Plan shall also be reviewed and approved by Culver City's Fire and Police Departments. The Culver City's Building Official, City Engineer and/or Planning Manager, as applicable reserve the right to reject any engineer at any time and to require that the Plan be prepared by a different engineer. Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector ("Inspectors") of	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits and On-Going during Construction	Culver City Planning, Public Works, Fire and Police Departments

MITIGATION MONITORING PROGRAM
P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP

Project Design Feature/Mitigation Measure	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other surrounding developments that will potentially be under construction at around the same time as the Project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another. The Construction Traffic Management Plan shall identify, at a minimum, the following to the satisfaction of the City: ▪ The name and telephone number of a contact person who can be reached 24 hours a day regarding construction traffic complaints or emergency situations. ▪ An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties. ▪ Procedures for the training and certification of the flag persons. ▪ The location, times, and estimated duration of any roadway closures, traffic detours, use of protective devices, warning signs, and staging or queuing areas. ▪ The location and travel routes of off-site staging and parking locations. ▪ The location of temporary power, portable toilet and trash and materials storage locations. ▪ The timing and duration of all street and/or lane closures and shall be made available to the City in digital format for posting on the City's website and				

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
distribution via email alerts on the City's "Gov Delivery" system. The Plans shall be updated weekly during the duration of Project construction, as determined necessary by the City Department of Public Works or designee determined appropriate by Public Works. ▪ Prior to approval of the Plan, the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community. 1) Construction schedule and hours. 2) Framework for construction phases. 3) Identify traffic diversion plan by phase and activity. 4) Potential location of construction parking and office trailers. 5) Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity). 6) Emergency access plan. 7) Demolition plan. 8) Staging plan for the concrete pours, material loading and removal. 9) Crane location(s). 10) Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).				

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
TRANSPORTATION				
MM-TRANS-1: The Project shall implement a TDM Plan to encourage the use of non-auto modes of transportation and reduce vehicle trips. The TDM Plan shall be reviewed and approved by the City's Planning Division, Public Works/Engineering, and Transportation Staff for review prior to the issuance of the first building permit for the Project. The TDM Plan shall include, at a minimum, measures required by the CCMC. In addition, as recommended by the Project's Traffic Study, the TDM Plan shall also include, but not be limited to measures and strategies to reduce vehicle trips via amenity Improvements supporting alternative modes of transportation and a trip reduction program.	Condition of Approval	Approval of Plan	Prior to issuance of Building Permit	Culver City Traffic Engineering, Engineering/ Public Works , Transportation Department and Planning Division
MM-TRANS-2: To enhance the traffic signal system in the Project study area and in response to the forecast significant Project impacts, the Applicant shall contribute a fixed-fee financial contribution toward funding traffic signal upgrades, including installation of closed-circuit television (CCTV) cameras at Intersection No. 3 (Jefferson Boulevard & 1-405 Northbound Ramps). The funding contributions toward Intersection No. 3 (Jefferson Boulevard & 1-405 Northbound Ramps) shall be based on coordination with Culver City's Planning Division and Public Works/Engineering Staff, as well as LADOT, as necessary. This, and any other required financial fair-share contributions, must be guaranteed prior to the issuance of the Project's building permit and completed prior to the issuance of the Project's certificate of occupancy. Temporary certificates of occupancy may be granted in the events of any delay through no fault of the applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of the Culver City's Planning Division and Public Works/Engineering Staff, as well as LADOT, as necessary.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to issuance of Building Permit; installation prior to issuance of Certificate of Occupancy	Culver City Traffic Engineering, Engineering/ Public Works and Planning Division

MITIGATION MONITORING PROGRAM P2019-0194-SPR; P2019-0194-CUP; and P2019-0194-AUP				
Project Design Feature/Mitigation Measure	**Implementing Action, Condition or Mechanism**	**Method of Verification**	**Timing of Verification**	**Responsible Persons**
TRIBAL CULTURAL RESOURCES				
Refer to Mitigation Measure CUL-2, above	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division