

# CULVER STUDIOS INNOVATION PLAN- COMPREHENSIVE PLAN AMENDMENT NO. 7

Draft Environmental Impact Report  
State Clearinghouse No. 2016111044

Volume 1

Prepared for  
City of Culver City  
Culver City Case Nos: P2016-0208-EIR;  
P2016-0208-CP; P2016-0208-HPCA;  
P2016-0208-DA

September 2017



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# EXECUTIVE SUMMARY

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This Draft Environmental Impact Report (Draft EIR) has been prepared pursuant to the requirements of the California Environmental Quality Act, Public Resources Code sections 21000 et. seq. (CEQA) with respect to The Culver Studios Innovation Plan – Comprehensive Plan Amendment No. 7 (the Project). In accordance with the State CEQA Guidelines §15123, this chapter of the Draft EIR includes (1) a brief description of the Project; (2) issues raised during the Notice of Preparation (NOP) process including areas of controversy known to the lead agency; (3) significant and unavoidable impacts; (4) identification of alternatives that would reduce or avoid environmental impacts; and (5) summary of Project impacts, with proposed project design features and mitigation measures.

## ES.1 Project Description

The Project Site (or Studio Campus) encompasses approximately 14 acres at 9336 Washington Boulevard in downtown Culver City. The Studio Campus is generally bounded by the vacated portion of Washington Boulevard to the north, Ince Boulevard to the east, Van Buren Place to the west, and Lucerne Avenue to the south.

The Culver Studios Innovation Plan, which is reflected in proposed Comprehensive Plan Amendment No. 7 (CPA No. 7), would technologically update and expand the facilities within the existing approximately 14-acre Studio Campus. CPA No. 7 includes some, but not all, of the improvements approved as part of CPA No. 6 but not yet constructed, including new Building Y and the Van Buren Parking Structure near Van Buren Place. Although the historically significant bungalows have been relocated to the area south of the Mansion and are currently being rehabilitated subject to the mitigation measures required under CPA No. 6, this change to the Studio Campus is also included in CPA No. 7.

No major exterior changes are proposed to the Mansion or adjacent Buildings D, E, H, and I under the Innovation Plan. Minor exterior changes being proposed include the addition of two wheelchair lifts (reversible) on the rear (south) elevations of the Mansion and Building D, and regrading of pathways to meet accessibility requirements for the DeMille Theater and Buildings E, H, and I. As further described in Section 4.3.1, Cultural Resources – Historical Resources, of this EIR, interior rehabilitation of the Mansion would be undertaken in a manner that would protect the building’s eligibility as a historical resource under the City’s Historic Preservation Ordinance. The interior rehabilitation would support compliance with the Secretary of the Interior’s Standards for Rehabilitation by retaining key historic features and spaces, while allowing for alterations to accommodate future uses and bring the building up to current

standards. Interior rehabilitation of the Mansion would be undertaken in a manner that would protect the building's eligibility as a historical resource under the City's Historic Preservation Ordinance. The four existing bungalow Buildings S, T, U, and V, previously located along the western edge of the Studio Campus, were recently relocated to a site immediately south of the Mansion as approved under CPA No. 6. Their relocation, orientation and configuration in this area retains the historic grouping of the Bungalows within the Studio Campus in keeping with their original setting. The Bungalows are now in the process of being rehabilitated for continued use as offices. The rehabilitation work is being undertaken by a team of qualified consultants and contractors in conformance with the Secretary of the Interior's Standards for Rehabilitation.

The Culver Studios Innovation Plan proposes to modernize and expand the existing Central Area, encompassing the portion of the Studio Campus south of the Mansion and the relocated bungalow area. Proposed improvements include the construction of six new Digital Media buildings consisting of a flexible mix of creative space, production space, and digital media stages. The Digital Media buildings would replace six existing buildings consisting of offices and support services (Buildings L, O, X, Y, Z, and the Commissary) and four existing buildings consisting of sound stages, which would be demolished. Existing Stages 11/12/14 and Stages 15/16, all of which are contained in a single interconnected building in the southwestern portion of the Studio Campus, would remain in place for continued use. The buildings consisting of Stages 2/3/4, Stages 5/6, Stages 7/8/9, and Stage 10 would be demolished. Eight new digital media stages would be provided within the Central Area of the Studio Campus, co-located with media office and support uses. Buildings to be demolished would total approximately 236,293 square feet (sf) and new construction at Project buildout would total approximately 649,420 sf, for a net new square footage total of approximately 413,127 sf Campus-wide.

Two new parking structures are proposed. The proposed below-grade Central Parking Structure would be located south of the Mansion and the existing Rear Lawn Parking Structure, within the existing Central Area of the Studio Campus. The Central Parking Structure consists of two parking levels totaling 836 parking spaces and would accommodate Studio employee, VIP, and visitor parking. The Van Buren Parking Structure would be constructed on the western edge of the Studio Campus on the site of an existing above-grade parking structure, existing surface parking lot, and the former Bungalow Area. The Van Buren Parking Structure would include two below-grade, one at-grade, and five above-grade levels and would provide 1,109 parking spaces. A total of 2,366 parking spaces would be provided Campus-wide, including the two new proposed parking structures and the existing below-grade Rear Lawn Parking Structure.

## **ES.2 Issues Raised during Notice of Preparation Process and Areas of Controversy**

The following lists potential environmental issues or concerns raised in response to the NOP circulation, the comment period for which extended from November 17, 2016 through December 21, 2016, and during the public scoping meeting held on December 8, 2016. The NOP comments are contained in Appendix A of this Draft EIR. The issues are provided by the section of this EIR in which the comment is addressed.

### ES.2.1 Project Description

- Size and scale of the Project.
- Consistency of the Project with the agreements reached during the Conformance Review Process.

### ES.2.2 Aesthetics

- Aesthetics, light and glare, and shading impacts on the adjacent neighborhood.

### ES.2.3 Air Quality

- Air quality impacts of the Project (local and regional emissions, etc.).
- Dust impacts on the adjacent neighborhood.
- Use of the CEQA Air Quality Handbook and use of the CalEEMod model in the air quality analysis.
- Toxic Air Contaminants.
- Consistency with the RTP/SCS.

### ES.2.4 Cultural Resources

- Impacts on Tribal cultural resources.
- Impacts on historical resources, and desire for further evaluation of potential eligibility of the property as a historic district, consideration of adaptive reuse alternatives, and recommendation for preparation of a historic preservation plan.

### ES.2.5 Land Use

- Consistency with the existing zoning of the Project Site.

### ES.2.6 Noise

- Noise impacts on the adjacent neighborhood.

## ES.2.7 Transportation and Traffic

- Traffic impacts on the local streets and Caltrans facilities.
- Neighborhood cut-through traffic.
- Traffic impacts of the proposed tunnel connection to Parcel B and Culver Boulevard.

## ES.2.8 Other

- Protection of parkway trees.

## ES.3 Significant and Unavoidable Environmental Impacts

Based on the analysis contained in Chapter 4.0, *Environmental Impact Analysis*, of this Draft EIR, the Project would result in the following significant and unavoidable environmental impacts:

- Cultural Resources (Historical Resources): The Project would require removal of Stage 2/3/4 and Stage 7/8/9, both of which are historical resources recommended eligible at the national, State and local levels.
- Traffic and Circulation (Construction): Substantial delays and disruptions of existing traffic flow based on the operational thresholds at intersections during peak hours. Also, there could be some temporary incompatibilities between existing motor vehicle traffic and Project construction traffic.
- Transportation and Circulation (Intersection Service Levels): Under the standard analysis, the Project would result in significant operational level of service impacts after mitigation at the following eight study intersections during the AM and/or PM peak hours:
  3. Duquesne Ave/Lucerne Ave (Culver City, AM peak hour)
  8. Washington Blvd/Culver Blvd (Culver City, AM peak hour)
  13. Robertson Blvd/Exposition Blvd/Venice Blvd (City of LA, AM & PM peak hours)
  14. National Blvd/Washington Blvd (Culver City, AM peak hour)
  19. Overland Ave/Culver Blvd (Culver City, AM peak hour)
  33. Overland Ave/Venice Blvd (City of Los Angeles, AM peak hours)
  38. Robertson Blvd/National Blvd (City of Los Angeles, AM & PM peak hours)
  42. Duquesne Ave/Braddock Dr (Culver City, AM & PM peak hours)

If optional Mitigation Measures TRAF-9 and TRAF-10 were implemented in order to address queuing issues at Intersection 10 and other mobility considerations, requiring a left turn prohibition from westbound Ince Boulevard to southbound Washington Boulevard at Intersection 10 (Ince Blvd/Washington Blvd), and reconfiguring the westbound approach at Intersection 11 (Canfield Ave/Washington Blvd/ & Culver Blvd) to include an exclusive westbound left-only lane, a shared left/through lane, and a shared through/right turn lane, traffic would be shifted such that new significant unavoidable impacts would occur at the following four intersections:

- 11. Canfield Ave/Washington Blvd & Culver Blvd
- 22. National Blvd/Venice Blvd
- 29. La Cienega Blvd/Venice Blvd
- 10. Ince Blvd/Washington Blvd

At the same time, the following two intersections, which would be significantly and unavoidably impacted by the Project, would no longer be significantly impacted with implementation of optional Mitigation Measures TRAF-9 and TRAF-10:

- 14. National Blvd/Washington Blvd
- 15. Higuera St/Washington Blvd

Under the Micro-Simulation analysis, the Project would also result in significant operational level of service impacts after mitigation at the intersections above as well as the following four study intersections during the AM and/or PM peak hours:

- 6. Duquesne Ave/Lucerne Ave (Culver City, AM and PM peak hours)
- 10. Ince Blvd/Washington Blvd (Culver City, PM peak hour)
- 15. Higuera St/Washington Blvd (Culver City, AM and PM peak hours)
- 37. Lafayette Pl/Culver Blvd (Culver City, PM peak hour)

No feasible mitigation measures are available to reduce the above impacts to less than significant levels.

## **ES.4 Alternatives that Would Reduce or Avoid Significant Impacts**

### **ES.4.1 Alternative 1: No Project/No Build**

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the Guidelines states that, “In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.” Under the No Project/No Build Alternative, the Project would not be developed and use of the entire Studio Campus would continue as under current conditions.

### **ES.4.2 Alternative 2: No Project/CPA No. 6 Buildout**

Under the No Project/CPA No. 6 Buildout Alternative, the Studio Campus would be built out in compliance with zoning pursuant to CPA No. 6. This Alternative would include the construction of Buildings O, Y, R, and the Van Buren Parking Structure, and demolition of existing Buildings L, O, X, Y, Z; the Commissary, and Stage 10, for a net new building square footage of approximately 138,997 sf (including 180,093 sf of office/digital media, and a reduction of 3,280 sf of stage and 37,816 of support use). CPA No. 6 would result in an overall reduction of 274,130 sf (including 341,539 sf of digital media, and an increase of 36,600 sf of stage and 30,809 sf of

support use), compared to the Project. Overall, this Alternative would result in 138,997 sf of net new development versus 413,127 sf under the Project.

Access and circulation improvements (with the exception of new Gate 2A), relocation of the Bungalows, and landscaping of the Front Lawn, Van Buren Place, and Ince Boulevard, would occur as proposed under the Project. Other proposed improvements include: relocation of the existing guard shack at Gate 1; realignment of existing Gate 4; upgrades to aging Studio Campus infrastructure including heating/ventilation/air conditioning, electrical, and domestic and fire water systems; and some off-site improvements including new curbs, gutters, sidewalks, streetlights, parking meters, and street trees on Ince Boulevard and Van Buren Place.

Lastly, this alternative includes rehabilitation of the four historically significant bungalows recently relocated near the Mansion (Buildings S, T, U and V) subject to a required Relocation and Rehabilitation Plan and approval of a Certificate of Appropriateness by the City consistent with requirements under CPA No. 6.

### ES.4.3 Alternative 3: Reduced Density Alternative

Under the Reduced Density Alternative, the Project would be reduced in size by approximately 135,000 sf, or an approximately 33 percent reduction in net new building sf, through a reduction in digital media/office use floor area. The reduction in floor area would be achieved through smaller building footprints (the heights of the proposed buildings would be the same as under the Project). As with the Project, this alternative would involve minor changes to the Mansion largely focused on interior rehabilitation, a connection to the Culver/Main Tunnel, relocation/rehabilitation of the Bungalows, and construction of six new Digital Media buildings which would house a flexible mix of creative space, production space, and digital media stages, and would replace six existing buildings housing offices and support services (Buildings L, O, X, Y, Z, and the Commissary) and four existing buildings housing sound stages.

New construction would be located throughout the existing Central Area, and along the eastern, western, and southern sides of the Studio Campus. As with the Project, Stage 11/12/14 and Stage 15/16 would be retained. New buildings would be a maximum of 56 feet in height, consistent with the height limitation of the Culver Studios Comprehensive Plan as well as the Studio Zoning district in the City's Zoning Code. Building exteriors would be constructed and finished in an architectural style compatible with the existing historically significant buildings. As with the Project, there would be a common open space area, improved Studio Campus access and internal circulation with associated gate changes, and below-grade, at-grade, and above-grade structured parking, including the Van Buren Parking Structure.

### ES.4.4 Alternative 4: Full Historic Preservation – Retain Stages 2/3/4 and 7/8/9 as Sound States

Under Alternative 4, Stages 2/3/4 (32,400 sf) and 7/8/9 (16,800 sf) would be retained in their current condition for continued use as Sound Stages. This would eliminate the development of Buildings K and M proposed under the Project. Of the proposed new space eliminated, the majority would be digital media space. This Alternative would result in net new construction of

285,912 sf of digital media/office and a decrease in existing stage of 10,680 sf (although the retention of the stages under this alternative would result in approximately 40,000 sf more stage use than under the Project). Also compared to the Project, this Alternative would reduce the overall amount of development, with most of this in digital media/office square. This Alternative would result in total net new square footage of 206,607 sf versus 413,127 sf under the Project. Other than these changes and a reduction in the size of the Central Parking Structure, other aspects of the Alternative would be similar to the Project. Most notably, the construction of new Buildings J, L, O and Y would be retained, along with the Van Buren Parking Structure. Access/circulation improvements, relocation of the Bungalows, landscape/Central Courtyard improvements would occur as proposed under the Project.

#### ES.4.5 Alternative 5: Historic Preservation – Retain Stages 2/3/4 as Sound Stages

Under Alternative 5, Stages 2/3/4 (32,400 sf) would be retained in their current condition for continued use as sound stages. Proposed Building K would not be constructed. This Alternative would include 347,549 sf of net new development versus 413,127 sf under the Project (although due to the retention of Stages 2/3/4, this alternative would result in more stage use than under the Project). Other than these changes and a reduction in the size of the Central Parking Structure, other aspects of the Alternative would be similar to the proposed Project.

#### ES.4.6 Alternative 6: Historic Preservation – Retain Stages 7/8/9 as Sound States

Under Alternative 6, Stages 7/8/9 (16,800 sf) would be retained in their current condition for continued use as sound stages. Proposed Building M would not be constructed. This alternative would include 347,007 sf of net new development versus 413,127 sf under the Project (although due to the retention of Stages 7/8/9, this alternative would result in more stage use than under the Project). Other than these changes and a reduction in the size of the Central Parking Structure, other aspects of the Alternative would be similar to the proposed Project.

#### ES.4.7 Alternative 7: Full Adaptive Reuse – Retain Stages 2/3/4 and 7/8/9 as Digital Media

Under Alternative 7, Stages 2/3/4 (32,400 sf) and 7/8/9 (16,800 sf) would be adaptively reused to balance historic preservation with the need for efficient digital media production space. Proposed Building K (170,800) and M (84,920 sf) would not be constructed. Overall, this alternative would result in 206,607 sf of net new development versus 413,127 sf under the Project. Other than these changes and associated reductions in parking spaces, other aspects of the Project would not change.

#### ES.4.8 Alternative 8: Adaptive Reuse – Retain Stages 2/3/4 for Digital Media

Under Alternative 8, Stages 2/3/4 (32,400 sf) would be adaptively reused to balance historic preservation with the need for efficient digital media production space. Proposed Building K

(170,800 sf), all of which would be digital media space under the Project, would not be constructed. Although Stages 2/3/4 would provide 32,400 sf of digital media space, this is a net reduction of 138,400 sf of digital media space compared to the floor area that would be provided with the development of Building K under the proposed Project. Other than these changes and associated reductions in parking spaces, other aspects of the Project would not change.

## ES.4.9 Alternative 9: Adaptive Reuse – Retain Stages 7/8/9 for Digital Media

Under Alternative 9, Stages 7/8/9 (16,800 sf) would be adaptively reused to balance historic preservation with the need for efficient digital media production space. Proposed Building M (84,920 sf) would not be constructed. Overall, this alternative would result in 274,727 sf of net new development versus 413,127 sf under the Project. Other than these changes and associated reductions in parking spaces, other aspects of the Project would not change.

## ES.4.10 Environmentally Superior Alternative

Based on the analysis in Chapter 5, Alternatives, of this Draft EIR, all of the Project alternatives analyzed would result in less environmental impacts than the Project. In order from least to most impacting on a purely quantitative basis (e.g., number of environmental issues for which environmental impacts would be less than under the Project) would be the: No Project/No Building Alternative (Alternative 1); No Project/CPA No. 6 Buildout Alternative (Alternative 2); Adaptive Reuse Alternatives (Alternatives 7-9); Historic Preservation Alternatives (Alternative 4-6); and Reduced Density Alternative (Alternative 3). However, in accordance with CEQA, while the No Project/No Build Alternative would be the least impacting alternative, followed by the No Project/CPA No. 6 Alternative, the identification of an environmentally superior alternative should be identified from among the remaining alternatives.<sup>1</sup>

Among the remaining alternatives, the Full Historic Preservation Alternative (Alternative 4) is identified as the Environmentally Superior Alternative. It would be less impacting than the Project in 30 of the 41 environmental issues analyzed, would avoid the significant unavoidable historical resource impacts on Stages 2/3/4 and 7/8/9 and half of the significant unavoidable traffic (intersection level of service) impacts of the Project. While the Full Historic Preservation Alternative would substantially reduce the amount of digital media space proposed by the Project, which is fundamental to the objective of responding to changing industry needs and market conditions through a plan that technologically updates and expands Campus facilities, it would still achieve a number of the objectives of the Project albeit less effectively than the Project.

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<sup>1</sup> Both Alternatives 1 (No Project/No Build) and Alternative 2 (No Project/CPA No. 6) would avoid the significant unavoidable historical resources and traffic impacts of the Project.

## ES.5 Summary of Environmental Impacts

This section provides a summary of impacts, mitigation measures, and impacts after implementation of the mitigation measures associated with implementation of the Project. The summary is provided by environmental issue area below in **Table ES-1, *Summary of Project Impacts, Project Design Features and Mitigation Measures***. Table ES-1 provides the impact statement for each issue area evaluated in Chapter 4, *Environmental Impact Analysis*. The summary also includes any Project Design Features (PDFs) and mitigation measures, as applicable.

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. As shown in Table ES-1, based on analyses contained in this Draft EIR:

- Impacts related historical resources and traffic would be significant and unavoidable, even with implementation of the mitigation measures;
- Impacts related to archaeological and tribal resources, paleontological resources, geology and soils, noise and groundborne vibration, and wastewater were determined to be potentially significant, but would be reduced to less than significant levels with the implementation of mitigation measures; and
- Impacts related to air quality, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, police, fire, water supply, solid waste, and energy were determined to be less than significant so that no mitigation is required.

In addition, analysis was provided of the impacts of the Project in terms of aesthetics (e.g., aesthetic character, aesthetics plan consistency, light/glare, and shade/shadow) and parking, but in accordance with Senate Bill 743 (discussed further in Table ES-1), the analysis for these issues is provided for information purposes only, and no significance determination is provided.

**TABLE ES-1  
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<b>4.1. AESTHETICS</b>			
<i>Note: Under SB 743 the Project is not required to evaluate aesthetic impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to visual quality, views, light, glare, and shading.</i>			
<p><b>Aesthetic Character – Construction (Impact AES-1):</b> Project construction activities and associated equipment and materials would be screened by temporary fencing. Areas of the Project Site adjacent to public rights-of-ways would be inspected to remove litter, graffiti, and other unauthorized materials throughout the construction period. As a result, effects on visual character due to short term construction activities would not exceed thresholds.</p>	<p><b>PDF-AES-1 (Construction Fencing):</b> Prior to the commencement of any excavation, the Applicant shall install a temporary construction fence with screening around the site. The height, fence, and screening materials are subject to approval by the City Engineer and the Planning Manager.</p> <p><b>PDF-AES-2 (Construction Staging):</b> All staging and storage of construction equipment and materials, including the construction dumpster, shall be on-site only. The Property Owner must obtain written permission from adjacent property owners for any construction staging occurring on adjacent properties.</p> <p><b>PDF-AES-3 (Litter and Graffiti):</b> The property shall be maintained daily so that it is free of trash and litter and all graffiti shall be removed from the Property within 48 hours of its application.</p>	<p>No mitigation measures are required.</p>	<p>N/A (information provided for informational purposes only)</p>
<p><b>Aesthetic Character – Operation (Impact AES-2):</b> The Project would technologically update and expand facilities within the Studio Campus, with modern buildings, a parking structure, landscaped setbacks, and gate improvements designed to support compatibility with surrounding development, including residential areas. Compared to existing conditions changes in visual quality are generally considered beneficial and would not substantially alter or degrade the visual quality of the area. Therefore, the Project would not exceed thresholds with respect to aesthetic character.</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>N/A (information provided for informational purposes only)</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<p><b>Aesthetics Plan Consistency (Impact AES-3):</b> The Project would not result in substantial conflicts with applicable environmental policies in the General Plan or other regional and local plans adopted for the purpose of avoiding or mitigating an environmental effect related to visual character.</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>N/A (information provided for informational purposes only)</p>
<p><b>Light and Glare (Impact AES-4):</b> Lighting associated with the Project would be shielded and directed onto the Project Site to avoid glare and minimize light trespass onto residential properties. Furthermore, Project Design Features PDF-AES-4 and PDF-AES-5, include restrictions on illuminance intensity for adjacent residential and pedestrian areas, and PDF-AES-6, includes design characteristics to address light trespass from the proposed Van Buren Parking Structure. Given these components of the Project, it would not create substantial light or glare that would adversely affect day or nighttime views in the area.</p>	<p><b>PDF-AES-4 (Lighting – Residential Adjacency Guideline):</b> All Project Site and exterior building mounted luminaires shall produce a maximum initial illuminance value no greater than 0.10 horizontal footcandles 10 feet beyond the property boundary. No more than 2 percent of the total initial designed fixture lumens (sum total of all fixtures in the areas with residential adjacencies) shall be emitted at an angle of 90 degrees or higher from nadir (straight down).</p> <p><b>PDF-AES-5 (Lighting – Pedestrian Level Guideline):</b> The illumination guidelines for areas with residential adjacencies shall apply to the pedestrian zone. Qualitative lighting strategies for increasing comfort and safety and creating a more pedestrian-friendly zone with minimal light spill, such as low level landscape lighting, low level lighting around street furniture, and low intensity downlighting from street trees, are encouraged.</p> <p><b>PDF-AES-6 (Lighting – Van Buren Parking Garage Interior):</b> Use shielded linear small aperture luminaires with opaque sides oriented perpendicular to the façade to minimize views of light sources, reduce glare and light spill outside the garage. In addition, the garage will utilize occupancy sensors to reduce unnecessary lighting when not in use.</p>	<p>No mitigation measures are required.</p>	<p>N/A (information provided for informational purposes only)</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<p><b>Shading (Impact AES-5):</b> The Project would result in limited net new shading effects on three residential uses for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. PST, or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. PDT. Therefore, the Project would exceed the shade/shadow threshold at these locations.</p>	<p>Not applicable</p>	<p>No mitigation measures are available.</p>	<p>N/A (information provided for informational purposes only)</p>
<p><b>4.2. AIR QUALITY</b></p>			
<p><b>Air Quality Management Plan (Impact AIR-1):</b> The Project would not conflict with or obstruct implementation of relevant air quality policies in the adopted Air Quality Management Plan. Therefore, impacts would be less than significant.</p>	<p><b>PDF-AIR-3 (Voluntary Design Elements):</b> The project shall incorporate many optional energy and emission saving features including the following:</p> <ul style="list-style-type: none"> <li>• The Project shall pursue minimum LEED Certification.</li> <li>• The Project shall install 100 bicycle parking spaces.</li> <li>• The Project shall install infrastructure for future gray water uses.</li> </ul>	<p>No mitigation measures are required.</p>	<p>Less than Significant</p>
<p><b>Regional Impacts (Impact AIR-2):</b> Construction of the Project would not exceed the applicable SCAQMD significance thresholds. Operation of the Project would not exceed the applicable SCAQMD significance thresholds. Therefore, construction and operational emission impacts would be less than significant.</p>	<p><b>PDF-AIR-1 (Construction Features):</b> Construction equipment operating at the Project Site would 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:</p> <ul style="list-style-type: none"> <li>• The Project shall require all off-road diesel equipment greater than 50 horsepower (hp) used for this Project to meet USEPA Tier 4 off-road emission standards. Welders would also meet USEPA Tier 4 off-road emission standards or will be electric-powered. All equipment shall be outfitted with Best Available Control Technology (BACT) devices including a California Air Resources Board (CARB)-certified Level 3 Diesel Particulate Filter or equivalent. This PDF would allow for a reduction in diesel particulate matter and NOx</li> </ul>	<p>No mitigation measures are required.</p>	<p>Less than Significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
	<p>emissions during construction activities.</p> <ul style="list-style-type: none"> <li>• Consistent with CPA #6, the Project shall utilize low-VOC coatings during construction activities to avoid excessive VOC emissions.</li> <li>• Consistent with CPA #6 Condition of Approval #140, trucks and other vehicles in loading and unloading queues shall be parked with engines off to reduce vehicle emissions during construction activities.</li> </ul> <p><b>PDF-AIR-2 (Design Elements):</b> In accordance with CALGreen Building Standards, the project shall incorporate the following mandatory energy and emission saving features:</p> <ul style="list-style-type: none"> <li>• The Project shall recycle and/or salvage at least 65 percent of non-hazardous construction and demolition debris.</li> <li>• The Project shall use water efficient landscaping and native drought tolerant plants.</li> <li>• 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).</li> <li>• The Project shall include efficient heating, ventilation, and air conditioning (HVAC) systems.</li> <li>• The Project shall install low-flow water fixtures that are consistent with USEPA WaterSense specifications.</li> <li>• The parking structures would shall be designed with occupancy-sensor controlled lighting that would place lighting fixtures in a low power state in unoccupied zones.</li> </ul>		

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<p><b>Non-Attainment Criteria Pollutants (Impact AIR-3):</b> The South Coast Air Basin is designated as non-attainment for O3, PM10, and PM2.5 under federal and/or state ambient air quality standards. Construction and operation of the Project would not exceed the applicable SCAQMD significance thresholds for ozone precursor emissions (i.e., VOCs and NOX), PM10, or PM2.5. Therefore, construction and operational emissions would be less than significant.</p>	<p>Refer to Project Design Features Air-1, AIR-2, and Air-3.</p>	<p>No mitigation measures are required.</p>	<p>Less than Significant</p>
<p><b>Expose Sensitive Receptors to Substantial Pollutant Concentrations (Impact AIR-4):</b> Construction and operation of the Project would not exceed the localized significance thresholds at off-site sensitive receptors. The Project would not cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 parts per million (ppm), respectively. Therefore, CO hotspots impacts would be less than significant. Construction of the Project would not generate emissions of TACs (i.e., diesel particulate matter) that would result in a significant health impact to off-site sensitive receptors. Operation of the Project would not include permanent sources (equipment, etc.) that would generate substantial long-term TAC emissions in excess of the health risk thresholds. Therefore, construction and operational TAC impacts would be less than significant.</p>	<p><b>PDF-NOISE-8 (Compliance with Noise Element):</b> The following noise standards from Policy 2.A of the City's General Plan Noise Element shall be complied with at all times:</p> <ul style="list-style-type: none"> <li>A. No construction equipment shall be operated without an exhaust muffler, and all such equipment shall have mufflers and sound control devices (i.e., intake silencers and noise shrouds) that are no less effective than those provided on the original equipment;</li> <li>B. All construction equipment shall be properly maintained to minimize noise emissions;</li> <li>C. If any construction vehicles are serviced at a location onsite, the vehicle(s) shall be setback from any street and other property lines so as to maintain the greatest distance from the public right-of-way and from Noise Sensitive Receptors;</li> <li>D. Noise impacts from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) shall be minimized by proper selection of equipment and the installation of acoustical shielding as approved by the Planning Manager and the Building</li> <li>E. The Project shall not allow any delivery truck idling in the loading area. Signs shall be posted prohibiting idling.</li> </ul>	<p>No mitigation measures are required.</p>	<p>Less than Significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<b>4.3.1 CULTURAL RESOURCES – HISTORICAL RESOURCES</b>			
<p><b>Direct Impacts (Impact HIST-1):</b> The Project would require removal of Stage 2/3/4 and Stage 7/8/9, both of which are recommended eligible at the national, State and local levels, and therefore, there would be significant unavoidable Project impacts on historical resources. Impacts associated with relocation and rehabilitation of the bungalows would be less than significant with implementation of mitigation <b>measures</b>. Impacts associated with changes to the Mansion</p>	<p>Not applicable</p>	<p><b><u>Removal of Stage 2/3/4 and Stage 7/8/9</u></b>  <b>MM-HIST-1 (Recordation).</b> Perform a Level II Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation of The Culver Studios (interior and exterior of all eligible structures dating from the period of significance to be removed). Documentation shall include selective laser scanning, 3-D modeling, narrative text and appropriate photographs per HABS/HAER requirements describing existing conditions and summarizing the relevant construction history and use of the buildings, structures, and features. Documentation shall be prepared by a qualified historic preservation consultant who meets the Secretary of the Interior’s Professional Qualifications Requirements in history and/or architectural history. Documentation shall be provided to the Library of Congress where it will be appropriately archived and publically accessible. The HABS/HAER documentation shall be completed and submitted to the Library of Congress within 180 days of issuance of the first demolition permit issued by the City of Culver City for removal of a building from the Studio Campus.  <b>MM-HIST-2 (Salvage Plan).</b> Applicant shall prepare a Salvage Plan that shall be filed with the City of Culver City Planning Division. Prior to demolition, key character-defining physical features of the two individually eligible sound stages (Stage 2/3/4 and Stage 7/8/9) to be demolished shall be identified and made available for use in an interpretive program to be developed for the Project or donated for curatorial and/or educational purposes to a local historical society, preservation organization, or the like. Unsound, decayed, or toxic materials (e.g. asbestos, lead paint, etc.) need not be included in the salvage process. The salvage materials which will not be reused for the Project shall be offered for donation or shall be advertised for a period of not less than thirty (30) days in historic preservation websites and the Culver City News, as well as by posting on the project site itself and by other means as deemed appropriate. Salvage efforts shall be conducted by the Applicant. These efforts shall be documented in writing by summarizing all measures taken to encourage receipt of salvage materials by the public. Copies of notices, evidence of publication of such notices, along with a summary of results</p>	<p>Significant unavoidable (stages)  Less than significant (bungalows)</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
		<p>from the publicity efforts, a list of salvage offers (if any) that were made, and an explanation of why the features were not or could not be accepted shall be included in this salvage summary document.</p> <p><b>MM-HIST-3 (Interpretive Program).</b> The Applicant shall, in consultation with an expert in museum curation and/or the history of the motion picture industry, develop a publicly accessible interpretive and commemorative program with enforceable performance standards (“Interpretive and Commemorative Program” or “Program”), commemorating and actively illustrating:</p> <ul style="list-style-type: none"> <li>• the significant creative, production, and administrative activities and events that took place and films produced during the Thomas H. Ince, Cecile B. DeMille/RKO Pictures, and David O. Selznik eras of the Studio’s history,</li> <li>• how these activities and events were associated with the continued evolution of the motion picture industry through the pioneering era of independent studios, the emergence of the Big Eight major motion picture studios and the “studio system,” and the rise of smaller independent production companies in the post-war era,</li> <li>• significant innovations, technical approaches, and technology developed at the Studio and how these important events contributed significantly to the physical development of the site and the evolving motion picture studio.</li> </ul> <p>Program elements may be located on-site, entirely off-site or in a combination of on-site and one or more off-site locations such as new or existing museums and exhibition spaces; provided, however, that at least one publically accessible element of the Program be placed or housed on the Studio Campus property and incorporated as part of any future use and development of the property (e.g., commemorative elements incorporated as part of publically accessible open space features).</p> <p><b>Substantive Program Requirements.</b> This Interpretive and Commemorative Program shall be based on a research phase to identify and/or determine the availability of the following resources:</p> <ul style="list-style-type: none"> <li>• An inventory of museums, exhibition spaces or other institutions (such as the Academy Museum of Motion Pictures currently under development, The Culver City</li> </ul>	

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
		<p>Public library, or The Culver City Historical Society) that provide public programming regarding the motion picture industry, with which the Interpretative and Commemorative Program might share resources or house Program components;</p> <ul style="list-style-type: none"> <li>• An inventory of physical assets or artifacts extant in public or private collections that may be available for exhibition as part of the Interpretive and Commemorative Program;</li> <li>• Sources of supplementary funding, such as foundation grants.</li> <li>• With knowledge of such availability, the Interpretative and Commemorative Program shall contain recommendations for programming, which collectively commemorate the history of motion picture production, development, administration, and technical engineering achievements at The Culver Studios and may, by way of example, include:             <ul style="list-style-type: none"> <li>• exhibition locations,</li> <li>• artifacts for display,</li> <li>• thematic content,</li> <li>• audio presentations,</li> <li>• video-based interpretive virtual tour or 3-D modeling of the most significant areas of the Studio, and database accessibility.</li> </ul> </li> </ul> <p><b>MM-HIST-4 (Studio Campus Preservation Plan).</b> A Studio Campus Preservation Plan shall be completed by a qualified preservation consultant to govern maintenance, rehabilitation, or improvement of historical resources on the Studio Campus. The Studio Campus Preservation Plan shall comply with the methodology called for by the Standards and would specify the maintenance and treatment of character-defining features, materials and finishes and provide appropriate guidelines for future rehabilitation or improvement projects to protect the integrity of historical resources. The Studio Campus Preservation Plan shall serve as a primary planning document for long-term decision-making about treatments and improvements, and would: a) serve as a basis for design of recommended work; b) provide a summary of information known and conditions observed at the time of the survey; and c) provide a bibliography of archival documentation relevant to the structures. The Studio Campus Preservation Plan shall be</p>	

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
		<p>reviewed by Cultural Affairs for comment prior to approval and issuance of a permit.</p> <p><b><u>Bungalows Relocation (Reproduced from CPA No. 6)</u></b></p> <p><b>MM-HIST-5 (Recordation).</b> Prior to the issuance of a relocation permit for the bungalows, a recordation document in accordance with Historic American Buildings Survey (HABS) Level III requirements shall be completed for the existing buildings. The HABS document shall be prepared by a qualified architectural historian or historic preservation professional. This document shall include a historical narrative on the architectural and historical importance of the subject property and record the existing appearance of the four bungalows in professional large format HABS photographs. The building exteriors, representative interior spaces, character-defining features, as well as the setting and contextual views shall be documented. All documentation components shall be completed in accordance with the Secretary of the Interior’s Standards and Guidelines for Architectural and Engineering Documentation (HABS standards). Original archivally-sound copies of the report shall be submitted to the HABS collection at the Library of Congress, and South Central Coastal Information Center, California State University, Fullerton, CA. Non-archival copies will be distributed to the City of Culver City and Public Library. In addition, any existing and available design and/or as-built drawings shall be compiled, reproduced, and incorporated into the recordation document. [Note: This mitigation measure has been implemented as of the date of publication of this EIR.]</p> <p><b>MM-HIST-6 (Relocation, Storage and Rehabilitation).</b> Prior to relocation, the bungalows shall be recorded (see MM-HIST-4 (Recordation) before being moved to an appropriate on-site location with compatible setting and association qualities. A Relocation and Rehabilitation Plan shall be commission by the applicant and developed by a qualified historic preservation consultant. The Plan shall include relocation methodology recommended by the National Park Service (NPS), which are outlined in the booklet entitled “Moving Historic Buildings,” by John Obed Curtis (1979). The Plan shall include an assessment of the building condition by a qualified engineer, and a shoring plan for relocation and storage, and relocation to the final site. If temporary storage is required, the storage conditions should closely follow the recommendations of NPS Preservation Brief 31: Mothballing Historic Buildings with regard to</p>	

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
		<p>recommendations for structural stabilization, pest control, protection against vandalism, fire, and moisture, adequate ventilation which should be applied to the building at the temporary storage location to ensure the safety of the building during storage. A periodic maintenance and monitoring plan shall also be included in the Plan and implemented during the storage period in accordance with the guidance outlined in NPS Preservation Brief 31. The Relocation and Rehabilitation Plan shall be reviewed and approved by the City of Culver City prior to its implementation.</p> <p>Upon relocation of the structures to the new site, any maintenance, repair, stabilization, rehabilitation, preservation, conservation, or reconstruction work performed in conjunction with the relocation of the building shall be undertaken in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Properties. In addition, a plaque describing the date of the move and the original location shall be placed in a visible location on each of the buildings. The removal, storage, relocation and rehabilitation process shall be monitored by a qualified historic preservation consultant at key intervals to ensure conformance with the Standards and NPS guidelines. The preservation consultant shall also be available to provide technical expertise to reduce potential impacts to historical resources from unforeseen circumstances. [Note: This mitigation measure has been partially implemented as of the date of publication of this EIR. Rehabilitation of the bungalows in accordance with this measure is underway.]</p> <p><b>MM-HIST-7 (Interpretive Plaque/Marker).</b> A permanent metal plaque will be affixed to the primary elevation of the relocated buildings or a marker will be imbedded in the pavement in front, which will briefly explain that the buildings were relocated and its original site.</p>	

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<p><b>Indirect Impacts (Impact HIST-2):</b> The Project would not reduce or materially impair the integrity or significance of important historical resources in the Project vicinity such that their eligibility for listing on a register of historical resources would be substantially changed. Therefore, indirect impacts would be less than significant.</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p><b>4.3.2 CULTURAL RESOURCES – ARCHAEOLOGICAL AND TRIBAL RESOURCES</b></p>			
<p><b>Archaeological Resources (Impact ARCH-1):</b> The Project Site has been previously disturbed through grading and development for the existing Studio Campus, however, Project grading and excavation may encounter buried archaeological resources. As a result, construction may cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Impacts to archaeological resources are considered potentially significant.</p>	<p>Not applicable</p>	<p><b>MM-ARCH-1:</b> Prior to issuance of demolition permit, the Applicant shall retain a Qualified Archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the Qualified Archaeologist and Gabrielino Tribe and shall focus on how to identify archaeological and cultural resources that may be encountered during earthmoving activities, and the procedures to be followed in such an event.</p> <p><b>MM-ARCH-2:</b> Prior to issuance of demolition permit, the Applicant shall retain a Native American tribal monitor from a Gabrielino Tribe who shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall take into account the rate of excavation and grading activities, proximity to known 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</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
		<p>archaeological resources encountered. Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Gabrielino Tribe.</p> <p><b>MM-ARCH-3:</b> In the event that historic (e.g., bottles, foundations, refuse dumps/privies, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist and the Gabrielino Tribe. If the resources are prehistoric or Native American in origin, the Gabrielino Tribe shall consult with the City Planning Division and Qualified Archaeologist regarding the treatment and curation of those resources. If a resource is determined by the Qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City Planning Division to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan shall incorporate the Gabrielino Tribe’s treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Fowler Museum, if such an institution agrees to accept the material, and/or the Gabrielino Tribe. If no institution accepts the archaeological material and the Gabrielino Tribe does not accept the material, it may be donated to a local school or historical society in the area for educational purposes.</p> <p><b>MM-ARCH-4:</b> Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and</p>	

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
		<p>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 Planning Division, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.</p>	
<p><b>Human Remains (Impact ARCH-2):</b> The Project Site has been previously disturbed through grading and development for the existing Studio Campus, however, Project grading and excavation may encounter buried human remains. As a result, construction may disturb human remains, including those interred outside of dedicated cemeteries. Impacts to human remains resources are considered potentially significant.</p>	<p>Not applicable</p>	<p><b>MM-ARCH-5:</b> If human remains are encountered unexpectedly during construction of the project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the location 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 land owner 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 land owner 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 land owner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.</p> <p>Whenever the NAHC is unable to identify a MLD, or the MLD</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
		identified fails to make a recommendation, or the land owner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the land owner, the land owner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.	
<p><b>Tribal Cultural Resources (Impact TCR-1):</b> The Project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074, since no tribal cultural resources were identified as located within the Project Site or immediately adjacent. No impacts to tribal cultural resources would occur.</p>	Not applicable	Refer to Mitigation Measures ARCH-1 through ARCH-5.	Less than significant
<p><b>4.3.3 CULTURAL RESOURCES – PALEONTOLOGICAL RESOURCES</b></p>			
<p><b>Paleontological Resources (Impact PALEO-1):</b> The Project Site has been previously disturbed through grading and development for the existing Studio Campus, however, Project grading and excavation may encounter native soil/sediment associated with older Quaternary Alluvium, which has high potential for containing buried paleontological resources. As a result, construction may directly or indirectly destroy unique paleontological resources or sites or unique geologic features. Impacts to paleontological resources are therefore considered potentially significant.</p>	Not applicable	<p><b>MM-PALEO-1:</b> A qualified Paleontologist shall be retained to monitor construction excavations that would encounter older Quaternary sediments (generally associated with sediments below six feet in the area). The Paleontologist shall attend a pre-grading/excavation meeting to discuss the paleontological monitoring requirements. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older Quaternary sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated (older vs. younger alluvium), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Paleontologist.</p> <p><b>MM-PALEO-2:</b> If a potential fossil is found, the paleontological</p>	Less than significant

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
		<p>monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Paleontologist shall implement a paleontological salvage program to remove the resources from the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.</p> <p><b>MM-PALEO-3:</b> The Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected (if any) and their significance. The report shall be submitted by the project Applicant to the City Planning Division and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project monitoring and required mitigation measures.</p>	

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<b>4.4. GEOLOGY AND SOILS</b>			
<p><b>Seismic Hazards (Impact GEO-1):</b> The Project Site is not subject to fault rupture, and compliance with existing regulations would avoid substantial hazards related to seismic ground shaking and reduce hazards associated with liquefaction. However, potential hazards associated with liquefaction are considered potentially significant impacts and mitigation measures are recommended.</p>	<p>Not applicable</p>	<p><b>MM-GEO-1:</b> During the building permit stage, the detailed geotechnical evaluation required by CBC Section 1803 shall be prepared to further investigate and address potential constraints associated with liquefaction, lateral spreading and expansive soils hazards, as required by CBC Section 1803. Any such constraints shall be addressed to the satisfaction of a qualified geotechnical engineer and the City through such techniques as over-excavation and replacement of problematic soils with compacted soil; constructing buildings on deep foundations (drilled, not driven) mat foundations, or spread footings, and using braced shoring systems and/or tiebacks, depending on the results of the evaluation. Typical deep foundation systems include the use of precast, driven concrete piles and cast-in-drilled hole (CIDH) piles. In addition, it shall be confirmed whether or not permanent dewatering is required during Project operation. Compliance with the geotechnical engineering recommendations in the detailed geotechnical investigation shall be monitored and shall ensure that the site-specific geotechnical and soils hazards at a Project Site are taken into account during design and construction, and are properly mitigated in accordance with ASTM standards and practices.</p> <p><b>MM-GEO-2:</b> Additional subsurface exploration shall be performed, as part of the detailed geotechnical evaluation required by CBC Section 1803, in areas of the Project Site not previously explored to address the site-specific conditions at the locations of the planned improvements and to provide detailed recommendations for design and construction.</p> <p><b>MM-GEO-3:</b> Construction dewatering shall be implemented if determined to be required either by the City or the construction engineer in accordance with applicable permit requirements.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<p><b>Geological Hazards (Impact GEO-2):</b> Compliance with existing regulations would avoid substantial hazards related to subsidence and collapse and would substantially reduce hazards associated with lateral spreading and liquefaction. However, potential lateral spreading and liquefaction hazards are considered potentially significant impacts and mitigation measures are recommended.</p>	<p><b>PDF-GEO-1 (Groundwater Dewatering):</b> Unless determined not to be required in the detailed geotechnical report for the Project dewatering systems shall be installed in the lowest levels of the proposed Central and Van Buren Parking Structures and along the underground vehicular connection between the existing on-site subterranean parking structure and Culver Boulevard. The design of the systems shall be reviewed and approved by the City, and shall be based on accepted principles of engineering that consider but are not necessarily limited to, permeability of the soil, rate at which water enters the drainage system, rated capacity of pumps, head against which pumps are to operate, and the rated capacity of the disposal area for the system. Consideration of these issues would ensure that dewatering systems are properly sized and designed to accommodate the required dewatering in accordance with CBC Section 1805.1.3. A modified discharge permit shall be obtained from the RWQCB, LADPW, or other appropriate permitting agency for the additional discharge</p>	<p>Refer to Mitigation Measures GEO-1 through GEO-3.</p>	<p>Less than significant</p>
<p><b>Expansive/Corrosive Soils (Impact GEO-3):</b> The Project Site does not have corrosive soils, and compliance with existing regulations would substantially reduce hazards associated with expansive soils. However, hazards associated with expansive soils are considered a potentially significant impact and mitigation measures are recommended.</p>	<p>Not applicable</p>	<p>Refer to Mitigation Measures GEO-1 through GEO-3.</p>	<p>Less than significant</p>
<p><b>Erosion (Impact GEO-4):</b> Impact Statement GEO-4: Compliance with existing grading and water quality regulations would avoid substantial soil erosion or the loss of topsoil during Project construction and operation. Therefore, the impact would be less than significant</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<b>4.5. GREENHOUSE GAS EMISSIONS</b>			
<p><b>GHG Emissions (Impact GHG-1) and GHG Plan Consistency (Impact GHG-2):</b> The Project would generate GHG emissions due to construction and operational activities. The Project's annual direct and indirect GHG emissions would be generated from development that is located and designed to be consistent with relevant goals and actions to reduce Project emissions as much as feasibly possible, as well as consistent with the HSC Division 25.5 goals and CARB guidelines for assessing GHG emissions. Therefore, the Project's GHG emissions and associated impacts would be less than significant.</p>	<p>Refer to Project Design Features AIR-1 through AIR-3.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<b>4.6. HAZARDS AND HAZARDOUS MATERIALS</b>			
<p><b>Hazardous Materials Management (Impact HAZ-1):</b> The transport, use, storage and disposal of hazardous materials during Project construction and operation would occur in accordance with applicable regulations and manufacturer instructions which have been formulated to provide for safe use of these materials. Accordingly, impacts would be less than significant.</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p><b>Upset/Accident Conditions (Impact HAZ-2):</b> The Project would not create a significant hazard to the public or environment through conditions involving the release of hazardous materials with compliance with applicable regulations and Project Design Features PDF-HAZ-1 and PDF-HAZ-2. Accordingly, impacts would be less than significant.</p>	<p><b>PDF-HAZ-1 (Vector/Pest Control Plan):</b> A vector/pest control abatement plan prepared by a pest control specialist licensed or certified by the State of California shall be submitted for review and approval by the Planning Manager and the Building Official. Said plan shall outline all steps to be taken prior to the commencement of demolition or construction activity in order to ensure that any and all pests (including, but not limited to, rodents, bees, ants and mosquitoes) that may populate the Property do not relocate to or impact adjoining properties.</p> <p><b>PDF-HAZ-2 (Groundwater Filtration System):</b> For the permanent dewatering required at the subterranean levels of the proposed Central and</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
	<p>Van Buren Parking Structures, and along the proposed underground vehicular connection between the existing on-site subterranean parking structure and Culver Boulevard, carbon filter tank treatment systems will be installed by the Applicant in these structures to treat the dewatered groundwater prior to discharge, and the discharge will occur under a LADPW discharge permit.</p> <p>Refer to Project Design Feature WW-1.</p>		
<p><b>Hazardous Emissions Near Schools (Impact HAZ-3):</b> While the Project would include the handling of hazardous materials typical of studio operations within one-quarter mile of a school, the handling of such materials already occurs on the Project Site, would be reduced under the Project, and would continue to occur in accordance with applicable regulations, and manufacturer instructions formulated for safe use of these materials. Accordingly, impacts would be less than significant.</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p><b>Hazardous Materials Database Listings (Impact HAZ-4):</b> The Government Code Section 65962.5 database listings on the Project Site do not represent RECs (only one CREC and one HREC), and thus would not create a significant hazard to the public or the environment. Accordingly, impacts would be less than significant.</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p><b>Emergency Response Plan Consistency (Impact HAZ-5):</b> The Project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. Accordingly, impacts would be less than significant.</p>	<p>Refer to Project Design Feature TRAF-1.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<b>4.7. HYDROLOGY AND WATER QUALITY</b>			
<p><b>Hydrology (Drainage) - Construction (Impact H/WQ-1):</b> Project construction activities would not change the course of a stream or river, or increase the rate or amount of surface runoff from the Project Site, in a manner that could lead to flooding. Furthermore, while Project construction activities could temporarily alter the existing drainage pattern of the Project Site, grading activities would be subject to NPDES, SWPPP and City grading permit requirements which require that stormwater runoff be controlled and routed to avoid flooding. Therefore, Project construction-related hydrology (drainage) impacts would be less than significant.</p>	<p>Not applicable.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p><b>Hydrology (Drainage) - Operation (Impact H/WQ-2):</b> Project operation would not change the course of a stream or river, or increase the rate or amount of surface runoff from the Project Site in a manner that could lead to flooding. Furthermore, the Project would decrease peak stormwater runoff flows and on-site stormwater infrastructure meeting City standards would be constructed to safely convey stormwater runoff to the off-site storm drain system. Therefore, Project operations-related hydrology (drainage) impacts would be less than significant.</p>	<p><b>PDF-H/WQ-1 (Structural BMPs):</b> The following structural BMPs would be implemented during Project operation:</p> <ul style="list-style-type: none"> <li>• 13 Environmental Passive Integrated Chamber (EPIC) stormwater treatment areas of 18-inches in depth will be developed on the Project Site totaling 24,200 sf (approximately 0.56 acres) to retain the SWQDv (37,600 cf) through capture and reuse. Pipes will channel rainwater collected from roof and area drains to the treatment areas, which will be planted with native vegetation to remove the collected rainwater over time through uptake and transpiration. Flow entering the treatment areas in excess of the SWQDv will be discharged directly to the off-site storm drain system via overflow valves. The sizes and locations of the proposed treatment areas are identified in Figure 4.7-2, Preliminary LID Plan.</li> <li>• Trash enclosure areas will have floor drains that connect to the sewer system rather than the storm drain system.</li> <li>• On-site drains, catch basins and stormwater</li> </ul>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
	treatment areas will be stenciled to indicate that no substance other than stormwater is to be collected by the storm drain system.		
<p><b>Surface Water Quality – Construction (Impact H/WQ-3):</b> The Project would implement a SWPPP outlining BMPs to be implemented during construction to protect the quality of stormwater runoff in accordance with the NPDES General Construction Activity Permit. The Project would also implement a Wet Weather Erosion Control Plan outlining BMPs to be implemented during any grading and/or earthwork during the rainy season to avoid substantial water-born erosion or siltation. Therefore, Project construction-related surface water quality impacts would be less than significant.</p>	Not applicable	No mitigation measures are required.	Less than significant
<p><b>Surface Water Quality – Operation (Impact H/WQ-4):</b> The Project includes a LID Report which outlines non-structural and structural BMPs to be implemented during Project operation, based on LID and SUSMP (or functional equivalent) design principles, as required by the applicable NPDES MS4 Permit. These BMPs would ensure Project operational stormwater runoff discharges are protective of the TMDLs and beneficial uses of the receiving waters. Therefore, Project operations-related surface water quality impacts would be less than significant.</p>	<p><b>PDF-H/WQ-2 (Non-Structural BMPs):</b> The following non-structural BMPs will be implemented during Project operation:</p> <p><u>Open Paved Areas and Planter Areas:</u></p> <ul style="list-style-type: none"> <li>• Maintenance records will be kept of, regular visual inspections/sweeping/removal of debris will be conducted for, and regulator disposal and replacement of the absorbent materials will be conducted in, the stormwater treatment areas.</li> <li>• Regular sweeping of all open hardscape areas, at a minimum, on a weekly basis in order to prevent dispersal of pollutants that may collect on those surfaces.</li> <li>• Regular pruning of the trees and shrubs in the planter areas to avoid formation of dried leaves and twigs, which are normally blown by the wind during windy days. These dried leaves are likely to clog the surface inlets of the drainage system when rain comes, which would result to flooding of the surrounding area due to reduced flow capacities of the inlets.</li> </ul>	No mitigation measures are required.	Less than significant

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
	<ul style="list-style-type: none"> <li>• Trash and recycling containers will be used such that, if they are to be located outside or apart from the principal structure, are fully enclosed and watertight in order to prevent contact of stormwater with waste matter, which can be a potential source of bacteria and other pollutants in runoff. These containers will be emptied and the wastes disposed of properly on a regular basis.</li> </ul> <p><u>Education and Training:</u></p> <ul style="list-style-type: none"> <li>• The Operation and Management Manual will include education/training standards to ensure training of studio staff as to proper maintenance of on-site BMPs. Training will include information on proper methods of handling and disposal of wastes.</li> <li>• Monitoring and Maintenance:</li> <li>• All BMPs will be operated, monitored, and maintained for the life of the Project. At a minimum, all structural BMPs will be inspected, cleaned-out, and where necessary, repaired, at the following minimum frequencies: 1) prior to October 15th each year; 2) during each month between October 15th and April 15th of each year and, 3) at least twice during the dry season (between April 16 and October 14 of every year).</li> <li>• Debris and other water pollutants removed from structural BMPs during cleanout will be contained and disposed of in a proper manner.</li> <li>• The drainage system and BMPs will be maintained according to manufacturer's specification to ensure maximum pollutant removal efficiencies.</li> </ul>		

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<b>4.8. LAND USE AND PLANNING</b>			
<p><b>Consistency with of Project Applicable Plans and Policies (Impact LU-1):</b> The Project, with the approval of CPA No. 7 and associated entitlements, would be substantially consistent with applicable adopted land use plans, policies, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts with respect to land use plans, policies, guidelines, and regulations would be less than significant.</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<b>4.9. NOISE</b>			
<p><b>Construction and Operational Noise (Impact NOISE-1):</b> Construction activities would increase noise levels at off-site noise-sensitive receptors in excess of the applicable thresholds. However, with implementation of the identified construction mitigation measures and project design features, noise levels would be less than significant. Operation of the Project would not increase noise levels at off-site noise-sensitive receptors in the Project Area in excess of the applicable thresholds. Thus, operational noise impacts would be less than significant and operational mitigation measures would not be required.</p>	<p><b>PDF-NOISE-1 (Project Construction Schedule):</b> Prior to issuance of a building permit, notice of the Project construction schedule shall be provided to all abutting property owners and occupants. Evidence of such notification shall be provided to the Building Division. The notice shall identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).</p> <p><b>PDF-NOISE-2 (Foundation Piles):</b> Any foundation piles shall be drilled and cast not driven.</p> <p><b>PDF-NOISE-3 (Parking Structure Floors):</b> All parking structure levels in the new parking garage shall be treated with a broom finish or some other treatment that results in a no-skid surface.</p> <p><b>PDF-NOISE-4 (Van Buren Parking Structure – Noise Barrier):</b> A concrete wall shall be placed along level 1 of the new Van Buren parking structure that extend from the ground up to the underside of the Level 2 slab and the concrete wall shall be free from gaps or penetrations.</p> <p><b>PDF-NOISE-5 (Van Buren Parking Structure – Noise Barrier):</b> The pre-cast concrete panels at the north and south side of the parking structure</p>	<p><b>MM-NOISE-1:</b> The Project shall provide a temporary 20-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 20 dBA between the Project Site and the surrounding residences and elementary school. Prior to the commencement of any excavation, the applicant shall install a temporary construction fence with screening around the site. The height, fence and screening materials are subject to approval by the City Engineer or his/her designee. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptors during early Project construction phases (up to the start of framing) when the use of heavy equipment is prevalent. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel.</p> <p><b>MM-NOISE-2:</b> Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.</p> <p><b>MM-NOISE-3:</b> Heavy equipment, such as use of a large bulldozer (greater than 600 horsepower), shall not be used within 45 feet of the neighboring residential structures. If such proximate construction is required, alternative equipment and methods such as small bulldozers (less than 300 horsepower), shall be used to ensure that vibration effects on adjacent residential uses.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
	<p>shall weigh at least 4 lbs per square foot, form a continuous façade with no gaps between precast concrete panels.</p> <p><b>PDF-NOISE-6 (Parking Structure Noise Level):</b> All parking structure exhaust or ventilation systems shall be designed, through the use of quiet fans and duct silencers or similar methods, to not exceed 55 dBA Leq from 7:00 AM to 10:00 PM and 50 dBA Leq from 10:00 PM to 7:00 AM at the neighboring property lines including the west property line per sound level limits of the Culver City Noise Element.</p> <p><b>PDF-NOISE-7 (Construction Rules Sign):</b> During all phases of construction, a “Construction Rules Sign” that includes contact names and telephone numbers of the Applicant, Property Owner, construction contractor(s), and the City, shall be posted on the Property in a location that is visible to the public. These names and telephone numbers shall also be made available to adjacent property owners and occupants to the satisfaction of the Planning Manager and Building Official.</p> <p><b>PDF-NOISE-8 (Compliance with Noise Element):</b> The following noise standards from Policy 2.A of the City’s General Plan Noise Element shall be complied with at all times:</p> <ul style="list-style-type: none"> <li>A. No construction equipment shall be operated without an exhaust muffler, and all such equipment shall have mufflers and sound control devices (i.e., intake silencers and noise shrouds) that are no less effective than those provided on the original equipment;</li> <li>B. All construction equipment shall be properly maintained to minimize noise emissions;</li> <li>C. If any construction vehicles are serviced at a location onsite, the vehicle(s) shall be setback from any street and other property lines so as to maintain the greatest distance from the public right-of-way and from Noise Sensitive Receptors;</li> <li>D. Noise impacts from stationary sources (i.e.,</li> </ul>	<p><b>MM-NOISE-4:</b> To avoid or minimize potential construction vibration damage to finish materials on historic buildings, the condition of such materials shall be documented by a qualified preservation consultant, prior to initiation of construction. During construction, the contractor shall install and maintain at least two continuously operational automated vibrational monitors on historic buildings. The monitors must be capable of being programmed with two predetermined vibratory velocities levels: a first-level alarm equivalent to a 0.1 inches per second at the face of the building and a regulatory alarm level equivalent to 0.12 inches per second at the face of the buildings. The monitoring system must produce real-time specific alarms (via text message and/or email to on-site personnel) when velocities exceed either of the predetermined levels. In the event of a first-level alarm, feasible steps to reduce vibratory levels shall be undertaken, including but not limited to halting/staggering concurrent activities and utilizing lower-vibratory techniques. In the event of an exceedance of the regulatory level, work in the vicinity shall be halted and the historic buildings visually inspected for damage. Results of the inspection must be logged. In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant, and if warranted, in a manner that meets the Secretary of the Interior’s Standards.</p>	

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
	<p>mechanical equipment, ventilators, and air conditioning units) shall be minimized by proper selection of equipment and the installation of acoustical shielding as approved by the Planning Manager and the Building</p> <p>E. The Project shall not allow any delivery truck idling in the loading area. Signs shall be posted prohibiting idling.</p> <p><b>PDF-NOISE-9 (Outdoor Activities):</b> Shoots, production support film screenings, concerts, outdoor teaming space, housing of amenities, and passive recreational uses in any proposed balconies, courtyards, patios, walkways, and decks on proposed buildings, shall not occur where open to the nearby residences.</p>		
<p><b>Groundborne Vibration and Groundborne Noise Levels (Impact NOISE-2):</b> Operational activities would not exceed the vibration significance thresholds. Thus, operational vibration impacts would be less than significant. However, construction activities would result in sporadic, temporary vibration effects adjacent to the Project area, which would exceed the vibration significance thresholds. Impacts due to vibration from on-site construction activity would be potentially significant.</p>	<p>Not applicable</p>	<p>Refer to Mitigation Measures NOISE-1 through NOISE-4.</p>	<p>Less than significant</p>
<p><b>Ambient Noise Levels (Impact NOISE-3):</b> Operational activities would not substantially increase the ambient noise levels in the vicinity of the Project. Thus, impacts would be less than significant.</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p><b>Temporary or Periodic Noise (Impact NOISE-4):</b> Construction activities would increase noise levels at off-site noise-sensitive receptors in the Project Area in excess of ambient noise levels. Impacts due to noise from on-site construction activity would be potentially significant at off-site sensitive use locations. However, with implementation of the identified construction mitigation measure, noise levels would be</p>	<p>Refer to PDFs NOISE-1 through NOISE-9.</p>	<p>Refer to Mitigation Measures NOISE-1 through NOISE-4.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
reduced to below the threshold. Thus, construction noise impacts would be less than significant with implementation of mitigation.			
<b>4.10.1 PUBLIC SERVICES: FIRE PROTECTION</b>			
<p><b>Fire Protection (Impact FIRE-1):</b> Project construction and operation would not require new or expanded fire protection facilities to maintain service due to compliance with City Fire Code requirements and proposed Project Design Features that address fire safety, emergency access, emergency response times, and fire flow. Therefore, construction and operational impacts would be less than significant.</p>	<p><b>PDF-FIRE-1 (Fire Proof/Resistant Construction):</b> All proposed new buildings will include class A fire resistant roofing, 2-hour fire rated shafts and storage/electrical service/trash rooms, 2-hour fire ratings of one building to another, 100 percent non-combustible treads/risers/stair construction within common stairways, and exterior non-combustible walls where within five feet of the property line and not fronting on a street.</p> <p><b>PDF-FIRE-2 (Fire and Smoke Detectors/Alarms/Sprinklers and Emergency Lighting):</b> All proposed new, renovated, and relocated buildings will be equipped with NFPA 72 fire/smoke detectors, fire alarms, NFPA 13 automatic fire sprinkler systems connected to the lot's fire monitoring system, and emergency lighting and illuminated EXIT lights with 90-minute battery back-up.</p> <p><b>PDF-FIRE-3 (Submittal of Plans to CCFD for Review/Approval):</b> Plans for the proposed new buildings, relocated fire pump house, on-site fire lane and associated turn arounds, new fire hydrant locations, and associate fire prevention/suppression equipment, will be submitted to the CCFD for review and approval.</p> <p>Also, refer to Project Design Features TRAF-1 and Water-4.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<b>4.10.2 PUBLIC SERVICES: POLICE PROTECTION</b>			
<p><b>Police Protection – Construction (Impact POL-1):</b> Impacts on police protection services, access and emergency response times during Project construction would be temporary and less than significant. While Project construction would temporarily add on-site employees and off-site traffic, security features would be incorporated, and emergency access would be maintained.</p>	<p><b>PDF-POL-1 (Project Site Security and Access During Construction):</b> Project construction sites will be enclosed with security fencing during the construction period, lit with security lighting, and patrolled periodically by Studio security personnel, and emergency access on and within the vicinity of the Project Site will be maintained during construction.</p> <p><b>PDF-POL-2 (Coordination with CCPD):</b> The Culver Studios will regularly coordinate with the CCPD, including providing the CCPD with advance notice of pending on-site development activities and special events.</p> <p>Also, refer to Project Design Feature TRAF-1.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p><b>Police Protection – Operation (Impact POL-2):</b> Impacts on police protection services related to access and emergency response times during Project operation would be less than significant. While Project operation would add on-site employees and off-site traffic, it would maintain and upgrade the strict security provisions in place at the Studio Campus and improve circulation and access in proximity to the Project Site. Overall, Project effects on police services would not require new or expanded police facilities.</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<b>4.11. TRANSPORTATION AND TRAFFIC</b>			
<p><b>Construction Impacts (Impact TRAF-1):</b> Project construction activities would not require temporary relocation of existing bus stops or a substantial loss in street parking during the construction period, but could cause substantial delays/disruptions of existing traffic flow and/or exceed the operational thresholds at intersections during peak hours. Also, there could be some temporary incompatibilities between existing motor vehicle traffic and Project construction traffic. Therefore, Project construction-related traffic impacts would be significant.</p>	<p><b>PDF-TRAF-1 (Construction Management Plan):</b> A Final Construction Management Plan (FCMP) shall be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, and alternative transportation modes and public transit are minimized to the extent feasible. The FCMP shall be subject to review and approval by Culver City's Building Official, City Engineer and/or Planning Manager, as applicable, prior to issuance of any Project demolition, grading or excavation permit. The FCMP shall also be reviewed and approved by Culver City's Fire and Police Departments. The Culver City 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 FCMP be prepared by a different engineer.</p> <p>Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector (Inspectors) of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other representatives of surrounding developments if under construction at around the same time as the Project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another. The FCMP shall assess project construction impacts and provide effective strategies to limit the use of the public right of way (streets and sidewalks) during peak traffic periods, and shall be subject to adjustment by City staff as deemed necessary and appropriate to preserve</p>	<p><b>MM TRAF-1 (Haul Truck Staging):</b> Any off-site haul truck staging shall be provided in a legal area furnished by the construction truck contractor. The route to and from the Project Site shall be identified in the Construction Management Plan. Trucks shall not be permitted to travel along residential streets to the south, east, and west of the Project Site.</p> <p><b>MM TRAF-2 (Flagman):</b> Flagmen shall be placed at the truck entries and exits from the Project Site onto Ince Boulevard to control the flow of exiting trucks to coordinate the entering and exiting trucks with the traffic signal at Ince Boulevard and Washington Boulevard.</p> <p><b>MM TRAF-3 (Truck Deliveries/Pick-Ups):</b> Deliveries and pick-ups of construction materials shall be scheduled during non-peak travel hours and coordinated to reduce the potential of trucks waiting to load or unload for protracted hours of time.</p> <p><b>MM TRAF-4 (Access):</b> Access shall remain unobstructed for land uses in proximity to the Project Site during Project construction.</p> <p><b>MM TRAF-5 (Lane Closures):</b> Temporary lane closures, if needed, shall be scheduled to avoid peak commute hours and peak school drop-off and pick-up hours to the extent possible. In the event of a lane closure, a worksite traffic control plan, approved by Culver City, shall be implemented to route traffic around any such lane closures.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
	<p>the general public safety and welfare.</p> <p>Prior to approval of the FCMP, the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community:</p> <ul style="list-style-type: none"> <li>• Construction schedule and hours.</li> <li>• Framework for construction phases.</li> <li>• Identify traffic diversion plan by phase and activity. (The Traffic Control Plan will be submitted for review and approval by the City for each phase).</li> <li>• Potential location of construction parking and office trailers.</li> <li>• 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).</li> <li>• Emergency access plan.</li> <li>• Demolition plan.</li> <li>• Staging plan for the concrete pours, material loading and removal.</li> <li>• Crane location(s).</li> <li>• Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).</li> <li>• Community notification procedures.</li> <li>• The FCMP shall at a minimum include the following:                             <ol style="list-style-type: none"> <li>1. The name and telephone number of a contact person who can be reached 24 hours a day regarding construction or construction traffic complaints or emergency situations.</li> <li>2. An up-to-date list of local police, fire, and</li> </ol> </li> </ul>		

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
	<p>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.</p> <ol style="list-style-type: none"> <li>3. Construction plans and procedures to address: community and City notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures and best practices to reduce disturbances to adjacent and nearby land uses.</li> <li>4. Procedures for the training and certification of flag persons.</li> <li>5. To the extent known identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and, plans for use of protective devices, warning signs, and staging or queuing areas.</li> <li>6. The location of temporary power, portable toilet and trash and materials storage locations.</li> <li>7. The timing and duration of all street and/or lane closures 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</li> </ol>		

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
	<p>determined necessary by the City.</p> <p>8. Provisions that staging of construction equipment and materials will be accommodated within the Studio Campus and that construction worker parking will be accommodated on the Studio Campus and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Studio Campus.</p>		
<p><b>Intersection Service Levels (Impact TRAF-2):</b> The Project would not require a traffic signal where a traffic signal is not already required at any of the four unsignalized intersections analyzed. However, the Project would result in significant operational level of service impacts at five intersections under Existing (2016) plus Project Conditions (three under the micro-simulation analysis), and at 10 intersections under Future (2021) plus Project Conditions (five under the micro-simulation analysis), during the AM and/or PM peak hours.</p>	<p><b>PDF-TRAF-2 (Traffic Signal Optimization):</b> Traffic signals shall be optimized (i.e., splits, offsets, and lead/lag phases) at Intersections 9 (Main St/Culver Blvd), 10 (Ince Blvd/Washington Blvd) and 11 (Canfield Ave//Washington Blvd/Culver Blvd) to account for the new south leg at Intersection 9 (Main St/Culver Blvd) under the Parcel B Project.</p>	<p><b>MM TRAF-6 (Transportation Demand Management (TDM) Program):</b> TCS shall require the following TDM measures to be provided by each tenant, given the term of the tenancy is long enough for the programs to be implemented (for example, tenancy longer than six months). TCS shall integrate these TDM measures into standard lease documents for each respective tenant leasing over 25,000 gross sf:</p> <ol style="list-style-type: none"> <li>1. Site Design – The site perimeter shall be designed to encourage walking, biking, and transit. Amenities include wide sidewalks and pedestrian plaza/paseo accessible to neighborhood, street trees and landscaped pathways between buildings, improved street and pedestrian lighting and improved bus shelters, lighting and landscaping on the perimeter of the Project Site.</li> <li>2. Rideshare Programs – Rideshare programs typically include the provision of an on-site transit and rideshare information center that provides assistance to help people form carpools or access transit alternatives. Rideshare programs often also include priority parking for carpools. The research literature shows that rideshare programs can reduce commuting VMT by up to 15% (CAPCOA, 2010).</li> <li>3. Bicycle Parking and other Complimentary Services – Culver Studios plans to provide both long-term and short-term bicycle parking. In addition, the Project will provide complementary amenities such as shower facilities, lockers, and a self-service bike repair area to encourage bicycle use.</li> <li>4. Contribution to Bike Share Program – Bike share service, available for employees and visitors to use, will be provided off-site, adjacent to the property.</li> <li>5. Unbundled Parking – Unbundling parking typically separates the cost of purchasing or renting parking spaces</li> </ol>	<p>Significant unavoidable (at eight intersections under the standard analysis, 10 intersections under the standard analysis if optional Mitigation Measures TRAF-9 and TRAF-10 are implemented, and four intersections under the micro-simulation analysis).</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
		<p>from the cost of leasing commercial space. Saving money on commercial space by forgoing a parking space acts as an incentive that minimizes auto usage. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making. The research literature shows that unbundled parking costs can reduce vehicle miles traveled (VMT) by up to 13%.</p> <p>6. Transit Pass Discount Program – Transit pass discount programs are typically negotiated with transit service providers to purchase transit passes in bulk, and therefore at a discounted rate. Discounted passes are then sold to employees, helping them to obtain price discounts through the economies of scale of bulk purchasing. The Project tenants shall participate in the B-TAP+Green transit pass discount program and work with the City to participate in the future B-TAP+Green+Bike share transit/bike share pass discount program. The research literature shows that discounted transit passes can reduce commuting VMT by up to 20%.</p> <p>7. Car Share Program – The Project shall allow space for a car-share service within its proposed parking facilities. A car share program is a model of car rental where people rent cars for short hours of time, often by the hour. The programs are attractive to tenants who make only occasional use of a vehicle, as well as others who would like occasional access to a vehicle of a different type than they use day-to-day.</p> <p>8. Parking Cash-out – Tenants shall provide employees a choice to keep a parking space at work, or to accept a cash payment and give up the parking space.</p> <p><b>TRAF-7 (Intersection 10 - Ince Blvd/Washington Blvd):</b>                      Restripe the southbound approach from one left-only lane and one shared through/left-turn lane to two left-only turn lanes. Restripe the lane currently reserved for southbound right turns as a shared through/right-turn lane. Prohibit eastbound left-turn movement. These improvements are shown in Figure 12 of the Traffic Study. The Project shall be responsible for designing and implementation of restriping the approaches as described above. Implementation of this mitigation measure shall be required prior to the issuance of certificates of occupancy for the</p>	

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
		<p>Project by the City.</p> <p><b>TRAF-8 (Intersection 11 - Canfield Ave/Washington Blvd/Culver Blvd):</b> Restripe the northbound approach from one left-turn lane, one shared through/left-turn lane, and one right-turn lane to two left-turn lanes and one shared through/right-turn lane. These improvements are shown in Figure 12 of the Traffic Study. Implementation of this mitigation measure shall be required prior to the issuance of certificates of occupancy for the Project by the City.</p> <p><b>TRAF-9 (Intersection 10 - Ince Blvd/Washington Blvd) – OPTIONAL MITIGATION:</b> A prohibition on left turns from westbound Ince Boulevard to southbound Washington Boulevard at Intersection 10.</p> <p><b>TRAF-10 (Intersection 11 - Canfield Ave/Washington Ave &amp; Culver Blvd) – OPTIONAL MITIGATION:</b> Reconfiguration of the westbound approach at Intersection 11 to include an exclusive westbound left-only lane, a share left/through lane, and a share through/right turn lane).</p>	
<p><b>Intersection Queuing (Impact TRAF-3):</b> Under Future (2021) plus Project conditions, additional turning pocket queuing distances would be required at the westbound left-turn lanes at Intersections 9 (Main St/Culver Blvd) and 10 (Ince Blvd/Washington Blvd), while adequate queuing distances would be available at 11 (Canfield Ave/Washington Blvd/Culver Blvd).</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>N/A (information provided for informational purposes only)</p>
<p><b>Public Transit (Impact )TRAF-4:</b> Transit ridership generated by the Project would not exceed the capacity of the Project area’s transit lines. Furthermore, the Project support adopted policies, plans, programs and requirements that promote alternative transportation. Therefore, Project operational public transit impacts would be less than significant.</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<p><b>Access and Circulation (Impact TRAF-5):</b> The Project would not substantially increase conflict of movement between vehicles and pedestrians or bicycles due to driveway design, the location of parking facilities, or other Project characteristics affecting visibility and tuning movements. Therefore, Project operational access and circulation impacts would be less than significant.</p>	<p><b>PDF-TRAF-3 (Bicycle Striping Along Ince Boulevard):</b> Bike sharrow striping along the Project Site's Ince Boulevard frontage, and striped crosswalks across Studio gate driveways, will be provided to minimize conflicts between vehicles and bicyclists/pedestrians.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p><i>Note: Under SB 743 and ZI No. 2452, as a designated TPA site, the mixed-use Project is not required to evaluate parking impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to parking.</i></p> <p><b>Parking (Impact TRAF-6):</b> The Project would provide at least the number of on-site vehicle and bicycle parking spaces required by Code. Therefore, adequate on-site vehicle and bicycle parking would be provided to serve the Project.</p>	<p>Not applicable</p>	<p>No mitigation measures are required.</p>	<p>N/A (information provided for informational purposes only).</p>
<p><b>4.12.1. WASTEWATER</b></p>			
<p><b>Wastewater Infrastructure (Impact WW-1):</b> Project construction and operation would result in an increase in wastewater generation that would increase demands on wastewater collection and treatment facilities. While this increase would not exceed the available capacity of these facilities nor exceed the wastewater treatment facilities or wastewater treatment requirements of the LARWQCB during either construction or operation, it would exceed the half flow capacity of the Ince Boulevard sewer main during operation. Therefore, impacts would be significant with respect to wastewater collection and less than significant with respect to wastewater treatment.</p>	<p><b>PDF-WW-1 (Dewatering):</b> Similar to the existing dewatering operation at the Project Site since 2014, any additional permanent dewatering required under the Project will be treated and used for on-site landscape irrigation rather than being treated and discharged to the local sewer system.</p>	<p><b>MM WW-1:</b> Unless further sewer flow monitoring determines to the satisfaction of the City that the Project would not trigger exceedance of the half flow capacity of the Ince sewer main, the Project Applicant shall upsize the existing 10" Ince sewer main with a 12" line from Hubbard Street to Lucerne Ave. (approximately 700 linear feet) (Exhibit 4 of the Wastewater Report shows the recommended sewer line segment to be upsized). The upsizing shall occur prior to the issuance of occupancy permits for the proposed new buildings. A temporary 15-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 20 dBA shall be located between the work area and surrounding residences and elementary school. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<b>4.12.2 WATER SUPPLY</b>			
<p><b>Water Supply/Infrastructure – Construction (Impact WS-1):</b> Water demand during construction would be less than significant as the demand would be modest compared to current use on the Project Site and would more than offset by the temporary removal or relocation of most occupants currently on the Studio Campus. Furthermore, implementation of PDF-WATER-2 and PDF-WATER-3 would prevent impacts to the public water service lines serving the Project Site during construction.</p>	<p><b>PDF-WATER-2 (Water Lines):</b> Rerouting and/or and potential future reconnection of the on-site 4-inch service line to the City's water main shall be coordinated with GSWC prior to construction of the proposed parking building.</p> <p><b>PDF-WATER-3 (Water Service):</b> Prior to construction of additional buildings, the need for new connections to City lines or on-site service lines to maintain adequate on-site domestic water service and pressure levels shall be coordinated with GSWC.</p> <p><b>PDF-WATER-4 (Fire Flow):</b> Prior to construction, building plans shall be submitted to the Culver City Fire Department (CCFD) to determine fire flow and time period requirements based on tenant type, building size, and building type. If additional fire service lines and hydrants are required to maintain adequate fire flow, the Project shall install fire service lines and hydrants as required.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p><b>Water Supply/Infrastructure – Operation (Impact WS-2):</b> Impacts of Project operation on water supply would be less than significant. The Project's demand for water associated with potable supplies is within GSWC's water demand projections. Sufficient water infrastructure to serve the Project is available within the roadway right-of-ways adjacent to the Project Site.</p>	<p><b>PDF-WATER-1 (Water Conservation):</b> The Project shall implement conservation measures related to landscape irrigation. Conservation measures include the following:</p> <ul style="list-style-type: none"> <li>• Low water-demand and drought tolerant planting will be used on the Project Site.</li> <li>• Irrigation runoff on the Project Site will be collected and treated on site.</li> <li>• Irrigation will have weather sensor input to determine need of irrigation.</li> <li>• All irrigation will be drip irrigation.</li> <li>• Irrigation will be on timers.</li> </ul>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<b>4.12.3 SOLID WASTE</b>			
<p><b>Landfill Capacity – Construction (Impact SW-1A):</b> While the Project would generate construction and demolition waste during construction, it would comply with the diversion requirements of AB 939 and AB 341, and adequate disposal capacity exists at the County’s C&amp;D disposal sites to accommodate this waste. Therefore, the impact would be less than significant.</p>	<p><b>PDF-SW-1 (Solid Waste Diversion):</b> In accordance with Senate Bill 1374 and Assembly Bills 939 and 341, Project construction will achieve at least a 65 percent solid waste diversion rate until 2020, Project operation will achieve at least a 50 percent solid waste diversion rate until year 2020, and Project construction and operation will achieve at least a 75 percent solid waste diversion rate thereafter, through source reduction, recycling, composting and other methods. Furthermore, in accordance with Assembly Bill 1826, the Project will provide separate recycling bins for organic waste and arrange for organic waste recycling services.</p> <p><b>PDF-SW-4 (Demolition Debris Recycling Plan for Construction):</b> Reasonable efforts will 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 will be provided to the Culver City Building Official prior to the issuance of a demolition permit. The Plan will list the materials to be recycled and the name, address, and phone number of the facility of organization accepting the materials. As required by CCMC Section 5.01.01, EPO or its agents shall be the exclusive hauler of all demolition debris (unless an exemption is granted by EPO, in which case EPO would need to approve the processing and disposal sites along with requires to show proof of disposal vs. recycling of these materials).</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<p><b>Landfill Capacity – Operation (Impact SW-1B):</b> While the Project would generate a net increase in Class III solid waste during operation, it would comply with the waste diversion requirements of AB 939 and AB 341, and adequate disposal capacity exists at the County’s Class III landfills to accommodate this waste. Therefore, the impact would be less than significant.</p>	<p>Refer to Project Design Feature SW-1.</p> <p><b>PDF-SW-2 (Solid Waste Refuse Bins and Enclosed Refuse Areas):</b> In accordance with the requirements of CCMC Chapter 5.01 and AB 1826, separate Class III solid waste, recyclable, and green waste/organics refuse bins approved by EPO for size and type of containers, and enclosed minimum 6’x 6’ cement-paved refuse areas, will be provided on-site during Project operation, and Project solid and recyclable waste material handling will be in accordance with the EPO’s exclusive franchise for services.</p> <p><b>PDF-SW-3 (Green Building and Sustainability):</b> The Project will be designed to meet the standards for LEED certification, which identifies and give credit for green building techniques and other sustainability features. Green building practices will be integrated into all building design, construction, and operation. This could potentially include: 1) use of post-consumer recycled materials (e.g., crushed concrete masonry from demolished buildings, fly ash, slag cement, etc.) in building construction; and 2) use of materials in construction that can later be recycled should the buildings eventually be demolished.</p> <p><b>PDF-SW-5 (Trash/Recycling Management Plan for Operations):</b> The Culver Studios will submit a Trash/Recycling Management Plan (Plan) for studio operations to the City for review and approval. Elements of the Plan will include, but will not necessarily be limited to: 1) projections of Project waste generation by type; 2) calculations of the bin and bin sizes required for each type of waste given the waste generation projections and frequency of collection; 3) plans for the location(s) and type(s) of trash enclosures/trash rooms; and 4) a mechanism for demonstrating over time that the studio is diverting at least 50 percent of its solid waste until 2020 and at least 75 percent thereafter.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<p><b>Compliance with Applicable Solid Waste Plans (Impact SW-2):</b> The Project would be implemented in compliance with all applicable regulatory requirements regarding diversion and recycling of landfill materials and efficient use of County landfill facilities. Thus, impacts would be less than significant.</p>	<p>Refer to Project Design Features SW-1 through SW-5.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p><b>CHAPTER 6. OTHER CEQA CONSIDERATIONS - ENERGY</b></p>			
<p><b>Energy Consumption – Construction:</b> Project construction would use the necessary energy for on-site construction activities and the transport of materials, soil, and debris to and from the Project Site. The amount of energy used would not represent a substantial fraction of the available energy supply in terms of equipment and transportation fuels. Furthermore, compliance with the previously discussed anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and diverting waste would result in less fuel combustion and energy consumption. Therefore, construction of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy, and would not preempt opportunities for future energy conservation.</p>	<p>Refer to Project Design Feature AIR-1.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Impact Level of Significance
<p><b>Energy Consumption – Operation:</b> Upon occupancy of the Project, the studio operations would demand energy for on-site activities and off-site transportation associated with vehicles traveling to and from the Project Site. The amount of energy used would not represent a substantial percentage of the available energy supply in terms of equipment and transportation fuels. Furthermore, the Project has PDFs that promote energy efficiency, such as, green building measures, consistent with state, regional, and local energy efficiency goals. Therefore, operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not preempt opportunities for future energy conservation.</p>	<p>Refer to Project Design Features AIR-2 and AIR-3.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>

SOURCE: ESA PCR, September 2017.

# CHAPTER 1

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## Introduction

This Draft Environmental Impact Report (Draft EIR or EIR) has been prepared for The Culver Studios Innovation Plan (the Project), which is reflected in proposed Comprehensive Plan Amendment No. 7 (CPA No. 7). The Culver Studios Owner, LLC, (the Studio), proposes to technologically update and expand the facilities within the existing approximately 14-acre studio campus (Project Site or Studio Campus), including the relocation of existing bungalows; construction of new Digital Media buildings, which would house a flexible mix of creative space, production space, and digital media stages, and support facilities; and the demolition of some existing buildings for a net new square footage total of approximately 413,127 square feet.

### 1.1 Purpose of the Draft EIR

The purpose of this Draft EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the Project. The City of Culver City (City) is the Lead Agency under the California Environmental Quality Act (CEQA) responsible for preparing this Draft EIR. This Draft EIR has been prepared in conformance with CEQA (California Public Resources Code Section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.). The principal State CEQA Guidelines sections governing content of this document are Sections 15120 through 15132 (Contents of an EIR), and Section 15161 (Project EIR).

The City is responsible for processing and approving the Project pursuant to CEQA Statute Section 20167. The City will consider the information in this Draft EIR, along with other information that may be presented during the CEQA process, including but not limited to the Initial Study and a Final EIR. The EIR will be used in connection with other permits and approvals necessary for the construction and operation of the Project. The EIR will be used by the City's Planning Division, Building Safety Division, Public Works Department, and any other responsible public agencies that must approve activities undertaken with respect to the Project.

In accordance with Section 15121 of the State CEQA Guidelines, this Draft EIR is an informational document that will inform public agency decision-makers and the public generally of the environmental effects associated with the Project, and ways to minimize significant environmental effects through mitigation measures or reasonable alternatives to the Project. For some effects, significant environmental impacts cannot be mitigated to a level considered less than significant; in such cases, impacts are considered significant and unavoidable. In accordance with Section 15093(b) of the State CEQA Guidelines, if a public agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts

where impacts cannot be mitigated to less than significant levels), the agency must state in writing the specific reasons for approving the project, based on the Final EIR and any other information in the public record for the project. This is known as a “statement of overriding considerations.”

This Draft EIR analyzes the environmental effects of the Project to the degree of specificity appropriate to the activities proposed by the Project, as required under Section 15146 of the State CEQA Guidelines. This analysis considers the activities associated with the Project, to determine the short-term and long-term effects associated with their implementation. This Draft EIR discusses both the direct and indirect impacts of this Project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects in the vicinity. CEQA requires the preparation of an objective, full disclosure document to inform agency decision-makers and the general public of the direct and indirect environmental effects of the proposed Project, including mitigation measures and reasonable alternatives that can reduce or eliminate any identified significant adverse impacts.

## **1.2 EIR Scoping Process**

In compliance with the State CEQA Guidelines, the City has taken steps to provide opportunities to participate in the environmental review process. In association with preparation of the Draft EIR, efforts were made to contact various State, regional, and local government agencies and other interested parties to solicit comments and inform the public of the Project. As further described below, this included the distribution of an Initial Study and Notice of Preparation (NOP) of an Environmental Impact Report and Public Scoping Meeting/Community Meeting.

### **1.2.1 Initial Study**

In accordance with Section 15063(a) of the State CEQA Guidelines, the City prepared an Initial Study to identify potential environmental impacts. The Initial Study determined that the Project had the potential to result in significant impacts associated with a number of environmental issues. As a result, the Initial Study led to a determination that a Draft EIR should be prepared to address those issues where the Project could result in significant environmental impacts, and to consider feasible mitigation measures and alternatives to the Project.

The Draft EIR focuses primarily on changes in the environment that would result from the Project, individually and cumulatively with other development projects. The Draft EIR identifies potentially significant direct and indirect impacts resulting from construction and operation of the Project, and provides mitigation measures to reduce or avoid such effects. Based on public input and the results of the Initial Study, this Draft EIR addresses environmental effects in the following areas:

- Aesthetics
  - Visual Character
  - Light and Glare
  - Shading

- Air Quality
- Cultural Resources
  - Historical Resources
  - Archaeological and Tribal Cultural Resources
  - Paleontological Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
  - Fire Protection
  - Police Protection
- Transportation and Traffic
- Utilities and Service Systems
  - Wastewater
  - Water Supply
  - Solid Waste

Based on the Initial Study, issues for which no significant impacts are anticipated to occur are discussed briefly as a part of Chapter 6, Other CEQA Considerations, of this Draft EIR. The analyses supporting these determinations are provided in the Initial Study included as Appendix A of this Draft EIR.

## 1.2.2 Notice of Preparation

Pursuant to the provision of Section 15082 of the State CEQA Guidelines, the City circulated an NOP to State, regional, and local agencies, and members of the public for a 35-day review period commencing November 17, 2016 and ending December 21, 2016. The purpose of the NOP was to formally notice that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. See Appendix A of this Draft EIR for a copy of the NOP.

## 1.2.3 Public Scoping Meeting/Community Meeting

The NOP included notification that a Community Meeting and Scoping Meeting would be held. Consistent with City policy, the purpose of the Community Meeting was for the Applicant to present the Project, solicit community comments, and receive feedback in association with the

entitlement applications submitted to the City. In accordance with the CEQA Guidelines, the purpose of the Scoping Meeting was for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the Draft EIR. The Community Meeting was held on December 8, 2016 at 6:00 P.M. followed by the Scoping Meeting at 7:00 P.M. at the Culver City Senior Center, located at 4095 Overland Avenue, Culver City, CA 90232. The Scoping Meeting was held in an open house/workshop format and provided interested individuals, groups, and public agencies the opportunity to view materials, ask questions, and provide written comments to the City regarding the scope and focus of the Draft EIR as described in the NOP and Initial Study. The presentation materials and other documentation from the Scoping Meeting are provided in Appendix A of this Draft EIR.

## 1.2.4 Comments Received

During the 35-day public review period for the NOP, ten written comment letters and emails responding to the NOP were submitted to the City by public agencies, organizations, and individuals. Correspondence was received from the State of California, Native American Heritage Commission; State of California, Department of Transportation (Caltrans)-District 7; Southern California Association of Governments (SCAG); South Coast Air Quality Management District (SCAQMD); and The Los Angeles Conservancy. Also, written comments were provided by an additional five interested organizations and/or individual parties via mail and e-mail. Two Written Comment Forms with public responses to the NOP were submitted at the Scoping Meeting. All written comments are provided in Appendix A, of this Draft EIR and summarized in the Executive Summary, Areas of Controversy and Issues to be Resolved.

## 1.3 Format of the Draft EIR

The Draft EIR includes an Executive Summary, nine chapters, and appendices, which are organized as follows:

**Executive Summary.** This section of the Draft EIR provides an overview of the entire document in a concise, summarized format. It briefly describes the Project (location and key Project features), the CEQA review process and focus, identifies effects found to be significant and unavoidable, identifies areas of controversy, provides a summary of the Project alternatives (descriptions and conclusions regarding comparative impacts), and provides a summary of Project impacts, Project Design Features and mitigation measures, and the level of impact significance following implementation of mitigation measures.

**1.0 Introduction.** This section provides a summary of the Project, describes the purpose of the EIR, including CEQA compliance requirements, steps undertaken to date regarding implementation of the CEQA process, and also summarizes the Draft EIR's organization.

**2.0 Project Description.** This section describes the location, background and existing conditions, objectives, physical and operational characteristics of the Project, and requested entitlements.

- 3.0 Environmental Setting.** This section presents an overview of the Project’s environmental setting, including on-site and surrounding land uses. This section also provides a list and the mapped locations of past, present, and probable future projects considered in the analysis of potential Project contributions to cumulative impacts.
- 4.0 Environmental Impact Analysis.** This section contains the environmental setting, regulatory framework, methodology, thresholds to determine level of significance, Project Characteristics and/or Project Design Features, Project-specific and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the following environmental issues: 1) Aesthetics – Visual Character, Light and Glare, Shading; 2) Air Quality; 3) Cultural Resources – Historical Resources, Archaeological and Tribal Cultural Resources, Paleontological Resources; 4) Geology and Soils; 5) Greenhouse Gas Emissions; 6) Hazards and Hazardous Materials; 7) Hydrology and Water Quality; 8) Land Use and Planning; 9) Noise; 10) Public Services – Fire Protection, Police Protection; 11) Transportation and Traffic; and 12) Utilities and Service Systems – Wastewater, Water Supply, and Solid Waste.
- 5.0 Alternatives.** This section describes a reasonable range of alternatives to the Project, including the No Project/No Build Alternative, No Project/CPA No. 6 Buildout Alternative, Reduced Density Alternative, Full Historic Preservation-Retain Stages 2/3/4 and 7/8/9 as Sound Stages Alternative, Historic Preservation – Retain Stages 2/3/4 as Sound Stages Alternative, Historic Preservation – Retain Stages 7/8/9 as Sound Stages Alternative, Full Adaptive Reuse – Retain Stages 2/3/4 and Stages 7/8/9 for Digital Media Alternative, Adaptive Reuse – Retain Stages 2/3/4 for Digital Media Alternative, and Adaptive Reuse – Retain Stages 7/8/9 for Digital Media Alternative. This section also evaluates the environmental effects of the alternatives for each issue area analyzed in the Draft EIR, though not at the same level of detail as analyzed for the Project.
- 6.0 Other CEQA Considerations.** This section includes a discussion of issues required by CEQA that are not covered in other chapters. This includes irreversible environmental changes, significant unavoidable impacts, reasons why the Project is being proposed notwithstanding significant unavoidable impacts, growth-inducing impacts, potential secondary effects related to Project mitigation measures, effects found not to be significant in the Initial Study, effects found to be less than significant in the Draft EIR (before mitigation), and energy.
- 7.0 References.** This section lists the references and sources used in the preparation of this Draft EIR.
- 8.0 List of EIR Preparers and Organizations and Persons Contacted.** This section lists the persons, public agencies, and organizations that were consulted or who contributed to the preparation of this Draft EIR.
- 9.0 Standard Terms, Acronyms and Abbreviations.** This section provides a reference listing of the common terms, acronyms and abbreviations that are used throughout this document, as well as definitions of key terms.

The Environmental Analyses in this Draft EIR are supported by the following appendices:

- Appendix A – Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and NOP/Scoping Meeting Comments
- Appendix B – Shade/Shadow Models
- Appendix C – Air Quality Technical Report
- Appendix D – Cultural Resources Documentation
  - D-1 Historical Resources Technical Report
  - D-2 Phase 1 Archaeological and Paleontological Resources Report
  - D-3 Sacred Lands File Search and Native American Consultation Documentation
- Appendix E – Geotechnical Report
- Appendix F – Greenhouse Gas Technical Report
- Appendix G – Phase I Environmental Site Assessment
- Appendix H – Hydrology and Water Quality Reports
  - H-1 Hydrology Report
  - H-2 Preliminary Low Impact Development (LID) Study
- Appendix I – Noise and Vibration Technical Report
- Appendix J – Public Services Correspondence
- Appendix K – Traffic Study
- Appendix L – Wastewater Report
- Appendix M – Water Supply Reports
  - M-1 Water Supply Assessment
  - M-2 Water Infrastructure and Demand Analysis

## **1.4 Public Review of the Draft EIR**

The Draft EIR is subject to a 45-day review period in which the document is made available to responsible and trustee agencies and interested parties. In compliance with the provision of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the City, serving as the Lead Agency: 1) published a Notice of Completion (NOC) of a Draft EIR which indicated that the Draft EIR was available for public review at the City’s Planning Division; 2) provided copies of the NOC and Draft EIR to the Culver City Julian Dixon Library ; 3) posted the NOC and the Draft EIR on the City’s Planning Division website (<http://www.culvercity.org/city-hall/city-government/city-departments/community-development/planning>); 4) prepared and transmitted a NOC to the State Clearinghouse; 5) sent a NOC to all property owners within 500 feet of the Project Site; and 6) sent a NOC to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project. Proof of publication is available at the Culver City Planning Division. The public review

period commenced on September 22, 2017 and will end on November 6, 2017 for a total of 46 days.

Any public agency or members of the public desiring to comment on the Draft EIR must submit their comments in writing or send them via email to the following address prior to the end of the public review period:

Mail: Michael Allen, Planning Manager  
City of Culver City Planning Division  
9770 Culver Boulevard  
Culver City, California 90232  
Email: michael.allen@culvercity.org

Upon the close of the public review period, the City will proceed to evaluate and prepare responses to all relevant oral and written comments received from public agencies and other interested parties during the public review period. A Final EIR will then be prepared. The Final EIR will consist of the Draft EIR, any necessary revisions to the Draft EIR, comments submitted by responsible agencies or reviewing parties during the public circulation period for the Draft EIR, and City responses to those comments. After the Final EIR is completed and at least 10 days prior to its certification by the City Planning Commission<sup>1</sup>, responses to comments made by public agencies on the Draft EIR will be provided to the commenting agencies.

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<sup>1</sup> Prior to approval of the Project, the City, as Lead Agency and decision-making entity, is required to certify that the Final EIR has been completed in compliance with CEQA, that the Project has been reviewed and the information in the Final EIR has been considered, and that the Final EIR reflects the independent judgement of the City.

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# CHAPTER 2

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## Project Description

### 2.1 Introduction

The Culver Studios Owner, LLC (the Studio, or Applicant) has had a long history in Culver City. From its beginnings in 1918 with silent movies until its present focus on the expanding role of digital entertainment, the Studio has been a major employer and economic force in the creative city economy.

Today, the Studio seeks to sustain its role as a dynamic, independent studio in the entertainment, digital media, and creative industries, supporting a wide range of activity through the transformation of its approximately 14-acre digital media studio campus (the Project Site or Studio Campus). The Studio is transitioning from a traditional film studio to a modern media center reflecting the way movies and entertainment are now produced and consumed. The Studio's proposed Innovation Plan (the Project) describes in detail the physical changes to the Studio Campus intended to foster current and future content creation, digital media, creative technologies, virtual reality, and related entertainment industries synonymous with the Studio's heritage and the history and evolution of Culver City, known as "The Heart of Screenland."

The Studio proposes to update and expand its facilities within the existing Studio Campus footprint, while retaining the Studio's unique ambiance and prominent place in downtown Culver City. The Innovation Plan incorporates:

- Flexible and sustainable digital media space
- Reuse and reinvigoration of prominent buildings to adapt to new creative production needs
- Inviting and collaborative landscaped open areas
- Sensitive treatment of neighborhood interfaces, and
- Redesigned and improved access.

The Innovation Plan is reflected in proposed Comprehensive Plan Amendment No. 7 (CPA No. 7) and includes some improvements approved under Comprehensive Plan Amendment No. 6 (CPA No. 6) but not yet constructed.

Upon implementation of the Innovation Plan, The Studio would be a state-of-the-art campus of media and digital content stages and support facilities, ensuring its resilience and continued position at the cutting edge of innovation essential to the invention and production of entertainment and digital media for future generations. The Innovation Plan would also serve to strengthen the economic environment and identity of the City of Culver City.

## 2.2 Project Location and Surrounding Uses

The Project Site is located at 9336 W. Washington Boulevard in downtown Culver City on a long property made up of a few parcels under single ownership. The Campus is generally bounded by the vacated street portion of Washington Boulevard to the north, Ince Boulevard to the east, Van Buren Place to the west, and Lucerne Avenue to the south. See **Figure 2-1. Regional and Vicinity Location Map**, for the location of the Studio Campus, and **Figure 2-2, Aerial Photograph of The Culver Studios**, for an aerial image of the Campus and surrounding development.

Adjacent and surrounding land uses include, to the north, commercial retail uses, the Culver Hotel, and surface parking (Parcel B),<sup>1</sup> fronting on vacated Washington Boulevard and Culver Boulevard. To the east across Ince Boulevard are entertainment-related light industrial and studio facilities, including some affiliated with The Culver Studios, and single- and low-density multi-family residential uses. To the west, single- and low-density multi-family residential uses on Van Buren Place abut the Studio Campus, with Linwood E. Howe Elementary School located across Van Buren Place. To the south, multi-family residential uses abut the Studio Campus and primarily front on Lucerne Avenue.

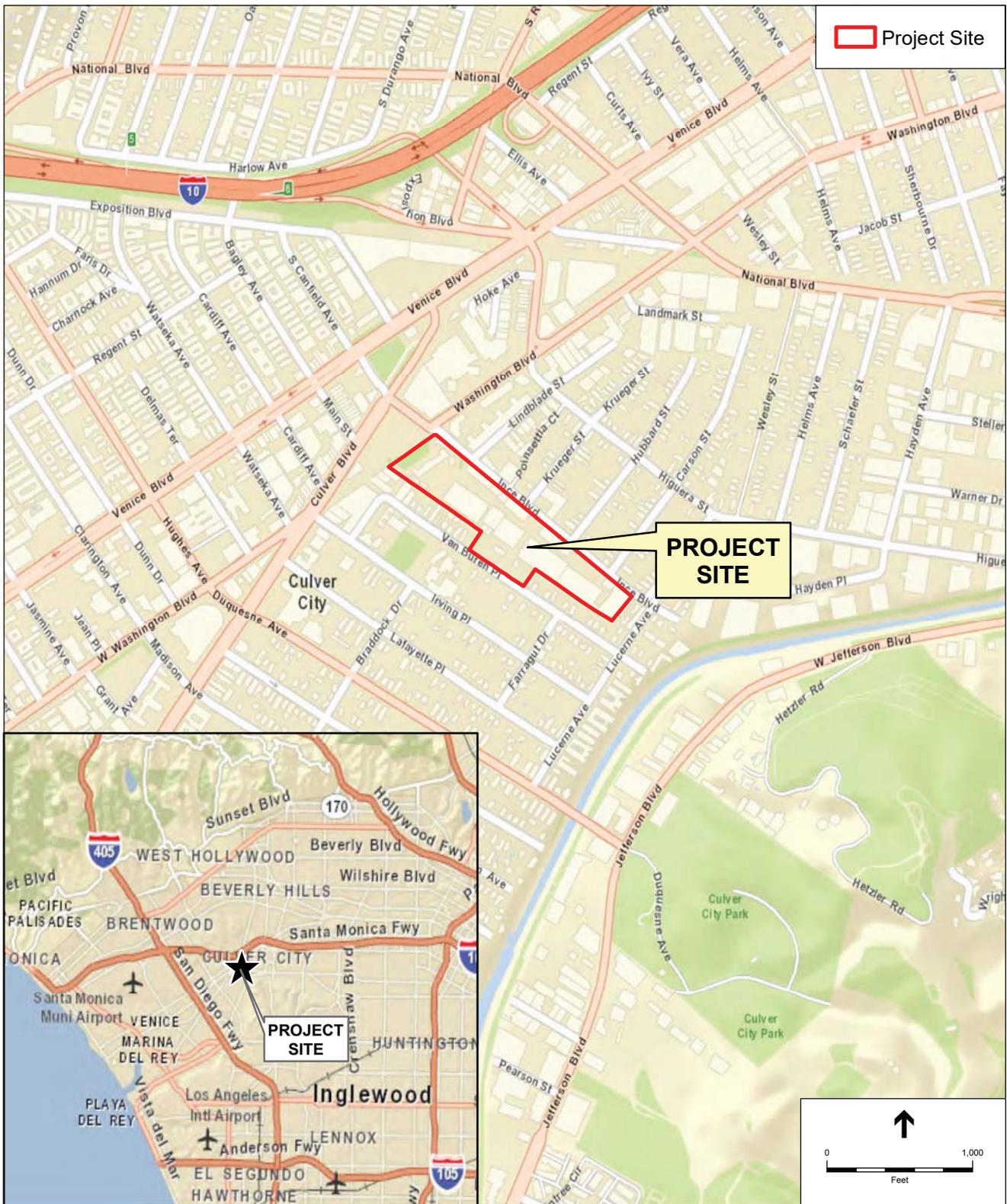
Existing vehicular access to The Culver Studios is restricted to users and guests provided in five (5) locations from surrounding streets as follows.

- “Gate 1” on Washington Boulevard is the public entrance to the Studio Campus providing staffed security controlled ingress and egress at two locations via a semi-circular driveway that allows pick-up/drop-off in front of the historic Mansion, the iconic face of the Campus, as well as access to the rear of the Studio Campus.
- “Gate 2” on Ince Boulevard is the primary entrance to the Studio Campus and provides secure employee and visitor ingress and egress in addition to access for production vehicles.
- “Gate 3” on Ince Boulevard is the secondary entrance to the Studio Campus for both employees and production vehicles.
- “Gate 4”, on Ince Boulevard is the southernmost gate and is used as an alternative exit gate for large production vehicles.
- “The Van Buren Gate” on Van Buren Place is the only access point on the western side of the Studio Campus and is used for emergency vehicle access only.

Pedestrian access is only provided at Gate 1. Bicycle access is provided at Gates 1 and 2.

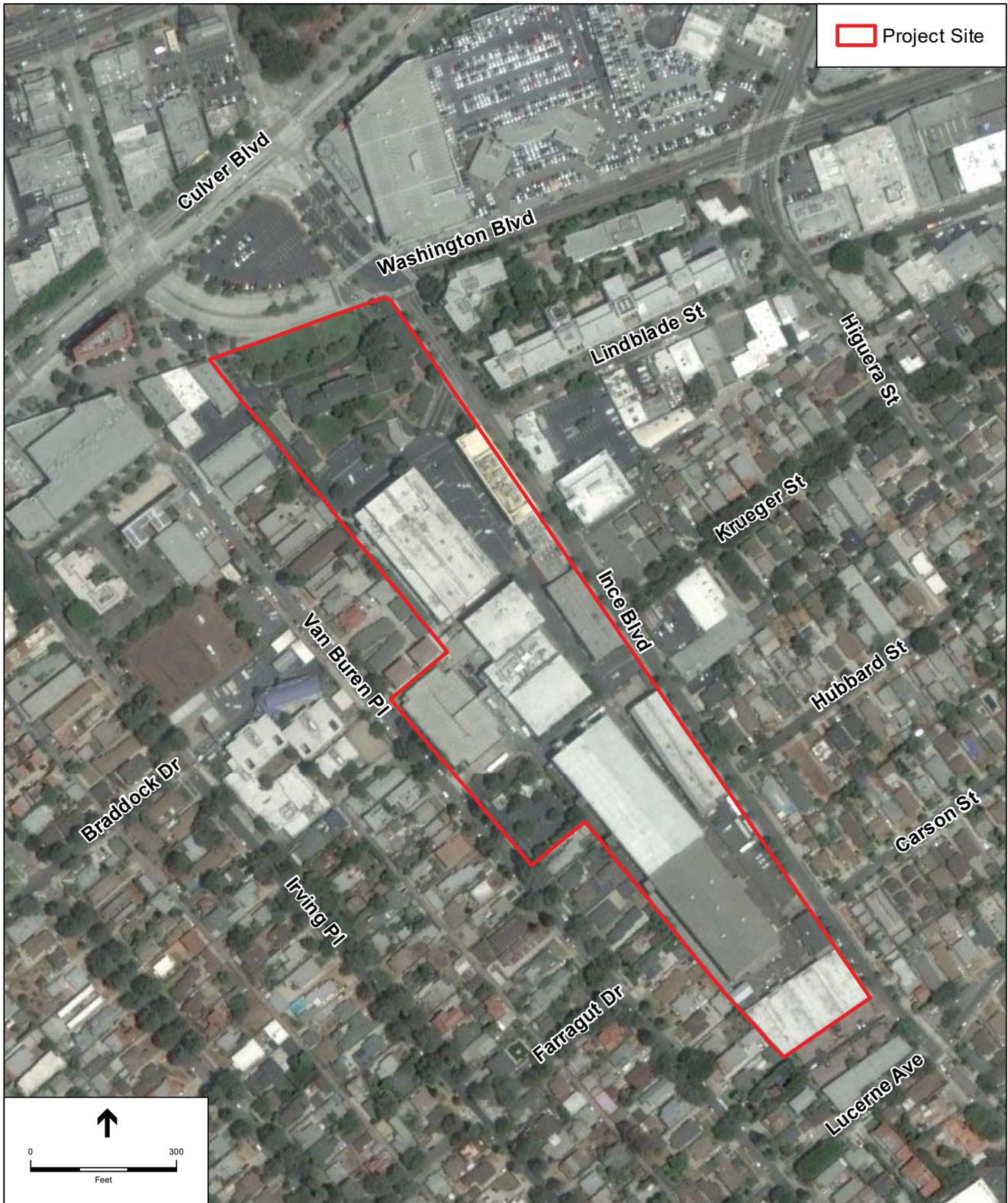
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<sup>1</sup> The downtown Parcel B and Town Plaza Expansion is a mixed-use project that includes 74,600 square feet of office, 21,700 square feet of retail, and 21,700 square feet of restaurant uses with subterranean parking.



SOURCE: ESRI Street Map, 2010.

The Culver Studios Innovation Plan  
**Figure 2-1**  
 Regional and Vicinity Location Map



SOURCE: Google Earth, 7/8/2016 (Aerial)

The Culver Studios Innovation Plan

**Figure 2-2**  
Aerial Photograph of The Culver Studios

Primary freeway access to the Studio Campus is along the Santa Monica Freeway (I-10). Primary transit access to the Studio Campus is provided by Metro's Expo Line, and multiple regional and local bus lines. National Boulevard, Venice Boulevard, and Jefferson Boulevard are major arterials that lead to and from the Studio Campus.

## **2.3 Project Background and Existing Conditions**

### **2.3.1 Project Background**

#### **2.3.1.1 Historic Development of the Studio**

As further detailed in the Historic Resource Assessment for the Project included in Appendix D-1 of this Draft EIR, The Culver Studios was founded in 1918 on the Project Site as Ince Studios by Mr. Thomas Ince, who left nearby Ince/Triangle Studios, founded in 1915 with partners Mack Sennet and D. W. Griffith, to form his own production company. Harry Culver, the founder of Culver City, was instrumental in convincing Mr. Ince, who by then had shot several hundred silent westerns and other films from a base of operations in Santa Monica, to locate his new studio in newly incorporated Culver City's downtown district. Mr. Culver sought to expand Culver City's fledgling motion picture industry to secure the City's economic stability and cement its status as an entertainment capital.

One of a number of major motion picture production studios established in southern California by the 1920s, The Culver Studios belonged to a group known today as "The Big Eight" that operated under an early management model called the "studio system", controlling their own production, distribution, and theaters. Mr. Ince died unexpectedly in 1924 while vacationing with William Randolph Hearst and the Studio changed hands numerous times in subsequent years, passing first to Cecil B. DeMille in 1925, and then to RKO in 1926. RKO owned and operated the Studio for 30 years, leasing it to executive David O. Selznick in 1935 and continuing to operate its own productions alongside Selznick International Pictures, and later, Selznick's Vanguard Pictures. In 1939, RKO-Pathé relocated operations to its Gower Street Studios and Vanguard went bankrupt. That same year, the Studio was acquired by Howard Hughes, whose Hughes Aircraft Company was headquartered in Culver City beginning in 1932. The property was purchased in 1956 by Desilu Productions, which operated it until 1967, by which time it had transitioned to predominantly television production. Since then the Studio has been sold several times, including to Sony Pictures. The Studio is currently owned by a private investment group headed by Hackman Capital Partners, a local, private studio operator, long-term owner, and stakeholder in Culver City.

The first building constructed on the Studio Campus, in 1918, was the Mansion (also known as Building C) facing Washington Boulevard, followed by the Ince-era administrative buildings adjacent to the Mansion, four of which remain today (one relocated within the Studio Campus). The Studio contains a series of sound stages, the majority of which were constructed between 1925 and 1928 under DeMille's ownership, reflecting the advent of "talkies" and artificial lighting which required – and permitted – highly controlled conditions. Of the sound stages existing today, Stages 2/3/4 were constructed in 1926, followed by Stages 11/12/14 in 1927 and 7/8/9 in 1929. Four bungalows housing dressing rooms and a gym for use by major film stars

were constructed on or relocated to the Studio Campus starting in 1929, with the first one constructed for Gloria Swanson. The Cecil B. DeMille Theater was constructed in 1929 for private film screenings. Additional improvements were implemented during subsequent studio ownership. A number of buildings and structures from the Ince, DeMille, and RKO-Pathé/Selznick eras still remain in their original locations or have been relocated within the Studio Campus, while other characteristic studio lot features, such as early glass stages employed when sunlight was the only reliable source of illumination, a water tower, a pool, and film vaults, have gradually been demolished and replaced to accommodate changing studio needs and emerging technologies in response to transformative industry shifts – analogous to the industry’s current shift to digital technologies and sustainable practices.

### **2.3.1.2 Comprehensive Plan Amendments**

Development on the Studio Campus is governed by a Comprehensive Plan pursuant to Section 17.250.015 of the City’s Zoning Code. The Comprehensive Plan regulates permitted uses, development standards, and conditions of approval on a project site. The original Comprehensive Plan for the Studio Campus<sup>2</sup> has been amended six times; the most recent amendment, CPA No. 6, is discussed below.

#### ***Comprehensive Plan Amendment (CPA) No. 6***

In December 2015, Comprehensive Plan Amendment No. 6 (CPA No. 6) was approved and a Mitigated Negative Declaration adopted by the City of Culver City. CPA No. 6 was the first step to transition the Studio Campus from traditional media production to new and emerging technologies and trends towards a digital platform, process, and delivery.

CPA No. 6 proposed the demolition of seven buildings and structures encompassing 66,703 square feet of office, stage, and support area. These included existing Buildings L, O, X, Y, and Z; the Commissary Building; and Stage 10. In addition, demolition of the existing parking structure near Van Buren Place was proposed. CPA No. 6 proposed the construction of three new production office buildings totaling 138,997 net new square feet, including a new and expanded Building O and new Buildings R and Y, as well as a new 1,109 space<sup>3,4</sup> multi-level parking structure and associated linear, park-like open space on Van Buren Place on the west side of the Studio Campus (the Van Buren Parking Structure).

CPA No. 6 also proposed the relocation to an area south of the Mansion of four historically significant bungalows, Buildings S, T, U and V.<sup>5</sup> Relocation is subject to a required Relocation and Rehabilitation Plan and approval of a Certificate of Appropriateness by the City to ensure

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<sup>2</sup> Comprehensive Plan, CP No. 87-01 was approved by the City Council on January 25, 1988, and has subsequently been amended.

<sup>3</sup> Proposed Van Buren garage striped stall count is 1,109; excluding 111 stalls dedicated for production vehicle parking at the ground level.

<sup>4</sup> Van Buren stall count reduced by 188 striped spaces from initial design during Project conformance review.

<sup>5</sup> City of Culver City, Mitigated Negative Declaration for the Comprehensive Plan Amendment No. 6 (CPA No. 6), Attachment No. 3: Project Proposed Conditions exhibit entitled Proposed Project Overview, p. 28, November 10, 2015.

relocation and exterior alterations comply with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards).

Other proposed improvements included relocation of the existing guard shack at Gate 1; realignment of existing Gate 4; upgrades to aging Studio Campus infrastructure including heating/ventilation/air conditioning, electrical, and domestic and fire water systems; and some limited off-site improvements including new curbs, gutters, driveway and access approaches, sidewalks, streetlights, parking meters, and street trees on Ince Boulevard and Van Buren Place.

During the public hearings and as part of the City Conformance Review process, refinements were made to CPA No. 6 that addressed setback, architectural, lighting, and landscaping requirements for Building Y and the Van Buren Parking Structure, in order to provide additional visual enhancements and minimize potential adverse effects on adjacent residential uses. For Building Y this included a 5-foot landscaped setback along the western and southern boundary; a 12-foot high wall along the western, southern and eastern boundary; a canted roofline on the west façade; additional trees along the western property line; and increased raised planter width on levels 2 and 4. For the Van Buren Parking Structure the changes included a 36-inch articulated façade screen; a stepback at the roof level from the lower parking levels of 14-foot, 4-inches along the northern elevation and 18 feet along the western elevation; a 15-foot setback of the basement parking levels from the western property line; and a fully enclosed, filtered, and ventilated ground parking level..

## 2.3.2 Existing Uses

### 2.3.2.1 General Plan Land Use and Zoning Designations

The General Plan Land Use designation for the Studio Campus is “Studio”, and per the Culver City Zoning Code, The Culver Studios Campus is zoned “S Zoning District” (Studio), which permits the following:

*uses customary or incidental to the production or distribution of motion pictures and other forms of audiovisual products, including but not limited to, education and entertainment films, tapes and other reproduction media new development. Restaurants, retail, and related support uses are permitted as long as they are not open to the general public.*

Temporary structures constructed as part of a set are not subject to these restrictions; telecommunications facilities may require an Administrative or Conditional Use Permit. A maximum building height limit of 56 feet is applicable to uses in the S Zoning District.<sup>6</sup>

<sup>6</sup> As stated in the Culver City Zoning Code, Section 17.250.015.D, the maximum building height within the S Zoning District is 56 feet. However, per Section 17.300.025.C of the Zoning Code, exceptions to height limits include parapets (which may extend up to 5 feet above the top of the roof), and mechanical screening and other architectural features which may extend up to 13 feet, 6 inches above the top of the roof.

New development within Studio Districts must be governed by a Comprehensive Plan to be prepared or, if already in effect, modified in compliance with Section 17.250.015 of the Zoning Code.<sup>7</sup> As stated therein, a Comprehensive Plan allows flexibility in the application of zoning code standards to proposed development, in order to encourage innovation in site planning and design and more effective responses to the setting and other environmental considerations. To permit this, a Comprehensive Plan regulates permitted uses, development standards, and conditions of approval on a project site. In order to be approved, environmental review must support specific findings set forth in the Zoning Code that affirm, among other requirements, compatibility with adjacent uses, the sustainability and stability of the proposed project, adequacy of the road network serving the project site, and conformance with the General Plan.

### 2.3.2.2 Existing Site Improvements

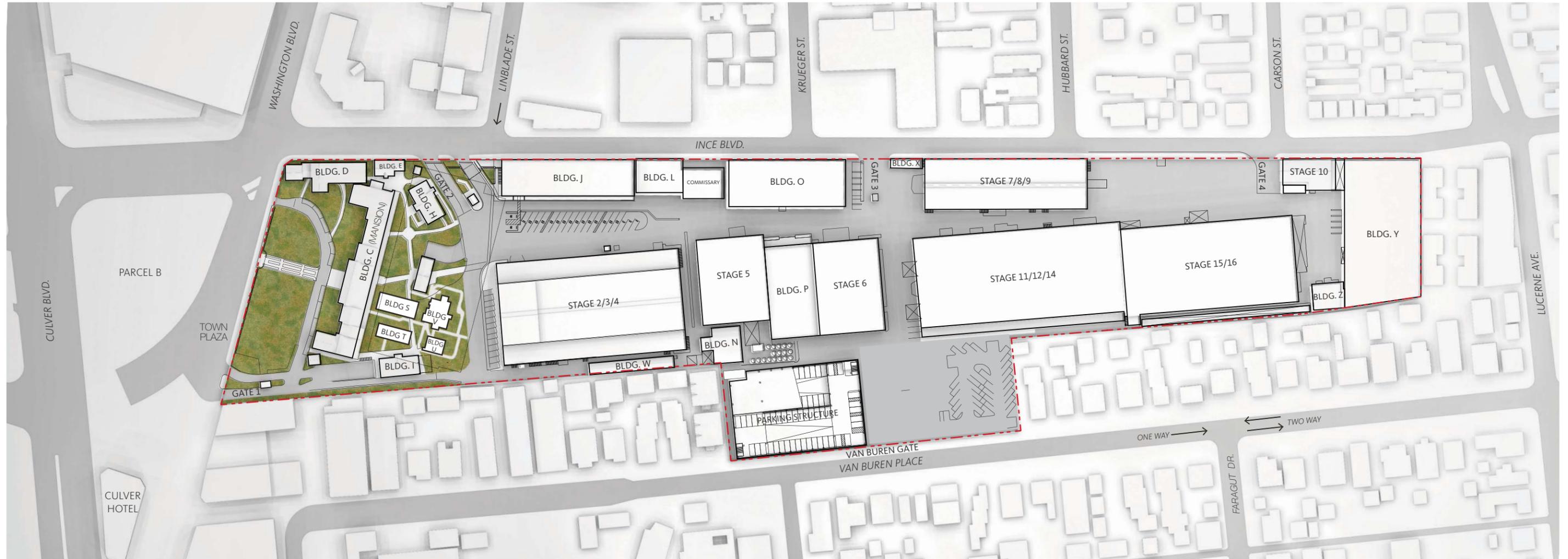
The Culver Studios is currently a fully operational movie and television studio in heavy demand for the production of feature-length films, television shows, short-term shoots, commercials, green screen/motion capture, video games, and music videos. The Studio Campus houses the headquarters of The Culver Studios as well as 14 sound stages and support facilities that are leased for use on a short-term basis by a range of tenants.

The Studio Campus is a narrow, wedge-shaped, relatively flat site and is generally divided into three distinct subareas: the Mansion Area, which contains the public face of the Studio; the Central Production and Support Area (the Central Area), which occupies the majority of the approximately 14-acre Campus and contains the sound stages, offices, and support services/facilities; and the peripheral Western Area where the property extends to Van Buren Place and is primarily occupied by parking. These uses are shown on **Figure 2-3, Existing Site Conditions** and briefly characterized below.

The existing Mansion Area, the northernmost portion of the Studio Campus, contains the prominent and historically significant American Colonial Revival-style Mansion, set back from Washington Boulevard behind a deep, fenced, front lawn (the Front Lawn); associated administrative buildings designed in the same style and arrayed on either side of the lawn; and a sweeping internal driveway paved with asphalt. The Front Lawn is set behind a low brick and lattice fence and secured pedestrian gate along its Washington Boulevard frontage and is lined around its perimeter by low clipped hedges. Hedges also line a brick walkway bisecting the Front Lawn. The southern edge of the driveway is planted with a line of six mature sycamore trees (*Platanus racemosa*); there are also two large Deodar cedar trees (*Cedrus deodora*) at the eastern end of the Mansion and several fruit trees scattered around the Front Lawn.

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<sup>7</sup> City of Culver City Zoning Code, Title 17, Chapter 17.560, Comprehensive Plans. Accessed March 2016. [http://library.amlegal.com/nxt/gateway.dll/California/culver/title17zoningcode/article5landuseanddevelopmentpermitproce/chapter17560comprehensiveplans?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:culvercity\\_ca\\$anc=JD\\_17.560.005](http://library.amlegal.com/nxt/gateway.dll/California/culver/title17zoningcode/article5landuseanddevelopmentpermitproce/chapter17560comprehensiveplans?f=templates$fn=default.htm$3.0$vid=amlegal:culvercity_ca$anc=JD_17.560.005).



SOURCE: Gensler, 2017

The Culver Studios Innovation Plan  
**Figure 2-3**  
 Existing Site Conditions

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Immediately south of the Mansion, a rear yard contains a smaller lawn, trees, and hardscape that comprise an internal courtyard for the use of Studio employees and visitors. This area sits atop a below-grade parking structure (the Rear Lawn Parking Structure) and is not visible from off-site. This area also contains four bungalow Buildings S, T, U, and V, previously located along the western edge of the Studio Campus, that were recently relocated to this area under the observation of a qualified architectural historian. Their relocation, orientation and configuration retain the historic grouping of the Bungalows within the Studio Campus in keeping with their original setting. The Bungalows are currently in the process of being rehabilitated for continued use as offices in conformance with the Secretary of the Interior's Standards for Rehabilitation to reduce and mitigate adverse impacts pursuant to CEQA and the requirements set forth in the Mitigated Negative Declaration approved for CPA No. 6.

The Central Area, which comprises most of the Studio Campus, contains 14 sound stages, production support facilities, offices, and a commissary, housed in 13 buildings (Buildings D, E, H, I, J, L, O, W, X, Y, Z, commissary, and breezeway/Building P)); plus a central plant. The largest sound stages and central plant are arrayed along the western side of the Studio Campus, while offices, the smaller sound stages, and the commissary line the eastern side of the Studio Campus; support facilities are scattered throughout and include Building Y at the southernmost property boundary. The spine of the Studio Campus accommodates production vehicle circulation and parking and outdoor production support functions in an internal courtyard.

The Western Area, forming the property boundary along Van Buren Place, contains a three-level above-grade parking structure, and until recently contained bungalow Buildings S, T, U, and V, which have been relocated to the area south of the Mansion.

Existing facilities total approximately 347,549 gross square feet. Office and support buildings on the Studio Campus range in height from single-story to approximately 56 feet, exclusive of rooftop mechanical and stairway housings and architectural projections, while sound stages are up to 64 feet in height, all with varying setbacks from the property boundaries. The Studio Campus also contains below-grade, at-grade, and above-grade structured parking, and bicycle parking.

### 2.3.2.3 Historic Significance

In association with CPA No. 6, the Studio Campus was evaluated for its potential to qualify for listing on the National Register as an historic district under applicable national and state criteria pertaining to and the Culver City Historic Preservation Ordinance. Although the Studio Campus was concluded to lack eligibility for listing as a historic district, several buildings appear individually eligible for listing at the federal, state, and local levels. Six on-site buildings have been designated at the local level as Landmark and Significant structures and also appear eligible for the National Register and California Register. Building C and D are designated by the City of Culver City as Landmark structures. Culver City has designated Building S, T, U, and V as Significant Structures. In addition, Stages 2/3/4, Stages 7/8/9, Stages 11/12/14, and Stages 15/16 appear eligible for the National Register, California Register, and local listing Building E, H, and I also appear eligible for local listing. **Table 2-1, *Historic Status of Resources on The Culver***

*Studios Campus*, summarizes the eligibility of the resources as evaluated in the Historic Assessment Report provided in Appendix D-1 of this Draft EIR.

**TABLE 2-1  
HISTORIC STATUS OF RESOURCES ON THE CULVER STUDIOS CAMPUS**

<b>Address</b>	<b>Date</b>	<b>Eligibility</b>	<b>Criteria</b>	<b>HRI Status Code</b>
Building C and DeMille Theatre	1918-19 Building C 1929 DeMille Theatre	National/California Register Eligible Designated Local Landmark Structure	A/1, C/3, City Ordinance	3S, 3CS, 5S1
Building D	1919	National/California Register Eligible Designated Local Landmark Structure	A/1, C/3, City Ordinance	3S, 3CS, 5S1
Building E	1925	Eligible for Local Listing	City Ordinance	5S3
Building H	1925	Eligible for Local Listing	City Ordinance	5S3
Building I	1919	Eligible for Local Listing	City Ordinance	5S3
Building S	1936	National/California Register Eligible Designated Locally Significant Structure	A/1, City Ordinance	3S, 3CS, 5S1
Building T	1942	National/California Register Eligible Designated Locally Significant Structure	A/1, City Ordinance	3S, 3CS, 5S1
Building U	1941	National/California Register Eligible Designated Locally Significant Structure	A/1, City Ordinance	3S, 3CS, 5S1
Building V	1929	National/California Register Eligible Designated Locally Significant Structure	A/1, City Ordinance	3S, 3CS, 5S1
Stage 2/3/4	1926	National/California Register Eligible Eligible for Local Listing	A/1, City Ordinance	3S, 3CS, 5S3
Stage 7/8/9	1929	National/California Register Eligible Eligible for Local Listing	A/1, City Ordinance	3S, 3CS, 5S3
Stage 11/12/14	1927	National/California Register Eligible Eligible for Local Listing	A/1, City Ordinance	3S, 3CS, 5S3
Stage 15/16	1940	National/California Register Eligible Eligible for Local Listing	A/1, City Ordinance	3S, 3CS, 5S3

SOURCE: ESA PCR, 2017

### 2.3.2.4 Existing Operations

The Studio Campus houses 14 sound stages and support facilities leased for use on a short-term basis. The Culver Studios remain one of the few independent facilities of its type in the area; that is, non-union production houses are permitted to use its facilities, which helps control production costs and retain productions in the Los Angeles metropolitan area that might otherwise seek locations and support elsewhere, including outside of California or the U.S.

The Studio Campus operates 24 hours per day, with the majority of current operations, including office operations, shooting, editorial, writing, and screenings, as well as transportation returning from local location shoots, typically occurring between 6:00 A.M. and 10:00 P.M. Although daily operations can vary considerably depending on scheduled activities, typically production company employees arrive, stages are opened, and crews prepare for shoots on the stages beginning at 4:00 A.M.; the Studio Campus gates open at 6:00 A.M.; office employees arrive between 8:00 A.M. and 10:00 A.M.; and visitors arrive beginning at 8:00 A.M. and continue throughout the day. Office employees typically leave at 5:00 P.M.; production companies conclude activities and stages are locked at 11:00 P.M.

Outdoor activities including but not limited to shoots, concerts, and outdoor dining, as well as special events, also take place on the Studio Campus on the Front Lawn and Rear Lawn and in the central courtyard (the Central Courtyard). All outdoor events currently end by 10:00 P.M.

## 2.4 Statement of Project Objectives

The underlying purpose and primary objective of the Project is to sustain The Culver Studio's prominent role as a dynamic, independent studio in the entertainment, digital media, and creative industries, through transformation and technological updates to its Studio Campus that will support a wide range of related activities. As further required by the State CEQA Guidelines, the specific objectives sought by the Applicant for the Project are provided below:

**Objective 1.** Create a state-of-the-art Studio Campus of media and digital content stages, film and television production offices, and support facilities that will ensure the Studio's resilience, competitiveness, and continued position at the cutting edge of innovation essential to the invention and production of entertainment and digital media for future generations.

**Objective 2.** Through new and upgraded facilities foster current and further content creation, digital media, creative technologies, virtual reality, and related uses consistent with the Studio's heritage and the history and evolution of the entertainment industry.

**Objective 3.** Support the continued economic viability of the Studio and its ability to respond to changing industry needs and market conditions through a plan that technologically updates and expands Campus facilities while allowing flexibility in the application of development standards.

**Objective 4.** Implement an innovative plan that supports development of flexible and sustainable new media space, inviting/collaborative landscaped open areas, sensitive treatment of neighborhood interfaces, and redesigned and improved access.

**Objective 5.** Upgrade and rehabilitate the Mansion in a manner that protects its eligibility as a historical resource under the City’s preservation ordinance while allowing for interior alterations to accommodate future uses and bring the building up to current standards. Upgrade the Front Lawn of the Mansion in a manner that respects the original landscape design intent and scale.

**Objective 6.** Provide a circulation plan that: moves vehicles as efficiently as possible onto the Studio Campus from the surrounding street network with a minimum of queuing or delays; reduces production vehicle use of directly adjacent streets; minimizes truck/passenger vehicle and truck/emergency vehicle and fire lane conflicts; and frees up at-grade areas for use as attractive and usable outdoor open space.

**Objective 7.** Promote environmental sustainability through development of updated and expanded facilities on an existing Studio Campus within convenient walking distance to the nearby Metro Station and other public transit consistent with regional and local mobility goals to reduce vehicle trips and infrastructure costs.

**Objective 8.** Update and redevelop the Studio Campus with a high quality state-of-the-art design that supports environmental sustainability by: meeting or exceeding Culver City Green Building Program requirements; provision of more energy efficient buildings, high efficiency HVAC systems, and infrastructure; water conservation features; stormwater filtration systems; photovoltaics and passive solar design; use of renewable, recycled and low VOC materials; and, EV ready parking.

## 2.5 Description of Proposed Project

The Studio Campus has been in operation for 98 years and continues to occupy the same property as upon its founding, despite nearly continuous change and technological advances in motion picture, television, and technology industries and the related arts. The Innovation Plan is intended to allow the Studio Campus to efficiently, effectively, and sustainably adapt to the current and future needs of the entertainment industry and digital media within its existing Studio Campus boundary while remaining true to the aesthetic and historic background of The Culver Studios. In doing so, the Project is intended to ensure the continued viability, adaptability, and competitive status of the Studio while capitalizing on and strengthening the City’s historic and future identity as the “Heart of Screenland” and home to other major studios such as Sony Pictures, National Public Radio West, the NFL Network studios, and other entertainment concerns.

The Project encompasses the entire Studio Campus, with its specific characteristics reflected in proposed CPA No. 7, the formal entitlement document for the Project, which would replace CPA No. 6. upon its approval. CPA No. 7 includes some, but not all, of the improvements approved as part of CPA No. 6 but not yet constructed, including new Building Y and the Van Buren Parking Structure near Van Buren Place. Although the historically significant bungalows have been relocated to the area south of the Mansion and are currently being rehabilitated subject to mitigation measures required under CPA No. 6, this change to the Studio Campus is also included in CPA No. 7.

The improvements to the Studio Campus that were approved under CPA No. 6 and are being incorporated into the Innovation Plan have already been evaluated in the Initial Study/Mitigated Negative Declaration prepared for CPA No. 6. Nonetheless, these improvements, together with

those newly proposed under the Project (CPA No. 7), are being evaluated in this Draft EIR to benefit the decision-making process and ensure that the combined environmental impacts of all components of CPA No. 6 and CPA No. 7 are fully considered.

Project components are discussed in detail on the following pages and summarized in **Table 2-2, Existing Development and Proposed Development Program – The Culver Studios Innovation Plan**. **Figures 2-4 through 2-14** depict conceptual plans, sections, and renderings of the Innovation Plan. The square footage for proposed Digital Media buildings represent a maximum development envelope, within which the mix of creative office, live and digital production, support, and other floor area would be permitted to change to respond to market conditions and tenant needs. Building footprints and massing also represent maximum development envelopes with specific architectural design, compatible with existing historically significant buildings and improvements on the Studio Campus, to be defined as the programs and uses within the buildings are more fully established. The buildings' massing and design represent a direct response to the evolving needs of digital media production and delivery while providing a proactive, sustainable platform to ensure maximum environmental benefit and minimal environmental impacts.

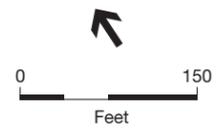
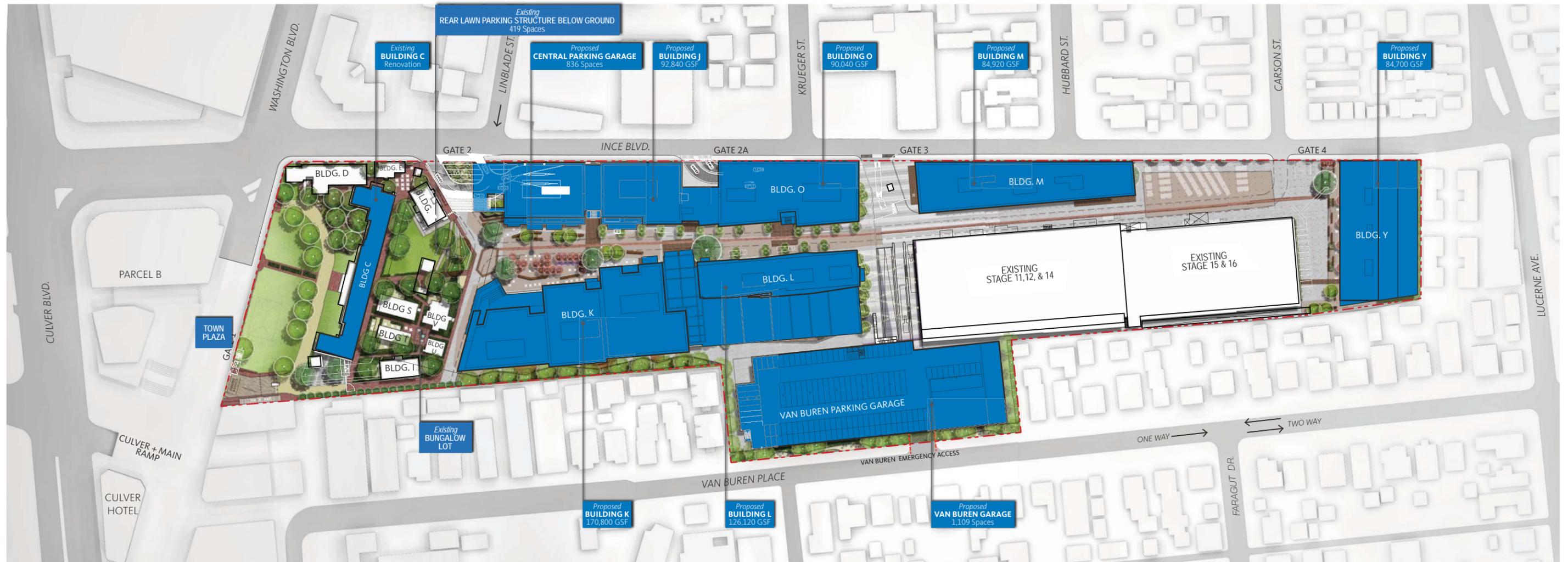
**TABLE 2-2  
EXISTING DEVELOPMENT AND PROPOSED DEVELOPMENT PROGRAM –  
THE CULVER STUDIOS INNOVATION PLAN**

<b>Building</b>	<b>Digital Media Space (SF)</b>	<b>Stage (SF)</b>	<b>Support (SF)</b>	<b>Total (SF)</b>
<b>Existing Studio Campus</b>				
	117,872	155,480	74,197	347,549
<b>Existing to Remain</b>				
C – Mansion	15,140	-	-	15,140
D	5,387	-	-	5,387
E	881	-	-	881
H	1,806	-	-	1,806
I	1,641	-	-	1,641
S – Bungalow	1,914	-	-	1,914
T – Bungalow	1,066	-	-	1,066
U – Bungalow	644	-	-	644
V – Bungalow	1,605	-	-	1,605
Stages 11/12/14	-	40,500	-	40,500
Stages 15/16	-	35,100	5,572	40,672
<b>Subtotal</b>	<b>30,084</b>	<b>75,600</b>	<b>5,572</b>	<b>111,256</b>
<b>Proposed for Demolition</b>				
J	(49,500 SF)	-	-	(49,500)
L	(3,343)	-	-	(3,343)
O	(22,264)	-	(4,700)	(26,964)
W	-	-	(875)	(875)
X	-	-	(541)	(541)
Y	-	-	(26,624)	(26,624)

<b>Building</b>	<b>Digital Media Space (SF)</b>	<b>Stage (SF)</b>	<b>Support (SF)</b>	<b>Total (SF)</b>
Z	-	-	(1,943)	(1,943)
Commissary	-	-	(3,566)	(3,566)
Breezeway	(12,681)	-	(9,334)	(22,015)
Stages 2/3/4	-	(32,400)	-	(32,400)
Stages 5/6	-	(27,400)	(20,600)	(48,000)
Stages 7/8/9	-	(16,800)	-	(16,800)
Stage 10	-	(3,280)	(442)	(3,722)
<b>Subtotal</b>	<b>(87,788)</b>	<b>(79,880)</b>	<b>(68,625)</b>	<b>(236,293)</b>
<b>Proposed New Construction <sup>a</sup></b>				
J	92,840	-	-	92,840
K	170,800	-	-	170,800
L	106,120	20,000	-	126,120
M	64,920	20,000	-	84,920
O	90,040	-	-	90,040
Y	84,700	-	-	84,700
Van Buren Parking Structure	-	-	-	-
<b>Subtotal</b>	<b>609,420</b>	<b>40,000</b>	<b>0</b>	<b>649,420</b>
Gross SF Total	639,504	115,600	5,572	760,676
Net New SF Total	521,632	(39,880)	(68,625)	413,127
<b>Parking Supply</b>				
<b>Existing Spaces</b>				
Below Grade – Rear Lawn Parking Structure				419
At Grade and Above Grade				337
Existing Spaces to be Demolished				(345)
<b>Proposed Spaces</b>				
Van Buren Parking Structure (striped spaces)				1,109
Below-Grade Central Parking Structure @ 2 Levels				836
Building Y				14
Total Spaces at Buildout				2,370
Net New Spaces				1,614

<sup>a</sup> Square footages of individual proposed buildings are approximate and may shift between buildings as designs are refined, but collectively would not exceed the total indicated in this table.

SOURCE: Gensler, May 2017; ESA PCR, June 2017

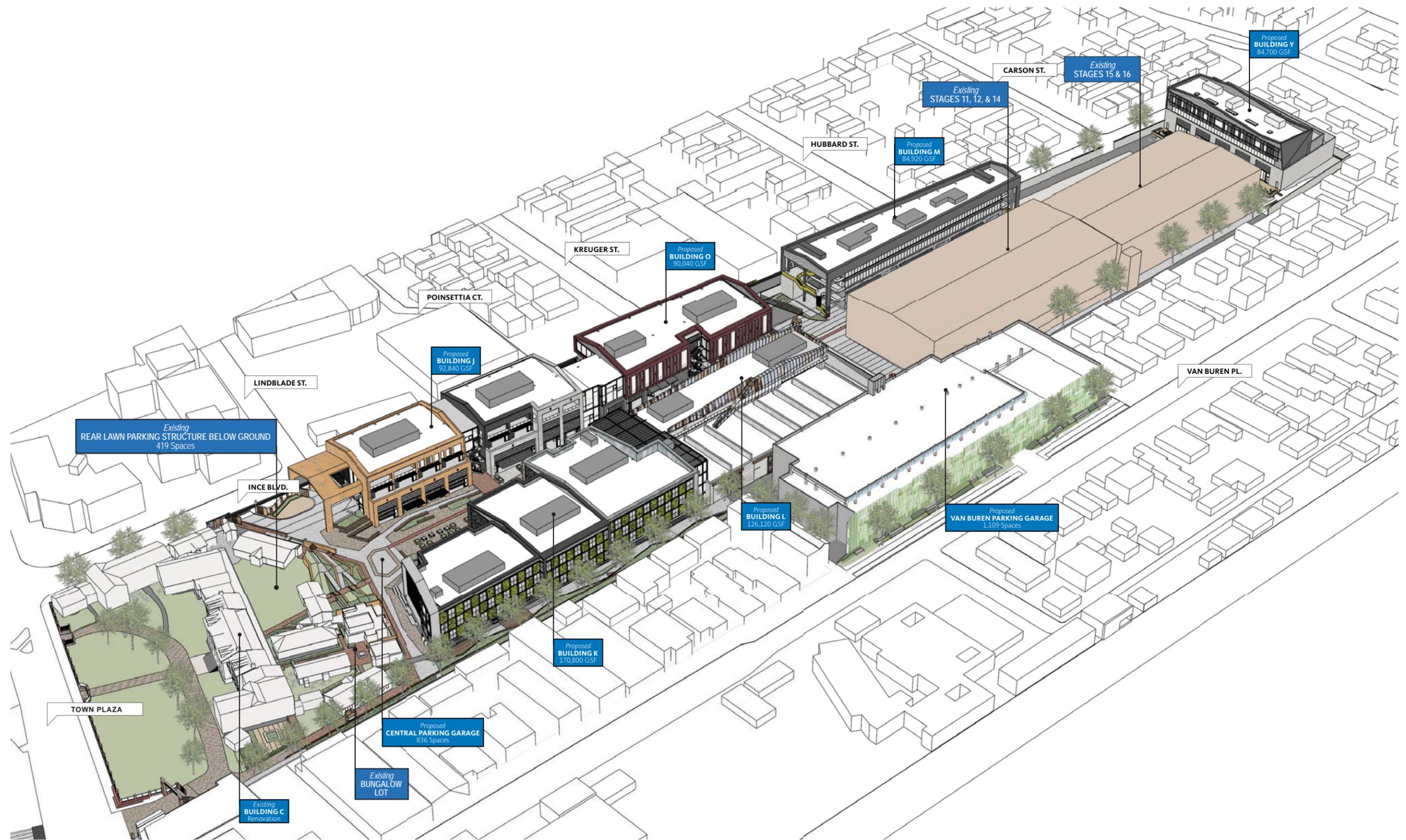


Note: Individual building square footages indicated are approximate and may shift as designs are refined, but will not exceed the total shown here and indicated in Table 2-2 of the Project Description.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan  
**Figure 2-4**  
 Site Plan Concept

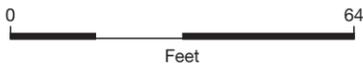




Note: Individual building square footages indicated are approximate and may shift as designs are refined, but will not exceed the total shown here and indicated in Table 2-2 of the Project Description.

SOURCE: Gensler, 2017

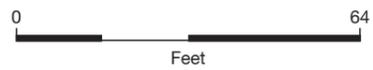
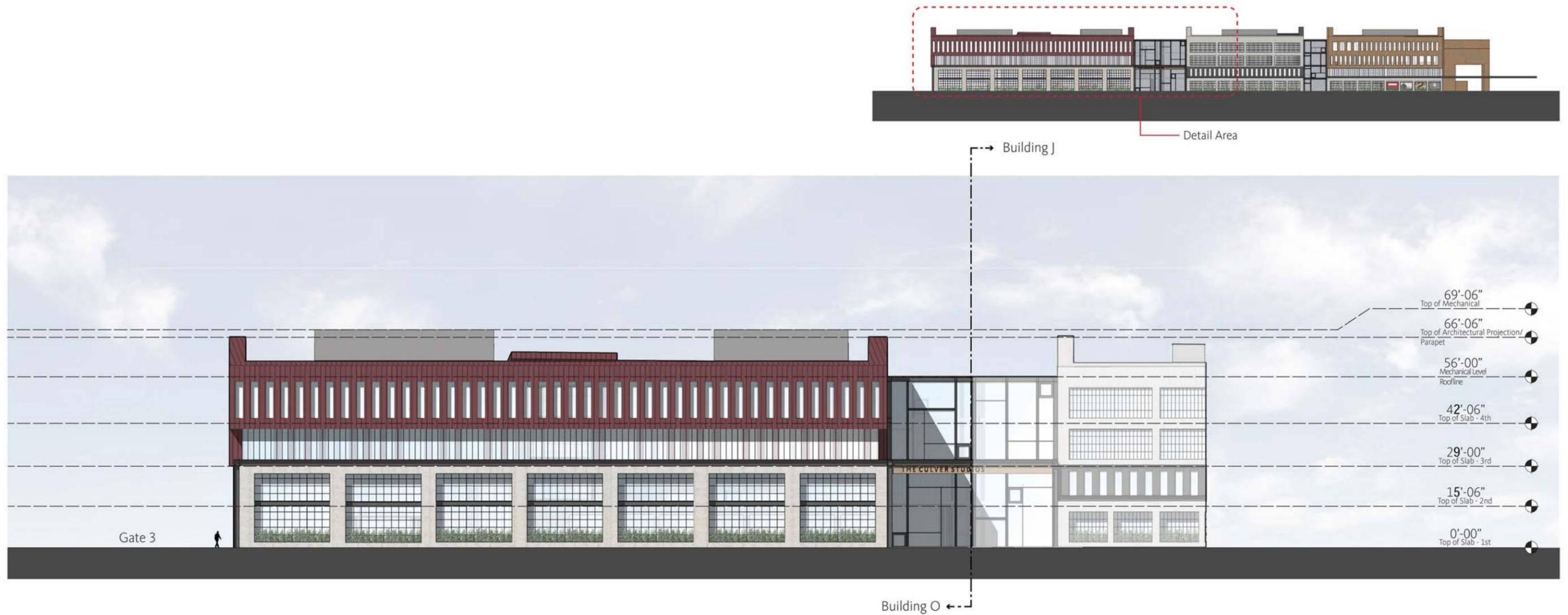
The Culver Studios Innovation Plan  
**Figure 2-5**  
 Concept Plan - Oblique View



SOURCE: Gensler, 2017

The Culver Studios Innovation Plan  
**Figure 2-6**  
 Proposed Ince Boulevard Elevation: Building J

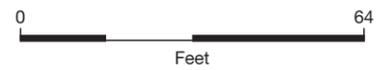
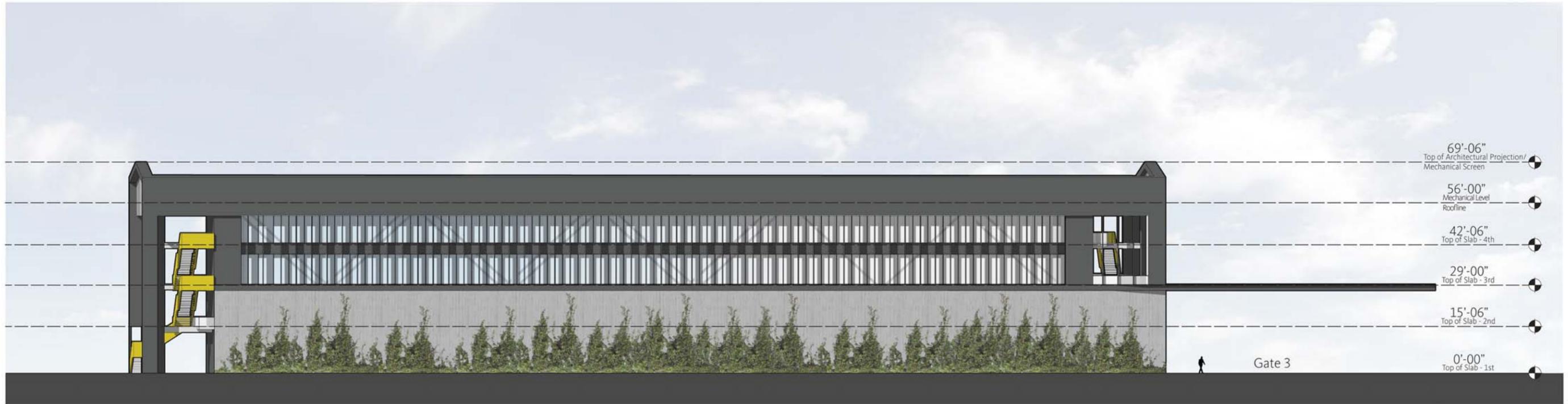




SOURCE: Gensler, 2017



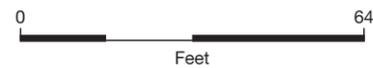
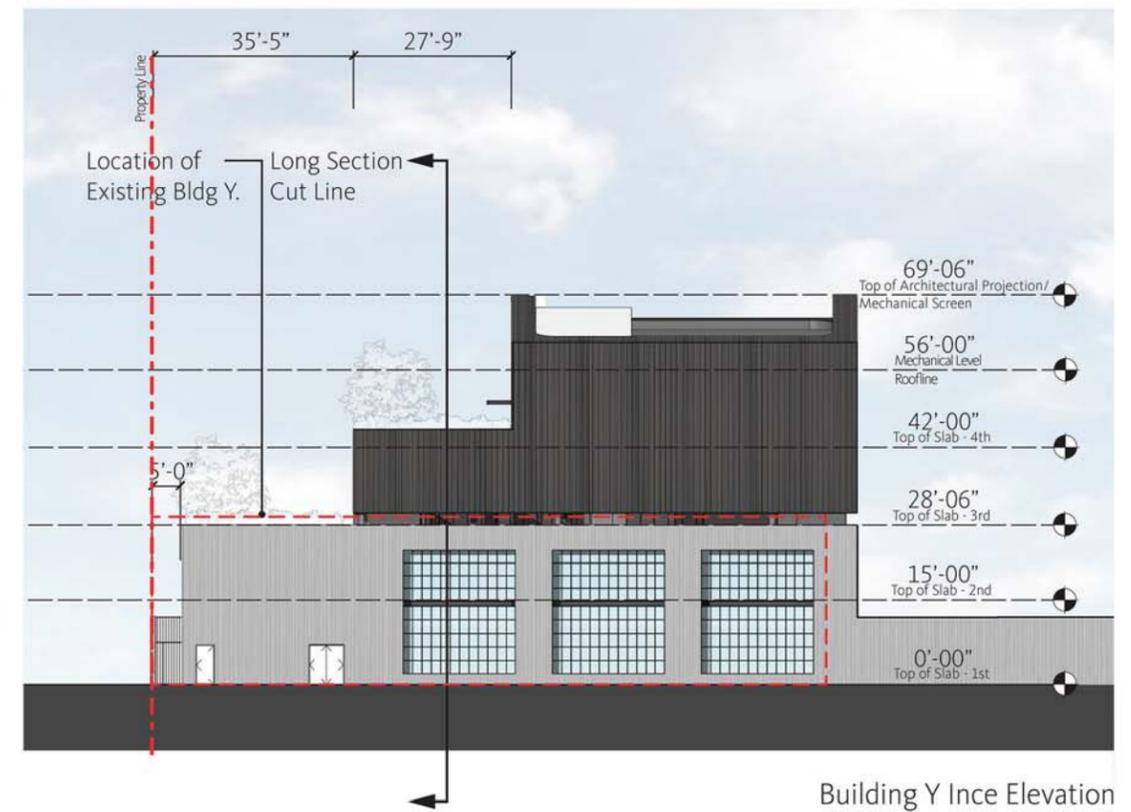
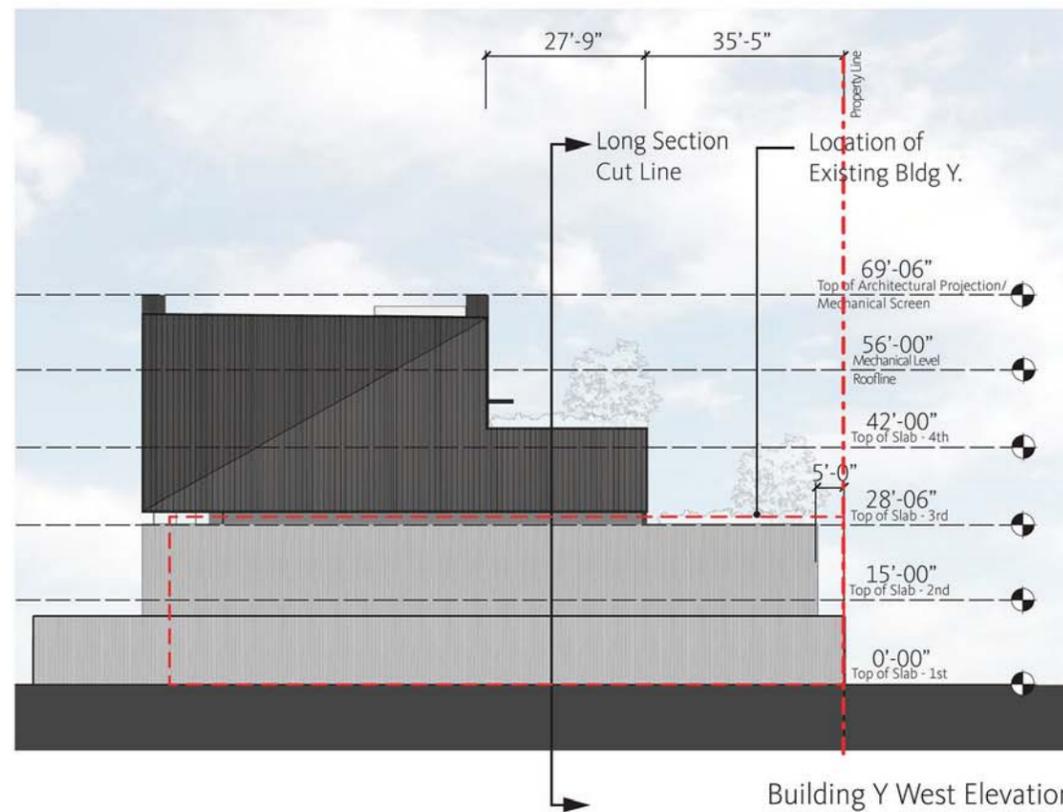
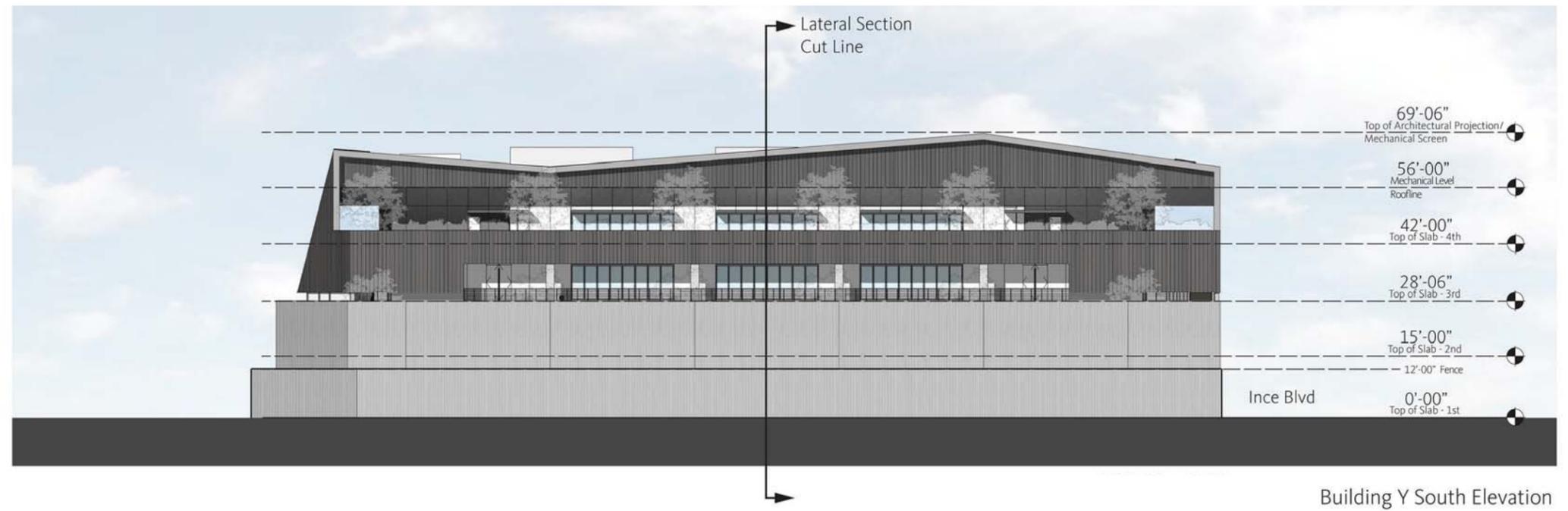
The Culver Studios Innovation Plan  
**Figure 2-7**  
 Proposed Ince Boulevard Elevation: Building O



SOURCE: Gensler, 2017



The Culver Studios Innovation Plan  
**Figure 2-8**  
 Proposed Ince Boulevard Elevation: Building M



SOURCE: Gensler, 2017

The Culver Studios Innovation Plan  
**Figure 2-9**  
 Proposed Elevations: Building Y



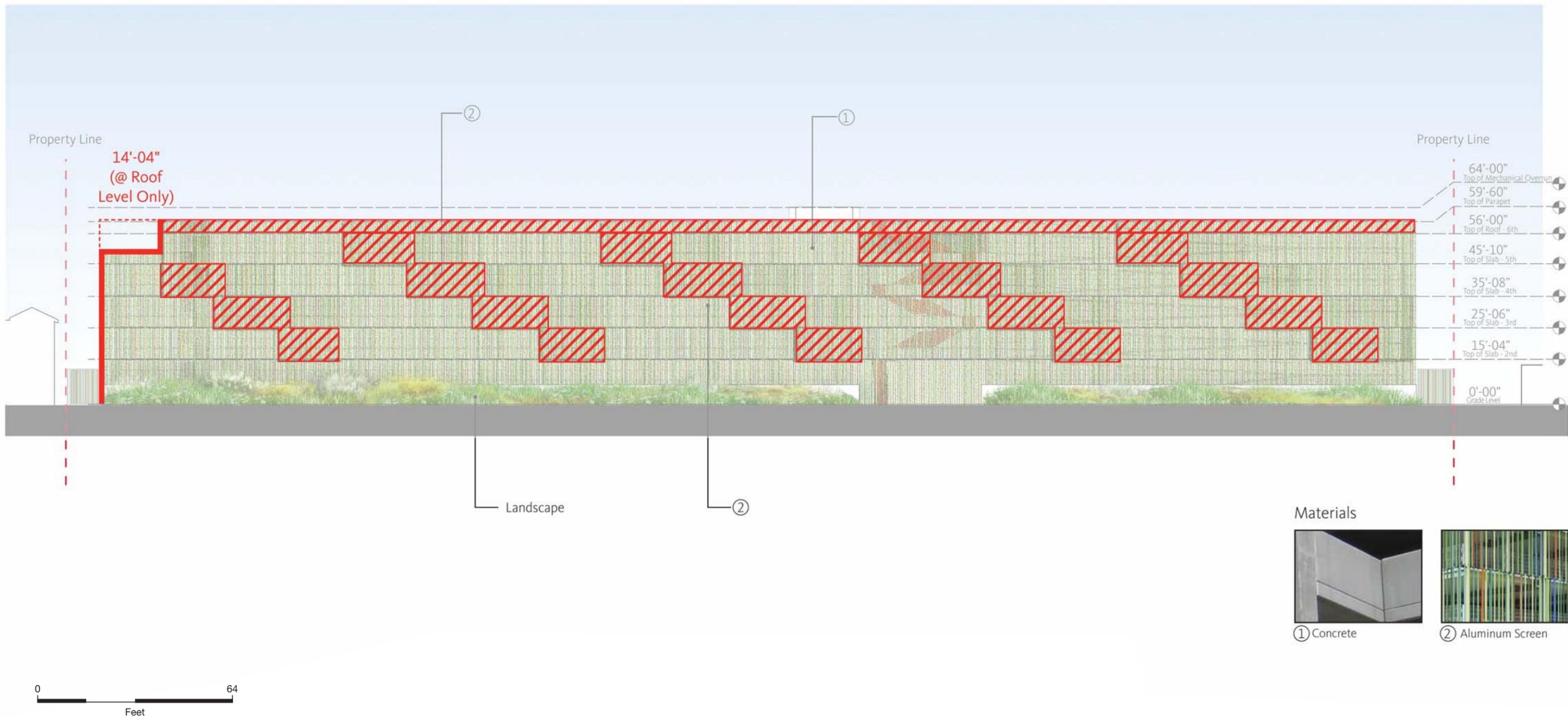


SOURCE: Gensler, 2016

The Culver Studios Innovation Plan

**Figure 2-10**  
Proposed Ince Boulevard View of Building Y

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SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 2-11**

Proposed Elevation: Van Buren Parking Structure



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SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 2-12**

Rendering: Van Buren Parking Structure



SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 2-13**

Rendering: Mansion and Front Lawn



SOURCE: Gensler, 2017

The Culver Studios Innovation Plan  
**Figure 2-14**  
Rendering: Building J and Gate 2

## 2.5.1 Project Characteristics

### 2.5.1.1 Mansion and Front Lawn

As previously stated, the Mansion (Building C) and Front Lawn represent the most visible public face of the Studio Campus. No major exterior changes are proposed to the Mansion or adjacent Buildings D, E, H, and I under the Innovation Plan. Minor exterior changes being proposed include the addition of two wheelchair lifts (reversible) on the rear (south) elevations of the Mansion and Building D, and regrading of pathways to meet accessibility requirements for the DeMille Theater and Buildings E, H, and I. As further described in Section 4.3.1, Cultural Resources – Historical Resources, of this EIR, interior rehabilitation of the Mansion would be undertaken in a manner that would protect the building’s eligibility as a historical resource under the City’s Historic Preservation Ordinance. The interior rehabilitation would support compliance with the Secretary of the Interior’s Standards for Rehabilitation by retaining key historic features and spaces, while allowing for alterations to accommodate future uses and bring the building up to current standards.

To support needed upgrades, accommodate construction of the proposed and independently entitled Culver/Main Tunnel connection to the Rear Lawn Parking Structure, and the proposed realignment and improvements to Gate 1, the Front Lawn area would undergo minor changes and upgrades, including the removal, replacement, and revised alignment of the existing sycamore trees, where needed, that would reflect the period of historic significance from the early years of the Studio Campus.

The formal clipped hedges lining the brick walkway bisecting the Front Lawn and enclosing the rose garden, as well as the clipped hedge along the perimeter fence, are overgrown and senescent and no longer reflect their original design intent. The hedges would be replaced using the same species, albeit using smaller specimens, and in the same design, to adhere to the original landscape design intent and scale. A new ornamental hedge garden would also be created on the eastern edge of the Front Lawn to recall the original landscaping in that location c. 1919, prior to the construction of Building D; a new fruit tree is proposed in this location as well. The five existing sycamore trees from the period of significance have been identified as approaching the end of their anticipated life span, and therefore as part of the Project, they would be replaced with mature specimens of the same species. The alignment of the replacement trees would be more uniform along the southern edge of the lawn to maximize flexibility and use of the Front Lawn area, however, the character defining colonnade of trees in front of Mansion would be maintained. Finally, the existing broad semi-circular asphalt driveway in front of the Mansion would be slightly realigned to create a more formal symmetrical curve and would be resurfaced with decomposed granite.

The upgrades to the Front Lawn area, including enhancements to Gate 1, would provide an opportunity to activate and celebrate the Studio, the City, and community participation by opening up the lawn area to public access with connectivity to Parcel B and Town Plaza, which would provide an expanded publicly accessible area for various periodic events and celebrations. Security for The Culver Studios property during such events would be handled on a case by case basis, with temporary measures such as signage, additional security guards, and temporary

barriers to prevent the general public from entering the areas of the Studio Campus beyond the Front Lawn area.

### **2.5.1.2 Relocated Bungalow Area**

The four existing bungalow Buildings S, T, U, and V, previously located along the western edge of the Studio Campus, were recently relocated to the area immediately south of the Mansion as approved under CPA No. 6. As further described in Section 4.3.1, Cultural Resources – Historical Resources, of this EIR their relocation, orientation and configuration in this area retains the historic grouping of the Bungalows within the Studio Campus in keeping with their original setting. The Bungalows are now in the process of being rehabilitated for continued use as offices. The rehabilitation work is being undertaken by a team of qualified consultants and contractors in conformance with the Secretary of the Interior’s Standards for Rehabilitation to reduce and mitigate adverse impacts pursuant to CEQA and the requirements set forth in the Mitigated Negative Declaration approved for CPA No. 6. Although the Bungalows relocation is nearing completion, it is being evaluated in this EIR to ensure that the combined environmental effects of CPA No. 6 and CPA No. 7 are fully considered.

### **2.5.1.3 Central Area**

#### ***Digital Media Space***

The Culver Studios underwent dramatic physical and other transformations to accommodate the industrywide transition from silent films to talkies throughout the 1920s, and again to accommodate the shift from feature-length films to television shows in the 1950s. More recently, the Studio has seen a sharp rise in demand for flexible facilities and services that accommodate small independent productions as well as major motion pictures, green screen/motion capture, music videos, video games, virtual reality, still photography, podcasts, and many other nontraditional production activities that are continually introduced, also paralleled by the exponential development and advancement in technology and delivery of related products. Whereas in the past, offices, sound stages and support facilities could be physically distinct and separated from one another, present production needs and workflows require a very different, highly adaptable, flexible, and controllable creative environment that combines these various elements for tenants and, moreover, allows for adaptive reuse of a given space on a daily, weekly, lease-duration, or other short-term basis. Digital media space supports a wide range of entertainment-related activities associated with rapidly evolving technologies used in the creation of content for distribution through on-line and traditional channels, typically focused on digital capture of images and sound. These uses have a higher proportion of office occupancy to stage set areas, arising from the integration of pre-production and post-production activities within the production leased premises through extensive computerization of all phases of content capture in digital film/TV, virtual reality, augmented reality and other emerging technologies.

The Culver Studios Innovation Plan proposes to modernize and expand the existing Central Area, encompassing the portion of the Studio Campus south of the Mansion and Relocated Bungalow Area just south of the Mansion. Proposed improvements include the construction of six new Digital Media buildings which would house a flexible mix of creative space, production space, and digital media stages, and would replace six existing buildings housing offices and support

services (Buildings L, O, X, Y, Z, and the Commissary) and four existing buildings housing sound stages, which would be demolished. Buildings to be demolished would total approximately 236,293 square feet and new construction at Project buildout would total approximately 649,420 square feet, for a net new square footage total of approximately 413,127 square feet Campus-wide.

New construction would be located throughout the existing Central Area, along the eastern, western, and southern sides of the Studio Campus. New buildings would be a maximum of 56 feet in height, consistent with the height limitation of the Culver Studios Comprehensive Plan as well as the Studio Zoning district in the City's Zoning Code.<sup>8</sup> Building exteriors would be constructed and finished in an architectural style distinguished from but compatible with the existing historically significant buildings and improvements on the Studio Campus. Building massing and design would reflect the evolving requirements of digital media and creative industries, with integrated sustainable approaches and technology and a greater utilization of Southern California's climatic attributes. Interior building spaces would lend themselves to a variety of flexible configurations to allow a broad range of uses and activities, as discussed further under Subsection 2.5.2, Project Operations.

The reconfiguration of the Studio Campus would be complemented by the creation of new common open space for use by employees and visitors, as described in more detail in this chapter in Subsection 2.5.4.1, Open Space and Landscaping; and improved Studio Campus access and internal circulation and below-grade, at-grade, and above-grade structured parking, as described in more detail in this chapter in Subsection 2.5.3, Access, Circulation, and Parking.

### **Stages**

Existing Stages 11/12/14 and Stages 15/16, all of which are housed in a single interconnected building in the southwestern portion of the Studio Campus, would remain in place for continued use. The buildings housing Stages 2/3/4, Stages 5/6, Stages 7/8/9, and Stage 10 would be demolished. With the exception of Stage 3, these represent the smallest stages on the Studio Campus; freestanding Stage 10 in particular is remote and cannot be combined with other stages to expand its size and utility. Eight new digital media stages would be provided within the Central Area of the Studio Campus, colocated with media office and support uses. These digital media stages represent the evolution of technology and delivery required by new media industries.

### **Support**

A variety of production support services are currently provided throughout the Studio Campus, with the largest concentration of such services housed in existing Building Y, at the southernmost edge of the Studio Campus closest to Lucerne Avenue. Support facilities traditionally include but are not limited to machine shops, carpentry shops and planning mills, paint shops, electrical/grips/props, cameras, film processing and cutting rooms, dressing rooms, wardrobe, hair and makeup, the commissary, first aid, storage, and the provision of a range of other services. The existing single-story Building Y and Building Z would be demolished and support facilities

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<sup>8</sup> Exceptions to height limits include parapets (which may extend up to 5 feet above the top of the roof), and mechanical screening, and other architectural features which may extend up to 13 feet, 6 inches above the top of the roof.

would be decentralized and integrated into the proposed Digital Media buildings in response to tenant demand for improved security and the convenience of self-contained, single-user, customizable facilities in close proximity to a production set and other activities. A new Building Y would be constructed in a footprint similar to that of demolished Building Y and would house production offices and facilities for digital media content.

### **Central Plant and Infrastructure**

The entire Studio Campus's heating, ventilation, and air conditioning and other energy needs are presently supplied from a single central plant (Building N) located west of Stage 5 along the western property boundary. The central plant is proposed for replacement with decentralized controls for individual buildings to accommodate separate tenants. Alternative means of energy production would be utilized to the greatest extent feasible to supplement traditional energy sources. Proposed efficiency and sustainability standards applied to new construction would also reduce demands on energy and natural resources required for heating, ventilation, and air conditioning.

The Studio Campus is crossed by a below-grade municipal wastewater line which extends from Washington Boulevard to serve residences along Van Buren Place, running just inside the western property boundary. This wastewater line would require relocation within the Project Site to allow construction of below grade parking, with a new primary point of connection to the sewer main line in Ince Boulevard as further described in Section 4.12.1, Utilities and Service Systems-Wastewater, of this EIR.

## 2.5.2 Project Operations

### 2.5.2.1 Typical Operations

The heart of the Innovation Plan is the accommodation of current and future digital media and entertainment industry needs for production and related activities. For this reason, the physical configuration of the Innovation Plan is intended to support a flexible mix of traditional film and television production as well as digital media production and support activities such as those described in Subsection 2.5.1.3, Central Area – Digital Media Space. Creative and digital media office activities would also be accommodated in the new facilities. Hours of operation and periods of peak activity would be substantially similar to those currently existing on the Studio Campus, which vary in large part from a traditional office campus with large A.M. and P.M. peaks. The net new square footage associated with the Project could generate up to approximately 524 new employees.<sup>9</sup>

### 2.5.2.2 Special Events and Outdoor Programming

The Front Lawn and, to a lesser extent, the Rear Lawn have been used for a variety of special events including filming, screenings and concerts, weddings, picnics, and “pop-up” events, educational events, and community events. Following implementation of the Innovation Plan, the Front Lawn and Rear Lawn would continue to support these and similar uses and events, in a more sustainable and sensitive manner as part of the restoration and upgrade process. In addition, Gate 1, which is currently utilized as a limited access point, would be transformed into a

<sup>9</sup> 413,127 square feet (9.48 acres) of studio lots X 35.1 employees per acre (per the Low to Medium Rise major Office Use factor of 55.28 for Los Angeles County in The Natelson Company, Table B-1, Employment Densities [employees per acre] by Anderson Code) = 524 employees. Available at <https://www.mwcog.org/uploads/committee-documents/YV5WXFhW20110503134223.pdf>.

pedestrian and bicyclist access point to better engage Town Plaza, Parcel B, and the greater downtown area.

The Central Area would be used for a range of activities and special events, including but not limited to shoots, production support film screenings, concerts, outdoor teaming space, housing of amenities, and passive recreational uses.

Other on-site areas that could be used for outdoor programming include balconies, courtyards, patios, walkways, and decks on proposed buildings. As with current operations on the Studio Campus, special events would be permitted as an allowed use for events associated with Studio Campus tenants, and/or permitted via the City's Temporary Event Permit process for events unrelated to tenants on the property.

### **2.5.2.3 Security**

As is typically the case with studio properties, strict security provisions are currently in place at the Studio Campus. The Studio Campus is fully secured and strictly monitored with: security fencing; guard gates at Project Site access points; 24-hour a day, seven day a week security personnel; on-site roving security patrols; controlled access (e.g., ID badges for employees and pre-authorized visitors which are scanned or swiped at the guard gates upon entry); closed-circuit television (CCTV) surveillance; and, security lighting. Additional security personnel are provided during special events (e.g., additional security supervisors, off duty police officers, and specially trained guards). Furthermore: tenants are not issued stage keys - stages can only be opened or locked by Studio guards or Studio personnel; on-site parking is monitored by the security personnel; and tenants with on-site parking privileges are issued parking identification tags which must be hung from each car's rear-view mirror. Gate 2 is the main gate and security command post for the Studio Campus, with Gates 1 and 3 typically operating Monday through Friday. These security measures would continue to be implemented under the Project. The Culver Studios would also inform the Culver City Police Department in advance of pending on-site special events.

## **2.5.3 Access, Circulation, and Parking**

### **2.5.3.1 Vehicular Access and Circulation**

The Innovation Plan includes a comprehensive reconfiguration and improvement of the arrival experience at the Studio Campus for vehicular access by passenger and production vehicles, delivery trucks, and waste collection. The objectives of the improved access and circulation design are to move vehicles as efficiently as possible onto the Studio Campus from the surrounding street network with a minimum of queuing or delays; reduce production vehicle use of directly adjacent streets; ensure buildings can be serviced from below-grade loading facilities; minimize truck/passenger vehicle and truck/emergency vehicle and fire lane conflicts; and free up at-grade areas for use as attractive and usable outdoor open space.

As previously indicated, Gate 1 on Washington Boulevard, at the northwest corner of the Studio Campus, would remain and be transformed from a limited vehicle access point to an emergency vehicle, pedestrian and bicyclist access point that would better engage Town Plaza, adjacent

development, and greater downtown Culver City, while also allowing periodic and more convenient public access to the Front Lawn. No vehicles, other than emergency vehicles, would be permitted at Gate 1. This area would also be subject to construction of the Culver/Main Tunnel. This subterranean driveway from Culver Boulevard, developed as part of the entrance proposed by the Parcel B development, would provide access to the Rear Lawn Parking Structure. This driveway/entrance is the southern leg of the intersection of Culver Boulevard & Main Street. Access to the Studio Campus would be provided via a below-grade ramp connecting to the City's proposed below-grade Parcel B parking structure off-site to the north.

Gate 2 on Ince Boulevard would continue to be a staffed gate and the primary arrival and entry point for visitors, VIPs, and executives. It would continue to accommodate controlled ingress and egress to/from Ince Boulevard using the existing, but modified, curb cut. Improved with increased capacity and efficiency measures, drive aisles, turn-arounds, security gates, and vehicle queuing on the Studio Campus would be reoriented to direct motorists immediately to a ramp to the south to enter the proposed below-grade Central Parking Structure beneath Buildings J, O, L and K, or to continue below grade to the existing below-grade Rear Lawn Parking Structure or to the Van Buren Parking Structure on the west side of the Studio Campus.

A new Gate 2A and associated curb cut, to be located midway between existing Gates 2 and 3 on Ince Boulevard and aligned with Poinsettia Court, would serve as the primary employee entrance to the new Central Parking Structure beneath proposed Buildings J, O, L and K and to the below-grade and above-grade Van Buren Parking Structure on the west side of the Studio Campus. Gate 2A would be keycard entry-controlled and would allow ingress and egress at a four-way signed stop. Gate 2A would also be improved with increased capacity and efficiency measures, drive aisles, turn-arounds, security gates, and vehicle queuing.

Existing Gate 3 would allow controlled employee ingress and egress for the Van Buren Parking Structure and become the primary service, loading, and delivery entrance for production vehicles and other trucks, and emergency vehicles. Trucks would be able to access below-grade service and loading bays with maneuvering areas beneath each building within the first below-grade (B1) level of the Central Parking Structure, and in the first below-grade (B1) level of the Van Buren Parking Structure, both of which would incorporate both high bay and standard levels for this purpose. Trash and recycling services, currently in operation at grade on the Studio Campus would utilize a below-grade service and access strategy, reducing potential impacts to neighbors and community. Trash trucks (skips or full-sized trucks) would enter Gate 3 and proceed to decentralized trash collection areas on level B1 beneath each building. Gate 3 may also be used for employee ingress/egress for the Central Parking Structure during morning and evening commuter peak hours, which represent off-peak periods for truck deliveries.

Existing Gate 4 would be realigned and would provide for improved emergency access and maneuverability for emergency vehicles as well as limited egress for production vehicles unable to maneuver and exit via Gate 3.

Emergency access would be primarily provided via Gates 2, 3, and 4; an emergency exit onto Van Buren Place currently exists and would be reoriented following construction of the Van

Buren Parking Structure; and, Gate 1 would also continue to provide emergency access. As under existing conditions, no passenger vehicles, production vehicles, or other trucks would be permitted to use the Van Buren emergency exit for ingress or egress.

### **2.5.3.2 Pedestrian Access and Circulation**

The Studio Campus promotes and creates a pedestrian-friendly environment, and provides direct access to the cultural and business offerings of downtown Culver City and clear linkages to regional and local transportation systems. The Studio Campus location is highly integrated into downtown Culver City and would continue to provide strong walkability connections to City sidewalks and streets.

The streets surrounding the Studio Campus, including Culver Boulevard, Ince Boulevard, Van Buren Place, Lucerne Avenue all have sidewalk facilities on both sides of the road. These sidewalks are ADA accessible and major intersections have crosswalk striping with pedestrian countdown signals at major intersections. Pedestrians can take Ince to Lucerne and then Duquesne Avenue to reach the Ballona Creek Bicycle Path that is shared use for both bicyclists and pedestrians. The Studio has a Walk Score® of 93, which indicates a “walker’s paradise” and that daily errands do not require a car (Source: walkscore.com). This is much higher than the overall City average score of 72.

The walkability connection to downtown under the Project would be particularly enhanced through the proposed Gate 1 improvements. Improvements to other gate access points, including more efficient movement of vehicles onto the Studio Campus, would also improve pedestrian circulation, access and safety. On the Project Site, an assortment of walkways, pathways, and promenades would provide a high level of connectivity and accessibility across the Studio Campus.

### **2.5.3.3 Bicycle Access and Circulation**

There are several bicycle facilities in the Project vicinity. The Ballona Creek Bicycle Path provides an off-street shared use path that travels near the southern end of the Project Site, with an exit onto Duquesne Avenue, which is the connection nearest to the Studio Campus. Another off-street bicycle path (Class I) is located along National Boulevard between La Cienega Boulevard and Washington Boulevard. There is also a Class II, on-street bicycle lane along Venice Boulevard that connects to Venice Beach and Arlington Heights, but does not provide access to the Project Site. Van Buren Place and Lucerne Avenue, two of the streets that border the Studio Campus, are striped as Class III corridors. These are known as “bicycle-friendly” streets and may contain painted sharrows markings on the road, which encourage bicycles and automobiles to safely share the right-of-way. Wesley Street, which connects to Lucerne Avenue, is also a Class III route.

Bicycle parking is dispersed across the property, providing 100 bicycle parking spaces in total . Bicycle parking is generally located near primary building entries and provides for an even distribution of bicycle parking across the lot. Facilities are provided for both on-site use of bicycles and for those that utilize bicycles as a mode of transportation to and from the Studio.

As is typical with a functioning studio, bicycle culture is integral to the internal movements of people and goods. The Innovation Plan would reinforce and build upon the existing bicycle culture on the Studio Campus, as well as improve connections to downtown through the improvements proposed to Gate 1. The Project would include maintenance of 100 bicycle spaces on the Project Site and provision of related amenities in compliance with the City's applicable ordinances and plans.

In addition to proposed Project improvements, Washington Boulevard has been identified as a corridor in need of bikeway improvements in the City's Bicycle Pedestrian Master Plan. Accordingly, a major bicycle and pedestrian facility, the Expo-to-Downtown Bicycle Connector has been proposed by the City. The Expo-to-Downtown Bicycle Connector route would pass directly by the Studio Campus and would provide a viable alternative to other modes of travel, particularly the automobile. The City is also intending to implement a bike share system in the near future. While station locations are still being considered, there is currently a proposed bike share station at the Parcel B site, adjacent to the Studio Campus. A station at this location would allow employees and visitors easy access to an alternative mode from Culver Studios. Coupled with the Expo-to-Downtown Bicycle Connector, Culver Studios patrons are expected to have expanded options for mobility locally and to other destinations throughout Los Angeles.

#### **2.5.3.4 Vehicle Parking**

Two new parking structures are proposed as part of the Innovation Plan, the below-grade Central Parking Structure, and the Van Buren Parking Structure as proposed and approved under CPA No. 6. Both expand the existing capacity.

The proposed below-grade Central Parking Structure would be located south of the Mansion and existing Rear Lawn Parking Structure, within the existing Central Area of the Studio Campus and would include a lower (B2) level for passenger vehicles as well as a high-bay upper (B1) level for production vehicles, service trucks, and visitor and employee parking. Loading bays/cores would be provided beneath each building, with numerous truck maneuvering areas between those bays to allow passing, turnaround, and egress. This parking structure would contain 836 spaces and would accommodate Studio employee, VIP, and visitor parking in addition to production staging and service zones.

The Van Buren Parking Structure would be constructed on the western edge of the Studio Campus on the site of an existing above-grade parking structure, existing surface parking, and the former Bungalow Area. The Van Buren Parking Structure would include two below-grade, one at-grade, and five above-grade levels and would provide 1,109 striped spaces. The parking structure is intended to accommodate existing and future Studio tenant employees and visitors, live studio audiences, and fleet vehicles. The ground floor of the garage would be dedicated to production vehicles, with this stall count excluded from the stated total. The parking structure would be constructed with a solid concrete wall free of gaps or penetrations surrounding the at-grade level, to reduce off-site noise, air quality, and lighting impacts from operations. An articulated screen would run the length of its Van Buren Place façade and provide visual interest, screening from potential light and noise sources, and a trellis to support a vertical garden.

A total of 2,370 spaces and at-grade parking spaces would be provided Campus-wide, including the two new proposed parking structures, the existing below-grade Rear Lawn Parking Structure with new connectivity to Culver Boulevard, and Building Y.

### **2.5.3.5 Public Transit**

One Metro rail line and a number of regional and local bus lines currently serve the Project Site. The Metro Expo Line runs east/west between Santa Monica and downtown Los Angeles with Culver City being one of the station stops; the Project Site is served by the nearby Culver City Station, approximately 0.35 miles east of the Studio Campus. Regional bus lines include Metro lines providing service to downtown Los Angeles and Santa Monica, Palms, and Beverly Hills, and Malibu and the West Los Angeles Transit Center. Culver City local bus lines 1, 5, and 7 serve the Project Site and provide service throughout Culver City and adjacent communities. Two Los Angeles Department of Transportation (LADOT) Express Commuter lines provide weekday service between Culver City, Marina del Rey, Rancho Park, and Palms. Finally, four Santa Monica Big Blue Bus lines provide service within Culver City and to surrounding communities, Santa Monica College, Santa Monica Airport, Westwood, UCLA, and downtown Los Angeles.

## **2.5.4 Open Space and Landscaping, Lighting, and Signage**

### **2.5.4.1 Open Space and Landscaping**

Landscaping and hardscape are designed to provide connectivity between uses on the Studio Campus and lend coherence to the different parts of the Studio Campus, including historic and new construction, different Studio departments and tenants, and between the Studio Campus and its interface with the City and the surrounding neighborhoods.

A new Central Courtyard, approximately 1.5 acres in size, would be programmed with both active and passive uses and serve as a centralized spine of circulation and activity within the Studio Campus. Uses within the Central Courtyard would include outdoor seating and dining, active recreational activities, gathering and performance spaces, outdoor meeting/collaboration areas, and passive recreational for contemplation or rest.

As previously discussed, the Front Lawn would undergo minor changes and upgrades in association with construction of the Culver/Main Tunnel and realignment of Gate 1, and as otherwise needed, that would reflect the period of historic significance from the early years of the Studio Campus.

The Rear Lawn and Relocated Bungalow Area south of the Mansion would continue to be used as at present for special events, filming, and community events, as well as housing offices.

Following implementation of the Project, along Van Buren Place, a linear open space, at a minimum of 15-feet in depth would provide a landscape amenity to the community, complete with seating, pedestrian level lighting, stormwater treatment, and an array of climate appropriate planting material.

### 2.5.4.2 Lighting and Signage

Generally, and similar to existing conditions, lighting for the Studio Campus is intended to minimize light trespass from buildings and the site and impacts on adjacent residential properties; provide comfort, safety, and nighttime visibility through controlled illumination and glare reduction; and reduce sky-glow to increase night sky access.

There would be entry signage for The Culver Studios at Gates 1, 2, 2A, and 3; wayfinding signage for employees and visitors; corporate signage for tenants; and public signage identifying access to Project parking facilities. The gate entries would be redesigned and visually enhanced, and would include new signage that would be compatible with the historic characteristics of the Studio Campus. No digital or off-site signage is proposed. The proposed signage would be processed separately through a Master Signage Program.

### 2.5.5 Sustainability

The Culver Studios considers environmental sustainability an important component of Studio Campus development and the Innovation Plan would incorporate a number of related features and practices. Individual sustainable strategies would be considered during the design process for each of the components of the Project, including achieving the intent of the criteria required for Leadership in Energy and Environmental Design (LEED) certification. Energy efficiency, water conservation, and the reduction of greenhouse gas emissions would be considered in the design, construction, and operation of proposed new facilities.

Energy conservation would be implemented through a variety of strategies, including proactive design solutions to prevent heat gain within buildings, as well as through site design. On-site solar generation would be studied as an additional contributing factor for reducing energy demands on the public utility provider. Water-conserving fixtures would be installed throughout and infrastructure for future gray water would be provided. Landscaping would be responsibly watered through drip irrigation or similar practices.

An extensive amount of construction and demolition debris would be recycled to reduce effects on regional landfill capacity. For operational recycling, dedicated facilities would be established for stage set and production waste, as well as waste generated by other on-site users. All Project components would, at a minimum, meet Culver City's mandatory Green Building requirements. The Studio Campus would provide enhanced pedestrian and bicycle connections to downtown Culver City and the nearby Metro Culver City Station, which would provide multimodal transportation options as compared to using single-commuter vehicles to access area services. This could significantly reduce traffic volumes and associated greenhouse gas emissions generated. Moreover, additional community contributions would be considered.

### 2.5.6 Construction Schedule and Phasing

The Project would entail a multi-phased, approximate 32-month construction period. Anticipated construction phases include the following:

1. Abatement of hazardous materials;

2. Demolition of existing above- grade parking structure, Buildings J, L, N, O, P, W, Y & Z, The Commissary, and Stages 2 through 10;
3. Clearing, excavation and grading of construction sites;
4. Utility upgrades and replacement;
5. Relocation of buildings S, T & U, V;
6. Construction of Buildings J, K, L, M, O & Y; and
7. Construction of the Culver/Main Tunnel connection from Parcel B and Town Plaza to the Rear Lawn Parking Structure.

Construction of the Culver/Main Tunnel is anticipated to start in the first quarter of 2018 following anticipated Project approval, with the balance of construction estimated to commence in the fourth quarter of 2018, in anticipation of an approximate mid-2020 Project completion date. A Construction Management Plan would be prepared which defines the scope and scheduling of planned construction activities as well as the Applicant's proposed construction site management responsibilities, to ensure minimal impacts to neighboring land uses or interruption of pedestrian, vehicle, and alternative transportation modes and public transit. The Construction Management Plan, as further detailed below under 2.6, Project Design Features, would facilitate coordination with other projects that may be under construction in downtown Culver City during the same period.

Construction hours would normally occur in accordance with Culver City Municipal Code (CCMC) requirements, which prohibit construction 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 Saturday, and 7:00 P.M. and 10:00 A.M. on Sunday. Special construction activities such as concrete pours, oversized equipment delivery, or mobile crane placement may require after-hours construction, and special permission would be sought in these cases.

Construction worker parking would be accommodated on the Studio Campus and in off-site locations to be determined, potentially with shuttles to and from the Studio Campus. The staging of construction equipment and materials would be accommodated within the Studio Campus perimeter. A construction fence or pedestrian barricade/canopy would be installed along Ince Boulevard between Gate 2 and the southernmost property boundary. Temporary lane closures along Ince Boulevard and Van Buren Place may be necessary for new utility connections, street work, and in special limited circumstances, for offloading and mobile crane placement; however, two-way travel along these streets would be maintained at all times. A temporary lane closure would occur along Ince Boulevard in association with a sewer main line upgrade along an approximate 700-foot portion of the roadway. A comprehensive Construction Management Plan would be prepared for consideration and approval by the City prior to the commencement of any construction activity.

## 2.6 Project Design Features

The Culver Studios proposes to implement a number of Project Design Features that serve to reduce or avoid potential impacts of the Project. The Project Design Features will be included in the Mitigation Monitoring and Reporting Program required in association with certification of the EIR. The Project Design Features are summarized in **Table 2-3, *Summary of Project Design Features***, and are discussed in detail in the technical sections indicated in the table. The Project Design Features are taken into account in the analyses of potential Project impacts.

## 2.7 Anticipated Project Approvals

Discretionary entitlements, reviews, and approvals required or requested for The Culver Studios Innovation Plan may include, but would not necessarily be limited to, the following:

- Comprehensive Plan Amendment No. 7: City approval of the amendment to existing Comprehensive Plan, superseding all previous amendments
- Certificate of Appropriateness under the City's Historic Preservation Ordinance
- Conveyance Agreement for discharge of public sewer waste through Studio conveyance system
- EIR Certification: City certification of the EIR
- Development Agreement: To protect the Applicant's right to implement CPA No. 7 over the term of the agreement and to secure for the City and the public economic benefits of the Project
- Other approvals as needed and as may be required.

**TABLE 2-3  
SUMMARY OF PROJECT DESIGN FEATURES**

Draft EIR Section and Environmental Topic	Project Design Feature #	Project Design Feature Summary
4.1 Aesthetics	PDF-AES-1	<b>Construction Fencing.</b> Requires installation of a temporary construction fence with screening around the Project Site.
	PDF-AES-2	<b>Construction Staging.</b> Requires all staging and storage of construction equipment and materials on-site. Requires written permission from adjacent property owners if adjacent properties are used.
	PDF-AES-3	<b>Litter and Graffiti.</b> Requires daily maintenance to ensure property is free of trash and litter and removal of all graffiti on the Property within 48 hours of its application.
	PDF-AES-4	<b>Lighting – Residential Adjacency Guideline.</b> Limits all luminaires to a maximum initial illuminance value no greater than 0.10 horizontal footcandles 10 feet beyond the property boundary. Establishes a limitation of no more than 2 percent of the total initial designed fixture lumens to be emitted at an angle of 90 degrees or higher from nadir (straight down).
	PDF-AES-5	<b>Lighting – Pedestrian Level Guideline.</b> Requires that the illumination guidelines for areas adjacent to residential uses applies to the pedestrian zone. Encourages lighting strategies for increasing comfort and safety and creating a more pedestrian-friendly zone.
	PDF-AES-6	<b>Lighting – Van Buren Parking Garage Interior.</b> Requires the use of shielded linear small aperture luminaires with opaque sides oriented perpendicular to the building façade as well as occupancy sensors to minimize views of light sources, reduce glare and light spill and reduce unnecessary lighting.
4.2 Air Quality	PDF-AIR-1	<b>Construction Features.</b> Requires that bid documents contain construction limitations, including but not limited to: off-road diesel equipment shall meet USEPA Tier 4 off-road emission standards; welders shall meet USEPA Tier 4 off-road emission standard or be electric-powered; equipment shall be outfitted with Best Available Control Technology (BACT) devices including a California Air Resources Board (CARB)-certified Level 3 Diesel Particulate Filter or equivalent; low-VOC coatings during construction activities shall be used; engines shall be turned off in loading and unloading queues.
	PDF-AIR-2	<b>Design Elements.</b> Specifies the incorporation of mandatory energy and emission saving features in accordance with CALGreen Building Standards.

Draft EIR Section and Environmental Topic	Project Design Feature #	Project Design Feature Summary
	PDF-AIR-3	<b>Voluntary Design Elements.</b> Requires incorporation of optional energy and emission saving features including: pursuit of LEED® Certification; provision of 100 bicycle parking spaces; and installation of infrastructure for future gray water uses.
4.4 Geology and Soils	PDF-GEO-1	<b>Groundwater Dewatering.</b> Requires the installation of dewatering systems in the lowest levels of the Central and Van Buren Parking Structures and along the underground vehicular connection between the existing on-site subterranean parking structure and Culver Boulevard if determined necessary.
4.5 Greenhouse Gas Emissions	See PDF-AIR-1, AIR-2 and AIR-3	
4.6 Hazards and Hazardous Materials	PDF-HAZ-1	<b>Vector/Pest Control Plan.</b> Requires review, approval, and implementation of a vector/pest control abatement plan.
	PDF-HAZ-2	<b>Groundwater Filtration System.</b> Requires installation of carbon filter tank treatment systems in the permanent dewatering systems (PDF GEO-1) to treat groundwater collected prior to discharge.
	Also see PDF-TRAF-1 and WW-1	
4.7 Hydrology and Water Quality	PDF-H/WQ-1	<b>Structural BMPs.</b> Requires the development of Environmental Passive Integrated Chamber (EPIC) stormwater treatment areas. Sizes and locations are shown on Figure 4.7-1 Preliminary LID Plan.
	PDF-H/WQ-2	<b>Non-Structural BMPs.</b> Requires implementation and maintenance of BMPs, including seeding of open hardscape areas; pruning of trees and shrubs; protection of trash and recycling containers to avoid stormwater from entering; and provision of education and training for staff.
4.9 Noise	PDF-NOISE-1	<b>Project Construction Schedule.</b> Requires that prior to issuance of a building permit notice of Project construction schedule be provided to all abutting property owners and occupants.
	PDF-NOISE-2	<b>Foundation Piles.</b> Requires that foundation piles be drilled and cast.
	PDF-NOISE-3	<b>Parking Structure Floors.</b> Requires that parking structure levels be finished with no-skid surface.
	PDF-NOISE-4	<b>Van Buren Parking Structure – Noise Barrier.</b> Requires installation of concrete wall along level 1 of the Van Buren parking structure that extends from the ground up to the underside of the level 2 slab.

Draft EIR Section and Environmental Topic	Project Design Feature #	Project Design Feature Summary
	PDF-NOISE-5	<b>Van Buren Parking Structure – Noise Barrier.</b> Requires that the pre-cast concrete panels along the north and south side of the parking structure weigh at least 4 lbs per square foot, form a continuous façade, and have no gaps.
	PDF-NOISE-6	<b>Parking Structure Noise Levels.</b> Requires that parking structure exhaust or ventilation systems, through the use of quiet fans and duct silencers or similar methods, comply with the Noise Element.
	PDF-NOISE-7	<b>Construction Rules Sign.</b> Requires posting a sign during construction providing contact names and telephone numbers of the Applicant, Property Owner, construction contractor(s), and the City. Requires the information be provided to adjacent property owners and occupants.
	PDF-NOISE-8	<b>Compliance with Noise Element.</b> Requires compliance with standards from Policy 2.A of the Noise Element.
	PDF-NOISE-9	<b>Outdoor Activities.</b> Limits outdoor activities on proposed balconies, courtyards, patios, walkways, and decks that are open to the nearby residences.
	Also see PDF-AES-2	
4.10.1 Fire Protection	PDF-FIRE-1	<b>Fire Proof/Resistant Construction.</b> Requires installation of class A fire resistant roofing, 2-hour fire rated shafts and storage/electrical service/trash rooms, 2-hour fire ratings of one building to another, 100 percent non-combustible treads/risers/stair construction within common stairways, and exterior non-combustible walls in new buildings within five feet of the property line and not fronting on a street.
	PDF-FIRE-2	<b>Fire and Smoke Detectors/Alarms/Sprinklers and Emergency Lighting.</b> Requires installation of fire/smoke detectors, fire alarms, automatic fire sprinkler systems connected to the lot's fire monitoring system, and emergency lighting and illuminated EXIT lights in all new, renovated, and relocated buildings.
	PDF-FIRE-3	<b>Submittal of Plans to CCFD for Review/Approval.</b> Requires submittal of plans, subject to Culver City Fire Department approval, showing locations of: buildings, fire pump house, on-site fire lane and turn arounds, new fire hydrants, and fire prevention/suppression equipment.
	Also see PDF-TRAF-1	

Draft EIR Section and Environmental Topic	Project Design Feature #	Project Design Feature Summary
4.10.2 Police Protection	PDF-POLICE-1	<b>Project Site Security and Access During Construction.</b> Requires enclosure of construction sites with security fencing, security lighting, and security personnel and that emergency access be maintained.
	PDF-POLICE-2	<b>Coordination with CCPD.</b> Requires regular coordination with the Culver City Police Department to provide notice of on-site development activities and special events.
	Also see PDF-TRAF-1	
4.11 Transportation and Parking	PDF-TRAF-1	<b>Construction Management Plan.</b> Requires development and implementation, subject to City approval, of a comprehensive plan addressing the overall construction scope and scheduling and the Applicant's responsibilities. Prior to approval of the plan the Applicant is required to conduct a Community Meeting and provide information on the following: construction schedule and hours; traffic diversion plan; staging and parking locations and plans; truck hauling routes; emergency access plan; demolition plan; contact information; community notification procedures; procedures for detours and protection of alternate transportation modes; and timing and duration of street or lane closures to reduce impacts on the surrounding community. Biweekly construction management meetings with City Staff and other representatives of surrounding developments if under construction at around the same time as the Project shall also be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another
	PDF-TRAF-2	<b>Traffic Signal Optimization.</b> Requires optimization of traffic signals (i.e., splits, offsets, and lead/lag phases) at Intersections 9 (Main St/Culver Blvd), 10 (Ince Blvd/Washington Blvd) and 11 (Canfield Ave/Washington Blvd/Culver Blvd).
	PDF-TRAF-3	<b>Bicycle Striping Along Ince Boulevard.</b> Requires implementation of bike sharrow striping along the Ince Boulevard property frontage and striped crosswalks across Studio gate driveways.
4.12.1 Wastewater	PDF-WW-1	<b>Dewatering.</b> Requires that water collected from permanent dewatering system be treated and used on-site for irrigation.

Draft EIR Section and Environmental Topic	Project Design Feature #	Project Design Feature Summary
4.12.2 Water	PDF-WATER-1	<b>Water Conservation.</b> Requires the installation of low water-demand and drought tolerant landscaping and water conservation measures for irrigation.
	PDF-WATER-2	<b>Water Lines.</b> Coordinate with GSWC regarding rerouting and/or reconnection of the water service line to the City's water main prior to construction of the parking structure.
	PDF-WATER-3	<b>Water Service.</b> Requires coordinate with GSWC regarding on-site water distribution system prior to construction of proposed buildings.
	PDF-WATER-4	<b>Fire Flow.</b> Requires coordination with CCFD to determine fire flow and time period requirements for proposed buildings. Requires the installation of fire service lines and hydrants as required.
4.12.3 Solid Waste	PDF-SW-1	<b>Solid Waste Diversion.</b> Requires at least a 65 percent solid waste diversion rate until year 2020 and at least a 75 percent solid waste diversion rate thereafter, through source reduction, recycling, composting and other methods. Requires the provision of separate recycling bins for organic waste and coordination for organic waste recycling services.
	PDF-SW-2	<b>Solid Waste Refuse Bins and Enclosed Refuse Areas.</b> Requires the provision of solid waste, recyclable, and green waste/organics refuse bins located within an enclosed area and that waste handling be in accordance with the EPO's exclusive franchise for services.
	PDF SW-3	<b>Green Building and Sustainability.</b> Requires that buildings meet the standards for LEED certification.
	PDF-SW-4	<b>Demolition Debris Recycling Plan for Construction.</b> Requires that efforts be made to reuse and recycle construction and demolition debris, to use environmentally friendly materials, and to provide energy efficient buildings, equipment and systems. Requires a Demolition Debris Recycling Plan indicating destination for demolition debris.
	PDF-SW-5	<b>Trash/Recycling Management Plan for Operations.</b> Requires preparation of a Trash/Recycling Management Plan for City review and approval that includes, but is not limited to: waste projections by type; calculations of the bin sizes for each type of waste; location(s) and type(s) of trash enclosures/trash rooms; and mechanism for demonstrating at least 50 percent diversion until 2020 and at least 75 percent thereafter is being met over time.

SOURCE: ESA, 2017

# CHAPTER 3

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## Environmental Setting

### 3.1 Overview of Environmental Setting

State CEQA Guidelines Section 15125 requires that an EIR include a description of the existing environment. This chapter provides a general overview of the environmental setting for the Project, however, detailed information on existing conditions for each environmental resource area evaluated in this EIR is provided in Chapter 4, Environmental Impact Analysis. This chapter also provides an overview of related projects that are considered in evaluating cumulative impacts that could result from the Project together with other projects that could cause related impacts.

#### 3.1.1 On-Site Conditions

The Project Site is an approximately 14-acre, fully developed, relatively flat, wedge-shaped parcel at 9336 W. Washington Boulevard in downtown Culver City. The Project Site is generally bounded by the vacated portion of Washington Boulevard to the north, Ince Boulevard to the east, Van Buren Place to the west, and Lucerne Avenue to the south. It accommodates The Culver Studios (the Studios), a fully operational movie and television studio for the production of feature-length films, television shows, short-term shoots, commercials, green screen/motion capture, video games, and music videos.

Primary regional access to the Project Site is provided by the Santa Monica Freeway (I-10) and National Venice and Jefferson Boulevards. Local access is provided by Culver, Washington and Ince Boulevards. Site access is provided by five Studio gates. Gate 1 (staffed) on Washington Boulevard provides controlled ingress and egress at two locations via a semi-circular driveway that allows pick-up/drop-off at the Mansion as well as access to the southern Studio Campus. Gate 2 on Ince Boulevard is the primary entrance to the Studio Campus and provides secure employee and visitor access. Production vehicles and employees use Gates 2 and 3 for ingress and Gate 3 for egress. Gate 4, the southernmost gate on Ince Boulevard, is used for emergency egress. The Van Buren Emergency Gate is used only for emergency access.

The Studio Campus houses the headquarters of the Studio, as well as 14 sound stages and support facilities that are leased for use on a short-term basis by a range of tenants, and above-, at-, and below-grade structured vehicle and bicycle parking. The Studio Campus is generally divided into three distinct subareas: the Mansion Area, which contains the public face of the studio; the central Production and Support Area (the Central Area), which occupies the majority of the Campus and contains the sound stages, offices, and support services/facilities; and the western-central portion of the Studio Campus (Western Area), which contains the Van Buren Parking Structure and

surface parking Existing facilities total approximately 347,599 gross square feet and range up to 64 feet in height.

The Studio Campus operates 24 hours per day, with the majority of current operations, including office operations, shooting, editorial, writing, and screenings, as well as transportation returning from local location shoots, typically occurring between 6:00 A.M. and 10:00 P.M. Although daily operations can vary considerably depending on scheduled activities, typically production company employees arrive, stages are opened, and crews prepare for shoots on the stages beginning at 4:00 A.M.; the Studio Campus gates open at 6:00 A.M.; office employees arrive between 8:00 A.M. and 10:00 A.M.; and visitors arrive beginning at 8:00 A.M. and continue throughout the day. Office employees typically leave at 5:00 P.M.; production companies conclude activities and stages are locked at 11:00 P.M.

Outdoor activities including but not limited to shoots, concerts, and outdoor dining, as well as special events, also take place on the Studio Campus on the Front Lawn and in the central courtyard (the Central Courtyard). All outdoor events currently end by 10:00 P.M.

The General Plan Land Use designation for the Project Site is Studio, and per the Culver City Zoning Code, The Project Site is zoned “S Zoning District” (Studio). New development within Studio Districts must to be governed by a Comprehensive Plan to be prepared or, if already in effect, modified in compliance with Section 17.250.015 of the Zoning Code. The Culver Studios is currently operating under Comprehensive Plan Amendment (CPA) No. 6.

### 3.1.2 Surrounding Uses

Adjacent and surrounding land uses include, to the north, commercial retail uses, the Culver Hotel, and surface parking (Parcel B),<sup>1</sup> fronting on vacated Washington Boulevard and Culver Boulevard. To the east, across Ince Boulevard, are entertainment-related light industrial and studio facilities, including some affiliated with The Culver Studios, and single- and low-density multi-family residential uses. To the west, single- and low-density multi-family residential uses on Van Buren Place abut the Studio Campus, with Linwood E. Howe Elementary School located across Van Buren Place. To the south, multi-family residential uses abut the Studio Campus and primarily front on Lucerne Avenue.

## 3.2 Related Projects

CEQA requires that EIRs analyze cumulative impacts. As defined in State CEQA Guidelines Section 15355, a cumulative impact would result from the combination of the project evaluated in the EIR together with other projects that would cause related impacts. State CEQA Guidelines Section 15130(a) states that an EIR must discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065 (a)(3). Where a lead agency is examining a project with an incremental effect that is not “cumulatively considerable,” a lead agency need not consider that effect significant, but must briefly describe its

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<sup>1</sup> The downtown Parcel B and Town Plaza Expansion is a mixed-use project that includes 74,600 square feet of office, 21,700 square feet of retail, and 21,700 square feet of restaurant uses with subterranean parking.

basis for concluding that the incremental effect is not cumulatively considerable. When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if a project is required to implement or fund its fair share of a mitigation measures designed to alleviate the cumulative impact. A lead agency must identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.

In addition, State CEQA Guidelines Section 15130(b) states that the analysis of cumulative impacts shall reflect the severity of the impacts and the likelihood of occurrence, but the discussion need not provide as great of detail as provided for the effects attributable to the project alone. Instead, the discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of the other projects which do not contribute to the cumulative impact.

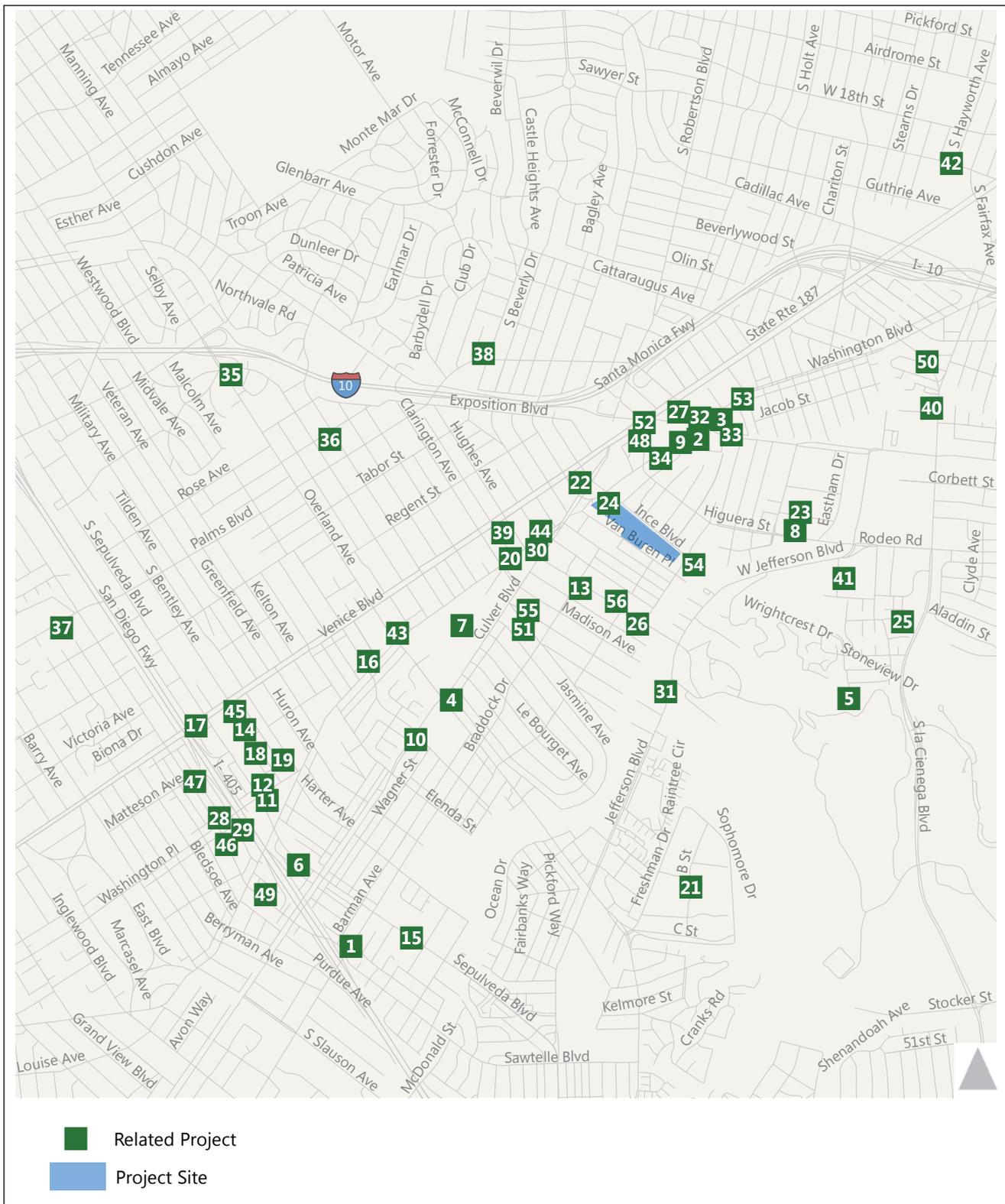
A project has “cumulatively considerable” or significant cumulative impacts, when its incremental effects “are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

For an adequate discussion of significant cumulative impacts, the State CEQA Guidelines (Section 15130(b)(1)(A) and (B)) allow an EIR to determine cumulative impacts and reasonably foreseeable growth based on either of the following methods:

Cumulative impacts are anticipated impacts of the proposed project along with reasonably foreseeable growth. Reasonably foreseeable growth may be based on either:

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

For the Project's cumulative impacts analysis, a list of related projects is used as the primary basis for evaluation. The list is based on information obtained from the Culver City Engineering Division and Planning Division, City of Los Angeles Department of Transportation (LADOT), and recent traffic studies for other projects in the area. The list of 56 related projects is provided in **Table 3-1, Related Projects List**, with their locations identified in **Figure 3-1, Related Projects Map**. Although the projects listed in Table 3-1 serve as the primary basis for evaluation of cumulative impacts, the related projects or methodology used to address cumulative impacts may vary among certain environmental issues and topics due to their unique characteristics. The cumulative analyses for each environmental issue, including the identification of relevant related projects are provided in their applicable sections in Chapter 4, Environmental Impact Analysis, of this Draft EIR.



SOURCE: Fehr & Peer, April 17, 2017

The Culver Studios Innovation Plan

**Figure 3-1**  
Related Projects Map

**TABLE 3-1  
RELATED PROJECTS LIST**

<b>No.</b>	<b>Location</b>	<b>Use</b>	<b>Size</b>	
1	11275 Braddock Dr	Residential Unit	1.00	du
2	8810 Washington Blvd	Restaurant and Retail	41.20	ksf
		Office	38.70	ksf
3	8870 Washington Blvd	Condominium	115.00	du
		Cafe	1.20	ksf
		Supermarket	16.00	ksf
		Convenience Store	11.50	ksf
		Retail	2.50	ksf
4	10638 Culver Blvd	Gas Station	2.70	ksf
5	5950 Stoneview Dr	Park	4.00	acres
		Multi-Purpose Room	4.00	ksf
6	4215 Sepulveda Blvd	Vehicle Maintenance/Repair Service Use	2.07	ksf
7	10202 Washington Blvd	Office	212.52	ksf
8	8509 Higuera St	Phase I	50.00	stu
		Phase II & III	100.00	stu
9	8817 Washington Blvd	Light Rail Station – Phase II	N/A	N/A
10	10808 Culver Blvd	Museum	12.60	ksf
11	11198 Washington Pl	Retail	3.85	ksf
		Outdoor Dining/Seating	0.50	ksf
12	11197 Washington Pl	Convenience Store	2.50	ksf
13	4109 Duquesne Ave	Apartment	2.00	du
14	3837 Bentley Ave	Residential Unit	2.00	du
15	4545 Sepulveda Blvd	Retail	28.53	ksf
16	10799 Washington Blvd	Restaurant	2.00	ksf
17	11224 Venice Blvd	Convenience Store	2.29	ksf
		Automated Car Wash Facility	0.86	ksf
18	3873 Bentley Ave	Condominium	2.00	du
19	3961 Tilden Ave	Condominium	2.00	du
20	10000 Washington Blvd	Retail	12.111	ksf
21	9000 Overland Ave	Community College	92.00	ksf
22	9355 Culver Blvd	Office	2.94	ksf
		Apartment	4.00	du
23	8511 Warner Dr	Retail	51.50	ksf
24	9300 Culver Blvd	Office	74.60	ksf
		Restaurant	21.70	ksf
		Retail	21.70	ksf
25	3814 Lenawee Ave	Single Family Home	8.00	du
		Assisted Living	110.00	beds

No.	Location	Use	Size	
26	4241 Duquesne Ave	Condominium	2.00	du
27	8824 National Blvd	Office	200.00	ksf
		Apartment	200.00	du
		Retail	85.50	ksf
		Hotel	148.00	rm
28	11281 Washington Place	Residential Unit	14.00	du
		Retail	4.90	ksf
29	4044 Globe Ave	Residential Unit	10.00	du
30	9814 Washington Blvd	Performance Theatre	200.00	seat
		Bakery/Cafe	7.50	ksf
31	9919 Jefferson Blvd	Research and Development Office	62.56	ksf
32	8777 Washington Blvd	Office	128.00	ksf
		Restaurant	4.50	ksf
33	3434 Wesley St	Residential Unit	15.00	du
		Office/Gallery	14.20	ksf
34	8888 Washington Blvd	Restaurant	5.97	ksf
		Office	56.56	ksf
35	10612 W National Blvd <sup>a</sup>	Coffee Shop	2.00	ksf
36	3417 S Motor Ave <sup>a</sup>	Apartments	85.00	du
		Retail	2.00	ksf
37	11350 Palms Blvd <sup>a</sup>	School	75.00	Students
38	9815 W National Blvd <sup>a</sup>	Gas Station	6.00	Fueling Positions
39	3822 S Dunn Dr <sup>a</sup>	Apartments	86.00	du
40	3221 S La Cienega <sup>a</sup>	Office	200.00	ksf
		Retail	100.00	ksf
		Apartment	1218.00	du
41	3640 S Holdrege Ave <sup>a</sup>	Office	25.00	ksf
42	5930 W Sawyer St <sup>a</sup>	Residential Unit	60.00	du
43	10601 Washington Blvd	Apartments	120.00	du
		Office	23.00	ksf
		Retail	18.00	ksf
44	9735 Washington Blvd	Office	55.48	ksf
		Retail	12.25	ksf
		High-Turnover Restaurant	2.15	ksf
		Quality Restaurant	2.00	ksf
45	3832 Bentley Ave	Condominium	3.00	du
46	4034 Sawtelle Blvd	Condominium	3.00	du
47	3906 Sawtelle Blvd	Residential Unit	1.00	du
48	3727 Robertson Blvd	Office	6.00	ksf
49	4234 Sawtelle Blvd	Condominium	2.00	du
50	3030 La Cienega Blvd	Retail	1.25	ksf

No.	Location	Use	Size	
51	4051 Jackson Ave	Condominium	3.00	du
52	3710 & 3750 S Robertson Blvd	Residential Unit	141.00	du
		Office	64.20	ksf
		Retail	30.04	ksf
53	8700-8750 Washington Blvd	Residential Unit	199.00	du
		Office	17.25	ksf
		Restaurant	5.00	ksf
		Retail	17.75	ksf
54	4227 Ince Blvd	Apartment	5.00	du
55	4034 La Salle Ave	Condominium	3.00	du
56	4810 Duquesne Ave	Condominium	3.00	du

<sup>a</sup> Project information and trip generation estimates provided by LADOT.  
Source: Fehr & Peers, LADOT, April 2017.

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# CHAPTER 4

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## Environmental Impacts Analysis

### Introduction

The focus of Chapter 4 is on the potential impacts that could occur as a result of the Project. The sections included are those that have the potential to result in significant adverse impacts to the physical environment. The following sections are included in this chapter:

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Cultural Resources: Historical Resources; Archaeological and Tribal Cultural Resources; Paleontological Resources (Section 4.3)
- Geology and Soils (Section 4.4)
- Greenhouse Gas Emissions (Section 4.5)
- Hazards and Hazardous Materials (Section 4.6)
- Hydrology and Water Quality (Section 4.7)
- Land Use and Planning (Section 4.8)
- Noise and Vibration (Section 4.9)
- Public Services: Fire Protection and Police Protection (Section 4.10)
- Transportation and Traffic (Section 4.11)
- Utilities and Service Systems: Water Supply; Wastewater; Solid Waste (Section 4.12)

Based on the Initial Study, which is contained in Appendix A of this EIR, and public comments received on the NOP, comments from the Community Meeting and Scoping Meeting, and review of existing information it was determined that several issue areas would not be affected by the Project. Generally, these issue areas include Agricultural and Forestry Resources, Biological Resources, Mineral Resources, Population and Housing, and Recreation. Please see Chapter 6, subsection 6.6, *Effects Found Not to be Significant*, of this Draft EIR for a discussion of those issue areas for which a detailed analysis is not included and the basis for those determinations.

## Environmental Impact

Each section in this chapter addresses a specific environmental issue area as listed above and includes the following components:

- **Existing Setting:** This subsection describes the physical characteristics and existing environmental conditions within and in the vicinity of the Project area.
- **Regulatory Setting:** This subsection presents information on the laws, regulations, plans, and policies that relate to the issue area being discussed. Regulations originating from federal, state, and local levels are discussed as appropriate.
- **Methodology:** This subsection provides a description of the methodology used for the analysis of the environmental issue addressed in the section.
- **Thresholds of Significance:** This subsection presents the criteria established by the lead agency to identify at what level an impact would be considered significant and require implementation of mitigation measures.
- **Project Design Features:** This subsection presents any relevant Project Design Features (PDFs) applicable to the environmental issue addressed in the section. PDFs are specific design elements or Project commitments that have been voluntarily incorporated into the Project that serve to minimize or avoid significant environmental effects. Because PDFs have been incorporated into the Project, they are accounted for in determining the significance of Project, and do not constitute mitigation measures, as defined by Section 15126.4 of the State CEQA Guidelines. However, the PDFs will be included in the Mitigation Monitoring and Reporting Program (MMRP) for the EIR to ensure their implementation is tracked and confirmed as the Project is carried out.
- **Analysis of Project Impacts:** This subsection provides an analysis of the nature and extent of potential Project impacts. These analyses address direct (or primary) effects of the Project as well as the indirect (or secondary) impacts. This subsection also provides any mitigation measures (beyond the PDFs) used to reduce or eliminate Project impacts that have been determined significant based on the established thresholds of significance.
- **Cumulative Impacts:** A discussion of the effects of the Project when combined with the effects of related projects, which include other past, present and future probable projects is provided. The approach to addressing cumulative impacts, including a list of related projects, is described in Chapter 3 of this EIR.
- **Mitigation Measures:** This subsection provides mitigation measures, if necessary, to reduce significant impacts identified in the analysis of the Project.
- **Level of Significance after Mitigation:** A discussion of the significance of each impact after mitigation is provided.

## Terminology Used in This EIR

In evaluating the impacts of the Project, the impact is determined by applying the evaluation criteria, or threshold of significance, presented for each resource area. The following terms are used to describe the effect:

- **Threshold of significance:** A threshold of significance is a criterion applied by the lead agency to identify significant adverse environmental impacts. A threshold is defined by a lead agency based on guidance found in CEQA or the *CEQA Guidelines*, scientific and factual data relative to the lead agency jurisdiction, views of the public in affected areas, the policy/regulatory environment of affected jurisdictions, and other factors.
- **Less than significant impact:** A less than significant impact does not result in a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (see CEQA Guidelines Section 15382). Impacts determined to be less than significant do not require mitigation measures.
- **Significant impact:** Public Resources Code Section 21068 defines a significant impact as “a substantial, or potentially substantial, adverse change in the environment.” The environmental checklist included as Appendix G of the CEQA Guidelines provides additional guidance for determining which impacts would be regarded as significant. This EIR applies the thresholds contained within Appendix G and identified in each section’s “Thresholds of Significance,” and uses the CEQA definition of “significant impact.” Feasible mitigation measures or alternatives to the Project must be identified and adopted if they would avoid or substantially reduce the significant impact.
- **Significant and unavoidable impact:** A significant and unavoidable impact is a substantial adverse effect on the environment that cannot be avoided or mitigated to a less than significant level. A project with significant and unavoidable impacts could still proceed, but the City would be required to prepare a statement of overriding considerations, pursuant to CEQA Guidelines Section 15093, explaining what factors the City considered in approving the project notwithstanding the potential for significant environmental impacts.

As indicated above, the proposed Project includes a number of PDFs which are features or commitments voluntarily committed to as part of the Project that serve to reduce or avoid environmental impacts. PDFs are accounted for in the EIR analyses prior to determining the significance of Project impacts on a given environmental issue area. Table 2-3, which is provided in Chapter 2, Project Description, of this Draft EIR provides a summary of the PDFs. The PDF in its entirety is provided within each section of the applicable environmental issue area.

Mitigation measures are measures identified to avoid or reduce a significant impact that has been identified through environmental analysis. Mitigation measures generally include provisions for:

- Avoiding the impact by not taking a certain action or parts of an action;
- Minimizing the impact by limiting the degree or magnitude of the action and its implementation;
- Rectifying the impact by repairing, rehabilitating or restoring the affected environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and
- Compensating for the effect by replacing or providing substitute resources or environments.

Both PDFs and mitigation measures will be adopted as part of the Mitigation Monitoring and Reporting Program so that their implementation can be tracked by the City to ensure compliance.

## 4.1 Aesthetics

### 4.1.1 Introduction

This section provides information relative to aesthetic effects that could result from the Project with regard to visual character, views, light and glare, and shading. Visual quality refers to the overall aesthetic character of an area or a field of view. Aesthetic features often consist of unique or prominent natural or man-made attributes or several small features that, when viewed together, create a whole that is visually interesting or appealing. The focus of the visual quality analysis is on the loss of aesthetic features or the introduction of contrasting features that could degrade the visual character of the Project area.

Senate Bill (SB) 743, enacted in 2013, changes the way in which environmental impacts related to transportation and aesthetics are addressed in an EIR. Specifically, Section 21099(d)(1) of the Public Resources Code (PRC) states that a project's aesthetic impacts shall not be considered a significant unavoidable impact on the environment if:

1. The project is a residential, mixed-use residential or employment center project, and
2. The project is located on an infill site within a transit priority area.

Because the Project is considered an employment center project<sup>1</sup> and on an infill site located within an urban transit priority area (less than 0.5 mile from a major transit station), it qualifies for exemption under SB 743. As such, the evaluation of the Project's aesthetic impacts in an EIR is not required pursuant to CEQA, and therefore, no findings of significance are provided in this section. Nonetheless, the Project is compared to the respective thresholds herein, for information disclosure purposes only.

The analysis of views focuses on the effects that the Project could have due to obstruction or partial obstruction of existing recognized and valued public views of scenic resources, including focal or panoramic views or historic structures. Potential impacts to historic structures on and near the Project Site are also evaluated in Section 4.3.1, Historic Resources, of this Draft EIR.

Artificial light impacts are typically associated with light that occurs during the evening and nighttime hours, and may include streetlights, illuminated signage, vehicle headlights, and other point sources. Residential uses are considered light sensitive because they are typically occupied by persons who have an expectation of privacy during evening hours and who are subject to disturbance by bright light sources. The analysis of lighting impacts focuses on whether the Project would cause or substantially increase the effects of light on light sensitive uses.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and to a lesser degree, from broad expanses of light-colored surfaces. Glare can also be produced during evening and

<sup>1</sup> Employment center project" means "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area." Although the Site is zoned Studio (S), uses permitted within the S Zoning District are similar to commercial uses.

nighttime hours by artificial light directed toward a light sensitive land use. The analysis of glare focuses on whether glare effects would interfere with glare sensitive activities.

Shading from buildings and structures has the potential to block sunlight. Although shading is common and expected in urban areas, and is considered a beneficial feature when it provides cover from excess sunlight and heat, it can have an adverse impact if it interferes with sun-related activities at sensitive uses.

## 4.1.2 Environmental Setting

### Visual Character

#### ***Project Site***

As shown on Figure 2-3, Existing Conditions in Chapter 2, Project Description, The Studio Campus includes a variety of office, stage, and support facilities related to production and distribution of feature-length films, television shows, short-term shoots, commercials, green screen/motion capture, video games, and music videos. Approximately 25 buildings are distributed throughout the Project Site. Office and support buildings on the Studio Campus range in height from single-story to approximately 56 feet, exclusive of rooftop mechanical and stairway housings and architectural projections,<sup>2</sup> while sound stages are up to approximately 64 feet in height, all with varying setbacks from the property boundaries, ranging from no setbacks to approximately 130 feet. Existing signage visible to the public is primarily limited to identification signs at Gate 2 off of Ince Boulevard and from Gate 1 along Washington Boulevard. Other than the Mansion and Front Lawn areas fronting Washington Boulevard, which are visually prominent to the community, the Project Site is otherwise enclosed by property walls and development within the Studio Campus is focused inward.

The Studio Campus is a narrow, wedge-shaped, relatively flat parcel and is generally divided into three distinct subareas: the Mansion Area, which contains the main public view of the Project Site; the central Production and Support Area (the Central Area), which occupies the majority of the Project Site and contains the sound stages, offices, and support services/facilities; and the peripheral Western Area, where the property extends to Van Buren Place and is primarily occupied by parking. The existing landscaping of the Studio Campus is primarily contained in the Mansion and Front Lawn area, as further described below. Otherwise there is minimal planting within the studio and stage areas. Along Van Buren Place, along the western property line, are plantings of ivy along the perimeter wall. Along Ince Boulevard, there are intermittent areas of narrow planting strips along the perimeter wall and the base of the buildings.

The Mansion Area, located at the northernmost portion of the Studio Campus, with a prominent view from Washington Boulevard and Culver Boulevard, contains the historically significant American Colonial Revival-style Mansion, set back from Washington Boulevard behind a deep

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<sup>2</sup> As stated in the Culver City Municipal Code (CCMC) Section 17.250.015.D, the maximum building height within the S Zoning District is 56 feet. However, per CCMC Section 17.300.025.C, exceptions to height limits include mechanical screening and other architectural features which may extend up to 13 feet, 6 inches above the top of the roof. Some of the sound stages exceed the 56-foot height limit because they were constructed prior to the time the building height limits were established.

fenced front lawn (the Front Lawn); associated administrative buildings designed in the same style and arrayed on either side of the lawn; and a sweeping internal driveway paved with asphalt. The Front Lawn is set behind a low brick and lattice fence and secured pedestrian gate along its Washington Boulevard frontage and is lined around its perimeter by low clipped hedges. Hedges also line a brick walkway bisecting the Front Lawn. The southern edge of the driveway is planted with a line of six mature sycamore trees; there are also two large Deodar cedar trees at the eastern end of the Mansion and several fruit trees scattered around the Front Lawn. Immediately south of the Mansion, a rear yard contains a smaller lawn, trees, and hardscape that comprise an internal courtyard for the use of Studio employees and visitors. This area sits atop a below-grade parking structure (the Rear Lawn Parking Structure) and is not visible from off-site. This area also contains four bungalows Buildings S, T, U, and V, previously located along the western edge of the Studio Campus, that were recently relocated to this area under the observation of a qualified architectural historian. Their relocation, orientation and configuration retains the historic grouping of the Bungalows within the Studio Campus in keeping with their original setting. The Bungalows are currently in the process of being rehabilitated for continued use as offices in conformance with the Standards to reduce and mitigate adverse impacts pursuant to CEQA and the requirements set forth in the Mitigated Negative Declaration approved for CPA No. 6.

The Central Area, which comprises most of the Studio Campus, contains 14 sound stages, production support facilities, offices, and a commissary, housed in 13 buildings (Buildings D, E, H, I, J, L, O, W, Y, Z, commissary, and breezeway/Building P), plus a central plant. The largest sound stages and central plant are arrayed along the west side of the Studio Campus, while offices, the smaller sound stages, and the commissary line the eastern side of the Studio Campus; support facilities are scattered throughout and include Building Y at the southernmost property boundary. The spine of the Studio Campus accommodates production vehicle circulation and parking and outdoor production support functions in an internal courtyard. Landscaping within the Central Area has minimal planting within the studio and stage areas. Landscaping is limited to linear planters adjacent to buildings and some trees (primarily Sweet Gum and Ficus) within the surface parking area and gate entries and along Stages 5 and 6.

The Western Area, forming the property boundary along Van Buren Place, contains a three-level above-grade parking structure, and until recently contained bungalow Buildings S, T, U, and V, which have been relocated to the area south of the Mansion.

### ***Project Vicinity***

#### **Culver Boulevard and Washington Boulevard**

Uses along Culver Boulevard are characterized by commercial and public uses, including the historic Culver Hotel, the Town Plaza, various restaurants and retail uses, and a surface parking lot (Parcel B). The view of the Mansion and Front Lawn are prominent along the abandoned portion of Washington Boulevard, where it currently terminates as a wide concrete sidewalk, and Culver Boulevard.

#### **Van Buren Place**

Van Buren Place is accessible to pedestrians only from the Town Plaza and commercial areas along Culver Boulevard, and primary vehicular access is from Washington Boulevard, Ince

Boulevard, Lafayette Place, and Duquesne Avenue. Van Buren Place is a one-way street between its northwesterly terminus and Farragut Drive to the southeast. Uses along Van Buren Place include a few retail shops and restaurants northwesterly towards Town Plaza which transition to low-rise, single- and multi-family residential uses. The Linwood E. Howe Elementary School is also located along the west side of Van Buren Place. Along Van Buren Place, adjacent to the western property line there is a five-foot sidewalk and mature cedar street trees within the 10-foot landscaped public right of way. The existing two-level Van Buren Parking Structure is located along Van Buren Place, with a variable set back between approximately 8 inches and 18 inches from the property line and separated by a concrete block wall partially covered by ivy. A wall along either side of the Van Buren Parking Structure separates adjacent residential uses to the west. The emergency access gate (Van Buren Gate) adjacent to the Van Buren Parking Structure also fronts Van Buren Place.

### **Lucerne Avenue**

Multi-family and single-family residential uses are located along Lucerne Avenue. The Project Site does not extend to this boundary, nor are the existing buildings directly visible from this street. A perimeter wall along the south property line separates The Culver Studios from these residential uses to the south.

### **Ince Boulevard**

Uses along Ince Boulevard are primarily studio and studio-related between Washington Boulevard and mid-block between Krueger Street and Hubbard Street, on the east side of the street. The Ince Boulevard streetscape includes an approximately 5-foot sidewalk and is planted with street trees (Brisbane Box) within the approximately 3-foot public right of way that partially screen the building façades and perimeter wall along Ince Boulevard from the adjacent residential areas to the east. On the west side of the street, The Culver Studios Buildings D, E, J, L, O; Stages 7, 8, 9, and 10; Building Y, and Gates 2 and 3 are the predominant uses, with building setbacks along Ince Boulevard ranging from zero feet to approximately 4 feet. Building Y abuts the property line with a narrow landscaped strip. Heading north on Ince Boulevard, a brick wall separates the parking area from the street. Stages 7, 8, and 9 abut the property line with a narrow landscaped strip of approximately 1 foot. Gate 3 includes brick fencing and hedges, a guard gate and has a view into the Site and trees in planters along Stage 6. Building O includes a landscaped setback between the building and the property line of approximately 3 feet. Between Buildings O and L, a brick wall separates the Commissary from Ince Boulevard. Building L abuts the property line with a narrow landscaped strip of approximately 8 inches. Building J abuts the property line. Past Building J is Gate 2, which includes an entry sign, a guard gate, and views of the interior of the Site. Building E is separated from the property line by a low concrete wall. The entrance to Building D fronts the street, otherwise the building is setback by an approximately 4-foot landscaped area planted with shrubs. Otherwise the buildings are oriented towards the center of the Site and away from the street.

### **Light and Glare**

The Project Site is located in an urbanized setting already characterized by relatively high ambient nighttime illumination levels, particularly along Washington Boulevard, Culver

Boulevard, and in downtown Culver City to the north and northwest. Ince Boulevard, which is developed with commercial uses east of the Project Site from Washington Boulevard to midblock between Krueger Street and Hubbard Street, is also characterized by moderate to high ambient nighttime light levels. Light sources in the Project vicinity include streetlights and stoplights, building security and architectural lighting, surface parking lot light standards, illuminated signage, and interior building lighting.

The Project Site supports 24-hour Studio operations, with the majority of operations typically occurring between 6:00 A.M. and 10:00 P.M., and light levels on the Project Site vary considerably depending on the intensity of activity. Typical light sources on the Project Site include exterior building security and architectural lighting, interior building lighting, light standards in the surface parking lot on Van Buren Place, lighting from the Van Buren Parking Structure, lighting from architectural highlighting, and incidental landscape lighting. Light levels may be periodically higher during active nighttime shoots and other operations.

The Project Site is directly abutted by low rise single- and multi-family residential development to the west, along Van Buren Place, and to the south, north of Lucerne Avenue. Low rise single- and multi-family development is also located east of the Project Site along Ince Boulevard, starting mid-block between Krueger Street and Hubbard Street continuing south to Lucerne Avenue. These residential uses represent sensitive land uses with respect to increased ambient nighttime light levels or sources of glare. Currently lighting within the Project Site from the Van Buren Parking Structure, exterior building lighting, and interior building lighting is visible from some residential uses along Van Buren Street, with the greatest light source emitting from the Van Buren Parking Structure. Along Ince Boulevard, lighting within the Project Site associated with the parking areas adjacent to Stage 16, exterior building lighting, and interior building lighting would be the primary light sources visible from residential uses to the east.

Daytime glare is generally associated with sunlight reflected from buildings with large continuous expanses of highly reflective materials. Activities that would be sensitive to daytime glare from reflected sunlight include motorists traveling on the adjacent roadways, people working in adjacent buildings, and schools. Sensitive receptors relative to glare include the existing residences located to the west, south, and east, the Linwood E. Howe Elementary School and playground, and motorists traveling on Washington Boulevard, Culver Boulevard, Van Buren Place, and Ince Boulevard. The existing buildings that are visible from the adjacent roadways and other sensitive uses do not generate substantial glare, as the majority of the building surfaces are painted in earth tones and do not include reflective materials. Therefore, under existing conditions, there are no notable sources of daytime glare on the Project Site.

Nighttime glare is associated with the degree of contrast occurring between the darkened environment and the light source. In the Project area sources of nighttime glare include street lights, parking lot lighting, and car headlights. The most notable source of nighttime glare from the Project Site is the Van Buren Parking Structure.

## Shading

The Project Site includes a variety of structures that vary in height from approximately 13 feet to 64 feet, excluding architectural projections and mechanical screening. Surrounding shade sensitive uses include one- and two-story residential uses along the western property boundary, southern property boundary, and to the east across Ince Boulevard. Shadows from existing buildings currently cause shading on off-site residential uses during certain times of the year. As shown in Appendix B, Shade/Shadow Models, the greatest shading effects on off-site residential uses is during the winter solstice when in the afternoon, shadows from Stages 7, 8, and 9 and Building Y shade portions of residential uses to the east. During the spring and fall equinox and summer solstice portions of some residential areas to the east would be shaded from Stages 7,8, and 9 and Building Y as well. A number of residential properties are also shaded by trees and other vegetation on the respective properties.

### 4.1.3 Regulatory Framework

This section provides a summary of pertinent regulations related to aesthetics at the federal, State, and local levels.

#### Federal

The U.S. Green Building Code provides maximum illumination guidelines for exterior areas to reduce exterior light pollution. Illuminate exterior areas only as required for safety and comfort and limit illumination in residential zones (LZ2: Low) to the following:

Design exterior lighting so that all site and building-mounted luminaires produce a maximum initial illuminance value no greater than 0.10 horizontal and vertical footcandles (1.0 horizontal and vertical lux) at the LEED project boundary and no greater than 0.01 horizontal footcandles (0.1 horizontal lux) 10 feet (3 meters) beyond the LEED project boundary. Document that no more than 2% of the total initial designed fixture lumens (sum total of all fixtures on site) are emitted at an angle of 90 degrees or higher from nadir (straight down).

#### State

##### ***Senate Bill No. 743***

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under CEQA for several categories of development projects including the development of infill projects in transit priority areas. The bill adds to the CEQA Statute, California Public Resources Code Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, Section 21099. Pursuant to Section 21099(d)(1) “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” The provisions of SB 743 apply to projects located on a “... lot within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses....and it is located within one-half mile of a major transit stop.” As discussed in the Introduction to this Section, the

Project meets the criteria set forth in SB 743 because it is (1) an employment center project, and (2) located within a transit priority area less than one-half mile from the Metro Culver City Station which serves the Expo Line within an established urban area. Under SB 743, the Project is exempt from findings of significance related to aesthetic effects, including view, visual quality, light and glare, and shade impacts that may exceed CEQA thresholds. For the purpose of this EIR, aesthetic effects are voluntarily disclosed for informational purposes only.

### **California Code of Regulations, Title 24**

Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code, consists of regulations to control building standards throughout the State. The following components of Title 24 include standards related to lighting:

#### **California Building Code (Title 24, Part 1) and California Electrical Code (Title 24, Part 3)**

The California Building Code (Title 24, Part 1) and the California Electrical Code (Title 24, Part 3) stipulate minimum light intensities for safety and security at pedestrian pathways, circulation ways, and paths of egress. All Project lighting will comply with the requirements of the California Building Code.

#### **California Energy Code (Title 24, Part 6)**

The California Energy Code (CEC) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment.

CEC Section 130.2 sets forth requirements for Outdoor Lighting Controls and Luminaire Cutoff requirements. All outdoor luminaires rated above 150 watts shall comply with the backlight, up light, and glare (BUG) in accordance with IES TM-15-11, Addendum A, and shall be provided with a minimum of 40% dimming capability activated to full illumination by motion sensor or other automatic control. This requirement does not apply to street lights for the public right of way, signs or building façade lighting.

CEC Section 140.7 sets forth outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by Lighting Zone, as defined in Section 10-114 of the CEC. Under Section 10-114, all urban areas within California are designated as Lighting Zone 3. Sports Athletic field lighting is exempt from this energy limit, and additional allowances are provided for Building Entrances or Exits, Outdoor Sales Frontage, Hardscape Ornamental Lighting, Building Façade Lighting, Canopies, Outdoor Dining, and Special Security Lighting for Retail Parking and Pedestrian Hardscape.

#### **California Green Building Standards Code (Title 24, Part 11)**

The California Green Building Standards requires that non-residential outdoor lighting must comply with the minimum light level requirements of the CEC; backlight, uplight, and glare ratings for outdoor lights defined by Illuminating Engineering Society of North America (discussed below); light ratings consistent with the CalGreen Code; or light and glare requirements set forth in a local ordinance, whichever is more stringent.

### **Illuminating Engineering Society of North America Handbook**

Recommended limits for light trespass are provided in the Illuminating Engineering Society of North America (IESNA) Handbook, 10th Edition. The IESNA Handbook, which is referenced in Title 24, defines outdoor lighting conditions by classification into distinct categories and recommends illuminance targets for Lux (light levels) for building facades characterized by various levels of reflectivity. The IESNA Handbook provides light trespass illuminance limits per lighting zone. The determination of light trespass would be the light spill at a plane perpendicular to the line-of-sight to the luminaires at observer locations where light trespass is under review. The IESNA Handbook defines Outdoor Lighting Zones relative to a range of human activity versus natural habitat. IESNA Handbook Table 26.4, Nighttime Outdoor Lighting Zone Definitions, designates a range of existing lighting conditions, from low or no existing lighting to high light levels in urban areas. The Project Site would be in Zone LZ3 (Moderately High Ambient Lighting). IESNA Handbook Table 26.5, Recommended Light Trespass Limits, describes the maximum light trespass values in Lux. Moderately High Ambient Lighting Areas (Zone LZ3) have a pre-curfew limit of 8 Lux and a post-curfew limit of 3 Lux.

## **Local**

### ***Culver City General Plan***

The Culver City General Plan Land Use, Circulation, and Open Space Elements include objectives and policies that address the visual environment, urban forest, urban design, and pedestrian amenities. A discussion of relevant objectives and policies is provided in the impact analysis below.

### ***Culver City Residential Parkway Design Guidelines***

The Culver City Residential Parkway Design Guidelines provide standards for planting, tree protection, maintenance, irrigation, hardscape, and access within a parkway in a residential area. The goal of the Parkway Guidelines is to support the creation and maintenance of parkways within the City that are safe, accessible, resource-efficient, ecologically responsible, beautiful, and that preserve the health of City trees. Consistency with the Urban Forest Master Plan is discussed in Section 4.8, Land Use and Planning, of this Draft EIR.

### ***Culver City Municipal Code***

The Culver City Municipal Code (CCMC) Titles 15 and 17 includes regulations related to the aesthetics and visual character including landscaping, outdoor lighting, and signage as described below.

## **Landscaping**

### **Section 17.310, Landscaping**

This section of the CCMC provides landscaping regulations and standards to enhance landscaping, conserve water, provide landscape area requirements, and general requirements for the type of landscaping and irrigation. Section 17.310.030, requires the preparation and submittal of a Preliminary Landscape Plan and Final Landscape Plan. The Preliminary Landscape Plan includes such features as proposed and existing buildings and structures; proposed parking areas; proposed landscaped areas; a calculation of total hardscape and planted areas; and preliminary list

of plant materials. The Final Landscape Plan identifies such features as plant materials; hardscaped and landscaped areas; water features and fences; existing and proposed buildings and structures; planting and installation details; irrigation design; and maintenance specifications.

#### Section 15.02.1100, et seq., Green Building Program

Section 15.02.1115, Urban Tree Requirements, is a component of the City's Green Building Program. Section 15.02.1115 requires that when feasible, all existing on-site trees with a trunk diameter of two inches or greater shall be preserved or replaced with trees of comparable size, per the recommendations of the City Parks Manager; and when feasible, all existing street trees with a trunk diameter of two inches or greater shall be preserved or replaced with trees of comparable size, per the recommendations of the City Engineer.

#### **Building Height**

Section 17.250.015.D, Height Limit, states that no structure within an S Zoning District shall exceed a height of 56 feet (per Initiative Ordinance No. 90-1301½ adopted April 17, 1990).

Section 17.300.025.C, Exceptions to Height Limits, allows non-habitable design elements, such as spires, turrets, towers, and similar architectural features to extend up to 13 feet, 6 inches above the height of the building.

#### **Lighting**

##### Section 17.300.040, Outdoor Lighting

This section provides general standards for outdoor lighting to regulate lighting fixtures and design, energy use, light shielding, light intensity, and lighting placement. Section 15.02.1100, et seq., Green Building Program

Section 15.02.1100A.12, requires that all new lighting installed in a garage or parking structure shall be motion-sensor controlled and that minimum base level lighting shall be permitted.

#### **Signage**

Section 17.330, Signs, provides a comprehensive system for the regulation of signs in the City in order to address community aesthetics, vehicular and pedestrian safety, property values, and the visual environment. Section 17.330.020.B, Table 3.5, and Section 17.330.025 identify the types of signs allowed in non-residential zoning districts and the corresponding maximum sign area, maximum sign height, maximum number of signs, location, and additional requirements. Section 17.330.030, General Requirements for All Signs, includes requirements for sign area measurement, sign height measurement, sign location requirements, aesthetic design standards, sign illumination, installation, and maintenance standards.

Section 17.330.050, Review Process and Appeals, identifies permit requirements, sign-related decisions and appeals, and requirements for Comprehensive Sign Programs.

#### **Art in Public Places**

Section 15.06.100 et seq. establishes an Art in Public Places Program (APPP) to fund and develop cultural and artistic outlets to improve the environment, image, and character of the community. All new residential development of five or more units, and all commercial, industrial, and public building development projects, with a building valuation of \$500,000 or more are subject to this

requirement. The APPP allocation can either be placed into a Cultural Trust Fund; used to commission original, site-specific artwork; used to donate artwork to the City; used to incorporate a Cultural Facility; used to designate a building or portion thereof as “Architecture as Art;” as specified in this section.

### ***Comprehensive Plan Amendment No. 6***

In December 2015, Comprehensive Plan Amendment No. 6 (CPA No. 6) was approved and a Mitigated Negative Declaration was adopted by the City of Culver City. CPA No. 6 included the new Building Y, the Van Buren Parking Structure, and the relocation of the historically significant bungalows to the area south of the Mansion. Although the bungalows have been relocated and are currently being rehabilitated, these improvements are being incorporated as part of CPA No. 7. Furthermore, CPA No. 6 and a Subsequent Conformance Review prepared in response to the appeal of the Planning Commission’s previous Conformance Review approval on June 8, 2016 identified setback, architectural, lighting, and landscaping requirements for Building Y and the Van Buren Parking Structure, in order to provide additional visual enhancements and minimize potential impacts to adjacent residential uses. For Building Y these included a 5-foot landscaped setback along the western and southern boundary; a 12-foot high wall along the western, southern and eastern boundary; a canted roofline on the west façade; additional trees along the western property line; and increased raised planter width on levels 2 and 4. For the Van Buren Parking Structure these included a 36-inch articulated façade screen; a stepback at the roof level from the lower parking levels of 14-foot, 4-inches along the northern elevation and 18 feet along the western elevation; a 15-foot setback of the basement parking levels from the western property line; and a fully enclosed, filtered, and ventilated ground parking level. Although the appeal was denied by City Council on July 25, 2017, further modification to Building Y and the Van Buren Parking Structure were incorporated as part of CPA No. 6.

A copy of Resolution No. 2015-P008 is on file with the City Planning Division.

## 4.1.4 Environmental Impacts

### **Methodology**

#### ***Visual Character***

The evaluation of visual character pertains to the degree and nature of contrast between the Project and its surroundings. The existing visual quality of the Project Site and the Project area are compared to the expected (future) appearance of the Project Site in order to determine whether the visual character of the general area would be substantially degraded. Factors such as changes in the appearance of the Project Site, building heights, massing, setbacks, landscape buffers and other features are taken into account. The analysis of visual character is based in part on the evaluation of simulated composite photographs showing existing and future conditions for representative locations within a range of distances and variety of directions from the Project Site.

#### ***Light and Glare***

The analysis of light and glare identifies the location of light-sensitive land uses and describes the general existing ambient conditions on the Project Site and in the Project vicinity. The analysis

describes the Project's proposed light and glare sources, and the extent to which project lighting, would spill from the Project Site onto light-sensitive areas. The analysis also describes the direction in which the light would be focused, and the extent to which the Project would illuminate sensitive land uses. The analysis also considers the potential for new sources of glare, including vehicle headlight glare and reflective glare from building surfaces that would adversely affect the character of an area.

### ***Shading***

The consequences of shadows on land uses can be positive, including cooling effects during warm weather; or negative, such as loss of warmth during cooler weather and loss of natural light for landscaping and human activity. In order to determine whether shading impacts would have a significant impact on the physical environment, shading diagrams have been prepared that show the adjacent off-site, shade-sensitive uses that would receive net new shadows and the nature of shading that would occur. The shading diagrams prepared for CPA No. 7 and included in this section and Appendix B, Shade/Shadow Models, reflect shade sensitive uses, shading time durations, and shading threshold limits established for purposes of CEQA compliance. The potential for impacts decreases the further the shade sensitive use is located from a project site. Facilities and operations that would be sensitive to the effects of shading include routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. The evaluation includes shading that would occur on the winter solstice (December 21) between 9:00 A.M. and 3:00 P.M. Pacific Standard Time (PST) and on the spring equinox (March 21), summer solstice (June 21), and fall equinox (September 21) between 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (PDT). The duration of shading is compared to threshold limits with the focus being on net new shadows associated with Project improvements that would affect shade sensitive receptors. Existing shadows from the Project Site as well as existing shadows associated with off-site structures and vegetation are considered in establishing net new shadow effects.

### ***Consistency with Regulatory Plans and Policies***

The evaluation of aesthetic resources also compares the Project to the standards and policies set forth in existing plans. These include the Culver City General Plan, the Culver City Residential Parkway Design Guidelines, and the Culver City Municipal Code. Consistency with the Urban Forest Master Plan is discussed in Section 4.8, Land Use and Planning, of this Draft EIR.

### **Thresholds of Significance**

As explained above, the Project is exempt under SB 743 and aesthetic impacts conclusions cannot be considered a significant impact on the environment. Accordingly, the restatement of thresholds below, and the analysis in this Draft EIR is for informational purposes only and not for determining whether the Project would result in significant impacts to the environment. Any aesthetic impact analysis in this Draft EIR is included to discuss what aesthetic impacts could occur from the Project if SB 743 was not in effect.

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines and the City of Los Angeles CEQA Thresholds Guide regarding shading impacts. Accordingly, a significant impact associated with aesthetics would occur if the Project were to:

### ***Aesthetic Character***

**AES-1:** Substantially alter or degrade the existing visual character of the Project area by damaging valued scenic features or resources, or introducing elements that substantially detract from the visual character of the Project area, including valued existing aesthetic features or resources.

**AES-2:** Substantially conflict with the applicable environmental policies in the General Plan or other regional and local plans adopted for the purpose of avoiding or mitigating an environmental effect related to visual character.

### ***Light and Glare***

**AES-3:** Introduce a new source of light or glare that would substantially alter the character of off-site areas surrounding the Project Site, or result in substantial light spill or glare onto adjacent light-sensitive receptors.

### ***Shading***

**AES-4:** Result in net new shading effects on shadow-sensitive uses for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (PST), between early November and mid-March, or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (PDT), between early mid-March and early November.<sup>3</sup>

As discussed in the Initial Study, which is contained in Appendix A of this EIR, and in Chapter 6, Other CEQA Considerations, of this EIR, the Project would have a less than significant impact with respect to scenic vistas or views because the Project Site is located in a highly urbanized area. Therefore, no further analysis of this topic is necessary. Furthermore, the Project Site is not located within a State or City-designated scenic highway.

## **Project Characteristics and Project Design Features**

### ***Project Characteristics***

The Project would be contained within the existing boundaries of the Project Site and similar to existing conditions, development would be oriented towards the interior of the Project Site with the perimeter of the Project Site being fenced or gated. As shown on **Figure 4.1-1, Proposed Landscape Features**, landscaped areas would include the front lawn and bungalows, the Assembly Yard, the Track, the Back Lot, and adjacent to residential areas along the western and southern boundary.

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<sup>3</sup> City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.

### **The Mansion and Front Lawn**

The Mansion and Front Lawn represent the most public view of the Project Site and front directly on Washington Boulevard. The exterior of the Mansion would not be altered by the Project, and only minor changes and upgrades would occur in the Front Lawn area. The existing broad semi-circular driveway would be slightly realigned to create a more formal symmetrical curve and would be resurfaced with decomposed granite. Gate 1 would be realigned to open up on to Town Plaza and would include a distinctive entrance sign for The Culver Studios. Some of the sycamore trees would be replaced with new sycamore trees and slightly realigned as described in Section 4.3.1, Historical Resources. Changes to the Front Lawn landscape would be undertaken in a manner that would reflect the period of historic significance from the early years of the Studio.

### **Van Buren Place**

Landscaped setbacks would be provided between Buildings K and L and residential properties to the south. Landscaped setbacks would also be provided between the Van Buren Parking Structure and Van Buren Place and between adjacent residential uses north and south of the parking structure, as further described below. Perimeter fencing between the western property and adjacent residential uses would include a 12-foot high solid textured concrete wall with planted vine, where feasible. Additional fencing treatment associated with the Van Buren Parking Structure is described below.

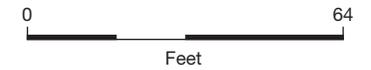
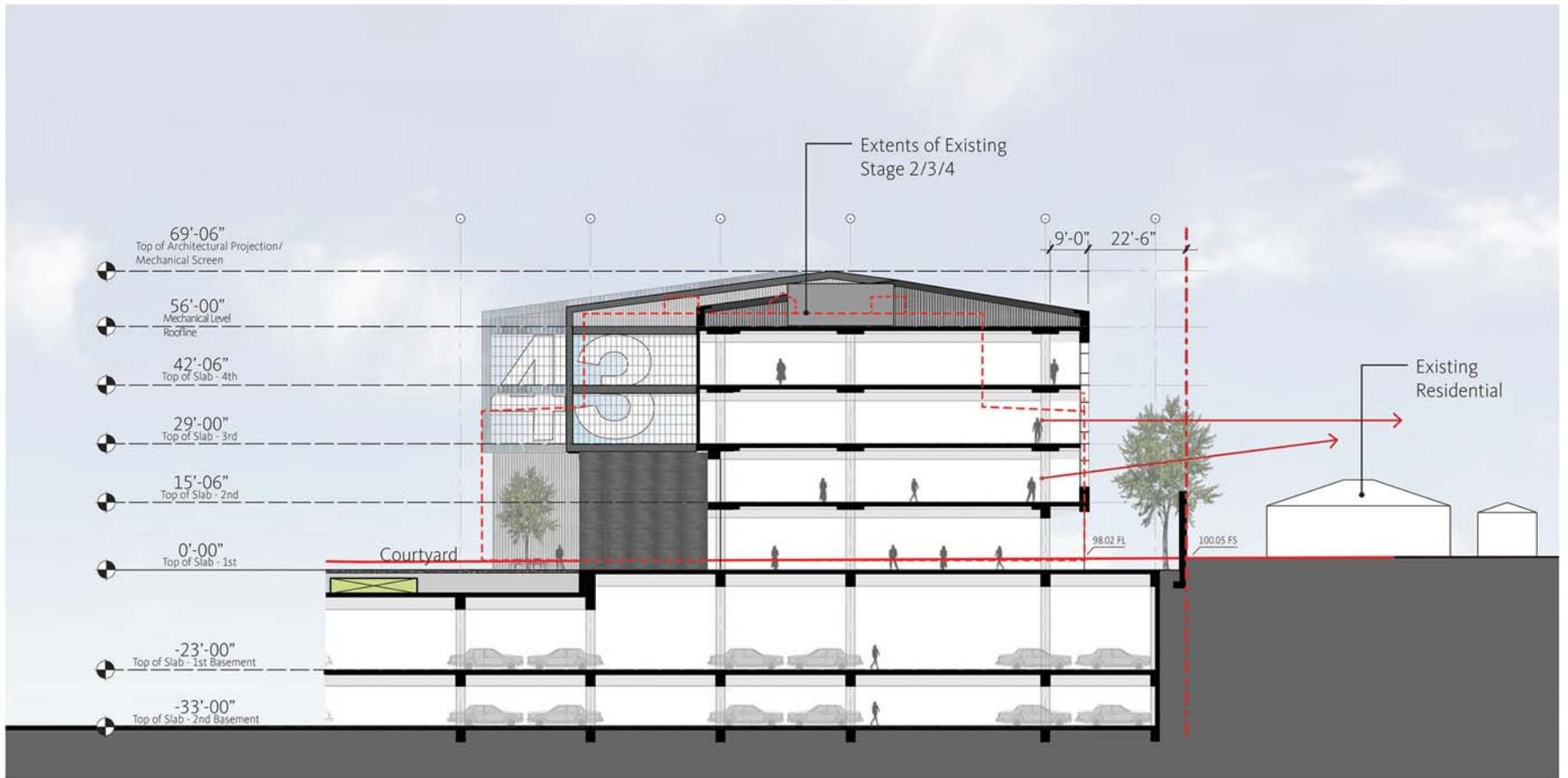
Building K includes 4 levels and would be 56 feet in height at the roofline and up to 69 feet, 6 inches with architectural projections/mechanical screening. The façade along Van Buren Place includes a composition of planting walls and perforated metal, corrugated metal along the roofline, and painted steel and glass window on the first floor. As presented on Figure 4.8-5 in Section 4.8, Land Use and Planning, Building K would include a 20-to-30-foot variable landscaped setback along the western property line adjacent to residential uses. As shown on **Figure 4.1-2, Building K Section**, the perimeter wall would block views from the upper levels into adjacent residential uses to the west. Building K includes monument signage “The Culver Studios” on the northern façade that would be visible from certain vantage points along Washington Boulevard near Gate 1.

Building L includes 4 levels and would be 56 feet in height at the roofline and up to 69 feet, 6 inches with architectural projections/mechanical screening. The façade along Van Buren Place includes boardform concrete, glass, and rusty corrugated metal near the roofline. Building L would include a 20-to-30-foot variable setback from the western property line adjacent to residential uses, which would also be landscaped. The variable setback would continue between Building L and the Van Buren Parking Structure to the west. A courtyard would be located on the ground level and away from Van Buren Boulevard and residential uses. Patios on Levels 3 and 4 would extend over a small portion of the variable setback between Building L and the parking structure. The parking structure would block views of adjacent residential uses to the west.



SOURCE: Gensler, 2017

The Culver Studios Innovation Plan  
**Figure 4.1-1**  
 Proposed Landscape Features



SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-2**  
Building K Section

The Van Buren Parking Structure provides 1,109 parking spaces within two levels below-grade (B1 and B2), one level at grade, and five levels above-grade. As shown on **Figure 4.1-3, Van Buren Parking Garage – Van Buren Place Elevation Detail**, the parking structure would be 56 feet in height, and up to 64 feet at the top of the mechanical screening. The parking structure elevation facing Van Buren Place would be screened by a 36-inch offset articulated façade, of subtle color variations of green, red, and light blue (at the roof level). A 12-foot high perimeter fence along Van Buren Place, in front of the parking structure would incorporate the same green and red color scheme as the parking structure façade screen. The parking structure would be setback approximately 18 feet from the residential property line to the north, and approximately 32 feet at the roof level of the parking structure. The roof level is stepped back 14 feet, 4 inches from the lower parking levels at the northern elevation and 18 feet at the western elevation. The parking structure would be set back approximately 18 feet from residential property line at the south. Landscaping would be provided within the setback areas, and would include columnar and evergreen type trees and climbing vines that would grow along the parking structure walls. The existing trees within the landscaped setback area to the south would be retained and additional trees would be added. The ground level of the parking structure would be fully enclosed, filtered, and ventilated. The screening, setbacks, and enclosed ground level would minimize light, glare, noise, and privacy impacts on adjacent residential uses. Levels B1 and B2 would also be set back 15 feet from the western property line at Van Buren Place to protect existing street trees.

The Van Buren Parking Structure would include a minimum 15-foot setback from Van Buren Place at the ground level that is approximately 410 linear feet. The linear open space would include landscaping, trees, and a vertical garden to screen the parking structure. All existing street trees would be retained or replaced at a 2:1 ratio. The linear open space would also include seating, pedestrian lighting, and stormwater management and parkway enhancement.

### **Ince Boulevard**

New Buildings Y, M, O, and J are adjacent to Ince Boulevard and together with Gates 4, 3, 2A, and 2 form the majority of the Ince Boulevard façade between Lindblade Street and approximately mid-block between Carson Street and Lucerne Avenue. Windows at the base of the buildings and entry treatments provide a view into The Culver Studios from Ince Boulevard. As shown on Figure 4.8-5, landscaped setbacks would range from 18 inches to 6 feet along Ince Boulevard. The majority of landscaping would include vines, climbing plants, and raised planters at the base of the buildings within an 18-inch setback and a 2-foot setback within raised planters to create a pedestrian scale environment.

Representative landscaping within these setbacks is illustrated on **Figure 4.1-4, Ince Boulevard – Representative Landscaping**. Existing street trees would remain or be replaced at a 2:1 ratio. The perimeter fencing would primarily consist of a 12-foot high solid textured concrete wall. Gate 3 would provide access for production and delivery trucks to service and loading areas within the Van Buren Parking Structure and therefore would eliminate the need for parking of production vehicles.



SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-3**  
Van Buren Parking Garage-Van Buren Place Elevation Detail



Green Wall within an 18-inch landscape setback.



Raised Planter within a 2-foot landscape setback.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-4**  
Ince Boulevard – Representative Landscaping

Building Y would be four levels and 56 feet high at the roofline and up to 69 feet, 6 inches with architectural projections/mechanical screening. Building Y is located at the southern and western property line adjacent to residential uses to the south and west. The façade facing the southern property line is boardform concrete, black corrugated metal, and railing at the upper levels 2 and 4. The west façade is primarily boardform concrete and black corrugated metal. Building Y would include a 5-foot landscaped setback and a 12-foot high concrete wall along the western and southern property line. Additional trees would be located along the western property line to further restrict views. The third and fourth levels would be stepped back approximately 35 feet and 63 feet, respectively, from the southern property line. Building Y would also include a canted roofline at the west façade, further increasing the setback from the property line. Furthermore, the height of the railing and raised planter areas on levels 2 and 4 would reduce views to adjacent residential uses to the south as shown on **Figure 4.1-5, *Building Y Section***. Building Y would also include an 18-inch landscaped setback and a 12-foot high wall along Ince Boulevard.

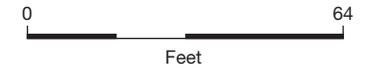
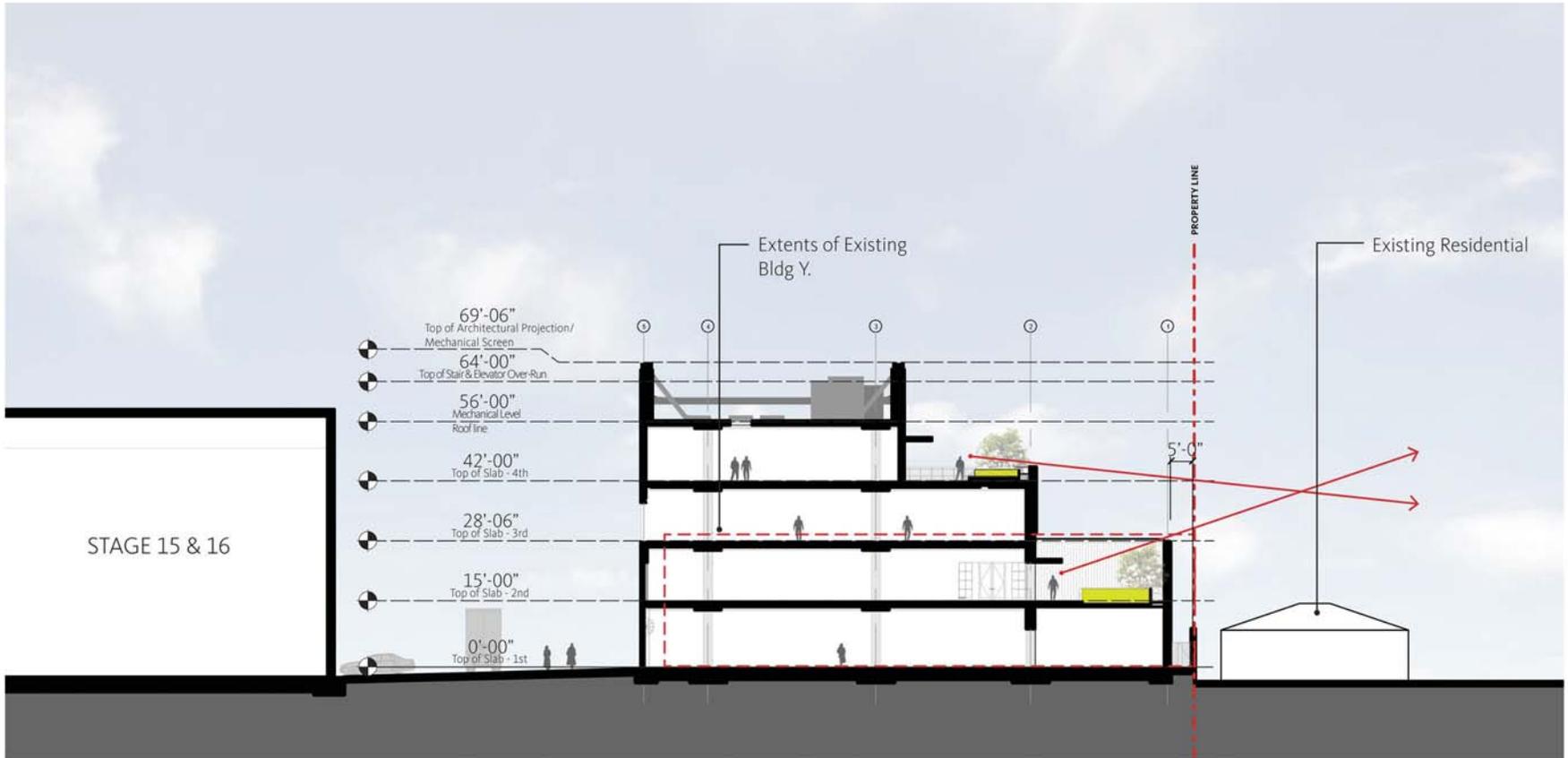
Building M would be four levels and 56 feet high at the roofline and up to 69 feet, 6 inches with architectural projections/mechanical screening. The façade facing Ince Avenue would include boardform concrete at the first two levels, painted steel at the third and fourth level, and a bright yellow staircase connecting the levels. Building M would include an 18-inch landscaped setback and a 12-foot high concrete wall with ivy.

Buildings O and J would be four levels and 56 feet high at the roofline and up to 66 feet, 6 inches with architectural projections and 69 feet, 6 inches with mechanical screening. These buildings span the Project Site between Gate 2 and Gate 3. Building O is separated from Building J by a garden at the base and an open set of stairs and walkways and include ground level windows along Ince Boulevard. Buildings O and J would include variable landscaped setbacks ranging from 2 feet (within a raised planter) to 5 feet. The new Gate 2A is also accessed from this area.

### **Lighting and Signage**

The overall nature and extent of lighting would be similar to existing conditions on the Project Site, with architectural lighting and perimeter lighting for safety and security visible from adjacent streets and properties. Lighting for the Studio Campus would be shielded and directed on the Project Site and placed in a manner that would minimize light trespass onto adjacent residential properties and sky-glow, while providing for safety, security, and architectural and landscape highlighting. Lighting levels along Van Buren Boulevard would be reduced compared to existing conditions, where there are unshielded acorn-style pole lights at street level and light fixtures around the base of the garage are sources of glare.

There would be entry signage for The Culver Studios at Gates 1, 2, 2A, and 3; wayfinding signage for employees and visitors; corporate signage for tenants; and public signage identifying access to Project parking facilities. The gate entries would be redesigned and visually enhanced, and would include new signage that would be compatible with the historic characteristics of the Campus. No digital or off-site signage is proposed. The proposed signage would be processed separately through a Master Signage Program.



SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-5**  
Building Y Section

## **Project Design Features**

**PDF-AES-1: Construction Fencing.** Prior to the commencement of any excavation, the Applicant shall install a temporary construction fence with screening around the site. The height, fence, and screening materials are subject to approval by the City Engineer and the Planning Manager.

**PDF-AES-2: Construction Staging.** All staging and storage of construction equipment and materials, including the construction dumpster, shall be on-site only. The Property Owner must obtain written permission from adjacent property owners for any construction staging occurring on adjacent properties.

**PDF-AES-3: Litter and Graffiti.** The property shall be maintained daily so that it is free of trash and litter and all graffiti shall be removed from the Property within 48 hours of its application.

**PDF-AES-4: Lighting – Residential Adjacency Guideline.** All Project Site and exterior building mounted luminaires shall produce a maximum initial illuminance value no greater than 0.10 horizontal footcandles 10 feet beyond the property boundary. No more than 2 percent of the total initial designed fixture lumens (sum total of all fixtures in the areas with residential adjacencies) shall be emitted at an angle of 90 degrees or higher from nadir (straight down).

**PDF-AES-5: Lighting – Pedestrian Level Guideline.** The illumination guidelines for areas with residential adjacencies shall apply to the pedestrian zone. Qualitative lighting strategies for increasing comfort and safety and creating a more pedestrian-friendly zone with minimal light spill, such as low level landscape lighting, low level lighting around street furniture, and low intensity downlighting from street trees, are encouraged.

**PDF-AES-6: Lighting – Van Buren Parking Garage Interior.** Use shielded linear small aperture luminaries with opaque sides oriented perpendicular to the façade to minimize views of light sources, reduce glare and light spill outside the garage. In addition, the garage will utilize occupancy sensors to reduce unnecessary lighting when not in use.

## **Analysis of Project Impacts**

### ***Aesthetic Character***

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**Threshold AES-1:** The Project would have a potentially significant impact if it would substantially alter or degrade the existing visual character of the Project area by damaging valued scenic features or resources, or introducing elements that substantially detract from the visual character of the Project area, including valued existing aesthetic features or resources.

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## Construction

**Impact Statement AES-1: Project construction activities and associated equipment and materials would be screened by temporary fencing. Areas of the Project Site adjacent to public rights of way would be inspected to remove litter, graffiti, and other unauthorized materials throughout the construction period. As a result, effects on visual character due to short term construction activities would not exceed thresholds.**

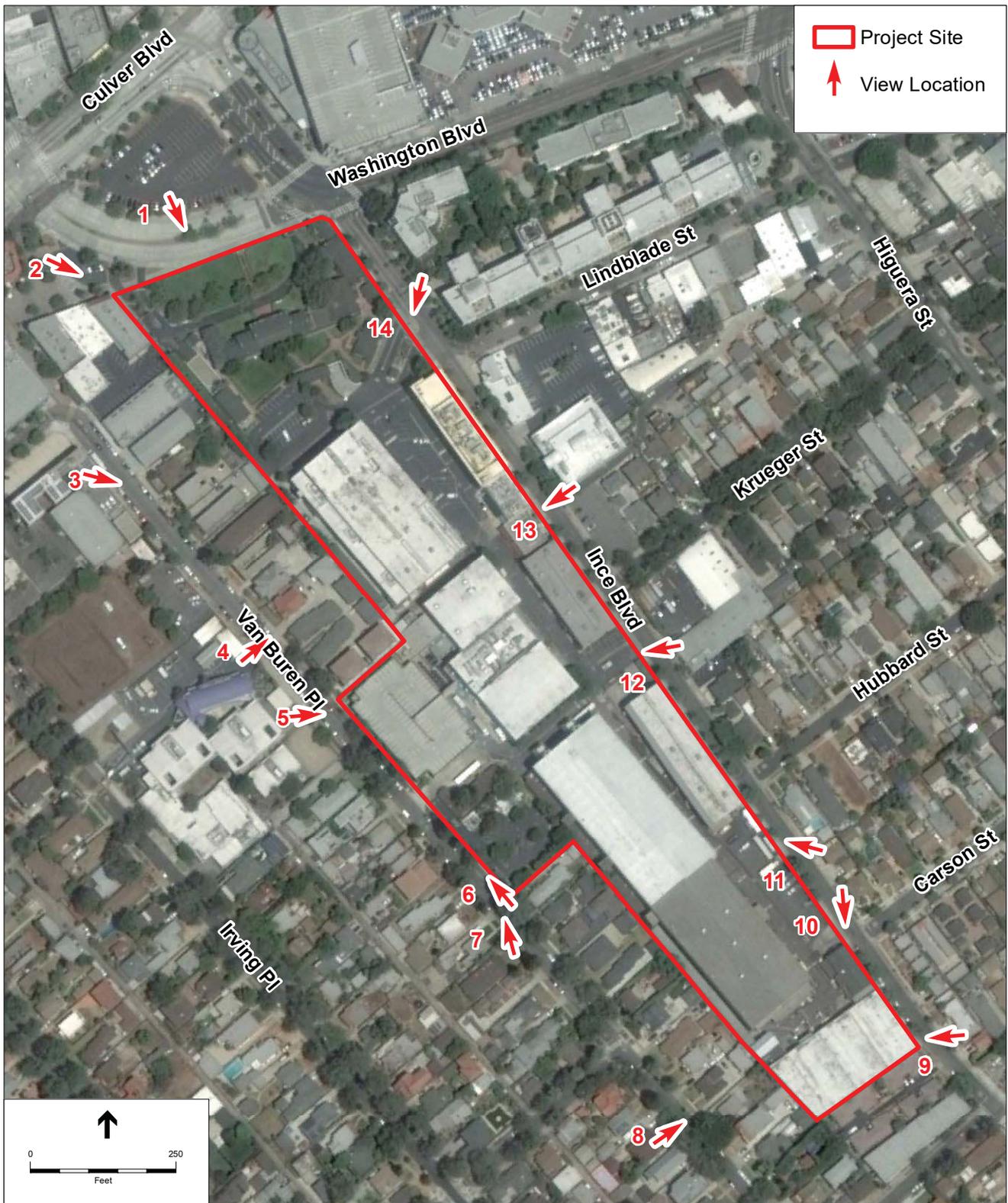
Construction of the Culver/Main Tunnel and realignment of and improvements to Gate 1 would temporarily affect views of the Project Site from Washington Boulevard and proximate areas in Downtown. Construction would also involve the realignment of Gates 2, 3, and 4 and a new Gate 2A; the demolition of some existing buildings; the construction of new Buildings K, L, Y, M, O and Y; excavation for and construction of the Van Buren Parking Structure; and, landscaping improvements along Van Buren Place. Per PDF-AES-1, all areas of construction would be screened by construction fencing. However, temporary effects on views would be evident along Van Buren Place in association with the Van Buren Parking Structure, and in areas proximate to Building Y and Gates 2, 2A, 3, and 4. Along the perimeters of the Project Site there would also be periods of construction associated with landscaping and perimeter walls that would be visible to the public, and new construction rising above perimeter walls would also be evident in some areas, such as along Ince Boulevard. Otherwise, most construction would occur internal to the Project Site and as set forth in PDF-AES-2, construction staging would be internal to the Project Site. In addition, PDF-AES-3 would require that the property would be maintained and kept free of litter and graffiti. Due to the temporary nature of effects on visual character, use of construction fencing to screen most areas of construction, and other Project Design Features, construction effects on visual character would not exceed thresholds.

## Operation

**Impact Statement AES-2: The Project would technologically update and expand facilities within the Studio Campus, with modern buildings, a parking structure, landscaped setbacks, and gate improvements designed to support compatibility with surrounding development, including residential areas. Compared to existing conditions changes in visual quality are generally considered beneficial and would not substantially alter or degrade the visual quality of the area. Therefore, the Project would not exceed thresholds with respect to aesthetic character.**

Visual simulations were prepared to show existing and future conditions from key vantage points along Washington Boulevard, Van Buren Place, and Ince Boulevard. A photo location reference map is provided on **Figure 4.1-6, Map of Visual Simulation Locations.**

**Figure 4.1-7, View 1: Existing and Simulated Views Looking Southeast from Washington Boulevard,** and **Figure 4.1-8, View 2: Existing and Simulated Views Looking East from Washington Boulevard,** depicts the Mansion and Front Lawn Area. As shown in these views, there would be no exterior changes to the Mansion, and only minor changes and upgrades to the Front Lawn landscape that would be in keeping with the Studio's period of historic significance. As shown on Figure 4.1-7, under existing and future conditions, roofs of some of the taller buildings are visible in the background.



SOURCE: Google Earth, 7/8/2016 (Aerial)

The Culver Studios Innovation Plan

**Figure 4.1-6**

Map of Visual Simulation Locations



Existing view of Mansion and Front Lawn area.



Simulated view showing minor upgrades to Front Lawn landscape and connection with Town Plaza.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-7**

View 1: Existing and Simulated Views  
Looking Southeast from Washington Boulevard



Existing view of Gate 1 entrance.



Simulated view of new Gate 1 entrance and connection with Town Plaza.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-8**

View 2: Existing and Simulated Views Looking East from Washington Boulevard

As shown in Figure 4.1-8, the changes to Gate 1 would improve the pedestrian experience and create a new interface between the Project Site and Town Plaza. New Building K would be visible, but well set back from the Gate 1 entrance. Overall, the Project would result in minor and beneficial changes to visual character in the Mansion and Front Lawn area, the most prominent publicly viewed area of the property.

**Figures 4.1-9 through 4.1-14** (Views 3 through 8) show various views along Van Buren Place. As shown on **Figure 4.1-9, View 3: Existing and Simulated Views Looking Northeast from Van Buren Place**, the view of new Building K from this vantage point would be slightly reduced compared to the existing view of Stages 2/3/4 (which have an existing building height of approximately 59 feet). A more direct view of Building K, compared to Stages 2/3/4 is depicted on **Figure 4.1-10, View 4: Existing and Simulated Views Looking Northeast from Van Buren Place**. As shown therein, compared to Stages 2/3/4, the height of Building K would be slightly reduced and the façade, with its panels of planting wall and perforated metal would provide greater visual interest and reduced views into adjacent residential areas. Overall, Building K would result in minor changes to visual character as viewed from Van Buren Place.

**Figures 4.1-11 through 4.1-13** (Views 5 through 7) depict various views of the Van Buren Parking Structure. As shown in **Figure 4.1-11, View 5: Existing and Simulated Views Looking Southeast from Van Buren Place**, the new Van Buren Parking Structure would result in an increase in the size of the structure from two to six levels. The parking structure would be screened by a 36-inch offset articulated façade, of subtle color variations of green, red, and light blue (at the roof level). The parking structure would be setback approximately 18 feet from the residential property line to the north (compared to the existing setback of approximately 12 feet), and approximately 32 feet at the roof level of the parking structure. Additional landscaping would be provided within the setback area. The façade facing this residential property would be comprised of precast boardform concrete panels.

The perimeter wall would incorporate climbing vines. **Figure 4.1-12, View 6: Existing and Simulated Views Looking Northwest from Van Buren Place**, shows a change from the existing concrete block wall and limited landscaping to a screened parking structure, and a minimum 15-foot setback from Van Buren Place that is approximately 410 linear feet. The linear open space would include landscaping, seating, pedestrian lighting, and stormwater management. All existing street trees within this area would remain. **Figure 4.1-13, View 7: Existing and Simulated Views Looking Northwest from Van Buren Place**, depicts the Van Buren Parking Structure and adjacent residential uses to the north. The parking structure would be setback approximately 18 feet from the property line and landscaping would be provided within the setback area. Overall, although the scale of the parking structure would increase compared to existing conditions, with the additional setbacks, linear open space with pedestrian amenities, landscaping, screening, and other architectural treatments, the Van Buren Parking Structure would enhance the visual character of Van Buren Place.



Existing view of residential uses along Van Buren Place.



Simulated view of residential uses along Van Buren Place with new Building K in background.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-9**

View 3: Existing and Simulated Views  
Looking Northeast from Van Buren Place





Existing view of residential uses along Van Buren Place and Stages 2/3/4.



Simulated view of residential uses along Van Buren Place and new Building K.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-10**

View 4: Existing and Simulated Views  
Looking Northeast from Van Buren Place





Existing view of two-level Van Buren Parking Structure and adjacent residential use to the northwest.



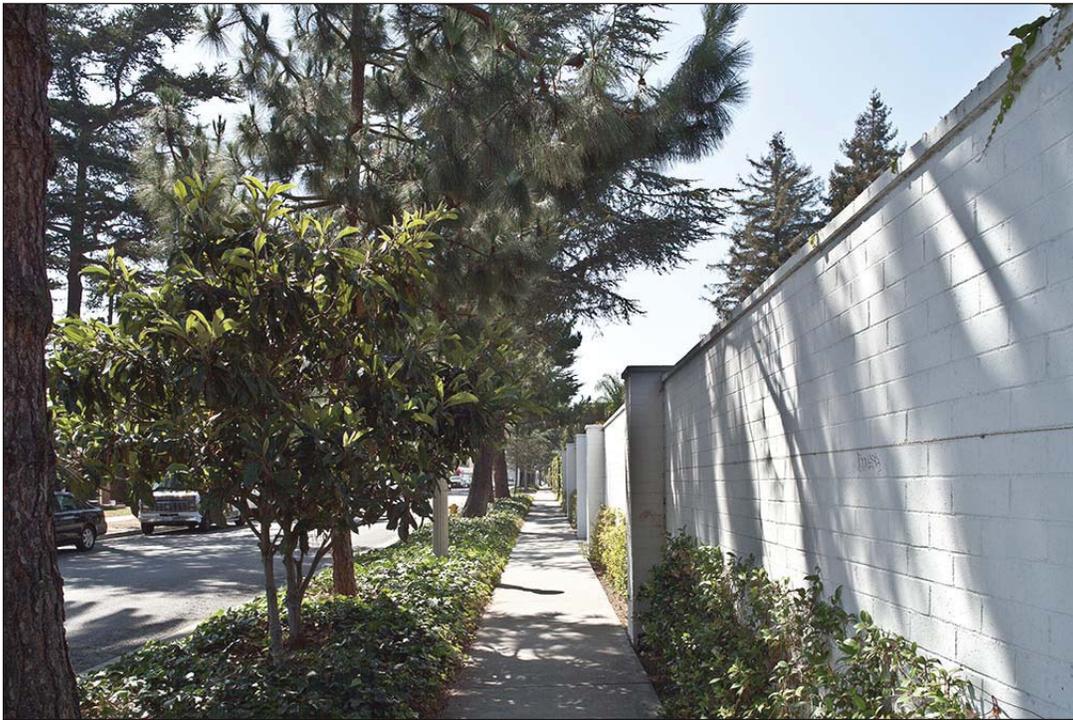
Simulated view of six-level Van Buren Parking Structure showing articulated façade and landscaped setbacks.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-11**

View 5: Existing and Simulated Views  
Looking Southeast from Van Buren Place



Existing view of concrete block wall adjacent to Van Buren Place.



Simulated view of linear open space and screened parking structure adjacent to Van Buren Place.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-12**

View 6: Existing and Simulated Views  
Looking Northwest from Van Buren Place





Existing view of two-level Van Buren Parking Structure and adjacent residential use to the southeast.



Simulated view of six-level Van Buren Parking Structure showing articulated façade and landscaped setbacks.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-13**

View 7: Existing and Simulated Views  
Looking Northwest from Van Buren Place

**Figures 4.1-14 through 4.1-16** (Views 8 through 10) depict various views of Building Y. As shown in **Figure 4.1-14, View 8: Existing and Simulated Views Looking Northeast from Van Buren Place**, the new Building Y, with a roofline height of 56 feet and a height of 69 feet, 6 inches at the top of highest architectural projection/mechanical screening, would be visible from residential uses to the west, where the existing Building Y (at approximately 29 feet) is not visible. Building Y would be setback 5 feet from the western property line (where currently there is no setback). Building Y would also include a 12-foot high concrete wall along the perimeter of the Project Site, which is taller than the existing wall which ranges in height from 8 feet to 10 feet. Building Y would be oriented away from residential uses to the west and includes a canted west upper wall to provide additional setback and greater feel for space. As depicted on **Figure 4.1-15, View 9: Existing and Simulated Views Looking West from Lucerne Avenue and Ince Boulevard**, the new Building Y would represent an increase in height but also incorporate a more distinct architectural style that includes upper level planters on the second and fourth level to restrict views into residential uses to the south. Building Y would be setback 5 feet from the southern property line (where currently there is no setback). As shown on **Figure 4.1-16, View 10: Existing and Simulated Views**, the existing Building Y façade presents a solid wall along Ince Boulevard, with minimal landscaping. Gate 4 is also shown. The proposed Building Y would include more distinctive architecture and materials, windows facing Ince Boulevard, a 12-foot high textured concrete wall with climbing vines, and a 12-foot high stainless steel gate (Gate 4). Overall, with the distinctive architecture, setbacks along the southern and western property boundaries, and features of the building that limit views into residential areas, the new Building Y would in many ways enhance, and not substantially degrade, the visual character of Van Buren Place.

Other new buildings along Ince Boulevard include Building M, Building O, and Building J. As shown on **Figure 4.1-17: View 11: Existing and Simulated Views Looking West from Carson Street and Ince Boulevard**, the existing brick wall and Stages 7/8/9 (approximately 46 feet tall) would be replaced with the more distinct architecture of new Building M (approximately 56 feet), including a bright yellow staircase connecting all levels, and 12-foot high concrete wall with climbing vines. As also shown in the simulation, production trucks would no longer park along Ince Boulevard, but rather would access the Van Buren Parking Structure through Gate 3.

As depicted in **Figure 4.1-18, View 12: Existing and Simulated Views Looking Southwest from Ince Boulevard near Krueger Street**, the existing Building O (which is approximately 41-foot tall), and Building X (which is approximately 11 feet tall) would be replaced with the new Building O (approximately 56 feet tall), enhanced Gate 3, and a 12-foot tall textured concrete wall with climbing vines. Together these provide a distinct architectural style and more visual interest than under current conditions. In addition, trash bins for the Culver Studios would not be placed on Ince Boulevard for pick up as collection of trash would occur within the Project Site in the Central Parking Structure. **Figure 4.1-19, View 13: Existing and Simulated Views Looking Southwest from Poinsettia Court and Ince Boulevard**, show new Buildings O and J and the new Gate 2A. Buildings O and J replace the existing Building O and Building J, as well as Building L and the commissary. The existing Building J is approximately the same height as the new Building J (56 feet), not including architectural projections. The new Buildings O and J span the Project Site between Gate 2 and Gate 3. Building O is separated from Building J by a garden at the base and an open set of stairs and walkways. These buildings also include ground level windows along Ince Boulevard.



Existing view of residential uses along Van Buren Place.



Simulated view of new Building Y showing canted west upper wall.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-14**

View 8: Existing and Simulated Views  
Looking Northeast from Van Buren Place





Existing view of Building Y and residential uses along Ince Boulevard at the southern property line.



Simulated view of new Building Y showing canted roofline and concrete wall along the southern property line.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-15**

View 9: Existing and Simulated Views  
Looking West from Lucerne Avenue and Ince Boulevard



Existing view of Building Y and Gate 4 along Ince Boulevard.



Simulated view of new Building Y showing window treatment, 12-foot wall, landscaping, and enhanced Gate 4.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-16**

View 10: Existing and Simulated Views  
Looking South from Carson Street and Ince Boulevard



Existing view of Stages 7/8/9 and Stages 11/12/14 along Ince Boulevard.



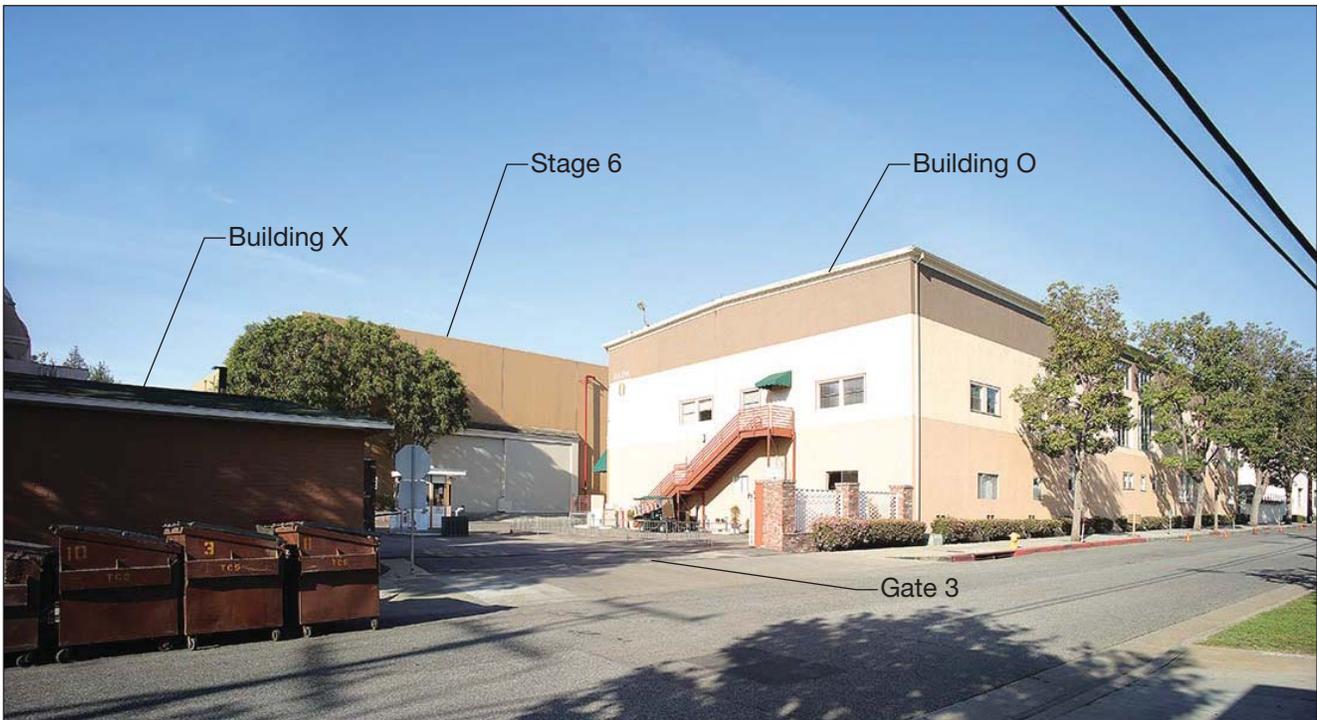
Simulated view of new Building M showing 12-foot high wall with climbing vines and yellow staircase connecting all levels at the south elevation. Note production trucks would no longer park along Ince Boulevard.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-17**

View 11: Existing and Simulated Views  
Looking West from Carson Street and Ince Boulevard



Existing view of Building O, Stage 6, Building X, and Gate 3 along Ince Boulevard.



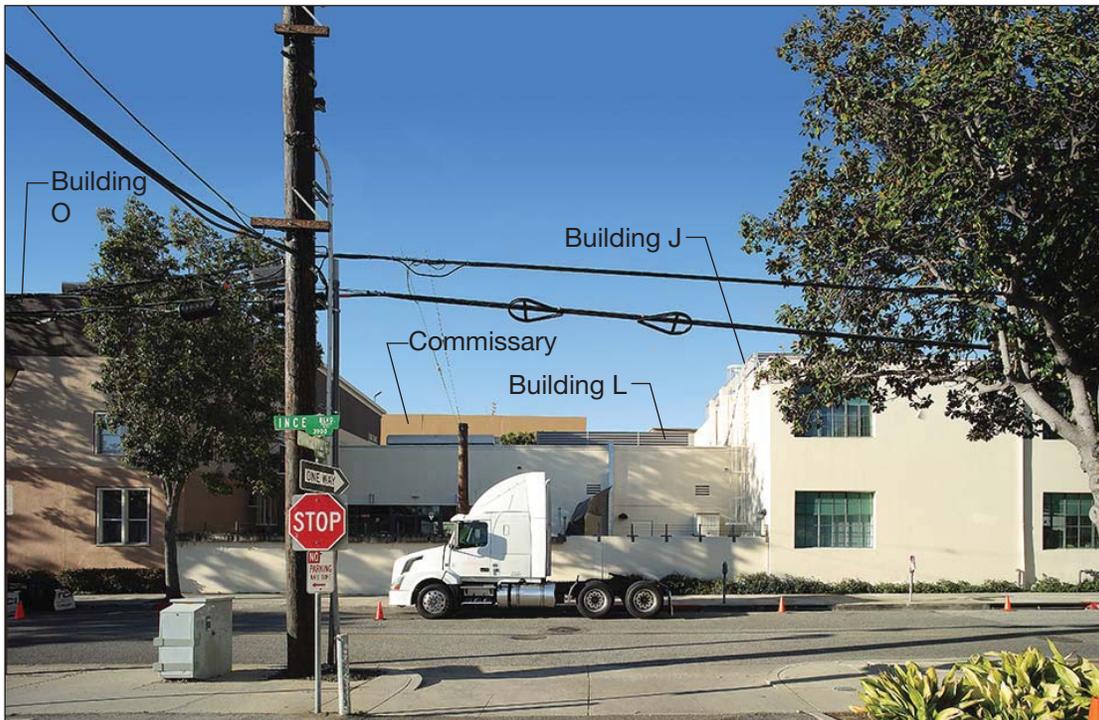
Simulated view of new Building O, enhanced Gate 3, and 12-foot wall with climbing vines. Note that trash bins would no longer be placed along Ince Boulevard.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-18**

View 12: Existing and Simulated Views  
Looking Southwest from Ince Boulevard near Krueger Street



Existing view of Building O, Commissary, Building L, and Building J along Ince Boulevard.



Simulated view of new Building O, Gate 2A, and Building J showing open view of garden, walkways, and stairs.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-19**

View 13: Existing and Simulated Views  
Looking Southwest from Poinetia Court and Ince Boulevard

**Figure 4.1-20, View 14: Existing and Simulated Views Looking South from Ince Boulevard and Washington Boulevard,** shows the realigned Gate 2 entrance, new Building J, and new Building K. Overall, although some of the building heights would increase compared to existing conditions, with more distinct architecture and materials, articulation of building facades, landscape upgrades, and upgrades to Gates 2, 2A, and 3, the overall visual character along Ince Boulevard would be improved.

### ***Policy Consistency***

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**Threshold AES-2:** The Project would have a potentially significant impact if it would substantially conflict with the applicable environmental policies in the General Plan or other regional and local plans adopted for the purpose of avoiding or mitigating an environmental effect related to visual character.

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**Impact Statement AES-3: The Project would not result in substantial conflicts with applicable environmental policies in the General Plan or other regional and local plans adopted for the purpose of avoiding or mitigating an environmental effect related to visual character.**

An evaluation comparing the Project to applicable objectives and policies of the Culver City General Plan is provided in **Table 4.1-1, Comparison of the Project to Applicable Aesthetic Policies of the Culver City General Plan.** As described therein, the Project would be consistent with applicable objectives and policies related to visual open space, landscaping, urban design, and pedestrian circulation.

### **Culver City Residential Parkway Design Guidelines**

Although no improvements are proposed within the City's residential parkway along Van Buren Place the proposed linear open space adjacent to the Van Buren Parking Structure would enhance the existing parkway and pedestrian experience. Any street trees that may be removed as a result of access or other improvements would be replaced with new street trees at a 2:1 ratio. Accordingly, no conflicts with the Residential Parkway Design Guidelines would occur.

### **Culver City Municipal Code**

The Culver City Municipal Code includes specific requirements for landscaping, outdoor lighting, signage, and art in public places which when applicable are being incorporated into the Project. Compliance with applicable code requirements will be ensured through City review and approval of CPA No. 7.



Existing view of Building J, Gate 2, Stages 2/3/4, and Building E along Ince Boulevard.



Simulated view of new Building J, and Building K, and realigned Gate 2.

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.1-20**

View 14: Existing and Simulated Views  
Looking South from Ince Boulevard and Washington Boulevard

**Culver City General Plan**

**TABLE 4.1-1  
COMPARISON OF THE PROJECT TO APPLICABLE AESTHETIC POLICIES OF THE CULVER CITY GENERAL PLAN**

Objective/Policy	Analysis of Project Consistency
<b>Land Use Element</b>	
<p><b>Objective 10. Visual Open Space.</b> Extend the City's park-like qualities into neighborhoods and business districts through streetscape and urban design improvements.</p>	<p><b>Consistent:</b> Although the Project involves redevelopment within an already developed Project Site, it does include streetscape and urban design improvements that would extend into neighborhoods and the downtown, through such features as the upgrades to Gate 1 and the Front Lawn; the linear open space and landscape improvements associated with the Van Buren Parking Structure; enhancements to Gates 2, 3, 4, and new Gate 2A; and more aesthetically pleasing architecture and landscape improvements along Ince Boulevard.</p>
<p><b>Policy 10.A</b> Enhance the visual identity of Culver City's neighborhoods and business districts with street trees, parkways, medians, streetscape amenities, entry statements and desirable urban design features that visually link neighborhoods and businesses throughout the City.</p>	<p><b>Consistent:</b> As indicated above, the Project includes a number of improvements that would enhance the adjacent neighborhoods and downtown. These improvements would include streetscape and parkway amenities, such as those associated with the Van Buren linear open space, as well as upgraded entry statements as proposed for each of the gated entries to the Studio Campus.</p>
<p><b>Policy 10.F</b> Continue to require the undergrounding of utilities in all new developments and during replacement of existing services whether alone or as part of a remodeling project, wherever feasible.</p>	<p><b>Consistent:</b> The Project involves redevelopment on an existing developed Project Site. To the extent that existing above ground utilities need to be replaced, upgraded or relocated they would be placed underground to the extent feasible. No new above ground power lines/poles are proposed along the perimeters of the Project Site or where they would adversely affect public views.</p>
<p><b>Objective 11. Urban Forest.</b> Create a sustainable urban forest that enhances Culver City's image and quality of life.</p>	<p><b>Consistent:</b> The Project would increase trees and landscaping on the Project Site, which would contribute to the objective of a sustainable urban forest that would enhance the City's image and quality of life.</p>
<p><b>Objective 12. Urban Design.</b> Ensure that new construction and renovation of existing residential and non-residential buildings and streetscapes are accomplished with the highest quality of architectural and site design.</p>	<p><b>Consistent:</b> As represented in Chapter 2, Project Description, of this EIR, and in Figures 4.1-7 through 4.1-20 in this section of the EIR, the Project includes high quality architectural and site design.</p>
<b>Circulation Element</b>	
<p><b>Policy 4.D</b> Enhance the aesthetic qualities of pedestrian access routes by increasing amenities, such as trees, awnings, lighting, street furniture, and drinking fountains, etc.</p>	<p><b>Consistent:</b> The Project would enhance the quality of public pedestrian access routes through streetscape and parkway amenities, such as those associated with the Van Buren linear open space which includes seating areas, and upgraded gate entries to the Studio Campus.</p>
<p><b>Policy 9.B</b> Create a sense of separation between vehicle and pedestrian uses through continued street tree planting and parkway development, consistent with a comprehensive streetscape master plan.</p>	<p><b>Consistent:</b> The Project does not include public right of way improvements that would involve new street tree plantings. Any existing street trees that would require removal as a result of access or other improvements would be replaced with new street trees at a 2:1 ratio.</p>
<b>Open Space Element</b>	
<p><b>Objective 5. Visual Open Space and Urban Design.</b> Extend the City's park-like qualities into neighborhoods and business districts through streetscape and urban design improvements.</p>	<p><b>Consistent:</b> See discussion of Land Use Objective 10 above.</p>

SOURCE: ESA PCR, August 2017

## ***Light and Glare***

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**Threshold AES-3:** The Project would have a potentially significant impact if it would introduce a new source of light or glare that would substantially alter the character of off-site areas surrounding the Project Site, or result in substantial light spill or glare onto adjacent light-sensitive receptors.

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**Impact Statement AES-4: Lighting associated with the Project would be shielded and directed onto the Project Site to avoid glare and minimize light trespass onto residential properties. Furthermore, PDF-AES-4 and PDF-AES-5, include restrictions on illuminance intensity for adjacent residential and pedestrian areas, and PDF-AES-6, includes design characteristics to address light trespass from the proposed Van Buren Parking Structure. Given these components of the Project, it would not create substantial light or glare that would adversely affect day or nighttime views in the area.**

New lighting associated with the Project would be in keeping with the general nature of existing lighting on the Studio Campus, with most lighting directed and located internal to the Campus and screened from off-site areas. New lighting would be shielded and directed on the Project Site and placed in a manner that would minimize light trespass onto adjacent residential properties and sky-glow, while providing for safety, security, and architectural and landscape highlighting. PDF-AES-4 and PDF-AES-5 include specific quantifiable restrictions on illuminance intensity for adjacent residential and pedestrian areas that would preclude the potential for substantial light spill. PDF-AES-6 includes design characteristics to address light trespass from the proposed Van Buren Parking Structure, including use of shielded linear small aperture luminaires with opaque sides oriented perpendicular to the façade that would minimize glare and light spill outside the structure. In addition, the Van Buren Parking Structure would utilize occupancy sensors to reduce unnecessary lighting when not in use. Overall, with implementation of Project Design Features, the Project would not create substantial light or glare that would adversely affect day or nighttime views in the area.

## ***Shading***

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**Threshold AES-4:** The Project would have a potentially significant impact if it would result in net new shading effects on shadow-sensitive uses for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. PST, between early November and mid-March, or more than four hours between 9:00 A.M. and 5:00 P.M. PDT, between early mid-March and early November.

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**Impact Statement AES-5: The Project would result in net new shading effects on three residential uses for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. PST, or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. PDT. Therefore, the Project would exceed the City's shade/shadow threshold at these locations.**

The Project would replace a number of existing buildings on the Project Site with new buildings, which would introduce new or increased shade/shadow effects on certain adjacent shade-sensitive uses. In particular, the existing buildings along Ince Boulevard, that are of varying heights and mass, would be replaced with new Buildings J, O, M, and Y, which would be approximately 56

feet tall at the roofline. Buildings J and O would be up to 66 feet, 6 inches with architectural projections and 69 feet, 6 inches with mechanical screening. Along Van Buren Place, Stages 2/3/4, Stages 5/6, and Building P, which vary in height from approximately 40 feet to 59 feet, at the roofline would be replaced by Buildings K and L, which are approximately 56 feet tall at the roofline, and 69 feet, 6 inches with architectural projections/mechanical screening. In addition, the two level Van Buren Parking Structure would be replaced with a six level Van Buren Parking Structure. In order to determine the extent of the shading from these uses, shading diagrams used to assess the shading patterns that would occur during the winter and summer solstices and the spring/fall equinoxes. Shadows for all other times of the year have been interpolated and would not exceed the shadows identified for these four periods of the year. Shading diagrams are included in Appendix B, Shade/Shadow Models, of this EIR, and illustrate shadows cast by the Project on nearby surrounding uses at 9:00 A.M., 1:00 P.M., and 5:00 P.M. during the spring equinox (March 21), summer solstice (June 21), and fall equinox (September 21). The shading diagrams also illustrate shadows cast by the Project at 9:00 A.M., 12:00 P.M., and 3 P.M. during the winter solstice.

As previously stated, shade-sensitive uses include routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. In the Project area, sensitive receptor sites include outdoor spaces associated with single-family and multi-family residences to the northwest and southeast of the existing on-site parking structure on Van Buren Place, as well as multi-family residences to the northeast of Ince Boulevard. No other uses, including various studio, studio-related, and commercial uses surrounding the site, are considered shade-sensitive uses.

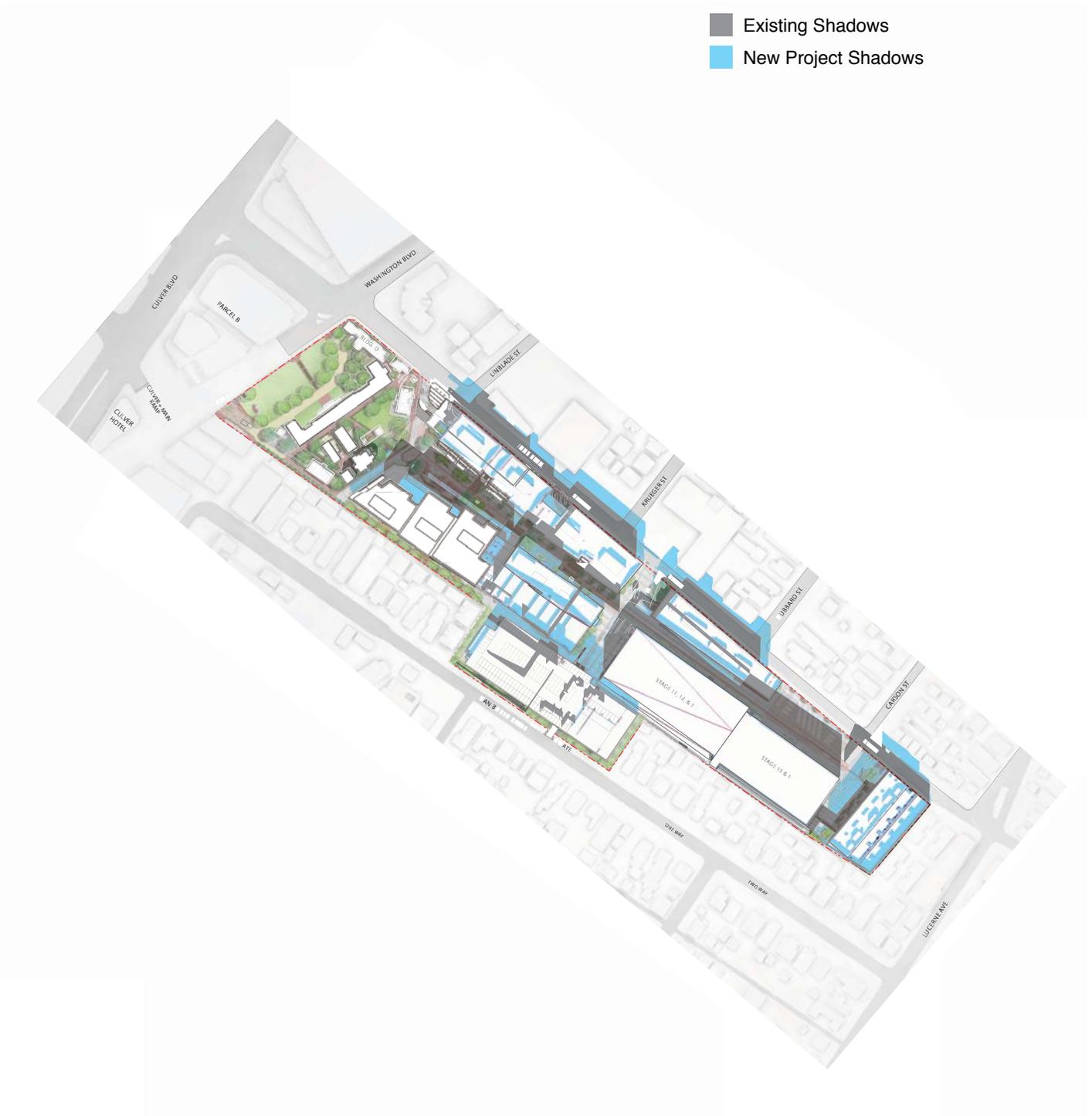
### **Winter Solstice**

As shown on **Figure 4.1-21**, *Winter Solstice Shadows – December 21*, during winter solstice certain residential areas would be shaded for more than three hours.

Building M would shade portions of the front yard areas of two single- and one multi-family residential uses to the northeast side of Ince Boulevard. Of these properties, one single-family residence already experience shading from existing vegetation on the property; however, the Project would result in net new shading for more than three hours at the front yard areas of two residential properties, which would exceed the three-hour winter solstice criteria. However, the extent of increased or new shadow effects for these properties is expected to be notably diminished due to the existing mature street trees along Ince Boulevard, which would shade much of the same areas shaded by Building M during the same period.

Areas of Shadows for 3 Hours or More  
(9am-3pm PST)

- Existing Shadows
- New Project Shadows



SOURCE: ESA PCR, 2017

The Culver Studios Innovation Plan  
**Figure 4.1-21**  
Winter Solstice Shadows - December 21

Building Y would shade portions of four multi-family residential front lawn areas on the northeast side of Ince Boulevard (south of Carson Street). However, one of these lawn areas already experiences shading from existing vegetation on the property. Therefore, overall net new shading at off-site, shade-sensitive sites or associated usable outdoor space would occur for more than three consecutive hours between the hours of 9:00 A.M. and 3:00 P.M. PST at five residential properties, which would exceed the shade/shadow criteria during the winter solstice. However, the extent of increased or new shadow effects for these properties is expected to be notably diminished due to the existing mature street trees along Ince Boulevard, which would shade much of the same areas shaded by Building Y during the same period.

While the shading effects described above during the winter solstice would exceed the three hour criteria, as previously stated in this section, this analysis is provided for informational purposes only and no significance finding is required under CEQA pursuant to SB 743.

### **Spring and Fall Equinox and Summer Solstice**

During the spring and fall equinox and summer solstice the Project would not result in any net new shadows being cast on shade sensitive uses. As shown in **Figure 4.1-22, *Spring Equinox Shadows – March 21***, **Figure 4.1-23, *Fall Equinox Shadows – September 21***, and **Figure 4.1-24, *Summer Solstice Shadows – June 21*** the shadows would not extend past Ince Boulevard onto shade-sensitive areas for more than four consecutive hours between the hours of 9:00 A.M. and 5 P.M.

## **Cumulative Impacts**

### ***Aesthetic Character***

With the exception of the Parcel B multi-use commercial development, including the extension of Town Plaza, there are no other projects in close enough proximity where they could contribute to combined effects associated with degradation of existing visual character within the same viewshed as the Project. In regards to Parcel B, existing conditions on this development site include surface parking and reflect a low level of visual quality, where future conditions would include a project that exhibits high quality architectural, landscaping and site design, including extension of Town Plaza as represented in conceptual form in Figure 4.1-7.

Given that the Parcel B project would upgrade visual quality in proximity to the Project Site, and in light of the Project's upgrades to Gate 1 and the Front Lawn area, cumulative impacts on visual quality would not degrade visual quality.

### ***Light and Glare***

There are no other projects in close enough proximity where they could contribute to combined lighting effects that would impact light sensitive receptors. The only project in close proximity is the Parcel B multi-use commercial development, which is not bordered by light sensitive uses. Furthermore, the Project does not involve any notable changes in lighting within the Front Lawn area that would affect residential uses or combine with Parcel B such that lighting impacts from light spill or glare would be significant. In addition, the Project includes PDF-AES-4 and 5, which would further limit potential for cumulative lighting impacts.

Areas of Shadows for 3 Hours or More  
(9am-5pm PST)

- Existing Shadows
- New Project Shadows

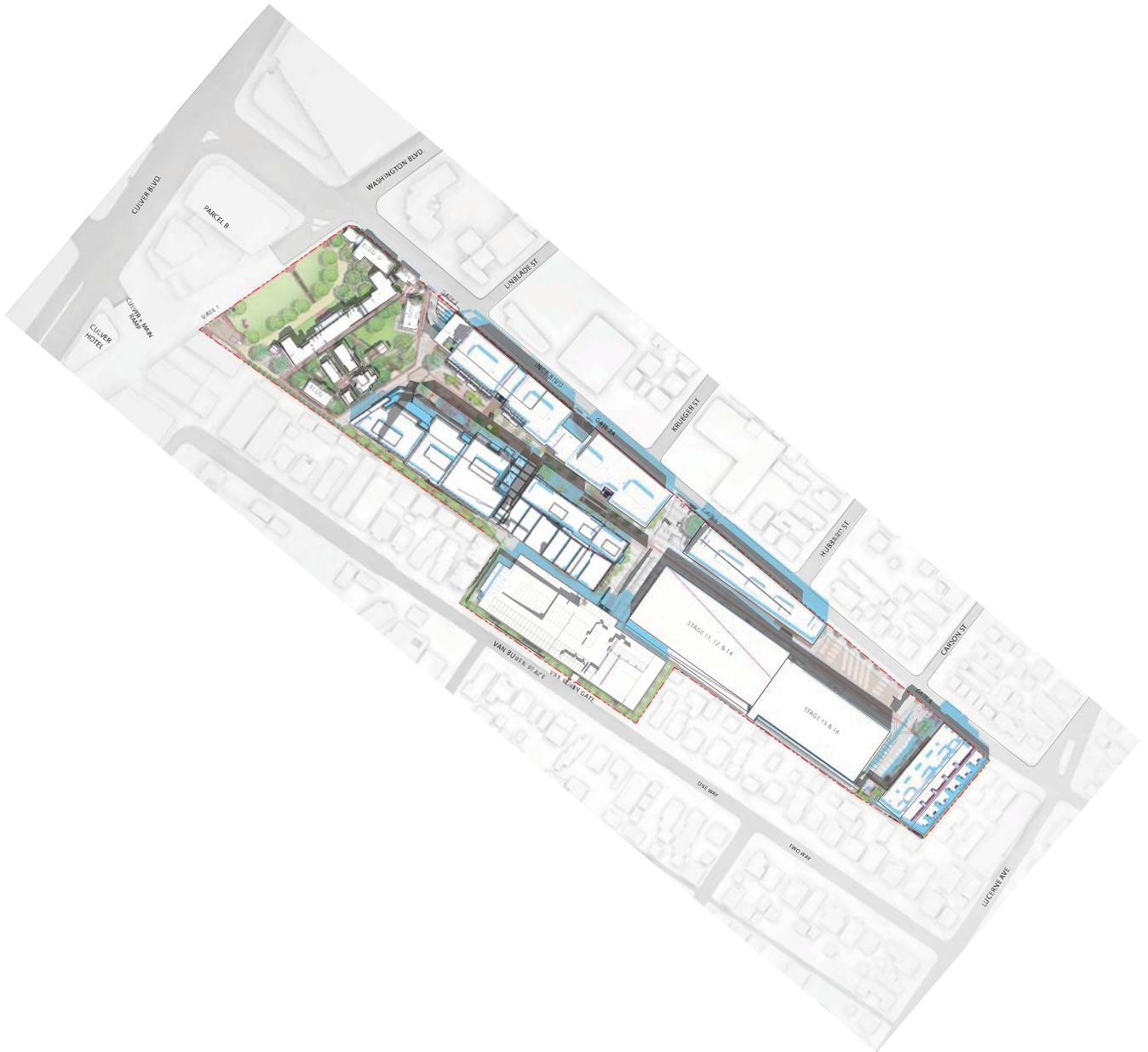


SOURCE: ESA PCR, 2017

The Culver Studios Innovation Plan  
**Figure 4.1-22**  
Spring Equinox Shadows - March 21

Areas of Shadows for 3 Hours or More  
(9am-5pm PST)

- Existing Shadows
- New Project Shadows



SOURCE: ESA PCR, 2017

The Culver Studios Innovation Plan  
**Figure 4.1-23**  
Fall Equinox Shadows - September 21

Areas of Shadows for 3 Hours or More  
(9am-5pm PST)

- Existing Shadows
- New Project Shadows



SOURCE: ESA PCR, 2017

The Culver Studios Innovation Plan  
**Figure 4.1-24**  
Summer Solstice Shadows - June 21

### **Shading**

There are no projects in close enough proximity where they could contribute to combined shadow effects that would impact light sensitive receptors. The only project in close proximity is the future commercial project known as Parcel B, which is not bordered by shade sensitive uses. Furthermore, the Project does not involve new construction within the Front Lawn area that would result in shadow effects in this area that would cause cumulative shading in combination with Parcel B. Accordingly, no significant cumulative shading effects would occur in association with the Project.

#### 4.1.5 Mitigation Measures

The analyses provided above for aesthetic impacts are for informational purposes only and no significance finding is required under CEQA for the Project pursuant to SB 743. Therefore, no significant impacts have been identified and no mitigation measures are required.

#### 4.1.6 Level of Significance after Mitigation

Not applicable. As indicated above, pursuant to SB 743 no significance finding is required under CEQA.

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## 4.10 Public Services

### 4.10.1 Fire Protection

#### 4.10.1.1 Introduction

This section analyzes the Project's potential effects on fire protection and emergency medical services provided by the Culver City Fire Department (CCFD). The analysis addresses fire protection facilities and services, response times, emergency access, and fire flow. The analysis is based, in part, on information provided by the CCFD through written correspondence and consultation as part of the City Public Review Committee (PRC) process. The CCFD written correspondence is included in Appendix J of this Draft EIR.<sup>1</sup>

#### 4.10.1.2 Environmental Setting

##### *Existing Conditions*

##### **Fire Protection Facilities and Services**

Fire protection and emergency medical services for the Project Site and greater City of Culver City (City) are provided by the CCFD. The CCFD provides a broad range of emergency response and specialized services including fire suppression, emergency medical service (EMS), technical rescue, hazardous materials response, fire prevention, building plan check, permit approvals, business inspections, fire investigation, life safety inspections, emergency preparedness, and public education, and consists of six divisions including the Office of the Fire Chief, Fire Suppression, EMS, Fire Prevention, Emergency Preparedness, and Telecommunications. The CCFD includes 72 staff, including 61 sworn personnel and 11 civilian personnel. CCFD facilities include, three fire stations, a telecommunications facility/radio shop, a training drill facility, and City Hall offices (e.g., fire administration office and fire prevention bureau). The CCFD serves an existing population of approximately 42,140 persons. The three CCFD fire stations, their addresses, apparatus, staffing, and distances to the Project Site are identified in Table 4.10.1-1, *CCFD Fire Stations*.<sup>2</sup>

The City is divided into three fire districts, two rescue/emergency medical service (EMS) districts, and 15 fire management zones (FMZs), with the fire and rescue/EMS districts evenly distributed by population and centerline miles of roads served, and the FMZs defined by occupancies within a given geographical area that share common fire risk. The CCFD utilizes a three-shift schedule, staffing each shift for a 24-hour period, seven days a week, and 365 days a year. As indicated in Table 4.10.1-2, *CCFD Daily Minimum Staffing Levels*, the CCFD maintains an on-duty staffing level of 18 personnel for continuous delivery of emergency services. During business hours, sworn administrative personnel are available to augment the on-duty shift and recall procedures are in place to facilitate additional staffing when required.<sup>3</sup>

<sup>1</sup> Culver City Fire Department, Chief David White, correspondence dated August 9, 2016. Information provided in the correspondence includes, but is not limited to, identification of the first-in fire station and supporting fire stations, station staffing and resources, service population, existing response times, emergency response incident data, fire sprinkler and hydrant requirements, and whether there are any plans for new or expanded fire stations.

<sup>2</sup> Culver City Fire Department, Chief David White, correspondence dated August 9, 2016.

<sup>3</sup> Culver City Fire Department, Chief David White, correspondence dated August 9, 2016.

**TABLE 4.10.1-1  
 CCFD FIRE STATIONS**

Fire Station	Address	Apparatus (on-duty and reserve apparatus)	Staffing	Distance from Project Site <sup>a</sup>
Fire Station 1 (headquarters)	9600 Culver Blvd.	Engine, Rescue, Battalion Chief Command Vehicle, Reserve Engines (2), Reserve Truck, Reserve Battalion	7	0.12 mile south
Fire Station 2	11252 Washington Blvd.	Engine, Truck	7	1.75 miles southwest
Fire Station 3	6030 Bristol Prkwy	Engine, Rescue, Reserve Engine, Reserve Rescue, 1 BLS Ambulance	7	2.38 miles south

<sup>a</sup> Approximate distance from Project Site is straight line distance (not driving distance).  
 SOURCE: City of Culver City Fire Department, 2014 Community Risk Assessment & Standards of Cover, 2014, and Michael Nagy, Fire Marshal, CCFD, May 2017.

**TABLE 4.10.1-2  
 CCFD DAILY MINIMUM STAFFING LEVELS**

Type	Number of Apparatus (on-duty apparatus only)	Number of Staff per Apparatus	Total Staff
Engine Company	3	3	9
Truck Company	1	4	4
Rescue	2	2	4
Battalion Chief Command	1	1	1
<b>Total</b>	<b>7</b>	<b>--</b>	<b>18</b>

SOURCE: City of Culver City Fire Department, 2014 Community Risk Assessment & Standards of Cover, 2014.

According to the CCFD, there are no current plans for new or expanded CCFD fire station facilities in the City. However, the CCFD is exploring the idea of implementing a continuously mobile, roaming quick response type 6 engine with some firefighting capability and full paramedic capacity that would patrol Monday through Friday, 7 A.M. to 7 P.M.<sup>4</sup>

The Project Site is located within Fire District 1, Rescue/EMS District 1, and FMZ 5, with first-in service to the Project Site provided by Fire Station 1. Fire District 1 denotes the area where Fire Station 1 provides first-in fire protection service; this area has a service population of 14,030 persons and a service area of approximately two square miles. Rescue/EMS District 1 is the area where Fire Station 1 provides first-in rescue and EMS service; this area has a service population of 20,268 persons and a service area of approximately 2.66 square miles. FMZ 5 denotes an area of downtown Culver City with similar relatively high fire risk; this area covers

<sup>4</sup> Culver City Fire Department, Chief David White, correspondence dated August 9, 2016.

0.24 square miles and includes 33 large businesses, some residential properties, and several properties such as the Project Site and other studio uses, which represent a “special risk”.<sup>5,6</sup>

As indicated in **Table 4.10.1-3, CCFD Fire and Paramedic Incident Data and Response Times (2015)**, the CCFD responded to a total of 5,155 incidents Citywide in 2015. These incidents included 79 structural fires, 4,290 EMS responses, 76 technical rescue responses, 96 hazardous material responses, and 616 other (e.g., good intent, false alarm, etc.) incidents. Within FMZ 5, the CCFD responded to a total of 450 incidents in 2015, including to 9 structural fire, 286 EMS, 13 technical rescue, 5 hazardous material, and 137 other incidents.<sup>7</sup>

**TABLE 4.10.1-3  
 CCFD FIRE AND PARAMEDIC INCIDENT DATA AND RESPONSE TIMES (2015)**

Incident Type	Fire Management Zone 5	Culver City
<b>All Emergencies – 90<sup>th</sup> Percentile</b>		
Incident Count	450	5,155
Average Response Time (1 <sup>st</sup> unit)	6:59 <sup>a</sup>	7:03 <sup>a</sup>
Average Response Time (ERF)	10:27 <sup>a</sup>	9:45 <sup>a</sup>
<b>Structural Fire – 90<sup>th</sup> Percentile</b>		
Incident Count	9	79
Average Response Time (1 <sup>st</sup> Unit)	6:22	6:34
Average Response Time (ERF)	11:14	10:48
<b>EMS – 90<sup>th</sup> Percentile</b>		
Incident Count	286	4,290
Average Response Time (1 <sup>st</sup> Unit)	6:03	8:27
Average Response Time (ERF)	8:43	10:33
<b>Technical Rescue – 90<sup>th</sup> Percentile</b>		
Incident Count	13	76
Average Response Time (1 <sup>st</sup> Unit)	7:06	4:00
Average Response Time (ERF)	N/A	5:57
<b>Hazardous Materials – 90<sup>th</sup> Percentile</b>		
Incident Count	5	96
Average Response Time (1st Unit)	7:51	9:10
Average Response Time (ERF)	11:26	11:39

Abbreviations: EMS = emergency medical service; ERF = effective response force

<sup>a</sup> Calculated by taking the average of the four types of incidents below for the given response type (e.g., 1<sup>st</sup> unit vs. ERF).

SOURCES: Cara Flores, Culver City Fire Department, correspondence dated January 31, 2017. Chief Dave White, Culver City Fire Department, email correspondence, dated August 10, 2016.

- <sup>5</sup> Culver City Fire Department, Chief David White, correspondence dated August 9, 2016. Also Culver City Fire Department, 2014 Community Risk Assessment & Standards of Cover, 2014.
- <sup>6</sup> According to the CCFD’s 2014 Community Risk Assessment & Standards of Cover, “high risk” applies to substantial structure with the potential for high loss of life, while “special risk” applies to high risk structures which, due to their age and type of construction, could be more combustible/collapsible during a fire/earthquake.
- <sup>7</sup> Culver City Fire Department, Chief David White, correspondence dated August 9, 2016. Also, Cara Flores, Culver City Fire Department, correspondence dated January 31, 2017.

As indicated in **Figure 4.10.1-1**, CCFD Fire Stations in the Project Vicinity, Fire Station 1 is located at 9600 Culver Boulevard, approximately two blocks (0.12 mile) south of the Project Site. As indicated in Table 4.10.1-1, Fire Station 1 is equipped with an engine, rescue, Battalion Chief command vehicle, and several reserve apparatus (e.g., engine, truck, and battalion), and is always staffed by at least seven sworn CCFD personnel.<sup>8</sup> CCFD Fire Stations 2 and 3, which provide back-up to service to calls from the Project Site, are located approximately 1.75 miles southwest and 2.38 miles south of the Project Site, respectively.

Based on the above, the existing on-duty firefighter to population ratios Citywide and within Fire District 1 are 1:2,004 and 1:2,341, respectively, while the incidents responded to by the CCFD Citywide in 2015 were 32 incidents per 1,000 persons.

The Project Site is surrounded by urban development, is not located adjacent to any wildlands, and is not located within a City-designated very high fire hazard severity zone (VHFHSZ). Therefore, the Project Site is not located within a high fire hazard area or an area subject to wildland fires.

### **Emergency Response Times**

The CCFD's response time standards differentiate between the first due-in unit (staffed with three firefighters) and the effective response force (ERF, 4-18 firefighters and officers, depending on fire risk). The first due-in unit response time standard is 8:38 minutes 90 percent of the time, while the ERF response time standard is 12:20 minutes 90 percent of the time.<sup>9</sup> As indicated in Table 4.10.1-3, in 2015 the City as a whole had average response times for all incident types of 7:03 minutes and 9:45 minutes for the first due-in and ERF responses, respectively, while FMF 5 had average response times for all incident types of 6:59 minutes and 10:27 minutes, respectively.<sup>10</sup> Given that the overall average FMZ 5 response times for both the first due-in unit and the ERF are below the CCFD's response time standards, and given that Fire Station 1 is located only two blocks from the Project Site, it is expected that CCFD emergency response times to the Project Site are well below CCFD's response time standards.

### **Emergency Access**

As shown on Figure 4.10.1-1, the Project Site is located within an urbanized area that has a fully developed roadway system. Emergency access to the Project vicinity is provided by the I-10 Freeway (located approximately 0.37 mile to the north with on- and off-ramps to Venice Boulevard) and several arterials including Venice, Washington and Culver Boulevards. Direct emergency access to the Project Site is provided by each of the three streets bordering the Project Site, including from Gate 1 along Washington Boulevard, Gates 2 through 4 along Ince Boulevard, and the Van Buren Gate along Van Buren Place.

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<sup>8</sup> Culver City Fire Department, Chief David White, correspondence dated August 9, 2016.

<sup>9</sup> Culver City Fire Department, Chief David White, correspondence dated August 9, 2016.

<sup>10</sup> Ibid. Also, Cara Flores, Culver City Fire Department, correspondence dated January 31, 2017.



SOURCE: ESRI Street Map, 2010.

The Culver Studios Innovation Plan  
**Figure 4.10.1-1**  
 CCFD Fire Stations in the Project Vicinity

Within the Project Site itself, emergency access is provided by a dedicated 20-foot-wide fire lane, accessible from each of the studio gates, which provide access to the entirety of the Project Site. A portion of this fire lane, between Stage 7/8/9 and Stage 11/12/14, is currently less than the required 20 feet wide due to the presence of existing on-site buildings which constrain the fire lane width.

The most direct route to the Project Site from CCFD Fire Station 1, located at 9600 Culver Boulevard approximately two blocks south of the Project Site, is via Culver Boulevard and Washington Boulevard to Gate 1. Multiple other routes exist between Fire Station 1 and the Project Site, as they do from CCFD Fire Stations 2 and 3 which are located 1.75 and 2.38 miles from the Project Site, respectively.

### **Water Infrastructure/Fire Flow for Firefighting Purposes**

Fire flow to the Project Site is currently provided by a looped system of on-site six- and 10-inch fire flow water pipelines that connect to the City's existing eight- to 10-inch water pipeline in Washington Boulevard. The connection to the City's water system occurs at the northwest corner of the Project Site where a lateral goes from the City's Washington Boulevard water pipeline to an on-site pump house before the water is distributed to the on-site loop system. It is noted that an existing eight- to 12-inch City water pipeline is also located in Ince Boulevard, although the on-site fire flow system does not currently connect to that pipeline. Existing fire hydrants are also present around the project boundary. Water pressure in the on-site system in the vicinity of Building J exhibited low pressure during the construction of that building; accordingly, it was recommended that, as new development occurs, a booster system or new public connection be required.

In general, fire flow pressure requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type of occupancy, and degree of fire hazard. The City ensures that adequate fire flow is available to serve proposed development during the development review and Building Permit processes.

### **4.10.1.3 Regulatory Setting**

This section provides a summary of State and local fire protection regulations and policies applicable to the Project.

#### **State**

##### **California Code of Regulations (CCR)**

The California Code of Regulations (CCR) Title 24 2016 California Building Code [CBC] is a compilation of building standards, including fire safety standards for residential and commercial buildings. CBC standards are based on building standards that have been adopted by State agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature, not covered by the national model code. The 2016 California Fire Code (CFC) is part of the CBC. Typical fire safety requirements of the CFC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and, the

clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The CFC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific CFC regulations have been incorporated by reference with amendments, in the Culver City Municipal Code (CCMC).

### **California Mutual Aid System & Plan**

The CCFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Emergency Management Agency, Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Air Plan (Mutual Aid Plan), as managed by the Governor’s Office of Emergency Services (OES).<sup>11</sup> The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. Culver City is located in Region I. Through the Mutual Aid Plan, the OES is informed of conditions in each geographic and organizational area of the state, and the occurrence or imminent threat of disaster. All OES Mutual Aid participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of the OES.

### **Local**

#### **City of Culver City General Plan**

The 1975 Public Safety Element of the Culver City General Plan contains the following fire protection policies applicable to the proposed Project:<sup>12</sup>

- Reduce fire hazards associated with older buildings.
- Encourage improved fire protection for multi-story structures and high-hazard industrial facilities.
- Require all new development and selected existing development to comply with established fire safety standards.

#### **CCFD 2014 Community Risk Assessment & Standards of Cover**

CCFD’s 2014 Community Risk Assessment & Standards of Cover (CRA) serves as the CCFD’s Integrated Risk Management Plan. The CRA defines the process, known as “deployment analysis,” as a written procedure which determines the distribution and concentration of fixed and mobile resources of an organization. The purpose for completing such a document is to assist the agency in ensuring a safe and effective response force for fire suppression, emergency medical services, and specialty response situations. The CRA serves as: (1) a baseline tool for defining service level objectives; (2) a descriptive tool for validating fire station locations; (3) a management tool for determining apparatus type and staffing levels; (4) a predictive tool for helping to determine workload and ideal unit; and (5) a basis for continually measuring service

<sup>11</sup> California Emergency Management Agency, Fire and Rescue Division, California Fire and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised February 2012.

<sup>12</sup> City of Culver City, Culver City General Plan, Public Safety Element, adopted August 25, 1975.

level performance. Performance measures set forth in the CRA applicable to the proposed Project include, but are not limited to, the following:<sup>13</sup>

**Response Time Goals:** Response time goals for fire suppression, technical rescue and HazMat are 6:20 minutes for the first due-in unit and 10:20 minutes for the ERF, 90 percent of the time. Response time goals for EMS are 6:00 minutes for the first due-in unit and 10:00 minutes for the ERF, 90 percent of the time.

It is noted that the above are goals, not standards. The CCFD’s response time standards are addressed in the Environmental Setting and Environmental Impact subsections, above and below, respectively.

**Fire Flow Requirements:** Fire flow requirements range from 2,000 gpm in low-density residential areas up to 12,000 gpm in commercial and industrial areas.

**High/Special Risk Fire Response:** High and Special Fire Risk incidents in the City represent unique critical tasking situations where there is very little historical response information to base tasking upon. These types of incidents are addressed with the region’s mutual aid agreements to help augment City resources. For example, the minimum mutual aid request to meet the demands of a high/special risk fire is an “A Assignment,” (i.e., one truck company, three engine companies, two rescue ambulances, two battalion chiefs, and one EMS Supervisor, requiring 26 personnel to assist with the incident).

#### **City of Culver City Municipal Code**

Sections of the City’s Municipal Code applicable to fire protection and EMS services at the Project Site include, but are not limited to, the following:

**Section 9.02 (Fire Prevention):**

Section 9.02.005 (Adoption of the 2013 CFC): Adopts the 2016 CFC with amendments as the City of Culver City Fire Code (Fire Code).

Sections 9.02.020 and 9.02.030 (Special Events and Assemblage): A permit is required from the CCFD for special events and assemblages.

Section 9.02.035 (Locks for CCFD Access): All noted gates and exterior doors shall be provided with locks for CCFD access - keys shall be provided in NXOX boxes.

Section 9.02.040 (Automatic Fire Sprinkler Systems): An automatic fire-extinguishing (sprinkler) system shall be installed in every new building in the City, hereinafter constructed or moved into the City, regardless of area separation or type of construction.

Section 9.02.055 (Motion Picture and Television Production Studio Stages/Production Facilities): All motion picture and television production studio stages/production facilities shall comply with CCFD’s Filming and Performance Regulations (e.g., Special Permit requirements, requirements

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<sup>13</sup> Culver City Police Department, 2014 Community Risk Assessment & Standards of Cover, 2014.

for the implementation of fire safety during filming, controls on pyrotechnics, whether need for City firefighter presence during filming, etc.).

Section 9.02.065 (Fire Flow Reduction Permitted for Sprinklered Buildings): A reduction in fire flow of up to 50 percent, as approved, is allowed when the building or structure is outfitted with an approved automatic fire sprinkler system, but the resulting fire-flow shall not be less than 1,500 gpm for the prescribed duration.

Section 9.02.070 (Fire Hydrant Spacing): Fire hydrant spacing in commercial/industrial areas shall be not more than 300 feet apart. The maximum distance of a fire hydrant to a Fire Department Connection (FDC) shall not exceed 150 feet.

#### **4.10.1.4 Environmental Impacts**

##### ***Methodology***

Fire protection and EMS service needs relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of the community and the Project. Changes in these factors resulting from the Project may increase the demand for service.

The CCFD evaluates the demand for fire protection and EMS services on a project-by-project basis, including review of a project's emergency features, to determine if a project would require new or expanded fire protection facilities, apparatus and/or personnel to maintain the existing level of service. Beyond consistency with applicable fire protection standards of the CCMC and other applicable regulations and plans, the following analysis considers: (1) the increase in demand for service created by the Project based on the City's existing firefighter to population ratio and number of fire incidents per 1,000 population; (2) impacts to emergency response times based on the distance of the nearest fire station and existing CCFD response times; (3) impacts to emergency access based on current avenues of access and the proposed on-site fire lane; and (4) whether adequate fire flow is available to serve the Project (based on existing fire flow pressure in the water pipelines serving the Project Site), and whether this meets the fire flow required by the proposed uses as identified by the City). Based on these factors, a determination is made as to whether the CCFD would require new or expanded fire protection facilities to serve the Project in order to maintain acceptable service ratios and response times. This analysis is based on written correspondence with CCFD, consultation with CCFD as part of the City's PRC process, and review of the CCFD website and applicable provisions of the City's General Plan, 2014 Community Assessment & Standards of Cover, and Fire Code.

##### ***Thresholds of Significance***

The significance threshold below is derived from the Environmental Checklist question in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact to fire protection services would occur if the Project were to:

**FIRE-1:** Generate a demand for fire protection facilities or services that could not be accommodated by the existing level of service, thereby requiring new or expanded fire protection facilities to maintain acceptable service ratios or response times, the construction of which would cause substantial adverse physical impacts.

## ***Project Characteristics and Project Design Features***

### **Project Characteristics**

The Project would include a net increase in development at the Project Site of 413,127 square feet. This would generate an estimated net increase of approximately 524 employees at the Project Site during Project operation.<sup>14</sup>

### **Proposed Fire Access**

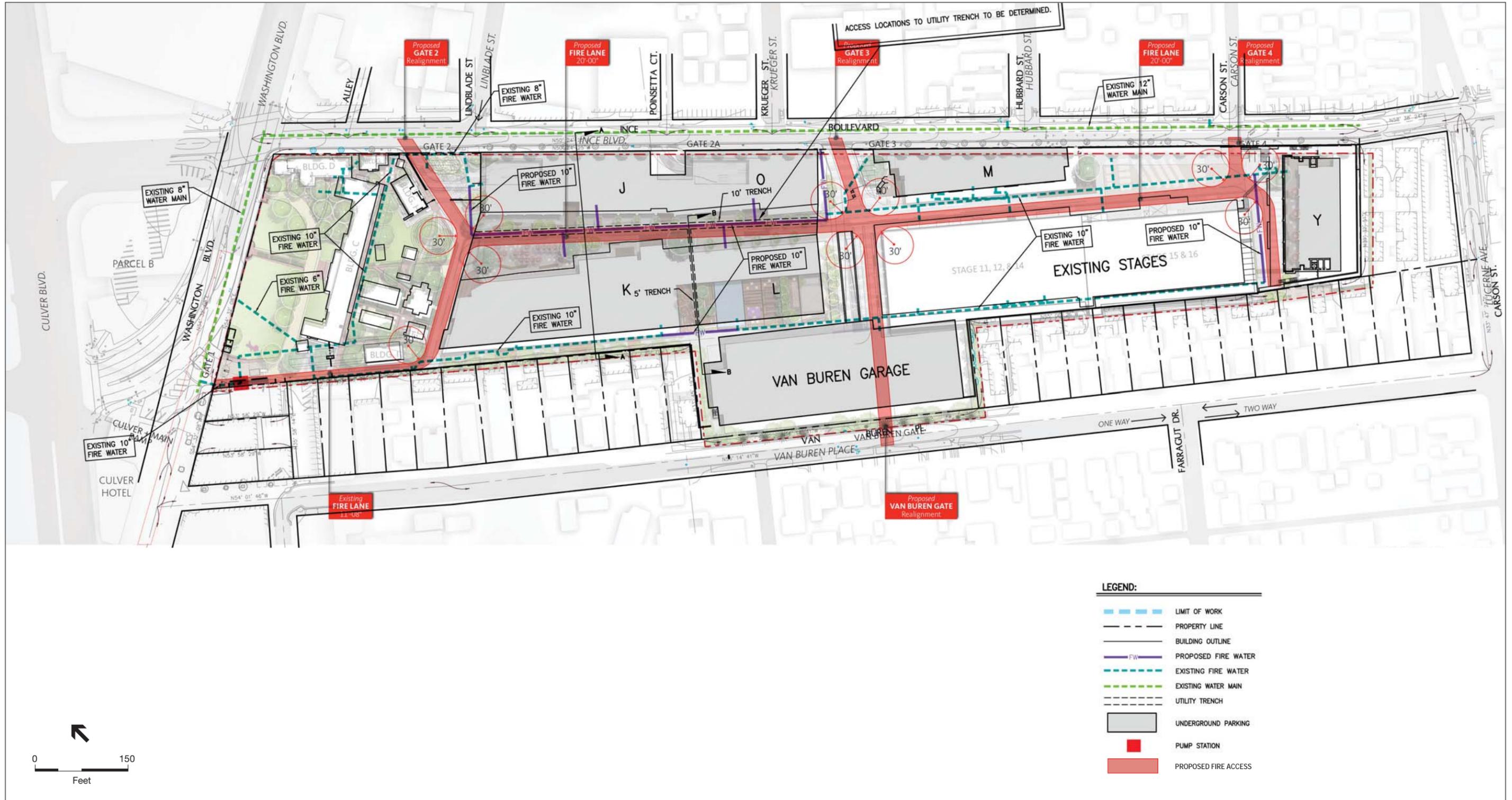
As indicated previously, there is a dedicated on-site fire lane providing access to the entirety of the Project Site. Emergency access is currently provided at Gates 1, 2, 3, 4, and the Van Buren Gate. As indicated in **Figure 4.10-1-2, *Proposed Fire Access/Flow***, the Project would provide an improved on-site fire lane, providing greater access to the Project Site. The fire lane would be a dedicated 20 foot-wide, painted (with “FIRE LANE NO PARKING” every 20 feet), and maintained lane unless impeded by existing buildings and their appendages, and would have 30-foot-wide internal radii to improve accessibility and ease of emergency vehicle turn-movements. Due to existing conditions on the Project Site, one stretch of the fire lane would remain less than 20 feet wide (e.g., at Gate 1). Gates 3 and 4 would be realigned to allow for improved emergency accessibility and maneuverability. Gate 4 would be for emergency access, with signs stating “Fire Access Gate, Do Not Block” on both sides and KNOX Key switches for the new motorized gate.

### **Proposed Fire Flow Infrastructure**

As indicated in Figure 4.10.1-2, the Project would include a looped on-site six- to 10-inch fire flow pipeline system that connects to the City’s eight- to 10-inch water pipeline in Washington Boulevard, similar to existing conditions. The existing on-site fire pump house would be relocated as part of the demolition of Building X, with an interim on-site location to be provided, as approved by the CCFD. Also, all Project buildings would be fire sprinklered in accordance with existing regulations, and any required new on- and/or off-site fire hydrants would be provided.

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<sup>14</sup> See Section XIII.a, Population and Housing, of Attachment B of the Initial Study, included as Appendix A of this Draft EIR, for the calculations used to generate the Project employee estimate.



SOURCE: KPFF and Gensler, 2017

The Culver Studios Innovation Plan  
**Figure 4.10.1-2**  
 Proposed Fire Access/Flow

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## Project Design Features

In addition to the Project regulatory requirements and proposed fire access and fire flow infrastructure described above, the Applicant would implement the following Project Design Feature to reduce the impacts of the Project on fire protection and EMS services:

**PDF-FIRE-1 (Fire Proof/Resistant Construction):** All proposed new buildings will include class A fire resistant roofing, 2-hour fire rated shafts and storage/electrical service/trash rooms, 2-hour fire ratings of one building to another, 100 percent non-combustible treads/risers/stair construction within common stairways, and exterior non-combustible walls where within five feet of the property line and not fronting on a street.

**PDF-FIRE-2 (Fire and Smoke Detectors/Alarms/Sprinklers and Emergency Lighting):** All proposed new, renovated, and relocated buildings will be equipped with NFPA 72 fire/smoke detectors, fire alarms, NFPA 13 automatic fire sprinkler systems connected to the lot's fire monitoring system, and emergency lighting and illuminated EXIT lights with 90-minute battery back-up.

**PDF-FIRE-3 (Submittal of Plans to CCFD for Review/Approval):** Plans for the proposed new buildings, relocated fire pump house, on-site fire lane and associated turn arounds, new fire hydrant locations, and associate fire prevention/suppression equipment, will be submitted to the CCFD for review and approval.

**PDF-TRAF-1 (Construction Management Plan):** A Final Construction Management Plan (FCMP) shall be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, and alternative transportation modes and public transit are minimized to the extent feasible. The FCMP shall be subject to review and approval by Culver City's Building Official, City Engineer and/or Planning Manager, as applicable, prior to issuance of any Project demolition, grading or excavation permit. The FCMP shall also be reviewed and approved by Culver City's Fire and Police Departments. The Culver City 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 FCMP be prepared by a different engineer.

Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector (Inspectors) of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other representatives of surrounding developments if under construction at around the same time as the Project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another. The FCMP shall assess project construction impacts and provide effective strategies to limit the use of the public right of way (streets and sidewalks) during peak traffic periods, and shall be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.

Prior to approval of the FCMP, the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community:

- Construction schedule and hours.
- Framework for construction phases.
- Identify traffic diversion plan by phase and activity. (The Traffic Control Plan will be submitted for review and approval by the City for each phase).
- Potential location of construction parking and office trailers.
- Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity).
- Emergency access plan.
- Demolition plan.
- Staging plan for the concrete pours, material loading and removal.
- Crane location(s).
- Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).
- Community notification procedures.
- The FCMP shall at a minimum include the following:
  1. The name and telephone number of a contact person who can be reached 24 hours a day regarding construction or construction traffic complaints or emergency situations.
  2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties.
  3. Construction plans and procedures to address: community and City notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures and best practices to reduce disturbances to adjacent and nearby land uses.
  4. Procedures for the training and certification of flag persons.
  5. To the extent known identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and, plans for use of protective devices, warning signs, and staging or queuing areas.
  6. The location of temporary power, portable toilet and trash and materials storage locations.

7. The timing and duration of all street and/or lane closures 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.
8. Provisions that staging of construction equipment and materials will be accommodated within the Studio Campus and that construction worker parking will be accommodated on the Studio Campus and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Studio Campus.

**PDF-WATER-4:** Prior to construction, building plans shall be submitted to the Culver City Fire Department (CCFD) to determine fire flow and time period requirements based on tenant type, building size, and building type. If additional fire service lines and hydrants are required to maintain adequate fire flow, the Project shall install fire service lines and hydrants as required.

### ***Analysis of Project Impacts***

**Threshold FIRE-1:** The Project would have a significant impact on fire protection if it would generate a demand for fire protection facilities or services that could not be accommodated by the existing level of service, thereby requiring new or expanded fire protection facilities to maintain acceptable service ratios or response times, the construction of which would cause substantial adverse physical impacts.

**Impact Statement FIRE-1: Project construction and operation would not require new or expanded fire protection facilities to maintain service due to compliance with City Fire Code requirements and proposed Project Design Features that address fire safety, emergency access, emergency response times, and fire flow. Therefore, construction and operational impacts would be less than significant.**

### **Construction**

Project construction activities would include demolition, site preparation including trenching for utilities, and construction of new buildings and street improvements during the approximately 32-month construction period. These periodic construction activities could temporarily increase the demand for fire protection and EMS through 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, Project construction activities would occur in accordance with California Division of Occupational Safety and Health Administration (Cal/OSHA) and Culver City Fire Code requirements (including Chapter 33 of the CBC, Fire Safety During Construction and Demolition) which have been formulated to avoid substantial fire risk during construction activities. These requirements include, but are not limited to: provision of fire suppression equipment specific to construction at the construction sites; training of construction managers and personnel in fire prevention and emergency response; storing flammable and combustible liquids in fire proof containers; proper maintenance of construction equipment; the handling of flammable materials in accordance with strict requirements and

manufacturer instructions; and the clean-up of any spills of flammable materials accordance with applicable requirements. Furthermore, construction activities would occur in the midst of the existing fire hydrants in the area. Therefore, the demand for fire protection and EMS during construction would be less than significant.

Regarding emergency access and response times during construction, per PDF-TRAF-1, construction staging and construction worker parking associated with the Project would be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. In addition, as required by the CCFD and PDF-TRAF-1, emergency access would be provided and maintained throughout construction to the Project Site, adjacent uses, and fire hydrants. Furthermore, while the Project would generate construction traffic and potentially require off-site utility and roadway improvements and associated temporary lane closures along one or more of the three streets bordering the Project Site: (1) as discussed in Section 4.11, Transportation and Traffic, construction traffic impacts would be less than significant with the implementation of the Construction Management Plan required by PDF-TRAF-1 ; and (2) per PDF-TRAF-1, Project construction contractors would coordinate with the CCFD concerning any planned temporary lane closures and other construction activities that could affect emergency access and emergency response times, and arrange for traffic control devices and detours to minimize any potential impacts to traffic. Lastly, the Project Site is located only two blocks from CCFD Fire Station 1, as is most of the Project vicinity, such that even if Project construction activities were to temporarily slow traffic in the area, it is anticipated that emergency response times to the Project Site and adjacent area would continue to remain well below existing City average response times and close to or below City response time goals. Therefore, impacts on emergency access and response times during Project construction would also be less than significant.

## **Operation**

### **Fire Protection Facilities and Services**

As indicated previously, the Project would result in a net increase of 413,127 square feet of new floor area and 524 employees at the Studio Campus.<sup>15</sup> Based on the existing Citywide fire/EMS incident to population ratio of 32 incidents per 1,000 persons, and the existing firefighter to population ratio within CCFD Fire District 1 of 1:2,341, the Project would generate the potential for an estimated 168 additional fire/EMS incidents per year requiring CCFD response, and a potential increase in demand for services that could translate to the need for approximately 0.3 additional CCFD firefighters (based purely on a mathematical analysis). However, the potential for an increase in the number of service calls and firefighter demand associated with the Project would represent very small proportions (approximately 3 and 1 percent, respectively) of the total number of Citywide service calls and CCFD firefighters. Because of these very small numbers, it is anticipated that Fire Station 1 would be able to accommodate the additional demand associated with the Project without the need for expansion or development of a new fire station.

Furthermore, the above estimates are conservative because they do not account for the reductions in fire/EMS incidents and service demand that would occur under the Project associated with:

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<sup>15</sup> See Section XIII.a, Population and Housing, of Attachment B of the Initial Study, included as Appendix A of this Draft EIR, for the calculations used to generate the Project employee estimate.

replacing existing older buildings at the Project Site, which are classified as “special risk” (e.g., combustible/collapsible) by the CCFD’s 2014 Community Risk Assessment and Standards of Cover document, with new buildings constructed to the latest Building and Fire Codes and, per PDF-FIRE-1 and PDF-FIRE-2, constructed with fire proof or fire resistant construction materials, fire and smoke detectors, fire alarms, automatic fire sprinkler systems connected to the lot’s fire monitoring system, emergency lighting, lit EXIT signs, and back-up power. The estimates also do not take into account the provision of additional fire hydrants as may be required to meet spacing requirements under CCMC Section 9.02.070, and the greater and more rapid emergency access to be provided the CCFD within the Project Site by: (1) the proposed improved fire lane that would provide multiple ingress/egress points and turning radii/hammerheads developed to CCFD specifications; and (2) the CCFD-accessible gates and exterior door locks required under CCMC Section 9.02.035. Lastly, as required by PDF-FIRE-3, plans for the proposed improvements, improved fire lane, fire hydrant locations, and associated fire prevention/suppression equipment would be submitted to the CCFD for review and approval at the building permit and plan check phases of the Project which would ensure compliance with applicable Fire Code requirements, thereby minimizing the risk of increased operational fire safety hazards.

Based on the above, Project operation would not require new or expanded fire protection facilities to maintain existing service ratios. Therefore, Project operational fire protection and EMS impacts would be less than significant.

#### Emergency Response Times

As discussed previously, CCFD emergency response times within FMZ 5 (the fire management zone within which the Project Site is located) for all incidents in 2015 were 6:59 minutes for the first due-in unit and 10:27 minutes for the ERF, 90 percent of the time, which are below CCFD’s response time standards of 8:38 minutes for the first due-in unit and 12:20 minutes for ERF, 90 percent of the time. In addition, CCFD Fire Station 1, the first due-in station to fire, EMS, technical rescue and hazardous materials incidents at the Project Site, is located only two blocks south of the Project Site such that CCFD emergency response times to the Project Site and the surrounding neighborhood are expected to be well below the CCFD’s response time standards.

Project operation would generate significant unavoidable peak hour traffic impacts at multiple intersections in the Project as discussed in Section 4.11, Transportation and Traffic, of this Draft EIR, which could adversely affect CCFD emergency response times. However, the Project Site is located in an established urban area that is well served by the surrounding roadway network, and multiple alternative routes exist in the area for emergency vehicles and evacuation. Furthermore, 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 station response such that the significantly impacted streets would still be available for use as CCFD emergency response routes. In addition, the Project would improve the on-site fire lane, including providing multiple ingress/egress points and turning radii/hammerheads developed to CCFD specifications, and would provide CCFD-accessible gates and exterior door locks as required under CCMC Section 9.02.035, which would increase CCFD access and response within the Project Site. Lastly, mitigation is identified in Section 4.11 of this Draft EIR to reduce the vehicle trips generated by the Project and the associated congestion on the local

roadway network as much as possible. For all these, Project operation would not result in impacts to emergency response times that would require new or expanded fire protection facilities, and the impact would be less than significant.

### Emergency Access

As discussed previously and as shown in Figure 4.10.1-1, the Project Site is located within an urbanized area with a fully developed roadway system. Direct emergency access to the Project Site is provided by each of the three streets bordering the Project Site, including from Gate 1 along the abandoned portion of Washington Boulevard, Gates 2 through 4 along Ince Boulevard, and the Van Buren Gate along Van Buren Place. This direct access to the Project Site would be maintained under the Project, although several of the Studio gate locations would be adjusted slightly and their lane geometrics reconfigured to meet current City lane geometric and access requirements and help straighten out the on-site fire lane (discussed below). Within the Project Site itself, emergency access would continue to be provided by a dedicated 20-foot-wide fire lane, accessible from each of the studio gates, although as indicated in Figure 4.10-1-2, this fire lane would be reconfigured and straightened in places to accommodate the new development, provide access to the entirety of the Project Site, and provide better emergency access (such as by meeting CCFD turning radii and hammerhead configuration requirements). In addition, an underground vehicular connection, the Culver/Main Tunnel, is proposed between Culver Boulevard and the existing Rear Lawn Parking Structure, which would increase emergency access to the Project Site. Lastly, CCFD-accessible gates and exterior door locks would be provided as required by CCMC Section 9.02.035.

The most direct route to the Project Site from CCFD Fire Station 1, located at 9600 Culver Boulevard approximately two blocks south of the Project Site, is via Culver Boulevard and the abandoned portion of Washington Boulevard to studio Gate 1. Multiple other routes exist between Fire Station 1 and the Project Site, as they do from CCFD Fire Stations 2 and 3 which are located 1.75 and 2.38 miles from the Project Site, respectively. This would not change under the Project (e.g., no permanent closures or realignments of surrounding streets, or the removal of lanes on these streets for parking or other uses, is proposed). Furthermore, any roadway and traffic improvements on the surrounding streets would comply with applicable CCMC requirements and would be subject to review and approved by the City.

As indicated previously, a portion of the existing on-site fire lane, between Stage 7/8/9 and Stage 11/12/14, south of Gate 3, is currently less than the required 20 feet wide due to the presence of existing on-site buildings which constrain the fire lane width. This condition would be corrected if and when Stages 7/8/9 are replaced with proposed Building M under the Project. This action is contingent on City approval and the timing of Project implementation. Note that The Culver Studios had previously obtained CCFD approval under CPA No. 6 for a work-around of this existing constrained fire lane condition via provision of a hammerhead south of the bottleneck location which would provide sufficient equipment maneuvering space to allow CCFD to be satisfied with its ability to fight fires on those structures. If, for any reason, replacement of Stages 7/8/9 with Building M would not occur, this hammerhead alternative would be implemented.

Based on the above, emergency access to, within, and around the Project Site would improve under the Project, Project operation would not result in impacts to emergency access that would require new or expanded fire protection facilities, and the impact would be less than significant.

#### Water Infrastructures/Fire Flow for Firefighting Purposes

Fire flow requirements are based on building size and construction type. The Project Site is served by a loop system that connects to two 10-inch and 6-inch laterals in Washington Boulevard. Existing fire hydrants are present around the Project boundary. Although fire service lines are provided to the Project Site, additional hydrants may be required depending on the Fire Department's review of development plans. In addition, current fire regulations require that all buildings be equipped with sprinkler systems, which may also increase fire flow demand. PDF-WATER-4 requires that, prior to construction, building plans be submitted to the CCFD to determine fire flow and time period requirements based on tenant type, building size, and building type. If additional fire service lines and hydrants are required to maintain adequate fire flow, the Project shall install fire service lines and hydrants as required. With implementation of PDF-WATER-4, operational impacts to the City's domestic and fire water service facilities and infrastructure would be less than significant.

#### **Cumulative Impacts**

Chapter 3, General Description of Environmental Setting, of this Draft EIR provides a list of 56 related projects that are planned or are under construction within an approximately 2-mile radius of the Project Site. These projects are summarized in Table 3-1, Related Projects List, and shown on Figure 3-1, Related Projects Map, in Chapter 3 of this Draft EIR. These related Projects occur in two separate jurisdictions, the City of Culver City and the City of Los Angeles. Of the 56 related projects, 48 occur within Culver City and, like the proposed Project, would create a demand for fire protection service from the CCFD.

The total amount of development and associated daytime population from the related projects located in Culver City are identified in **Table 4.10.1-4, Related Projects for Fire Protection**. As indicated therein, the related projects in the City would generate an estimated daytime population of approximately 5,174 persons which, when combined with the net increase of 524 employees associated with the proposed Project, would generate a cumulative daytime population of 5,698 persons requiring fire protection service from the CCFD. Applying the existing firefighter to population ratio in CCFD Fire District 1 (where the proposed Project and most of the related projects are located) of 1:2,341, this cumulative population would create a demand for approximately 2.4 additional CCFD firefighters (2.1 associated with the related projects and 0.3 associated with the proposed Project).

Although a cumulative demand for CCFD fire protection and EMS could occur, this demand would be reduced through regulatory compliance, similar to the Project. All the related projects in Culver City would be subject to review by the CCFD for compliance with applicable fire and building code requirements related to fire safety, emergency response times, emergency access, and fire flow which have been formulated to avoid significant fire protection and EMS impacts.

**TABLE 4.10.1-4  
 RELATED PROJECTS FOR FIRE PROTECTION**

<b>Land Use</b>	<b>Quantity<sup>a</sup></b>	<b>Generation Factor</b>	<b>Daytime Population<sup>a</sup></b>
Residential	920 du	2.36/du <sup>b</sup>	2,171
Assisted Living	110 beds	1/bed <sup>c</sup>	110
Commercial	573,930 sf	1.27/ksf <sup>d</sup>	729
Office	956,010 sf	1.27/ksf <sup>d</sup>	1,214
Restaurant	93,720 sf	1.27/ksf <sup>d</sup>	119
Hotel	148 rms	1/rm <sup>c</sup>	148
Manufacturing/Warehouse	0 sf	1.27/ksf <sup>d</sup>	0
Industrial	0 sf	1.27/ksf <sup>d</sup>	0
Theater	400 seat	1/seat <sup>c</sup>	400
School	150 stu	1/stu <sup>c</sup>	150
College	92,000 sf	1.27/ksf <sup>d</sup>	117
Museum	12,600 sf	1.27/ksf <sup>d</sup>	16
Park	4 ac	--	--
Light Rail Station Expansion	--	--	--
<b>Subtotal</b>	--	--	<b>5,174</b>
<b>Proposed Project</b>	--	--	<b>524</b>
<b>Total</b>	--	--	<b>5,698</b>

Abbreviations: du = dwelling units, sf = square feet, rms = rooms, stu = student, ksf = thousand square feet.

<sup>a</sup> Includes only those 48 related projects located in Culver City.

<sup>b</sup> 2010 federal Census: <https://www.census.gov/quickfacts/table/PST045213/0617568/embed/accessible>. Accessed March 7, 2017.

<sup>c</sup> Assumes 1:1 correspondence between number of beds, rooms, seats and students and number of persons.

<sup>d</sup> Assumes same employee generation as the proposed Project (e.g., 413,127 sf/524 employees = 1.27 empl0yees/ksf).

SOURCE: ESA PCR, April 2017

In addition, the CCFD’s operating budget includes funds generated by property tax revenues which are supplemented by tax-base expansion. Tax-base revenue from Project development, together with revenues from past, present, and reasonably foreseeable future projects, would generate funding for fire protection services. This funding would support any needed increases in fire stations, staffing, and equipment to keep response times within acceptable limits.

Lastly, given that the 2.4 additional firefighters required by the cumulative development at Fire Station 1 would represent only approximately one-third of the existing number of firefighters at this station, it is anticipated that these additional firefighters would be accommodated at Fire Station 1. If these additional firefighters could not be accommodated at the fire station, the cumulative demand for fire protection facilities could potentially contribute to the future need for a new or expanded fire station to accommodate the additional firefighters and their equipment. While the construction of any such station could potentially result in substantial adverse physical impacts (for example, air emissions and noise during construction, traffic during operation),

construction activities would be guided by City code requirements and potentially through mitigation measures required through a CEQA process. Currently CCFD does not currently have plans for new fire protection facilities, and it is not clear whether new or expanded facilities might be required in the future to accommodate demand from development projects. Therefore, it is speculative to predict the environmental effects resulting from any such improvements, and per State CEQA Guidelines Section 15145 regarding speculation, no further analysis is required.

Based on the above, the Project would not substantially contribute to cumulatively considerable impacts regarding fire protection. Therefore, cumulative impacts would be less than significant.

#### **4.10.1.5 Mitigation Measures**

No mitigation measures are required, as impacts would be less than significant.

#### **4.10.1.6 Level of Significance after Mitigation**

Not applicable. Project-specific and cumulative impacts related to fire protection would be less than significant.

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## 4.10.2 Police Protection

### 4.10.2.1 Introduction

This section addresses potential impacts on police services that could occur due to construction and operation of the Project. The analysis focuses on the Culver City Police Department (CCPD) facilities that currently serve the Project Site and the ability of the CCPD to provide police protection services to the Project. The analysis is based on information provided in a September 21, 2016 correspondence from the CCPD (included in Appendix J of this Draft EIR), input received through the City Public Review Committee (PRC) process, information available on the CCPD's website, and information from other published sources.

### 4.10.2.2 Environmental Setting

#### *Existing Conditions*

Police protection for Culver City and the Project Site is provided by the CCPD, with assistance on an as-needed basis through mutual aid agreements from the cities of Los Angeles, Santa Monica and Beverly Hills Police Departments and the Los Angeles County Sheriff's Department through mutual aid agreements.<sup>1</sup> The CCPD has 105 sworn officers, 21 reserve officers, and 56 professional staff which serve an area of approximately five square miles with nighttime and daytime populations of approximately 40,000 and 200,000, respectively.<sup>2</sup> In addition, the City has authorized CCPD to hire an additional four sworn officers for a total of 109 sworn officers.<sup>3</sup> Assuming the hiring of the new officers, the City will have a sworn officer to daytime population ratio of approximately 1:1,834.

As indicated in **Figure 4.10.2-1, Culver City Police Station**, the CCPD's police station is located at 4040 Duquesne Avenue, 2½ blocks (0.18-mile) south of the Project Site. In addition, the CCPD utilizes a regional communications center (e.g., South Bay Communications Center) along with several other local cities, a mobile command center that can be activated during emergencies, two K-9 units, and access to the County's SWAT team when needed.<sup>4</sup> The CCPD is divided into five districts which allows the CCPD to maintain average response times of three minutes or less to emergency calls and 20 minutes or less to non-emergency calls.<sup>5</sup> The Project Site is located within CCPD District 1 which covers the portion of the City northeast of Duquesne Avenue.<sup>6</sup>

<sup>1</sup> E-mailed correspondence from Captain Ron Iizuka, Culver City Police Department, September 21, 2016.

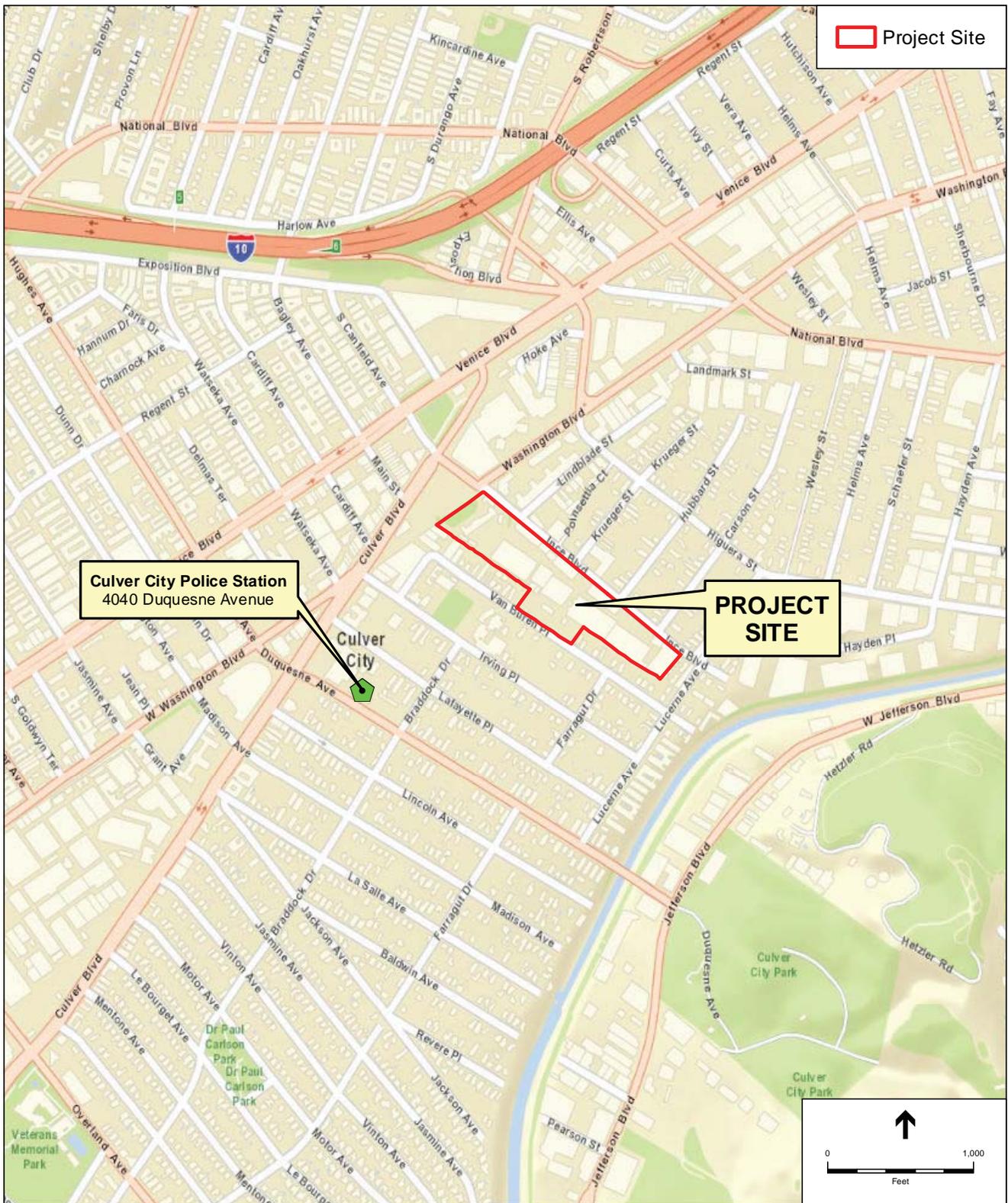
<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

<sup>4</sup> E-mailed correspondence from Captain Ron Iizuka, Culver City Police Department, September 21, 2016. Also, Culver City, Environmental Impact Report for the Entrada Office Tower, SCH #2007051061, November 2007.

<sup>5</sup> Ibid.

<sup>6</sup> Culver City Police Department website, Operations Bureau, Culver City CCPD Districts Map, dated March 2, 2017.



SOURCE: ESRI Street Map, 2010.

The Culver Studios Innovation Plan  
**Figure 4.10.2-1**  
 Culver City Police Station

**Table 4.10.2-1, *Culver City 2015 Part I Crime Statistics***, identifies Part I crimes reported in the City in 2015 (the latest annual crime statistics). As indicated therein, a total of 2,329 Part I crimes were reported in the City in 2015, including 122 assaults, 240 burglaries, 85 robberies, 26 rapes, and 1,856 cases of theft. No arsons or homicides were reported in the City in 2015.

**TABLE 4.10.2-1  
 CULVER CITY 2015 PART I CRIME STATISTICS**

<b>Crime Type</b>	<b>Number</b>
Assault	122
Arson	0
Burglary	240
Homicide	0
Robbery	85
Rape	26
Theft	1,856
<b>Total</b>	<b>2,329</b>

SOURCE: E-mailed correspondence from Assistant Chief Ron Iizuka, Culver City Police Department, September 21, 2016.

Based on these numbers and the City daytime population of 200,000 identified previously, the City has an existing annual crime rate of approximately 11.5 Part I Crimes per 1,000 population which is considered a relatively low crime rate when compared to other cities in the Los Angeles area.

The CCPD is responsible for providing visible patrol, preliminary criminal investigations, follow-up investigations, traffic accident investigations, and specialized investigations of crimes such as identify theft, vice offenses, and similar crimes. The CCPD attempts to enhance community safety through the deterrence and prevention of crime, the apprehension of offenders, and the education of the public in self-protective measures to minimize victimization. New projects are reviewed by the CCPD in accordance with Culver City Municipal Code Section 17.540 to ensure that public safety and site security measures are incorporated. In addition, the CCPD provides neighborhood and business watch programs to prevent criminal activities. Seminars are conducted for the business community to advise business leaders and their employees on ways to minimize losses from theft. Crime patterns are routinely analyzed and dispersed to patrol officers and special crime suppression units.

Police protection for the Project Site is provided by the CCPD with the first responder dispatched based on availability and the nearest unit to the Project Site at the time of the service call.

As a Studio Campus, the Project Site is fully secured and strictly monitored with: security fencing; guard gates at site access points; 24-hour a day, seven day a week security personnel; on-site roving security patrols; controlled access (e.g., ID badges for employees and pre-authorized visitors which are scanned or swiped at the guard gates upon entry); closed-circuit television

(CCTV) surveillance; security lighting; and additional security personnel during special events (e.g., additional security supervisors, off duty police officers, and specially trained guards). Furthermore: tenants are not issued stage keys - stages can only be opened or locked by Studio guards or Studio personnel; on-site parking is monitored by the security personnel; and tenants with on-site parking privileges are issued parking identification tags which must be hung from each car's rear-view mirror. Gate 2 is the main gate and security command post for the Studio, with Gates 1 and 3 typically operating Monday through Friday.

### **4.10.2.3 Regulatory Framework**

This section provides a summary of local police protection regulations and policies applicable to the Project Site.

#### ***Local***

##### **County of Los Angeles**

The Office of Emergency Management (OEM), established by Chapter 2.68 of the County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization. The OEM's broad responsibilities include, among others, planning and coordination of emergency services on a County-wide basis.

The County of Los Angeles organizes a formal mutual aid agreement between all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. Formal mutual aid requests between police departments can be made under the purview of the County Sheriff's Department; however, additional informal agreements may be made directly between the police agencies. The Mutual Aid Operations Plan provides a structure of response should an emergency arise which requires immediate response by more law enforcement personnel than would be available to CCPD using all other available resources.

##### **City of Culver City**

###### **City of Culver City General Plan**

The City's General Plan does not identify any goals, objectives, policies, standards or guidelines specifically applicable to police protection.

###### **City of Culver City Police Department Strategic Plan (Fiscal Year 2016-2019)**

The CCPD Strategic Plan (Fiscal Year 2016-2019) identifies department goals for CCPD operations, traffic, investigations and administration. Relevant applicable Strategic Plan goals are listed below:

- Maintain an emergency response time of 3½ minutes or less and reduce non-emergency response time.
- Impact critical crime occurrences by reinstating a patrol night-shift that will function as an Operations Bureau Special Problem Unit.
- Improve safety through increased bicycle and pedestrian education/enforcement.

- Strengthen community partnerships.
- Augment efforts to suppress criminal activity within Culver City.

#### City of Culver City Municipal Code

Sections of the City’s Municipal Code applicable to police protection services at the Project Site include, but are not limited to, the following:

Section 17.560 (Comprehensive Plans): This section provides procedures and standards for Comprehensive Plans, including required findings to ensure that the proposed development is capable of creating an environment of sustained desirability and stability and will not be substantially detrimental to present and potential surrounding uses. As part of the Comprehensive Plan process, the Planning Department circulates project plans to other City departments for review and comment, including to the CCPD.

Section 17.300.040 (Outdoor Lighting): This section requires that security lighting be provided at all building entrances and exits.

Section 9.07.055 (Amplified Sounds): This section requires a permit for amplified sounds audible at a distance of fifty (50) feet or beyond the subject's property line, and limits the operation of amplified sound equipment meeting the audible distance requirement to between the hours of: 8:00 a.m. through 8:00 p.m. Monday through Thursday; 8:00 a.m. through 10:00 p.m. Friday; 10:00 a.m. through 10:00 p.m. Saturday; and 10:00 a.m. through 8:00 p.m. Sunday and City specified holidays.

Section 11.04.030 (Service Charges): This section allows the City to assess service charges to property owners for each false alarm that results in a CCPD response in excess of three false alarms in a 12-month period.

### 4.10.2.4 Environmental Impacts

#### ***Methodology***

The analysis of impacts on police protection addresses the Project’s effects on the ability of the CCPD to adequately serve the Project. The analysis considers Project impacts to service ratios and emergency response times, taking into account regulatory requirements and Project characteristics and Project Design Features that serve to reduce demand for police protection in order to determine whether the Project would require new or expanded police protection facilities. The analysis presents statistical data for the City, including the existing sworn officer to daytime population ratio in the City and the City’s existing crime rate. The analysis then calculates the increases in the demand for sworn officers and the number of crimes that can be expected under the Project by applying this ratio and rate to the estimated net increase in daytime population at the Project Site under the proposed Project.

#### ***Thresholds of Significance***

The significance threshold below is derived from the Environmental Checklist question in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact associated with police protection would occur if the Project were to:

- **POL-1:** Generate a demand for police facilities or services that would require new or expanded police facilities to maintain acceptable service ratios or response times, the construction of which would cause substantial adverse physical impacts.

## ***Project Characteristics and Project Design Features***

### **Project Characteristics**

The Project would include a net increase at the Project Site of 413,127 square feet of floor area. This would generate an estimated net increase of approximately 524 employees at the Project Site during Project operation.<sup>7</sup> As under current conditions, the Project Site would be strictly controlled and existing security features would remain in place and be expanded or upgraded to serve new facilities within the Studio Campus. Specifically, the Project would continue to implement the same strict on-site security measures during operation as currently implemented at the Project Site (e.g., on-site security personnel, guard-gated access, etc.), and will provide secure on-site vehicular and bicycle parking. The Culver Studios currently conducts occasional special events and gatherings at the Studio Campus, including in the Front Lawn area. Depending on the size and nature of these events additional security is provided. Under the Project, security for events in the Front Lawn area and security for the Studio Campus as a whole during events would continue to be maintained at a high level.

### **Project Design Features**

There are certain practices and features of the Project that would serve to reduce or avoid environmental impacts. The following Project Design Features (PDFs) would serve to reduce or avoid potential impacts associated with police protection and have been accounted for in the impact analysis:

**PDF-POL-1 (Project Site Security and Access During Construction):** Project construction sites will be enclosed with security fencing during the construction period, lit with security lighting, and patrolled periodically by Studio security personnel, and emergency access on and within the vicinity of the Project Site will be maintained during construction.

**PDF-POL-2 (Coordination with CCPD):** The Culver Studios will regularly coordinate with the CCPD, including providing the CCPD with advance notice of pending on-site development activities and special events.

**PDF-TRAF-1 (Construction Management Plan):** A Final Construction Management Plan (FCMP) shall be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, and alternative transportation modes and public transit are minimized to the extent feasible. The FCMP shall be subject to review and approval by Culver City's Building Official, City Engineer and/or Planning Manager, as applicable, prior to issuance of any Project demolition, grading or excavation permit. The FCMP shall also be reviewed and approved by Culver City's Fire and Police Departments. The Culver City 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 FCMP be prepared by a different engineer.

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<sup>7</sup> See Section XIII.a, Population and Housing, of Attachment B of the Initial Study, included as Appendix A of this Draft EIR, for the calculations used to generate the Project employee estimate.

Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector (Inspectors) of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other representatives of surrounding developments if under construction at around the same time as the Project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another. The FCMP shall assess project construction impacts and provide effective strategies to limit the use of the public right of way (streets and sidewalks) during peak traffic periods, and shall be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.

Prior to approval of the FCMP, the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community:

- Construction schedule and hours.
- Framework for construction phases.
- Identify traffic diversion plan by phase and activity. (The Traffic Control Plan will be submitted for review and approval by the City for each phase).
- Potential location of construction parking and office trailers.
- Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity).
- Emergency access plan.
- Demolition plan.
- Staging plan for the concrete pours, material loading and removal.
- Crane location(s).
- Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).
- Community notification procedures.
- The FCMP shall at a minimum include the following:
  1. The name and telephone number of a contact person who can be reached 24 hours a day regarding construction or construction traffic complaints or emergency situations.
  2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties.
  3. Construction plans and procedures to address: community and City notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust

management and control; and worker education on required mitigation measures and best practices to reduce disturbances to adjacent and nearby land uses.

4. Procedures for the training and certification of flag persons.
5. To the extent known identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and, plans for use of protective devices, warning signs, and staging or queuing areas.
6. The location of temporary power, portable toilet and trash and materials storage locations.
7. The timing and duration of all street and/or lane closures 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.
8. Provisions that staging of construction equipment and materials will be accommodated within the Studio Campus and that construction worker parking will be accommodated on the Studio Campus and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Studio Campus.

### ***Analysis of Project Impacts***

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**Threshold POL-1:** The Project would have a significant impact on police protection if it were to generate a demand for police facilities or services that would require new or altered police facilities to maintain acceptable service ratios or response times, the construction of which would cause substantial adverse physical impacts.

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### **Construction**

**Impact Statement POL-1: Impacts on police protection services, access and emergency response times during Project construction would be temporary and less than significant. While Project construction would temporarily add on-site employees and off-site traffic, security features would be incorporated, and emergency access would be maintained.**

### **Police Protection Services**

During Project construction, construction vehicles, equipment and building materials could be temporarily stored on the Project Site. Construction sites are often times subject to potential trespassing, theft, vandalism, and graffiti, and these activities often create a demand for police protection. However, it is not anticipated that any of these would occur as the access to the Project Site is already controlled, the Project Site is already fully fenced, patrolled by security personnel, and monitored with CCTV, and per PDF-POL-1, each construction site within the Studio Campus would be enclosed with security fencing, lit with security lighting, and periodically patrolled by Studio security personnel. Furthermore, the CCPD's police station is located only 2½ blocks south of the Project Site, and the presence of this station so close to the Project Site would likely discourage construction site crime at the Project Site and provide for almost immediate response to any observed or reported construction site crimes in process. Therefore, the demand for police protection during Project construction would not require new or

expanded police protection facilities to maintain acceptable service ratios, and the impact would be less than significant.

### **Police Access and Response Times**

Construction staging and construction worker parking associated with the Project would be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. Also, per PDF-POL-1, emergency access on and within the vicinity of the Project Site would be maintained during construction. In addition, while the Project would generate construction traffic and potentially require temporary lane closures along one or more of the streets bordering the Project Site, as discussed in Section 4.11, Transportation and Traffic, with the implementation of PDF-TRAF-1 requiring the implementation of a City-approved Construction Management Plan, Project construction traffic impacts would be less than significant. Furthermore, as required by PDF-TRAF-1, the CCPD would be informed in advance of any required temporary lane closures and/or alternative access routes during the construction period. Lastly, the CCPD's police station is located only 2½ blocks south of the Project Site such that response times to calls for service from the Project Site and the adjacent neighborhood during construction would be expected to continue to be well below the 3½ minute response time standard set forth in the CCPD's Strategic Plan. Therefore, impacts on police access and response times during Project construction would not require new or expanded police protection facilities to maintain acceptable response times, and the impact would be less than significant.

### **Operation**

**Impact Statement POL-2: Impacts on police protection services related to access and emergency response times during Project operation would be less than significant. While Project operation would add on-site employees and off-site traffic, it would maintain and upgrade the strict security provisions in place at the Studio Campus and improve circulation and access in proximity to the Project Site. Overall, Project effects on police services would not require new or expanded police facilities.**

### **Police Protection Services**

As indicated previously, the Project would result in net increases of 413,127 square feet of floor area and 524 employees at the Studio Campus. Based on the City's existing officer to daytime population ratio 1:1,834, and the City existing annual crime rate of 11.5 Part I crimes per 1,000, Project operation would, without accounting for Studio Campus security features, hypothetically generate an increase in demand for 0.3 additional CCPD sworn officers and an estimated six additional Part I crimes annually.

However, this potential for an increase in officer demand and Part I crimes would represent negligible (e.g., 0.27 and 0.25 percent, respectively) increases in the number of sworn police officers and annual Part I crimes, and it is anticipated that adequate capacity exists at the CCPD police station to accommodate the additional need for services, especially given that police response is typically provided from officers in patrol cars on standard beats rather than from a centralized facility. Furthermore, these estimates are conservative because they do not take into account the reductions in Project-related sworn officer demand and crime associated with: (1) the existing strict on-site security measures (e.g., fully fenced site, on-site Studio security personnel,

controlled access, closed-circuit television video surveillance, security lighting, etc.) which would be continued under the Project (2) the regular coordination of the Studio with the CCPD, including providing the CCPD with advance notice of pending on-site development activities and special events, per PDF-POL-2; (3) the submittal of Project site plans to the CCPD for review and approval, to ensure that the site design incorporates required security and crime reduction features, as required by Culver City Municipal Code Section 17.560; and (4) the close proximity (2½ blocks) of the CCPD police station to the Project Site.

The Project would also include periodic on-site special events at the Project Site, including potential community events at the Studio Campus front lawn, which could potentially increase the demand for police protection services from the CCPD on a periodic basis. However, The Culver Studios would continue to implement the same on-site security measures during Project operation as are currently implemented at the Project Site, including the provision of extra Studio security personnel during special events. The Culver Studios would also inform the CCPD of pending on-site special events in advance per Project Design Feature PDF-POL-2, and would comply with all City requirements applicable to special events, such as Culver City Municipal Code Section 9.07.055 regarding amplified sound. These measures would minimize the demand for police protection services from the CCPD during on-site special events.

Based on the above, the demand for police protection services during Project operation would not require new or expanded police protection facilities to maintain acceptable service ratios, and the impact would be less than significant.

### **Police Access and Response Times**

Per PDF-POL-2, emergency access on and within the vicinity of the Project Site would be maintained during operation. In addition, while the Project would generate significant unavoidable peak hour operational traffic at multiple intersections as discussed in Section 4.11, Transportation and Traffic, which could adversely affect CCPD emergency response times, mitigation is identified in Section 4.11 to reduce the vehicle trips generated by the Project and the associated congestion on the local roadway network as much as possible. Furthermore, 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 unit response. In addition, the CCPD's police station is located only 2½ blocks south of the Project Site such that response times to calls for service from the Project Site and the adjacent neighborhood during operation would be expected to continue to be well below the 3½ response time standard set forth in the CCPD's Strategic Plan. Therefore, impacts on police access and response times during Project operation would not require new or expanded police protection facilities to maintain acceptable response times, and the impact would be less than significant.

### **Cumulative Impacts**

#### **Police Protection Services**

Chapter 3.0, General Description of Environmental Setting, of this Draft EIR provides a list of 56 related projects that are planned or are under construction within an approximately 2-mile radius of the Project Site. These projects are summarized in Table 3-1, Related Projects List, and shown on Figure 3-1, Related Projects Map, in Chapter 3. As shown in Figure 3-1, these related Projects

occur in two separate jurisdictions, the City of Culver City and the City of Los Angeles. Of these related projects, 48 occur within Culver City and, like the Project, would create a demand for police protection service from the CCPD.

The total amount of development and associated daytime population from the related projects located in Culver City are identified in **Table 4.10.2-2, *Related Projects for Police Protection***. As indicated therein, the related projects in the City would generate an estimated daytime population of approximately 6,758 persons which, when combined with the net increase of 524 employees associated with the proposed Project, would generate a cumulative daytime population of 7,282 persons requiring police protection service from the CCPD. Applying the existing sworn police officer to daytime population ratio in the City of 1:1,834, this cumulative population would create a demand for approximately 4.0 additional CCPD sworn officers (3.7 associated with the related projects and 0.3 associated with the proposed Project).

While the proposed Project and the related projects together could potentially and hypothetically generate a demand for approximately four additional CCPD sworn officers, this would represent only an approximately 3.7 percent increase over the existing 109 CCPD sworn officers in the City, with the Project's contribution to this demand (0.3 officer) representing only approximately 7.9 percent of the increase or 0.28 percent of the total existing CCPD sworn officer force. Hence, not only would the cumulative demand for additional CCPD sworn police officers be small, but the Project's contribution to this demand would be less than cumulatively considerable given the strict security features, Project Site controls, and security staff that would continue to be employed on the Studio Campus.

In addition, the cumulative demand for additional CCPD sworn police officers would not be expected to require new or expanded CCPD police facilities that would cause substantial adverse physical impacts. This is because: (1) it is anticipated that the additional officer required by the cumulative development would be able to be accommodated by the CCPD's existing police station facility; (2) the Project and the related projects would generate tax revenues for the City that the City could use to hire the additional officers and accommodate them; (3) even if expansion of the existing police station or development of new police station were required, such expansion/development would likely not lead to substantial adverse physical impacts because of the built out nature of the City and that any new such development would represent negligible infill development; and (4) and even if expansion or the existing police station or the development of a new police station were required, the Project's contribution to any cumulative demand for such facilities would not be cumulatively considerable.

Based on the above, the cumulative demand for police protection services would be less than significant.

**TABLE 4.10.2-2  
 RELATED PROJECTS FOR POLICE PROTECTION**

<b>Land Use</b>	<b>Quantity</b>	<b>Generation Factor</b>	<b>Daytime Population<sup>a</sup></b>
Residential	920 du	2.36/du <sup>a</sup>	2,171
Assisted Living	110 beds	1/bed <sup>b</sup>	110
Commercial	573,930 sf	1.27/ksf <sup>c</sup>	729
Office	956,010 sf	1.27/ksf <sup>c</sup>	1,214
Restaurant	93,720 sf	1.27/ksf <sup>c</sup>	119
Hotel	148 rms	1/rm <sup>b</sup>	148
Manufacturing/Warehouse	0 sf	1.27/ksf <sup>c</sup>	0
Industrial	0 sf	1.27/ksf <sup>c</sup>	0
Theater	400 seat	1/seat <sup>b</sup>	400
School	150 stu	1/stu <sup>b</sup>	150
College	92,000 sf	1.27/ksf <sup>c</sup>	117
Museum	1,260,000	1.27/ksf <sup>c</sup>	1,600
Park	4 ac	--	--
Light Rail Station Expansion	--	--	--
<b>Subtotal</b>	--	--	<b>6,758</b>
<b>Proposed Project</b>	--	--	<b>524</b>
<b>Total</b>	--	--	<b>7,282</b>

Abbreviations: du = dwelling units, sf = square feet, rms = rooms, stu = student, ksf = thousand square feet.

<sup>a</sup> 2010 federal Census: <https://www.census.gov/quickfacts/table/PST045213/0617568/embed/accessible>. Accessed March 7, 2017.

<sup>b</sup> Assumes 1:1 correspondence between number of beds, rooms, seats and students and number of persons.

<sup>c</sup> Assumes same employee generation as the proposed Project (e.g., 413,127 sf/524 employees = 1.27 empl0yees/ksf).

Source: ESA PCR, May 2017.

### Police Access and Response Times

Construction and operation of the proposed Project and the related projects could potentially block access to on-site and adjacent off-site uses, include construction activities (such as temporary lane closures) that disrupt area traffic, and generate construction traffic that results in localized traffic congestion and slows CCPD emergency response.

As indicated previously, Project construction and operation would not result in significant impacts to police access and response times because: (1) Project construction staging and parking would be restricted to the Project Site; (2) emergency access would be maintained during Project construction and operation per Project Design Feature PDF-POL-1 and -2; (3) the Project would be required to be designed to ensure adequate emergency access as ensured during the City site plan review process required by Culver City Municipal Code Section 17.560; (4) mitigation measures would be provided to reduce Project construction and operational traffic impacts, and the Construction Management Plan would be implemented as required by Project Design Feature

PDF-TRAF-1 to ensure the free flow of traffic during construction; and (5) the CCPD's police station is located only 2½ blocks south of the Project Site such that response times to any calls for service from the Project Site and the adjacent neighborhood during operation would be expected to continue to be well below the 3½ response time standard set forth in the CCPD's Strategic Plan.

Similarly, all of the related projects would be subject to a discretionary review by the City where the provision of required on-site emergency access would be ensured, most of the related projects would be required to implement a Construction Management Plan, most of the related projects would be subject to CEQA review where any significant construction and operational traffic impacts would need to be mitigated, and most of the related projects would occur within relatively close proximity of CCPD's police station. In addition, as indicated in PDF-TRAF-1, Construction Management Plan, biweekly construction management meetings with City Staff and other representatives of surrounding developments if under construction at around the same time as the Project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another. Therefore, for generally the same reasons as identified above for the proposed Project, the related projects would not be expected to result in significant impacts to police access and response times, and even if they were, the Project would not contribute considerably to any such cumulative impacts.

#### **4.10.2.5 Mitigation Measures**

No mitigation measures are required, as impacts would be less than significant.

#### **4.10.2.6 Level of Significance after Mitigation**

Not applicable. Project-specific and cumulative impacts related to police protection would be less than significant.

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## 4.11 Transportation and Traffic

### 4.11.1 Introduction

This section describes potential impacts associated with transportation, and includes analyses of construction traffic; intersection capacity; the regional transportation system; public transit; access and circulation, pedestrian and bicycle safety; and parking. The evaluation of intersection capacity examines the impact of the Project relative to existing and future conditions. This section is based on a Traffic Study prepared by Fehr & Peers, included as Appendix K-1 of this Draft EIR.<sup>1</sup> The Traffic Study, which provides more detailed information, data, and analyses, was prepared pursuant to a memorandum of understanding (MOU) with the City of Culver City (City), is included as Appendix A of the Traffic Study.

### 4.11.2 Environmental Setting

#### Existing Conditions

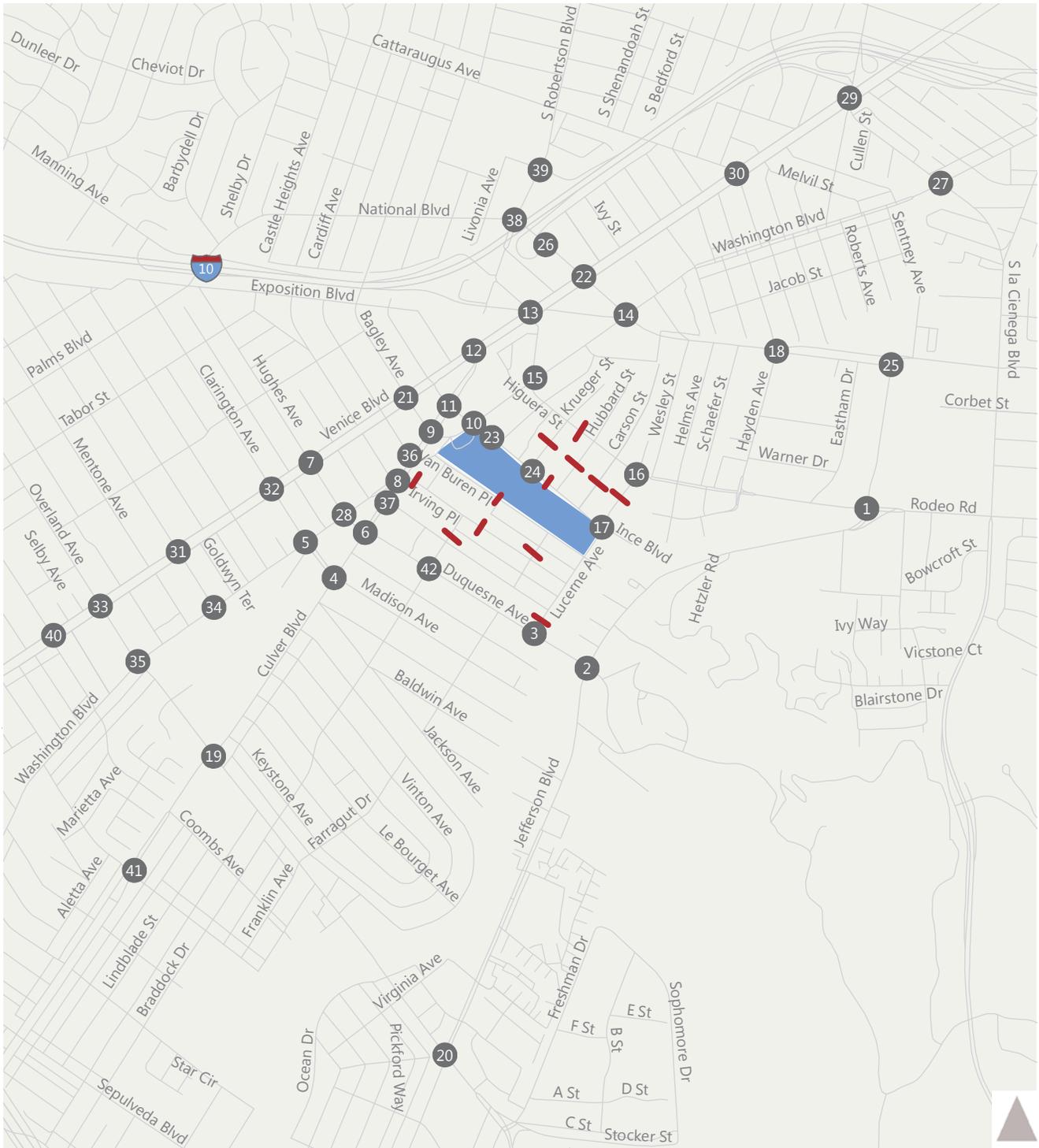
The Project Site encompasses approximately 14 acres at 9336 W. Washington Boulevard in downtown Culver City and is generally bounded by the vacated portion of Washington Boulevard to the north, Lucerne Boulevard to the south, Ince Boulevard to the east, and Van Buren Place to the west. The Project Site currently contains approximately 347,549 square feet (sf) of studio uses along with above- and below-grade structured parking.

Existing vehicular access to the Project Site is provided at five locations from surrounding streets. Gate 1 on Washington Boulevard provides staffed controlled ingress and egress at two locations via a semi-circular driveway that allows pick-up/drop-off at the Mansion as well as access to the southern Studio Campus as well as pedestrian and bicycle access. Gate 2 on Ince Boulevard is the primary entrance and provides secure employee and visitor access, as well as bicycle. Production vehicles and employees use Gates 2 and 3 on Ince Boulevard for ingress and Gate 3 on Ince Boulevard for egress. Gate 4, the southernmost gate on Ince Boulevard, is used for emergency egress and as an alternative exit gate for large production vehicles. The Van Buren Emergency Gate is used only for emergency access.

#### Existing Street System

The study area for traffic (Study Area) includes the geographic area generally bounded by the I-10 and Venice Boulevard to the north, Jefferson Boulevard to the south, the I-10 and S. La Cienega Boulevard to the east, and Overland Avenue to the west. **Figure 4.11-1, Traffic Study Area and Study Intersections/Roadway Segments**, depicts the Study Area and the 42 intersections and 12 roadway segments analyzed. Diagrams of the existing and future lane configurations at each of the analyzed intersections are provided in Appendix B of the Traffic Study.

<sup>1</sup> Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.



- Project Site
- Study Intersections
- Study Street Segments

SOURCE: Fehr & Peers, Traffic Report – Culver Studios Modified Comprehensive Plan Update #7, September 2017.

The Culver Studios Innovation Plan

**Figure 4.11-1**  
Traffic Study Area and Study Intersections/  
Roadway Segments

The Study Area is well-served by a network of freeways and streets, with the freeways under the jurisdiction of the California Department of Transportation (Caltrans) and most of the streets under the jurisdiction of Culver City (with portions of Venice, National and Robertson Boulevards under City of Los Angeles jurisdiction).

Primary regional access to the Project Site is provided by the Santa Monica Freeway (I-10), National Boulevard, Venice Boulevard, and Jefferson Boulevard. Local access is provided by Culver Boulevard, Washington Boulevard and Ince Boulevard. The following is a brief description of the freeways and streets in the Project vicinity:

### ***Freeway***

- **Santa Monica Freeway (I-10):** The I-10 runs east/west approximately a half mile north of the Project Site. Access to the I-10 can be obtained via interchanges at Robertson, Venice, La Cienega, and Washington.

### ***Primary Arterials***

- **Venice Boulevard:** Venice Boulevard is State Route 187 in the study area and provides six travel lanes, three per direction, with a raised median. Restricted and unrestricted parking is available on both sides of the street in the study area. The posted speed limit is 35 miles per hour (mph).
- **Jefferson Boulevard:** Jefferson Boulevard is a raised median arterial that runs north/south within Culver City and then runs east/west in the City of LA adjacent to the Expo line Metro. It provides four travel lanes, two per direction, with a Class II bike lane at certain locations. The posted speed is 35 mph.
- **National Boulevard:** National Boulevard is a major east/west arterial. It has on-ramps for I-10 East in the study area. It provides four travel lanes, two per direction, with a raised median. Parking is not allowed on either side of the street in the study area. The posted speed limit is 35 mph.
- **Robertson Boulevard:** Robertson Boulevard is a north/south road that has on- and off-ramps to the I-10 freeway in the study area. It provides four travel lanes, two per direction. Restricted parking is allowed on one side of the street in the study area. The posted speed limit is 35 mph. It turns into a two lane local route called Higuera Street south of Washington Boulevard.
- **Washington Boulevard:** Washington Boulevard is a major east/west arterial that provides four travel lanes, two per direction, with a raised median near the project site. Restricted and metered parking is available on both sides of the street in the study area. The posted speed limit is 35 mph.
- **Culver Boulevard:** Culver Boulevard is a major east/west arterial that provides four travel lanes, two per direction, with a raised median. Restricted and metered parking is available on both sides of the street in the study area. The posted speed limit is 35 mph.

### ***Collector***

- **Ince Boulevard:** Ince Boulevard provides access to Culver Studios campus via several different gates. This short 2 lane road has metered parking on the southbound side. The posted speed is 25 mph.

## Existing Intersection Service Levels

In consultation with Culver City and the City of Los Angeles Department of Transportation (LADOT), 42 intersections were selected for level of service (LOS) analysis in the Traffic Study as identified in Figure 4.11-1. Of these intersections, 26 are located in Culver City and 16 in the City of Los Angeles, with 36 being signalized and the following six being unsignalized:

- 3. Duquesne Ave./Lucerne Ave (4-way stop controlled)
- 16. Higuera St./Lucerne Ave. (4-way stop controlled)
- 17. Ince Blvd./Lucerne Ave (4-way stop controlled)
- 23. Ince Blvd./Culver Studios Gate 2 (2-way stop controlled)
- 24. Ince Blvd./Culver Studios Gate 3 (2-way stop controlled)
- 42. Duquesne Ave/Braddock Dr. (4-way stop controlled)

Traffic (including turning movement) counts were conducted at each of these intersections between December 2016 and March 2017 during the weekday morning (7:00 AM to 10:00 AM) and evening (3:00 PM to 6:00 PM) peak hours. The existing lane configurations, traffic controls (stop signs and traffic signals), and traffic (including turning movement) counts at each intersection are identified in Figure 4 of the Traffic Study.

Level of service (LOS) is a qualitative measure used to describe the condition of traffic flow on the street system, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. LOS D is typically recognized as the minimum acceptable level of service in urban areas. LOS definitions for signalized intersections are provided in **Table 4.11-1, *Level of Service Definitions for Signalized Intersections***, while LOS definitions for unsignalized intersections are provided in **Table 4.11-2, *Level of Service Definitions for Unsignalized Intersections***.

**TABLE 4.11-1  
 LEVEL OF SERVICE DEFINITIONS FOR SIGNALIZED INTERSECTIONS**

Level of Service	Intersection Capacity Utilization	Definition
A	0.000-0.600	EXCELLENT. No Vehicle waits longer than one red light and no approach phase is fully used.
B	0.601-0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701-0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801-0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume hours occur to permit clearing of developing lines, preventing excessive backups.
E	0.901-1.000	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, Circular No. 212, Interim Materials on Highway Capacity, 1980.

**TABLE 4.11-2  
 LEVEL OF SERVICE DEFINITIONS FOR UNSIGNALIZED INTERSECTIONS**

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

SOURCE: Transportation Research Board, 2010 Highway Capacity Manual, 2010.

For the study intersections in Culver City, the Intersection Capacity Utilization (ICU) methodology was used to determine the intersection volume-to-capacity (V/C) ratio and corresponding LOS. For the four 4-way stop-controlled intersections in the City, the *Highway Capacity Manual* (HCM) (Transportation Research Board, 2010) methodology was used to evaluate the capacity and the performance of the intersection. For the study intersections in the City of Los Angeles, the Critical Movement Analysis (CMA) methodology was used to determine the volume-to-capacity (V/C) ratio and corresponding LOS.

**Table 4.11-3, Existing (2016) Conditions - Intersection Levels of Service**, summarizes the LOS analysis results. As indicated therein, the following six intersections are currently operating at poor levels of service (i.e., LOS E or F) during one or both of the analyzed peak hours:

- 16. Higuera St/Lucerne Ave (AM peak hours)
- 20. Overland Ave/Jefferson Blvd (PM peak hours)
- 25. Jefferson Blvd/ National Blvd (AM peak hours)
- 35. Overland Ave/Washington Blvd (PM peak hours)
- 38. Robertson Blvd/National Blvd (AM & PM peak hours)
- 42. Duquesne Ave/Braddock Dr (AM peak hour)

### Existing Intersection Service Levels – Micro-Simulation Analysis

The addition of new traffic generators and new driveways associated with the Project would affect traffic along Culver and Washington Boulevards within the vicinity of the Project Site, especially during commute peak hours. While Synchro 9.0 was used to evaluate the LOS and vehicular delay at each controlled intersection, as presented above, it is a macroscopic-level traffic software program that does not account for intersection interaction, such as bottlenecks at intersections or queue spillbacks that can affect flow at upstream intersections. Therefore, to ensure that interaction between intersections is considered and to better understand the effect of the Project on traffic throughput on surrounding corridor operations, a micro-simulation model was developed using SimTraffic 9.0 for certain intersections selected in consultation with Culver City along Culver and Washington Boulevards. The model was calibrated to existing conditions as a result of corridor operation observations during peak hours.

**TABLE 4.11-3  
 EXISTING (2016) CONDITIONS - INTERSECTION LEVELS OF SERVICE**

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Existing	
				V/C or Delay	LOS
1	Jefferson Blvd	Rodeo Rd/ Higuera St <sup>[a]</sup>	AM	0.719	C
			PM	0.688	B
2	Duquesne Ave	Jefferson Blvd	AM	0.832	D
			PM	0.764	C
3	Duquesne Ave	Lucerne Ave <sup>[b]</sup>	AM	0.785	
			PM	0.738	
			AM	28.300	D
			PM	22.000	C
4	Madison Ave	Culver Blvd	AM	0.646	B
			PM	0.583	A
5	Clarrington Ave	Washington Blvd	AM	0.578	A
			PM	0.640	B
6	Duquesne Ave	Culver Blvd	AM	0.666	B
			PM	0.620	B
7	Hughes Ave	Venice Blvd <sup>[a]</sup>	AM	0.612	B
			PM	0.681	B
8	Washington Blvd	Culver Blvd	AM	0.898	D
			PM	0.856	D
9	Main St	Culver Blvd	AM	0.676	B
			PM	0.599	A
10	Ince Blvd	Washington Blvd	AM	0.529	A
			PM	0.571	A
11	Canfield Ave/ Washington Blvd	Culver Blvd	AM	0.728	C
			PM	0.651	B
12	Culver Blvd	Venice Blvd <sup>[a]</sup>	AM	0.588	A
			PM	0.596	A
13	Robertson Blvd/ Exposition Blvd	Venice Blvd <sup>[a]</sup>	AM	0.863	D
			PM	0.797	C
14	National Blvd	Washington Blvd	AM	0.687	B
			PM	0.741	C
15	Higuera Street	Washington Blvd	AM	0.786	C
			PM	0.656	B
16	Higuera Street	Lucerne Ave <sup>[b]</sup>	AM	0.858	
			PM	0.726	
			AM	56.400	F
			PM	13.300	B
17	Ince Blvd	Lucerne Ave <sup>[b]</sup>	AM	0.586	
			PM	0.624	
			AM	12.100	B
			PM	13.900	B
18	Hayden Ave	National Blvd	AM	0.394	A
			PM	0.431	A
19	Overland Ave	Culver Blvd	AM	0.867	D
			PM	0.872	D
20	Overland Ave	Jefferson Blvd	AM	0.889	D
			PM	0.925	E
21	Main St/ Bagley Ave	Venice Blvd <sup>[a]</sup>	AM	0.642	B
			PM	0.637	B
22	National Blvd	Venice Blvd <sup>[a]</sup>	AM	0.835	D
			PM	0.827	D

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Existing	
				V/C or Delay	LOS
23	Ince Blvd	Culver Studios Gate 2 <sup>[c]</sup>	AM	12.600	B
			PM	12.000	B
24	Ince Blvd	Culver Studios Gate 3 <sup>[c]</sup>	AM	11.700	B
			PM	10.700	B
25	Jefferson Blvd	National Blvd <sup>[a]</sup>	AM	0.947	<b>E</b>
			PM	0.527	A
26	National Blvd	I-10 EB On Ramp <sup>[a]</sup>	AM	0.234	A
			PM	0.463	A
27	La Cienega Blvd	Washington Blvd	AM	0.870	D
			PM	0.849	D
28	Duquesne Ave	Washington Blvd	AM	0.615	B
			PM	0.691	B
29	La Cienega Blvd	Venice Blvd <sup>[a]</sup>	AM	0.820	D
			PM	0.843	D
30	Cattaraugus Ave	Venice Blvd <sup>[a]</sup>	AM	0.715	C
			PM	0.537	A
31	Motor Ave	Venice Blvd <sup>[a]</sup>	AM	0.704	C
			PM	0.845	D
32	Clarington Ave	Venice Blvd <sup>[a]</sup>	AM	0.558	A
			PM	0.590	A
33	Overland Ave	Venice Blvd <sup>[a]</sup>	AM	0.808	D
			PM	0.782	C
34	Motor Ave	Washington Blvd	AM	0.668	B
			PM	0.642	B
35	Overland Ave	Washington Blvd	AM	0.816	D
			PM	0.907	<b>E</b>
36	Cardiff Ave	Culver Blvd	AM	0.560	A
			PM	0.554	A
37	Lafayette Pl	Culver Blvd	AM	0.457	A
			PM	0.433	A
38	Robertson Blvd	National Blvd <sup>[a]</sup>	AM	1.164	<b>F</b>
			PM	1.085	<b>F</b>
39	Robertson Blvd	I-10 WB Off-Ramp/ Kincardine Ave <sup>[a]</sup>	AM	0.627	B
			PM	0.842	D
40	Midway Ave	Venice Blvd <sup>[a]</sup>	AM	0.466	A
			PM	0.537	A
41	Elenda St	Culver Blvd	AM	0.715	C
			PM	0.617	B
42	Duquesne Ave	Braddock Dr	AM	0.802	
			PM	0.709	
			AM	61.000	<b>F</b>
			PM	31.200	D

**Bolded** results indicate unacceptable operations.

<sup>a</sup> City of Los Angeles jurisdiction.

<sup>b</sup> Intersection is unsignalized and was analyzed using both ICU and HCM methodologies per Culver City Traffic Study Criteria

<sup>c</sup> Intersection is unsignalized and was evaluated to determine the need for a traffic signal or other traffic control device.

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

**Table 4.11-4, Existing (2016) Conditions - Intersection Levels of Service Under Micro-Simulation Analysis**, summarizes the micro-simulation LOS analysis results. As indicated therein, the following two intersections are currently operating at poor levels of service (i.e., LOS E or F) during one or both of the analyzed peak hours, neither of which is identified in the macro-LOS analysis:

10. Ince Blvd/Washington Blvd (LOS F in the AM peak hours)

15. Higuera St/Washington Blvd (LOS E in the AM peak hours)

**TABLE 4.11-4  
 EXISTING (2016) CONDITIONS - INTERSECTION LEVELS OF SERVICE UNDER MICRO-SIMULATION ANALYSIS**

Intersection	Traffic Control <sup>1</sup>	Peak Hour	Existing		
			Delay (sec/veh) <sup>2</sup>	LOS <sup>3</sup>	% Served
6. Duquesne Ave/Culver Blvd	Signal	AM	48.1	D	97%
		PM	51.0	D	99%
8. Washington Blvd/Culver Blvd	Signal	AM	18.1	B	97%
		PM	21.5	C	99%
9. Main St /Culver Blvd	Signal	AM	22.7	C	97%
		PM	20.9	C	99%
10 Ince Blvd/Washington Blvd	Signal	AM	<b>80.6</b>	<b>F</b>	96%
		PM	33.1	C	98%
11. Canfield Av/ Washington Blvd/Culver Blvd	Signal	AM	27.8	C	97%
		PM	36.8	D	98%
15. Higuera St/Washington Blvd	Signal	AM	<b>60.3</b>	<b>E</b>	97%
		PM	25.1	C	99%
36. Cardiff Ave/Culver Blvd	Signal	AM	5.1	A	97%
		PM	6.8	A	99%
37. Lafayette Pl/Culver Blvd	Signal	AM	34.4	C	97%
		PM	31.8	C	97%

**Bolded** results indicate unacceptable operations.

<sup>1</sup> AWSC = All-way stop controlled, SSSC = Side-street stop controlled

<sup>2</sup> Whole intersection weighted average stopped delay expressed in seconds per vehicle for signalized and all-way stop-controlled intersections. The vehicular delay for the worst movement is reported for side-street stop-controlled intersections.

<sup>3</sup> Delay calculated using traffic simulation and LOS assigned using delay ranges from the 2010 *Highway Capacity Manual* (HCM). SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

## Congestion Management Program Monitoring Stations

The 2010 Congestion Management Program (CMP) for Los Angeles County requires that, when an environmental impact report (EIR) is prepared for a project that meets the size criteria specified in the CMP, traffic and transit impact analyses be conducted for designated regional facilities based on the quantity of project traffic expected on those facilities. The designated CMP arterial monitoring stations located nearest to the Project Site are listed below:

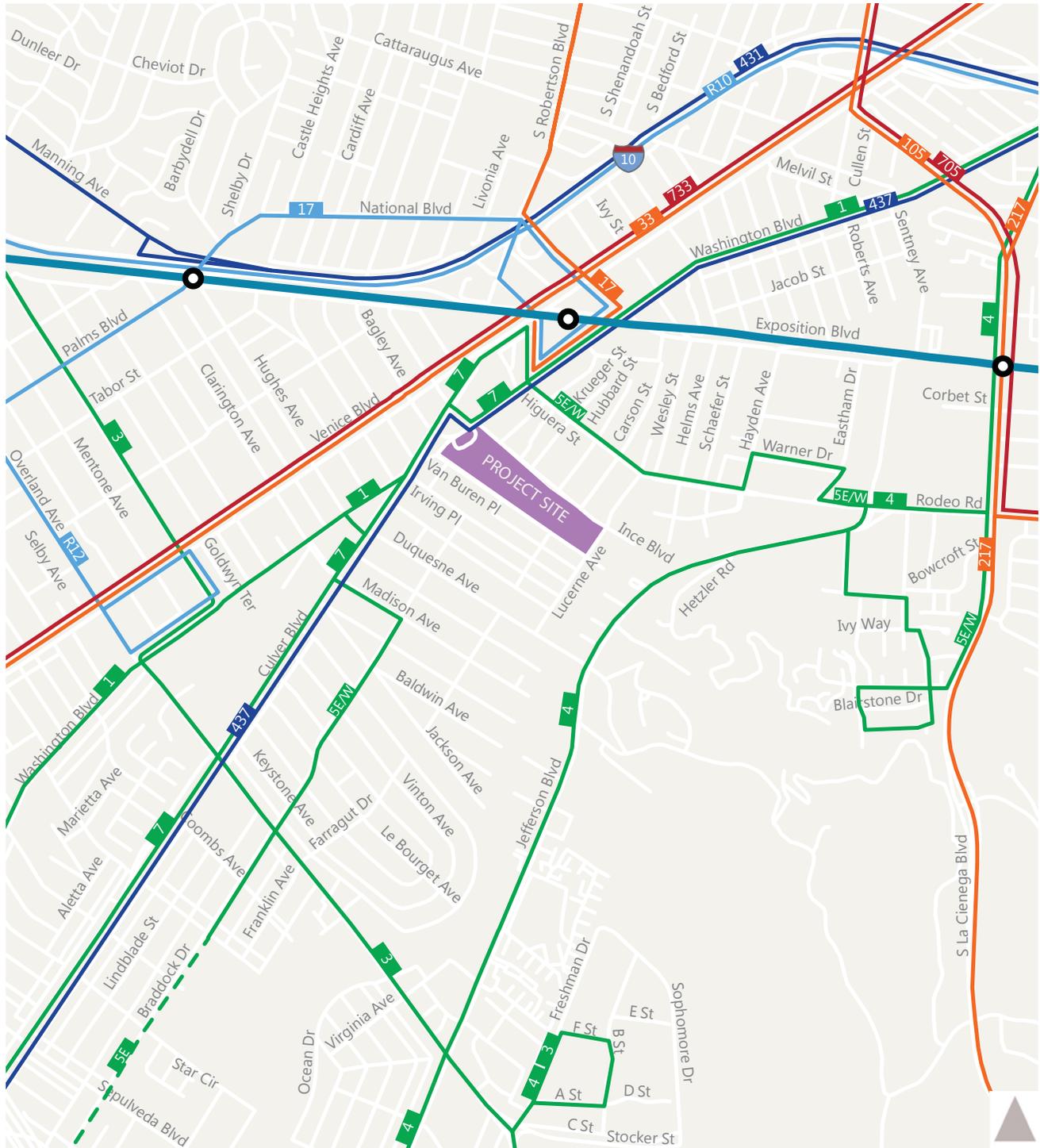
- La Cienega Blvd/Venice Blvd (City of Los Angeles)
- La Cienega Blvd/Jefferson Blvd (City of Los Angeles)

- Overland Ave/Venice Blvd (City of Culver City)
- La Cienega Blvd/Centinela Ave (City of Los Angeles)
- La Cienega Blvd/Stocker St (County of Los Angeles)

## Public Transit

The Project Site and Study Area are well served public transit routes, including one light rail lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and 14 rapid, regional and local bus lines operated by various operators (e.g., Metro, Culver City Bus, and LADOT, and Santa Monica Big Blue Bus). These transit and bus lines are listed below and identified in **Figure 4.11-2, Existing Transit Service:**

- **Metro Expo Line:** The Expo Line is an east/west light rail line running from downtown Santa Monica to downtown Los Angeles. The Study Area is served by Culver City Station.
- **Metro Line 17:** Line 17 is an east/west line that travels from Culver City to Downtown Los Angeles. This line serves Culver City and Cheviot Hills, and travels along Robertson Boulevard in the Study Area.
- **Metro Line 33 and Line 733:** Line 33/Line 733 is an east/west line that travels from downtown Los Angeles to Santa Monica. This line provides service to Union Station, and travels along Venice Boulevard in the Study Area.
- **Metro Line 105 and Line 705:** Line 105/Line 705 is a north/south line that travels from West Hollywood to Vernon. This line serves Culver City and travels along La Cienega in the Study Area.
- **Metro Line 217:** Line 217 is a north/south line that travels from Fox Hills to Hollywood. This line serves Culver City and travels along La Cienega Boulevard in the Study Area.
- **Culver City Bus Line 1:** Line 1 is a local east/west line that runs along Washington Boulevard from Venice Beach in the west to Washington and Fairfax in the east, and travels along Washington Boulevard in the Study Area.
- **Culver City Bus Line 3:** Line 3 is a local north/south line that runs from Century City in the north to Fox Hills Mall in the south on a route that includes Pico Boulevard, Westwood Boulevard, Motor Avenue, Overland Avenue and the Fox Hills/Corporate Pointe business area along Slauson Avenue, Buckingham Parkway, Bristol Parkway, Hannum Avenue and Green Valley Circle. This line travels along Washington and Overland in the Study Area.
- **Culver City Bus Line 4:** Line 4 is a local north/south line that runs between Washington Boulevard and Fairfax Avenue to West Los Angeles College and Fox Hills Mall on a route that includes Washington, Higuera, Jefferson, Sepulveda, Overland, and Slauson. This line travels along Washington, Jefferson, Higuera and Warner in the Study Area, and operates on an hourly basis on weekdays only.
- **Culver City Bus Line 5:** Line 5 is a local east/west line that runs from Blair Hills in the east to Washington and Inglewood Boulevards in the west. This line travels along Washington Boulevard, Braddock Drive and Higuera Street in the Study Area. Line 5 only operates when school is in session during AM and PM peak hours.



- |   |  |
|---|--|
|  Metro Local     |  Big Blue Bus           |
|  Metro Rapid     |  Culver City Bus        |
|  Metro Expo Line |  LADOT Commuter Express |

SOURCE: Fehr & Peers, Traffic Report – Culver Studios Modified Comprehensive Plan Update #7, August 28, 2017.

The Culver Studios Innovation Plan  
**Figure 4.11-2**  
 Existing Transit Service

- **Culver City Bus Line 7:** Line 7 is a local east/west line that runs from Venice Boulevard and Culver Boulevard in the east to Marina Del Rey in the west. This line travels along Culver Boulevard and Washington Boulevard in the Study Area.
- **LADOT Commuter Express Line 431:** Line 431 is a north/south commuter express line that travels from downtown Los Angeles to Westwood. This line also serves Rancho Park and Palms. This line travels on the I-10 in the Study Area. Line 431 operates on weekdays only.
- **LADOT Commuter Express Line 437:** Line 437 is a north/south commuter express line that travels from downtown Los Angeles to Venice. This line also serves Culver City and Marina Del Rey. This line travels along Robertson Boulevard and Culver Boulevard in the Study Area. Line 437 operates on weekdays only.
- **Santa Monica Big Blue Bus Express Line 10:** Line 10 is a freeway express line that travels from Santa Monica to Los Angeles. This line serves the Santa Monica Pier, Third Street Promenade, Financial District, Los Angeles Civic Center, Union Station and Patsaouras Transit Plaza. This line travels on the I-10 in the Study Area.
- **Santa Monica Big Blue Bus Line Rapid 12:** The Rapid 12 line travels from the Culver City Expo Station to UCLA – Ackerman Union. This line serves Palms, Rancho Park and Westwood, and travels along Overland Avenue in the Study Area.
- **Santa Monica Big Blue Bus Line 17:** Line 17 travels from the Culver City Expo Station to UCLA. This line serves Culver City, Palms, and Sawtelle, and travels along Palms Boulevard in the Study Area.

The Metro Expo Line, with 6-minute headways in both the AM and PM peak hours, has an estimated seating capacity of approximately 8,470 persons. The 14 bus lines, with five to 20 minute headways in both the AM and PM peak hours, have an estimated seating capacity of approximately 2,470 persons.

## **Bicycle Network**

According to the Culver City General Plan Circulation Element, multiple designated bikeways exist in the Project vicinity, including:<sup>2</sup>

### ***Class I (off-street) Bike Paths***

- National Boulevard
- Los Angeles River
- Ballona Creek

### ***Class II (separate on-street) Bike Lanes***

- Venice Boulevard
- Culver Boulevard (west of Duquesne Avenue)
- Duquesne Avenue (between Ballona Creek and Culver Boulevard)

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<sup>2</sup> Culver City, General Plan Circulation Element, Figure C-5, Bikeway Classifications Map, 1995.

### ***Class III (shared on-street) Bike Routes***

- Washington Boulevard
- Duquesne Avenue
- Culver Boulevard (east of Duquesne Avenue)
- Lucerne Boulevard
- Van Buren Place

Within the immediate vicinity of the Project Site: (1) the Ballona Creek Class I Bike Path provides an off-street shared use path that travels near the southern end of the Project Site, with an exit onto Duquesne Avenue which is the connection nearest the studio; and (2) Van Buren Place and Lucerne Avenue, two of the streets that border the Project Site, are Class III Bike Routes.

In addition, the Culver City Planning Department has been working on bicycle and pedestrian improvements throughout the City. With Washington Boulevard being identified as a corridor in need of bikeway improvements in the City's Bicycle Pedestrian Master Plan, a major bicycle and pedestrian facility called the Expo-to-Downtown Bicycle Connector has been proposed by the City along this corridor. The Expo-to-Downtown Bicycle Connector would provide a viable alternative to motor vehicle use to the Metro Expo Line Culver City Station located at the intersection of Washington Boulevard & National Boulevard. This proposed Class IV two-way cycle track would terminate at the site of the proposed development at 9300 Culver Boulevard (Related Project 24, on the "Parcel B" site), adjacent to the intersection of Washington Boulevard & Ince Boulevard and the Project Site. Figure 16 in the Traffic Study shows the proposed route and associated roadway and lane restriping improvements, including at the Washington Blvd/National Blvd, Washington Blvd/Robertson Blvd/Higuera St, and Washington Blvd/Ince Blvd intersections).

Furthermore, Culver City will be implementing a bike share system in the near future. Bike share station locations are still in deliberation, but a proposed bike share station is proposed at the Parcel B site. This station would provide bike sharing for residential and employees in the vicinity of the Project Site, and would maximize the use of the planned Expo-to-Downtown Bicycle Connector.

Bicycle parking spaces are currently located at the Project Site, with concentrations near primary building entries.

### **Pedestrian Routes**

The streets surrounding the Project Site, including Culver Boulevard, Ince Boulevard, Van Buren Place, Lucerne Avenue, all have sidewalk facilities on both sides of the road. These sidewalks are ADA accessible and have crosswalk striping at major intersections. Pedestrians can take Ince to Lucerne and then Duquesne Avenue to reach the Ballona Creek path that provides shared use for both bicyclists and pedestrians. The northern entrance of the Project Site, Gate 1, provides a direct connection to downtown Culver City, which includes pedestrian access. Based on

Walkability.com, The Culver Studios has a Walk Score® of 93 which indicates that most daily errands do not require a car. This is much higher than the overall Culver City average score of 72.

## Existing Project Site Vehicular Access/Circulation

There are currently five gated access points to the Project Site from three public right of ways:<sup>3</sup>

- Washington Blvd: Gate 1
- Ince Blvd: Gates 2, 3 and 4
- Van Buren Pl: Van Buren Gate

Primary access to the Project Site for visitors and employees is via Gate 2 from Ince Boulevard. Secondary vehicular access is provided by Gate 1 and Gate 3. Production vehicles accessing the property utilize both Gates 2 and 3 to enter and Gate 3 to exit. Gate 4 is used on a limited basis as an exit only when large trucks are unable to return and exit through Gate 3, as well as an emergency access point. The Van Buren Gate is for emergency vehicle access only.<sup>4</sup>

Existing on-site vehicular circulation routes serve four types of studio traffic: employee, visitor, production vehicle (primary), and production vehicle (secondary). The primary on-site route is the main north-south oriented spine between the studio buildings fronting Ince Boulevard and those backing up to the western boundary of the Project Site and Van Buren Place. This spine serves all four types of studio traffic. The on-site routes in the northern portion of the Project Site (around the Mansion and bungalows), and in the Van Buren portion of the Project Site (between States 6 and 11, and around Buildings S through V, are for employees and visitors only. Studio truck traffic uses Gates 2 through 4 and the on-site routes between those gates. Employee and visitor traffic uses Gates 1 through 3 and the on-site routes between those gates, as well as the spine route to get to Stages 10, 15 and 16, and Building Y, in the southern portion of the site.

A map showing the existing on-site access and circulation is provided in the Plan Set Book for the Project.<sup>5</sup>

## Parking Facilities

TCS currently has a parking supply of 756 spaces dispersed across the Project Site. The majority of the parking supply is provided in two locations; the below grade Rear Lawn Parking Structure (419 spaces) accessed from Gate 2, and the above grade Van Buren Parking Structure (200 spaces) accessed from both Gate 2 and Gate 3. In addition, there are several surface parking lots on the Project Site totaling approximately 137 spaces, including large spaces for production vehicles (large trailers and trucks), free from a dedicated fire lane. A map showing the location of the existing on-site parking structures and surface parking lots is provided in the Plan Set Book for the Project.<sup>6</sup>

<sup>3</sup> Gensler Architecture & Planning, Preliminary Plan Review for The Culver Studios – Comprehensive Plan Amendment 7 (CPA7), p.20, February 2017

<sup>4</sup> Ibid, p.20.

<sup>5</sup> Ibid, p.20.

<sup>6</sup> Ibid, p.21.

### 4.11.3 Regulatory Framework

This section provides a summary of State, regional, and local transportation regulations and policies applicable to the Project Site.

#### **State**

##### **Statewide Transportation Improvement Program**

Caltrans administers transportation programming, which is the public decision-making process that sets priorities and funds projects envisioned in long-range transportation plans. Caltrans commits expected revenues over a multi-year period to transportation projects. The Statewide Transportation Improvement Program (STIP) is a multiyear capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other sources.

##### **Congestion Management Program**

The CMP is a State-mandated program enacted by the State legislature and last updated in 2010. The program is intended to address the impact of local growth on the regional transportation system. Statutory requirements of the CMP include monitoring LOS on the CMP Highway and Roadway network, measuring frequency and routing of public transit, implementing the Transportation Demand Management and Land Use Analysis Program, and helping local jurisdictions meet their responsibilities under the CMP.

Metro, the local CMP agency, has established a Countywide approach to implement the statutory requirements of the CMP. This approach includes designating a highway network that includes all State highways and principal arterials within the County and monitoring traffic conditions on the designated transportation network; performance measures to evaluate current and future system performance; promotion of alternative transportation methods; analysis of the impact of land use decisions on the transportation network; and mitigation to reduce impacts on the network. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to be in conformance with the Countywide plan.

The CMP requires an EIR to evaluate traffic and public transit impact analyses for select regional facilities based on the quantity of project traffic expected to use those facilities. The CMP guidelines state that areas selected for analysis should include the following locations:

- All CMP arterial monitoring intersections, including monitored on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the A.M. or P.M. weekday peak hours of adjacent street traffic; and
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the A.M. or P.M. weekday peak hours.

##### **Senate Bill No. 743**

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under CEQA for several categories of development projects including the development of infill projects in transit priority

areas and to balance the needs of congestion management with Statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions

SB 743 adds Chapter 2.7: Modernization of Transportation Analysis for Transit Oriented Infill Projects to the CEQA Statute (Section 21099). Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. Because the Project is considered an employment center project<sup>7</sup> and is on an infill site located within an urban transit priority area (less than 0.5 mile from a major transit station), it qualifies for exemption under SB 743. As such, the evaluation of the Project's potential impact on parking in this EIR is not required pursuant to CEQA, and therefore, no findings of significance for parking impacts are provided in this section. Nonetheless, an evaluation of parking associated with the Project is provided herein for information disclosure purposes only.

SB 743 will also result in a change in the metrics for determining impacts relative to the transportation network through the development of new methodologies for traffic analyses for CEQA documents to promote the State's goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of multimodal transportation system, and providing clean, efficient access to destinations.

Currently, environmental review of transportation impacts focuses on the delay that vehicles experience at intersections and on roadway segments, which is often measured using LOS. Mitigation for increased delay often involves widening a roadway or the size of an intersection, which increases capacity and may therefore, increase auto use and emissions and discourage alternative forms of transportation. Under SB 743, the focus of transportation analysis will shift from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses.

Among other things, SB 743 requires that the Office of Planning and Research (OPR) prepare revisions to the CEQA Guidelines criteria for determining the significance of transportation impacts of projects within transit priority areas. OPR will submit the proposed changes to the Secretary of the Natural Resources Agency to certify and adopt. In August 2014 OPR released a report entitled "Updating Transportation Impacts Analysis in the CEQA Guidelines" for public comment. The report contained a new proposed Section 15064.3 to the CEQA Guidelines as well as proposed amendments to Appendix F (Energy Conservation) and Appendix G (Initial Study Checklist) of the CEQA Guidelines. The comment period closed November 21, 2014 and OPR reviewed and considered comments to determine if revisions were needed. OPR conducted many months of intensive engagement with the public, public agencies, environmental organizations, development advocates, industry experts, and many others, regarding the analysis of

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<sup>7</sup> Employment center project" means "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area." Although the Site is zoned Studio (S), uses permitted within the S Zoning District are similar to commercial uses. Based on a total Site development of 760,676 square feet (after Project completion) on approximately 14 acres (622,908 square feet), the overall FAR is 1.22.

transportation impacts. On January 20, 2016 OPR released a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. The comment period closed on February 29, 2016. After substantial study and public comment throughout the process, it is expected that OPR will submit a set of final revisions to the Natural Resources Agency. The regulations are anticipated to be effective statewide in 2019.<sup>8</sup>

## Regional

### Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments' (SCAG) Regional Transportation Plan (RTP) is a federal- and State-mandated transportation plan that envisions the future multimodal transportation system for the region and provides the basic framework for coordinated, long-term investment in the regional transportation system over the RTP planning horizon of 2035. In compliance with State and federal requirements, SCAG prepares the Regional Transportation Improvement Program (RTIP) to implement projects and programs listed in the RTP. Updated every other year, the RTP lists all transportation projects proposed for the region over a six-year period. Regional transportation projects are required to be consistent with the RTP and included within the RTIP to be eligible for State or federal funding.

The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) was adopted by SCAG on April 7, 2016. The 2016 RTP/SCS identifies mobility as an important component of a much larger picture with added emphasis on sustainability and integrated planning. In addition, the RTP/SCS includes goals and policies that pertain to mobility, accessibility, safety, productivity of the transportation system, protection of the environment and energy efficiency, and land use and growth patterns that complement the State and region's transportation investments. An integral component of the RTP/SCS is a strong commitment to reduce emissions from transportation sources in order to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the Clean Air Act. For further discussion of air quality and greenhouse gas emissions, see Section 4.B, Air Quality, and Section 4.E, Greenhouse Gas Emissions, respectively, of this Draft EIR.

## Local

### Culver City General Plan

The 1995 Circulation Element of Culver City's General Plan includes the following traffic and parking designations, goals, objectives and policies that relate to the Project:<sup>9</sup>

- **Street System Classifications:** According to the Circulation Element (p.C-10 and Figure C-3), W. Washington and Culver Boulevards are designated as Primary Arteries, Lucerne Avenue is designated as a Neighborhood Feeder, and Ince Boulevard and Van Buren Place are designated as Local Streets in the Project Site vicinity.

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<sup>8</sup> The Governor's Office of Planning and Research, Updating the Analysis of Transportation Impacts Under CEQA, [https://www.opr.ca.gov/s\\_sb743.php](https://www.opr.ca.gov/s_sb743.php). Accessed July 3, 2017.

<sup>9</sup> City of Culver City, General Plan Circulation Element – 1995, adopted September 24, 1996.

- **Designated Bikeways:** According to the Bicycle and Pedestrian Master Plan (Figure C-5), W. Washington and Culver Boulevards are designated Class III Bike Route in the Project Site vicinity.
- **Designated Bus Routes:** According to the Circulation Element (Figure C-4), two Culver City Bus Routes are designated along W. Washington Boulevard in the Project Site vicinity, including the Washington Boulevard and Braddock Drive Lines.
- **Policy 1.A:** Facilitate movement of vehicles at intersections and along roadway links by increasing capacity, improving operation, and reducing volumes as appropriate and feasible.
- **Policy 1.C:** Ensure that roadways are maintained according to City standards applicable to their classification.
- **Policy 1.F:** Reduce driveways and curb cuts on arterials.
- **Policy 1.H:** Examine opportunities for peak-period on-street parking restrictions and commensurate off-street parking development on congested arterials.
- **Policy 2.C:** Maintain levels of transit service that are adequate to meet and encourage ridership demand.
- **Policy 2.G:** Develop an outreach program to educate those who live or work in Culver City about transit and encourage their use of it.
- **Policy 2.P:** Encourage large developments to contribute to City transportation capital and operation funding as part of project traffic mitigation measures.
- **Policy 3.G:** Encourage large business to include bike lockers or other secure bicycle storage and related facilities to support bicycle commuting by employees.
- **Policies 3.H and 3.J:** Develop plans to facilitate bicycle commuting, and promote public education programs regarding bicycle safety and the City's bicycle resources.
- **Policy 4.C:** Provide safe and attractive pedestrian walkways/sidewalks which link streets and parking areas to the entrances of major developments.
- **Policy 4.J:** Where feasible, add curb extensions and medians or other safety measures along arteries to shorten the pedestrian crossing.
- **Objective 5:** Ensure the City's pedestrian, transit and paratransit systems are accessible to senior and disabled populations.
- **Policy 6.B:** Reduce pressure on on-street parking through provision of off-street parking.
- **Policies 6.H, 8.B, and 8.C:** Reduce traffic intrusion and spillover parking on residential streets from commercial and industrial uses. Install traffic control devices, such as stop signs and traffic diverters, to keep traffic from cutting through residential areas.
- **Policy 7.B:** Minimize potential traffic hazards at new developments.
- **Implementation Measure 3.B:** Prior to the approval of a specific development project, TDM improvements must be included such as: providing a bulletin board displaying transportation information such as current maps, routes and schedules for public transit routes serving the site and ridesharing information; providing preferential parking for car and van pools; and providing bicycle facilities.

## Culver City Bicycle & Pedestrian Master Plan Design Guide

The Culver City Bicycle & Pedestrian Master Plan Design Guide (October 2010) provides informational assistance to Culver City. It does not include design requirements, as Culver City will follow the design guidance mandated in the California Manual of Uniform Traffic Control Devices (CA MUTCD) and Caltrans Highway Design Manual (HDM). At the time of writing, the national Manual of Uniform Traffic Control Devices (MUTCD), Caltrans Highway Design Manual (HDM), and the American Association of State Highway and Transportation Officials (AASHTO) *Guide for the Development of Bicycle Facilities*, are undergoing updates to incorporate revised and new bicycle facility standards. The City may revise this guide after the MUTCD, HDM, and AASHTO finish their updates.

The Design Guide has two components (bicycle and pedestrian), with individual sections. Sections 1.2-1.9 relate primarily to cyclists. Section 1.2 covers the design needs of different types of cyclists to create a basis for a variety of accommodation strategies. Section 1.3 discusses the design of off street multiple-use paths. Section 1.4 covers the design of on-street bicycle lanes. Section 1.5 covers the design of bicycle routes. Section 1.6 discusses specific types of bicycle facilities applicable to the City of Culver City, including sharrows (e.g., shared-lane markings), Bicycle Friendly Streets, and bicycle intersection treatments. Section 1.7 includes considerations for cyclists at signalized intersections. Section 1.8 addresses bicycle parking facilities. Section 1.9 provides a description of temporary traffic control devices. Sections 1.10-1.11 relate primarily to pedestrians. Section 1.10 describes pedestrian design guides. Section 1.11 discusses specific enhancements for pedestrians at signalized intersections. The design sections include design information, example photos, schematics, and existing summary guidance from current and upcoming draft standards.

## Culver City Municipal Code

The Culver City Municipal Code (CCMC) contains the following traffic and parking sections applicable to the Project:

- **Section 7.05.015 (Transportation Demand and Trip Reduction Measures):** Prior to occupancy of any new development of 25,000 gross sf of floor area or more, lasting provisions shall be provided for a bulletin board, display, case or kiosk displaying transit route, ridesharing, bicycle route, and carpool/vanpool information; (2) not less than 10 percent of the employee parking area shall be located as close as is practical to employee entrances and be reserved for potential carpool or vanpool vehicles. For projects of 50,000 gross sf of floor area or more, bicycle racks or other secure bicycle parking shall also be provided at a rate of four spaces for the first 50,000 sf of new development, and once space for each additional 50,000 sf. For projects of 100,000 gross sf of floor area or more, the following shall also be provided: (1) sidewalks or other designated pedestrian pathways following direct and safe routes from the external pedestrian circulation system, vehicle and bicycle parking areas and transit facilities, to each building in the development; (2) if determined necessary by the City to mitigate impacts, bus stop improvements; and (3) a safe and convenient zone in which vanpool and carpool vehicles may deliver or board their passengers.
- **Section 17.320.020.H (Parking Space Requirements):** One space per 350 sf of office, administrative, corporate, professional, creative, and/or media production uses.

- **Section 17.320.030 (Accessible Parking Requirements):** Parking spaces for persons with disabilities shall be provided in compliance with the Uniform Building Code and the Federal Accessibility Guidelines. Accessible parking spaces shall count toward fulfilling the parking requirements of this Chapter.
- **Section 17.320.045 (Bicycle Parking Requirements):** Non-residential and non-retail commercial uses providing employment shall provide bicycle parking spaces equal to a minimum of 5 percent of the required vehicle spaces, distributed to serve employees and visitors to the project.
- **Section 17.320.050.B (Loading Area Requirements):** None-residential buildings meeting specified door opening and vehicle accessibility criteria shall include on-site loading areas.
- **Sections 17.540.005 – 17.540.025 (Site Plan Review):** Construction of a new non-residential building of 5,000 gross sf or more, or the addition of 5,000 sf or more to an existing non-residential building within a 1-year period, shall be subject to Site Plan Review. Site Plan Review shall include the comprehensive review of proposed development projects to: ensure compliance with required standards, design guidelines, and ordinances of the City; minimize potential adverse effects on surrounding properties and the environment; and protect the integrity and character of the residential, commercial and public areas of the City. This includes ensuring vehicular and pedestrian access to each property per Code, provision of parking and loading facilities per Code, and that the circulation pattern is safe and convenient for both pedestrians and vehicles.

## 4.11.4 Environmental Impacts

### Methodology

The analysis of transportation and traffic impacts considers potential Project effects related to construction, intersection service levels, the regional transportation system (i.e., CMP and Caltrans facilities), public transit, access and circulation, and vehicle and bicycle parking. As indicated previously, the analysis is based on the Traffic Study for the Project included as Appendix K-1 of this Draft EIR.

The scope of work for the Traffic Study was developed in conjunction with the City of Culver City. The City of Los Angeles was also consulted concerning the scope of the analysis within City of Los Angeles jurisdictions. Study approach, base assumptions, and technical methodologies were discussed and established as part of a detailed MOU executed with the Project's traffic consultant and the City on 02/07/2017 and attached as Appendix A of the Traffic Study. Completion of the Project is anticipated by mid-2020.

### Construction Impacts

The analysis of construction traffic includes a determination of the number of construction-related trips (i.e., construction worker trips and construction truck trips) that would occur as a result of the Project, the contributions of those trips to the local traffic system, and an analysis of the potential conflicts between construction activity and ongoing activity in the Project vicinity. Construction truck trips were assumed to occur evenly throughout the 6-hour daily haul window (generally 9:00 AM to 3:00 PM). The potential impact of construction traffic, including haul trucks, would be a lessening of the capacities of access streets and haul routes due to slower

movements and larger turning radii of trucks. Potential conflicts, including vehicular, pedestrian, bicyclists, site access, transit, and parking are also evaluated.

It is noted that both the City of Culver City and LADOT generally consider construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. However, to provide a conservative analysis, construction traffic impacts are evaluated in this section.

## **Operational Impacts**

### ***Traffic Analysis Scenarios***

The following traffic scenarios were developed and analyzed as part of the Traffic Study:

- **Existing (2016) Conditions:** The analysis of existing traffic conditions is intended to provide a basis for the analysis. The existing conditions analysis includes a description of the street system serving the site, current traffic volumes, and an assessment of the operating conditions at these locations.
- **Existing (2016) plus Project Conditions:** This traffic scenario provides projected traffic volumes and an assessment of operating conditions under existing conditions with the addition of Project-generated traffic. The impacts of the proposed Project on existing traffic operating conditions were then identified.
- **Future Base (2021) Conditions:** Future traffic conditions without the Project were developed for the year 2021. The objective of this analysis was to project future traffic growth and operating conditions that could be expected to result from regional growth and related projects in the vicinity of the Project Site by the Year 2021.
- **Future (2021) plus Project Conditions:** This traffic scenario provides projected traffic volumes and an assessment of operating conditions under future base conditions with the addition of Project-generated traffic. The impacts of the Project on future traffic operating conditions can then be identified.

### **Existing (2016) Conditions**

Traffic (including turning movement) counts were conducted at each of the study intersections between December 2016 and March 2017 during the weekday morning (7:00 AM to 10:00 AM) and evening (3:00 PM to 6:00 PM) peak hours. The existing lane configurations, traffic controls (stop signs and traffic signals), and traffic (including turning movement) counts at each intersection are identified in in Figure 4 of the Traffic Study.

### **Existing (2016) plus Project Conditions**

The estimated Project traffic (discussed further below) was added to the existing (2016) baseline traffic volumes to estimate existing baseline plus Project traffic volumes without the changes in transportation infrastructure assumed under Future Base (2021) and Future (2021) plus Project conditions.

### **Future Base (2021) Conditions**

In order to evaluate the potential impact of the Project on the local street system, it was necessary to develop estimates of future traffic conditions both with and without the Project. Future traffic volumes without the Project were first estimated, representing the future base conditions. The

traffic generated by the Project was then estimated and separately assigned to the surrounding street system. The sum of the future base and Project-generated traffic represents Future plus Project traffic conditions.

The future base traffic projections reflect growth in traffic from two primary sources: background or ambient growth in the existing traffic volumes to reflect the effects of overall regional growth both in and outside of the Study Area, and traffic generated by cumulative (related) projects in, or in the vicinity of, the Study Area.

1. **Background (Ambient) Growth:** Culver City Engineering Division staff indicated that traffic volumes in the traffic Study Area have increased at a rate of about 1% per year. Future increases in the background traffic volumes due to regional growth and development are expected to continue at this rate, at least through the year 2021. With the assumed completion date of 2021, the existing baseline 2016 traffic volumes were adjusted upward by a factor of 5% to reflect area wide regional growth up to Year 2021.
2. **Cumulative (Related) Projects:** The second major source of traffic growth in the traffic Study Area would be from cumulative projects expected to be built in the vicinity of the Project Site prior to the proposed build-out. Data describing cumulative projects in the area was developed based on information obtained from Culver City Engineering Division, as well as a review of other recent traffic studies conducted for projects in the vicinity. A total of 56 cumulative projects were identified in the traffic Study Area. See Figure 3-1 and Table 3-1 in Chapter 3, Environmental Setting, of this Draft EIR for identification of these cumulative projects and their locations.

Trip generation estimates for each of the cumulative projects were obtained from Culver City and the LADOT, or were developed according to ITE (9th Edition) rates.

The geographic distribution of the traffic generated by the cumulative projects is dependent on several factors, including the type and density of the proposed land uses, the geographic distribution of population from which the employees and potential patrons of the proposed developments are drawn, and the location of the employment and commercial centers to which residents of residential projects would be drawn, and the location of the projects in relation to the surrounding street system. If available, trip distribution from a cumulative project's traffic study was used in this analysis. When trip distribution was not available for a cumulative project, it was estimated based on the factors described above.

For the future scenarios (e.g., Future base and Future plus Project), the following future changes in transportation infrastructure are assumed in the analysis:

- In connection with the Parcel B project, Intersection 9 (Main St./Culver Blvd.) would have a south leg which would form the primary vehicular access to the Parcel B project. The intersection's geometry would be modified as follows: northbound and southbound approach would have one shared through/right-turn lane and one left-turn lane, the eastbound approach would have one left-turn, two through lanes, and one shared through/right-turn lane, and the westbound approach would have one left-turn lane, two through lanes, and one right-turn lane.
- In connection with the Parcel B project (Related Project 24), a new subterranean parking structure underneath the Plaza with access off of Washington Boulevard.

- In connection with the Expo-to-Downtown Bicycle Connector project, modification of Intersections 14 (National Blvd./Washington Blvd.) and Intersection 15 (Higuera St./Washington Blvd.) as follows (shown in Figure 16 of the Traffic Study):
  - At the intersection of National Boulevard/Washington Boulevard, the westbound leg would be reconfigured from one left-turn, two through lanes, and one through-right to one left-turn, two through lanes, and one right-turn. The eastbound leg would be reconfigured from one left-turn, two through lanes, and one right-turn to one left-turn, one through, and one through-right.
  - At the intersection of Higuera Street/Washington Boulevard, the westbound leg would be reconfigured from one left-turn, one through, and one through-right to one left-turn, two through lanes, and a right-turn lane.

### **Future (2021) plus Project Conditions**

The estimated Project traffic (discussed further below) was added to the future base (2021) traffic volumes to estimate the Future plus Project traffic volumes with the changes in transportation infrastructure assumed under Future Base (2021) conditions.

### ***Project Trip Generation, Distribution and Assignment***

#### **Project Trip Generation**

The Project would include the development of studio (e.g., production office, stage and support) uses. The traffic consultant used a variety of sources to identify the trip generation rates for these uses, including Trip Generation, 9<sup>th</sup> Edition (Institute of Transportation Engineers (ITE), 2012, Per discussions with Culver City, an active production support land use was determined to generate the equivalent of 75% of morning and evening peak hour trip generation rate for the General Office land use (ITE #710) identified in the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 9th Edition* (2012). Daily trip generation was assumed to be the same as for the General Office. This trip generation approach for active production support land use is consistent with the traffic study conducted for the Culver Studios Comprehensive Plan Update #6 Project. The ITE warehousing rate (ITE #150) was used to estimate the number of trips generated by Passive Production Support and Stage uses at Culver Studios.

In the absence of specific trip generation rate available in the ITE manual for a Studio's active production support land use, trip rate for active production support was derived by comparing empirical data from various sources to standard office trip generation data from ITE (see the Traffic Study for list of sources). It should be noted that media/entertainment offices generate less peak hour traffic than typical offices do primarily due to less regular employee hours, hence a spreading of employee arrival and departure times across more hours.

A comparative analysis was then conducted in order to validate this approach using the aforementioned trip generation rates against actual ground count data collected in 2009. Current Studio operations were estimated to generate 207 trips (175 inbound/32 outbound) in the morning peak hour and 206 trips (56 inbound/150 outbound) in the evening peak hour. The driveway counts conducted at the Studios facility in April 2009 (under typical operating conditions) indicate a total of 137 trips (120 inbound/17 outbound) in the morning and 154 trips (43

inbound/111 outbound) in the evening peak hour. A comparison of the counts versus the trip generation estimates indicates that the rates used to analyze the Project are conservative.

A 15% trip credit was applied to the Project and existing uses to account for trips made to and from the Project Site using modes other than automobiles. These include trips on light-rail, bus, bicycle, walk, etc. The Project Site is located within walking distance to the Expo Line Light Rail Station at Washington Boulevard and National Boulevard and in close proximity to other regional transit lines, and a wide diversity of land uses in downtown Culver City within reasonable walking distance.

### **Project Trip Distribution/Assignment**

The geographic distribution of the traffic generated by the Project depends on several factors. These factors include the type and density of the proposed land uses, the geographic distribution of population from which the employees and potential patrons of the proposed development are drawn, and the location of the project in relation to the surrounding street system. The general distribution pattern used in this Traffic Study was developed in consultation with Culver City traffic engineering staff assuming that a majority of Project and employee and visitor vehicular traffic would enter and exit via the three gates proposed along Ince Boulevard (Gates 2, 2A, and 3) and the subterranean tunnel connection from Main St/Culver Blvd to the Rear Lawn Parking Structure., with Gate 1 restricted to pedestrian, bicycle, and emergency vehicle traffic.

The traffic expected to be generated by the Project was assigned to the street network using the distribution pattern and assignments described in Figures 5 and 6, respectively, of the Traffic Study. As indicated therein, the trip distribution immediately to/from the Project Site would be approximately 40% Ince to/from Washington, approximately 30% the subterranean tunnel connection to/from Culver, approximately 18 percent Ince to/from Culver, and the remaining 12 percent other routes.

### **Intersection Service Levels**

The methodology for intersection level of service impacts involves several steps, including the identification of existing traffic conditions (2016) and the determination of existing conditions with Project traffic, future baseline conditions without Project traffic (Year 2021), and future baseline conditions with Project traffic (2021), at the 42 study intersections.

Per Culver City's requirements, the Intersection Capacity Utilization (ICU) methodology was used to determine the intersection volume-to-capacity (V/C) ratio and corresponding LOS for the 20 signalized study intersections in the City of Culver City. For the four 4-way stop-controlled intersections, the *Highway Capacity Manual* (HCM) (Transportation Research Board, 2010) methodology was used to evaluate the capacity and the performance of the intersection.

The City of Los Angeles requires the use of the Critical Movement Analysis (CMA) methodology (Transportation Research Circular No. 212, Interim Materials on Highway Capacity [Transportation Research Board, 1980]) to evaluate the operations of intersections, and this methodology was used to analyze the study intersections in the City of Los Angeles. The CMA methodology determines the intersection volume to capacity (V/C) ratio and corresponding LOS.

The CALCADB software package developed by LADOT was used to apply the CMA methodology at the 16 study intersections under City of Los Angeles jurisdiction.

The City of Los Angeles' Automated Traffic Surveillance and Control (ATSAC) system is a computer-based traffic signal control system that monitors traffic conditions and system performance to allow ATSAC-operations to manage signal timing to improve traffic flow conditions. The Adaptive Traffic Control System (ATCS) is an enhancement to ATSAC and provides fully traffic-adaptive signal control based on real-time traffic conditions. All 16 signalized study intersections under City of Los Angeles jurisdiction are currently operating under the City's ATSAC system and ATCS system. ATSAC and ATCS provide improved operating conditions. In accordance with established City of Los Angeles procedures, a 0.07 V/C reduction was applied at each intersection where ATSAC is implemented and an additional 0.03 V/C reduction was applied at each intersection where ATCS is implemented.

The City of Culver City has an ATSAC-like traffic control signal system at all intersections in Culver City. A 0.07 V/C reduction was applied at each intersection analyzed in Culver City.

### ***Intersection Service Levels – Micro-Simulation Analysis***

In SimTraffic, each vehicle in the traffic system is individually tracked through the model and comprehensive operational measures of effectiveness are collected on every vehicle during each tenth of a second of the simulation. Local driver behavior characteristics are assigned to each vehicle by the model, affecting the free-flow speed, queue discharge headways, and other behavioral attributes. The variation of each vehicle's behavior is simulated in a manner reflecting real-world operations. Since SimTraffic is a microscopic model, the full impact of queuing and blocking would be measured by the model.

The intention is to use Synchro and SimTraffic as companion models. The Synchro traffic models for the Project were coded with the peak hour volumes, posted speed limit, vehicle mix, and signal timing. Traffic signal-related information such as phasing and initial timing (minimum green, maximum green, gap, etc.) for the signalized intersections was obtained from City staff. Additional detail such as turn pocket lengths and intersection spacing was coded based on field visits and aerial photos. The Synchro models were converted to SimTraffic for further model development. The SimTraffic models reflecting existing field conditions required calibration to ensure that traffic volumes, queue lengths, and other operational observations were satisfactorily replicated. Fehr & Peers applied *Guidelines for Applying Traffic Microsimulation Modeling Software* (California Department of Transportation, September 2000) and conducted 20 traffic simulations, referred to as "runs," to account for stochastic nature of the model and to achieve confidence in the simulated results. Based on the performance results, the 10 runs with the most consistent results for each scenario are selected for final analysis. The average of these 10 runs is used to determine the various outputs. The subsequent sections below specifically focus on the following outputs:

- Level of Service and Delay
- Demand Served – Percent demand served is defined as the percentage of vehicles which can actually pass through the intersection during the simulation period (i.e., the peak hour)

compared to the projected demand at that intersection. At a location where all traffic is able to get through, the demand served is 100%. When all the demand is not capable of traveling through the corridor during the simulation period, queuing occurs and affects upstream intersections.

- **Queuing** – Selected study intersections were also analyzed for any excessive queuing based on the results of the simulation. The purpose of this evaluation is to determine if certain left-turn storage lengths are adequate to serve the left-turn volumes without impeding on through traffic during the peak hours. It is also used to identify internal queues on the driveways or gates at the Project Site.

### ***Intersection Signal Warrants***

As indicated previously, the following six study intersections are currently unsignalized, all of which are located in Culver City:

3. Duquense Ave/Lucerne Ave (4-way stop controlled)
16. Higuera Street/Lucerne Ave (4-way stop controlled)
17. Ince Blvd/Lucerne Ave (4-way stop controlled)
23. Ince Blvd/Culver Studios Gate 2 (2-way stop controlled)
24. Ince Blvd/Culver Studios Gate 3 (2-way stop controlled)
42. Duquesne Ave/Braddock Dr (4-way stop controlled)

Culver City traffic analysis methodology and significance criteria are for signalized intersections only; the City does not provide impact thresholds for unsignalized intersections. LADOT Traffic Study Policies & Procedures states that “unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control device.”

In consultation with Culver City staff, it was determined that signal warrant analysis would be conducted at the following unsignalized study intersections:

3. Duquense Ave/Lucerne Ave (due to Project-related significant traffic impacts)
23. Ince Blvd/Culver Studios Gate 2
24. Ince Blvd/Culver Studios Gate 3
42. Duquense Ave/Braddock Dr (due to Project-related significant traffic impacts)

Traffic volumes and lane configurations, as presented in Appendices A and B of the Traffic Study, were used to prepare signal warrant analyses for the existing, Existing baseline plus Project, Future Base, and Future plus Project conditions. The warrant analyses were conducted in accordance with the procedures described in Chapter 4C of the California Manual on Uniform Traffic Control Devices 2012 (MUTCD 2012). The warrant for a traffic signal is met if a plotted point representing the vehicles per hour on the major street (for both approaches) and the corresponding vehicles per hour on the higher-volume minor-street approach (one direction only) for one hour lies above the applicable curve in Figure 4C-3 in the MUTCD 2012 for the combination of approach lanes. If the combined volume of the major approaches and the corresponding conflicting volumes are greater than the threshold determined by the intersection configuration, then a traffic signal could be warranted.

### ***Intersection Queuing***

Consistent with the MOU, intersection queues were evaluated at selected study intersections along the Washington Boulevard corridor, specifically within the direct vicinity of the Project's Site access under Future Base and Future plus Project Conditions, with recommended improvements. Left turn queues were evaluated at Intersections 9 (Main St./Culver Blvd and 10 (Ince Blvd./Washington Blvd.) to determine if there is adequate storage in the westbound left-turn lane, and Intersection 11 (Canfield Ave./Washington Blvd./Culver Blvd.) was evaluated to determine if there is adequate storage available for the eastbound left-turn movement. In each case, the 95<sup>th</sup> percentile queues were evaluated as they represent the worst-case condition. Average queue lengths were also observed. The intersection queuing analysis in this section is provided for information purposes only.

### **Regional Transportation System**

The CMP guidelines require that the first issue addressed be the determination of the geographic scope of the traffic Study Area. The criteria for determining the study area for CMP arterial monitoring intersections and for freeway monitoring locations are:

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

The CMP traffic impact analysis guidelines establish that a significant project impact occurs when the following threshold is exceeded:

- The proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C 0.02), causing LOS F (V/C > 1.00)
- If the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C 0.02)

As indicated previously, the CMP arterial monitoring stations nearest to the Project and greater traffic Study Area are:

- La Cienega Boulevard & Venice Boulevard (City of Los Angeles)
- La Cienega Boulevard & Jefferson Boulevard (City of Los Angeles)
- Overland Avenue & Venice Boulevard (City of Culver City)
- La Cienega Boulevard & Centinela Avenue (City of Los Angeles)
- La Cienega Boulevard & Stocker Street (County of Los Angeles)

Based on the Project trip generation estimates and trip distribution and assignment, the Traffic Study indicates that the Project would add fewer than 50 vehicle trips at all these arterial monitoring stations except for La Cienega Boulevard & Venice Blvd. At this location, exactly 50 trips are added in the AM period, but V/C only increases by 0.006. Therefore, the Traffic Study indicates that no further analysis of CMP arterial intersections is required.

The Traffic Study also includes an analysis of potential Project impacts on the regional transportation system. This analysis was conducted in accordance with the transportation impact analysis procedures outlined in the CMP. Since incremental project-related traffic in any direction during either peak hour is projected to be less than the minimum criteria of 150 vph, the Traffic Study indicates that no further CMP freeway analysis is required.

Based on the above, impacts on the regional transportation system would be less than significant and are not evaluated further in this section.

See Section 7 of the Traffic analysis for further discussion of this issue.

## **Caltrans Impact Analysis**

Although the screening level CMP analysis above indicates that the Project would have a less than significant impact on CMP arterial intersections, and that further analysis of Project impacts to CMP freeway facilities is not required, two analyses were nevertheless conducted; mainline freeway segment analyses for a series of mainline segments on the Interstate 10 (I-10) freeway and ramp intersection LOS and queue analysis at two off-ramps on the I-10 freeway.

Mainline freeway segment analyses were conducted using the HCM operational analysis methodology as implemented by the Highway Capacity Software (HCS) software package for the following two segments along the I-10 Freeway in both the westbound and eastbound directions:

- I-10 between National Blvd and Exposition Blvd
- I-10 between Robertson Blvd and La Cienega Blvd

The freeway mainline analysis indicates that, with the addition of Culver Studios Project-generated trips, all of the segments would continue to operate at the same LOS as under Existing and Cumulative Base Conditions. For both Existing plus Project and Future plus Project, the Project is projected to represent between 0.1% and 0.9% of the projected cumulative traffic volumes on the segments, depending on location and direction.

The LOS and queuing analysis was conducted for the following intersections and respective off-ramps:

13. Robertson Blvd/Venice Blvd

39. Robertson Blvd/Kincardine Ave/I-10 WB Off-Ramp

The queuing analysis indicates that, with the addition of project-generated trips at the freeway ramps, the queue lengths on the I-10 freeway would be accommodated by the storage length of the ramps for all analysis scenarios. As a result, impacts would be less than significant.

See Appendix H for results summary tables and analysis worksheets.

## Public Transit

The estimated increase in the number of transit person trips generated by the Project are based on Section D.8.4 of the CMP, which provides a methodology based on the projected number of vehicle trips. The methodology assumes an average vehicle occupancy factor (AVO) of 1.4 in order to estimate the number of transit person trips to and from the Project, and then provides guidelines regarding the percentage of person trips assigned to public transit depending on the type of use (commercial versus residential) and the proximity to transit services. Since the Project Site is located within one-quarter mile of a designated CMP transit corridor, the CMP guidelines provide that approximately 7.0 percent of total person trips generated might use public transit to travel to and from the Project Site.

## Access and Circulation

Access for pedestrians and bicyclists was evaluated. The Project's access and circulation schemes were evaluated to determine whether the Project would substantially increase the potential for conflicts between vehicles and pedestrians and/or cyclists.

## Parking

The parking analysis estimates the vehicle and bicycle parking demand associated with the Project based on CCMC parking space requirements, and evaluates whether the proposed number of on-site vehicle and bicycle parking spaces would meet this demand.

## Thresholds of Significance

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact associated with transportation and traffic would occur based on the following thresholds described below:

### Construction Traffic and Parking<sup>10</sup>

- **TRAF-1:** Construction of the Project would (1) cause substantial delays and disruption of existing traffic flow; (2) require temporary relocation of existing bus stops to more than one-quarter mile from their existing stops; (3) result in impacts based on the operational thresholds at intersections during peak hours; or (4) result in the substantial loss of on-street parking such that the parking needs of the Project area would not be met.

### Intersection Service Levels

- **TRAF-2:** The Project would increase V/C ratios or delay above LOS standards set forth under Culver City and City of Los Angeles guidelines, as applicable during the AM or PM peak hours. The Culver City and City of Los Angeles LOS standards are identified below:

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<sup>10</sup> Both the City of Culver City and LADOT generally consider construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. However, to provide a conservative analysis, construction traffic impacts are evaluated in this section.

**INTERSECTION CAPACITY SIGNIFICANCE THRESHOLDS – CULVER CITY**

Intersection Conditions with Project Traffic		
LOS	Final V/C Ratio	Project-related Increase in V/C Ratio
C	0.701 to 0.800	Equal to or greater than 0.05
D	0.801 to 0.900	Equal to or greater than 0.04
E, F	0.901 or more	Equal to or greater than 0.02

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

**INTERSECTION CAPACITY SIGNIFICANCE THRESHOLDS – CITY OF LOS ANGELES**

Intersection Conditions with Project Traffic		
LOS	Final V/C Ratio	Project-related Increase in V/C Ratio
C	0.701 to 0.800	Equal to or greater than 0.04
D	0.801 to 0.900	Equal to or greater than 0.02
E, F	0.901 or more	Equal to or greater than 0.01

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

**Public Transit**

- **TRAF-3:** The Project would add substantial new ridership to the transit lines operating in excess of their capacity or if the Project would conflict with adopted policies, plans, or programs supporting alternative transportation.

**Access and Circulation**

- **TRAF-4:** The Project would increase roadway hazards resulting from a conflict of movement between vehicles and pedestrians or bicycles because of driveway design, the location of parking facilities, or other Project characteristics affecting visibility and turning movements.

**Parking**

- **TRAF-6:** The Project would provide less vehicle and bicycle parking than the projected demand.

As discussed in the Initial Study, which is contained in Appendix A of this Draft EIR, and in Chapter 6, Other CEQA Considerations, of this Draft EIR, the Project would have no impact with respect to a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. As such, no further analysis of this topic is provided in this section. Also, pursuant to SB 743, Project effects on parking are not considered significant impacts on the environment pursuant to CEQA, and the analysis provided in this section of the EIR is for informational purposes only.

## Project Characteristics and Project Design Features

### *Project Characteristics*

#### **Proposed Development**

The Project would include a net increase of 413,127 sf of studio (e.g., production office, stage and support) uses. The Project would also include: replacing the existing above-grade parking structure along Van Buren Place (the western edge of the property) with a new mixed below- and above-grade parking garage (e.g., Van Buren Parking Structure); a new subterranean parking structure (the Central Parking Structure); and a tunnel connection (Culver/Main Tunnel) from the entrance to the Parcel B parking structure on Culver Boulevard to the Rear Lawn Parking Structure.

As listed below, the Project would provide access to the Project Site via five gates (four along Ince Boulevard and one along Washington Boulevard) and the Culver/Main Tunnel (utilizing the Parcel B parking structure driveway off of Culver Blvd proposed under the Parcel B Project). See the description of the gate improvements in Chapter 3, Project Description, of this Draft EIR.

- Washington Plaza: Gate 1
- Ince Boulevard: Gate 2, Gate 2a (proposed) Gate 3, and Gate 4<sup>11,12</sup>
- Van Buren Place: Emergency Gate<sup>13</sup>
- Culver Boulevard: Culver/Main Tunnel (proposed)<sup>14</sup>

On-site circulation routes would serve the same four types of Studio traffic (e.g., employee, visitor, primary production vehicle, and secondary production vehicle) as is currently served. However, whereas most employee and visitor traffic currently uses on-site surface routes, most of the routes serving this traffic and some of the studio production vehicle traffic under the Project would occur underground, with the existing surface spine route and surface route from Gate 3 to the Van Buren Parking Structure confined primarily to production vehicle traffic.<sup>15</sup> See Figure 13 of the Traffic Study for a depiction of the proposed on-site circulation system.

As indicated above, one existing parking structure would be removed, one existing parking structure would be retained, and two new parking structures would be developed, for a total of 2,370 on-site vehicle parking spaces (a net increase of 1,614 spaces). Bicycle parking and related

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<sup>11</sup> Gates 2 and 2A would be designed with extended queuing lanes within the property to reduce potential public right of way impacts, have dedicated turnaround zones for vehicles entering at the incorrect location, as well as dedicated zones for drop-off and valet as appropriate. The vehicular gates as proposed, would allow for increased efficiency, improved vehicle flow, increased pedestrian safety, and bolstered user experience.

<sup>12</sup> Gate 3 would not be used by visitors to the property. Production and service vehicles entering from Gate 3 would either stage in dedicated zones within the property at grade, on the ground level of the Van Buren parking structure, or utilize the service ramp to the B1 level of the Van Buren parking structure.

<sup>13</sup> The Van Buren gate, would be relocated from its current location, and would remain for emergency access only. The relocation of the Van Buren gate provides for improved alignment and access for emergency vehicles, reducing tight turning radii and potential hazards while increasing access efficiency.

<sup>14</sup> The subterranean driveway would be incorporated within the entrance to the Parcel B parking garage via the south leg of the intersection of Culver Blvd/Main St/Driveway and connect to the Rear Lawn Parking Structure. The design of the driveway is illustrated in Figure 14 of the Traffic Study.

<sup>15</sup> Gensler Architecture & Planning, Preliminary Plan Review for The Culver Studios – Comprehensive Plan Amendment 7 (CPA7), p.30, February 2017

amenities would be provided in compliance with the City's applicable ordinances and plans. Furthermore, bicycle parking location, layout, and equipment would be in conformance with the BPMP Design Guide.

With respect to pedestrian and bicycle circulation, connections would continue to be provided between the Studio Campus and downtown, an assortment of walkways, pathways, and promenades would provide a high level of connectivity and accessibility across the Studio Campus, and approximately 100 bicycle parking spaces and related amenities would be provided in compliance with the City's applicable ordinances and plans is proposed to be dispersed across the Project Site near primary buildings. Pedestrian and bicycle connections to downtown would be enhanced through upgrades proposed to Gate 1. Improvements to other gate access points, including more efficient movement of vehicles onto the Studio Campus, would also improve pedestrian circulation, access and safety.

See Figure 2-4 in Chapter 2, Project Description, of this Draft EIR for an illustration of the proposed Site Plan and Studio gate locations, and Table 2-2 in Chapter 2 for a breakdown of existing development and the proposed development program. Maps showing the proposed on-site access, circulation and parking are provided in the in the Plan Set Book for the Project.<sup>16</sup>

### **Construction**

The Project would entail a multi-phased, approximately 32-month construction period, with construction anticipated to begin in the first quarter of 2018 and be completed by mid-2020. There are seven major phases of construction, which have been consolidated into the following three general phases for purposes of analysis:

1. Demolition/Abatement of Hazardous Materials (4 months);
2. Excavation, including clearing, excavation, grading, and utility upgrades/replacement (15 months); and
3. Construction, including relocation of Buildings S, T, U & V, construction of new buildings, and construction of the Culver/Main Tunnel connection, 13 months).

Construction hours would normally occur in accordance with CCMC requirements, which prohibit construction 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 Saturday and holidays, and 7:00 P.M. and 10:00 A.M. on Sunday. Permission would be sought for any Special construction activities that may be required outside of these hours. Most construction truck hauling operations would be anticipated to occur between 9:00 A.M. and 3:00 P.M. (e.g., the construction haul window), with the construction haul route most likely to be Ince Boulevard to Washington/ Robertson Boulevards and then to the I-10 freeway.

### **Project Trip Generation**

**Table 4.11-5, *Project Construction Period Trip Generation***, provides trip generate estimates for the Proposed Project during construction. As indicated therein: Phase I (Demolition) would generate an estimated 809 daily trips, including 144 morning (101 in/43 out) peak hour and 144

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<sup>16</sup> Ibid, p.30-32.

evening (43 in/101 out) peak hour trips; Phase 2 (Grading/Excavation/Foundations) would generate an estimated 1,145 daily trips, including 199 morning (120 in/79 out) peak hour and 199 evening (79 in/120 out) peak hour trips; and Phase 3 (Building Construction) would generate an estimated 937 daily trips, including 180 morning (165 in/15 out) peak hour and 180 evening (15 in/165 out) peak hour trips. See the Traffic Study for the assumptions concerning the percentage of construction traffic to arrive or depart the Project Site during peak hours, and for calculations associated with the conversion of Project construction haul truck and delivery/equipment truck trips to associated passenger car equivalent (PCE) trips.

**TABLE 4.11-5  
 PROJECT CONSTRUCTION PERIOD TRIP GENERATION**

Phase	Daily PCE Trips <sup>a</sup>	Morning Peak Hour PCE Trips			Evening Peak Hour PCE Trips		
		In	Out	Total	In	Out	Total
<b>Phase 1 (Demolition)</b>							
Construction Worker Trips <sup>b</sup>	292	58	0	58	0	58	58
Haul Truck Trips <sup>c</sup>	512	43	43	86	43	43	64
Delivery/Equipment Truck Trips <sup>c</sup>	5	0	0	0	0	0	0
<b>Phase 1 Total</b>	<b>809</b>	<b>101</b>	<b>43</b>	<b>144</b>	<b>43</b>	<b>101</b>	<b>144</b>
<b>Phase 2 (Grading/Excavation/Foundations)</b>							
Construction Worker Trips <sup>b</sup>	204	41	0	41	0	41	41
Haul Truck Trips <sup>c</sup>	836	70	70	140	70	70	104
Delivery/Equipment Truck Trips <sup>c</sup>	105	9	9	18	9	9	18
<b>Phase 2 Total</b>	<b>1,145</b>	<b>120</b>	<b>79</b>	<b>199</b>	<b>79</b>	<b>120</b>	<b>199</b>
<b>Phase 3 (Building Construction)</b>							
Construction Worker Trips <sup>b</sup>	748	150	0	150	0	150	150
Haul Truck Trips <sup>c</sup>	4	0	0	0	0	0	0
Delivery/Equipment Truck Trips <sup>c</sup>	185	15	15	30	15	15	30
<b>Phase 3 Total</b>	<b>937</b>	<b>165</b>	<b>15</b>	<b>180</b>	<b>15</b>	<b>165</b>	<b>180</b>

Acronyms: PCE = passenger car equivalent.

<sup>a</sup> Daily trips were calculated by counting two trips, one inbound and one outbound trip for each vehicle

<sup>b</sup> Up to 40% of the construction workers were assumed to arrive during the morning peak hour of adjacent street traffic. A total of up to 40% worker were assumed to depart during the evening peak hour.

<sup>c</sup> Daily haul and delivery/equipment truck trips were assumed to occur evenly throughout an 6-hour construction haul window. Therefore, the daily truck trips were divided by 6 hours to calculate morning and evening peak hour truck trips.

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

**Table 4.11 6, Project Operational Trip Generation**, provides trip generation estimates for the Project during operation. As indicated therein, Project operation would generate an estimated net increase of 4,562 daily trips, including 491 trips (433 inbound/58 outbound) peak hour morning trips and 468 trips (131 inbound/337 trips outbound) peak hour evening trips.

**TABLE 4.11-6  
PROJECT OPERATIONAL TRIP GENERATION**

Land Use	Size	Daily	A.M. Peak Hour Trips			P.M. Peak Hour Trips			
			In	Out	Total	In	Out	Total	
<b>Proposed Project</b>									
Active Production Support <sup>a</sup>	609.420	KSF	6,722	627	86	713	191	492	683
Passive Production Support <sup>b</sup>	0.000	KSF	0	0	0	0	0	0	0
Stage <sup>b</sup>	40.000	KSF	142	9	3	12	3	10	13
Gross Plan Buildout Trips	649.420	KSF	<u>6,864</u>	<u>636</u>	<u>89</u>	<u>725</u>	<u>194</u>	<u>502</u>	<u>696</u>
Transit Credit (15%)			1,030	-95	-13	-109	-29	-75	-104
<b>Net Plan Buildout Trips</b>	<b>649.420</b>	<b>KSF</b>	<b>5,834</b>	<b>541</b>	<b>76</b>	<b>616</b>	<b>165</b>	<b>427</b>	<b>592</b>
<b>Existing to be Removed</b>									
Active Production Support <sup>a</sup>	87.788	KSF	968	91	12	103	27	71	98
Passive Production Support <sup>a</sup>	68.625	KSF	244	17	4	21	6	16	22
Stage <sup>b</sup>	79.880	KSF	284	19	5	24	7	19	26
Gross Existing Trip Credit	236.293	KSF	<u>1,496</u>	<u>127</u>	<u>21</u>	<u>148</u>	<u>40</u>	<u>106</u>	<u>146</u>
Transit Credit (15%)			-224	-19	-3	-22	-6	-16	-22
<b>Net Existing Trip Credit</b>	<b>236.293</b>	<b>KSF</b>	<b>1272</b>	<b>108</b>	<b>18</b>	<b>126</b>	<b>34</b>	<b>90</b>	<b>124</b>
<b>Plan Buildout Net New Trips</b>	<b>413.127</b>	<b>KSF</b>	<b>4,562</b>	<b>433</b>	<b>58</b>	<b>491</b>	<b>131</b>	<b>337</b>	<b>468</b>

<sup>a</sup> 75% of Land Use # 710, Trip Generation, 9th Edition, Institute of Transportation Engineers, 2012.

<sup>b</sup> Land Use # 150, Trip Generation, 9th Edition, Institute of Transportation Engineers, 2012.

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

### **Project Design Features**

The following Project Design Features (PDFs) are proposed to reduce the traffic impacts of the Project:

**PDF-TRAF-1 (Construction Management Plan):** A Final Construction Management Plan (FCMP) shall be prepared by the Project contractor in consultation with the Project’s traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities as well as the Applicant’s proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, and alternative transportation modes and public transit are minimized to the extent feasible. The FCMP shall be subject to review and approval by Culver City’s Building Official, City Engineer and/or Planning Manager, as applicable, prior to issuance of any Project demolition, grading or excavation permit. The FCMP shall also be reviewed and approved by Culver City’s Fire and Police Departments. The Culver City 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 FCMP be prepared by a different engineer.

Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector (Inspectors) of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff

and other representatives of surrounding developments if under construction at around the same time as the Project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another. The FCMP shall assess project construction impacts and provide effective strategies to limit the use of the public right of way (streets and sidewalks) during peak traffic periods, and shall be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.

Prior to approval of the FCMP, the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community:

- Construction schedule and hours.
- Framework for construction phases.
- Identify traffic diversion plan by phase and activity. (The Traffic Control Plan will be submitted for review and approval by the City for each phase).
- Potential location of construction parking and office trailers.
- Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity).
- Emergency access plan.
- Demolition plan.
- Staging plan for the concrete pours, material loading and removal.
- Crane location(s).
- Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).
- Community notification procedures.
- The FCMP shall at a minimum include the following:
  1. The name and telephone number of a contact person who can be reached 24 hours a day regarding construction or construction traffic complaints or emergency situations.
  2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties.
  3. Construction plans and procedures to address: community and City notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures and best practices to reduce disturbances to adjacent and nearby land uses.
  4. Procedures for the training and certification of flag persons.

5. To the extent known identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and, plans for use of protective devices, warning signs, and staging or queuing areas.
6. The location of temporary power, portable toilet and trash and materials storage locations.
7. The timing and duration of all street and/or lane closures 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.
8. Provisions that staging of construction equipment and materials will be accommodated within the Studio Campus and that construction worker parking will be accommodated on the Studio Campus and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Studio Campus.

**PDF-TRAF-2 (Traffic Signal Optimization):** Traffic signals shall be optimized (i.e., splits, offsets, and lead/lag phases) at Intersections 9 (Main St/Culver Blvd), 10 (Ince Blvd/Washington Blvd) and 11 (Canfield Ave//Washington Blvd/Culver Blvd) to account for the new south leg at Intersection 9 (Main St/Culver Blvd) under the Parcel B Project.

**PDF-TRAF-3 (Bicycle Striping Along Ince Boulevard):** Bike sharrow striping along the Project Site's Ince Boulevard frontage, and striped crosswalks across Studio gate driveways, will be provided to minimize conflicts between vehicles and bicyclists/pedestrians.

## Analysis of Project Impacts

### *Construction Impacts*

**Threshold TRAF-1:** The Project's construction activities would result in a significant construction traffic impact if the Project would Construction of the Project would (1) cause substantial delays and disruption of existing traffic flow; (2) require temporary relocation of existing bus stops to more than one-quarter mile from their existing stops; (3) result in impacts based on the operational thresholds at intersections during peak hours; or (4) result in the substantial loss of street parking such that the parking needs of the Project area would not be met.

**Impact Statement TRAF-1: Project construction activities would not require temporary relocation of existing bus stops or a substantial loss in street parking during the construction period, but could cause substantial delays/disruptions of existing traffic flow and/or exceed the operational thresholds at intersections during peak hours. Therefore, Project construction-related traffic impacts would be significant.**

As indicated in Table 4.11-4, the greatest amount of construction traffic, including the greatest amount of construction truck traffic, would occur during Phase 2 (Excavation). During this phase, an estimated 1,145 daily construction trips would be generated, including an estimated 199

morning (120 in/79 out) peak hour and 199 evening (79 in/120 out) peak hour trips.<sup>17</sup> While this trip generation would be less than the net increase in operational traffic under the Project, it would still have the potential to cause substantial delays/disruptions of existing traffic flow on streets in the Project vicinity and/or exceed the operational thresholds at intersections during peak hours. For example, there may be intermittent hours when large numbers of trucks are required, some of the trucks could include large trucks (18-wheelers) which could cause congestion/delays on existing roadways (including turning movement delays), and the temporary queuing of trucks at the Studio gates.

The implementation of PDF-TRAF-1 (Construction Traffic Management Plan) would help reduce potential construction-related traffic congestion by requiring measures including but not limited to strategies to limit the use of public right of ways by Project construction traffic during peak traffic periods; the management of concurrent construction projects to minimize traffic impacts; City-approved traffic control/diversion plans by phase and activity; designation of construction parking/office trailer locations and designated truck haul routes; City-approved emergency access and staging plans; continuous coordination of construction activity, delays, alternative routes, etc., with police fire, and emergency response organizations; and making public the timing and duration of all street and/or lane closures in advance. Furthermore, per PDF-TRAF-1, the staging of construction equipment and materials would be accommodated within the Studio Campus, and construction worker parking would be accommodated on the Studio Campus and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Studio Campus, such that there would be no traffic on adjacent streets associated with construction staging or parking activities. Lastly, the hours of construction typically require construction workers to be onsite before the weekday commuter morning peak period and allow them to leave before or after the commuter evening peak period (i.e., arrive at the site prior to 7:00 AM and depart before 4:00 PM or after 6:00 PM). Nevertheless, because of the projected volume of Project construction-related peak hour traffic, and because some temporary incompatibilities could occur between existing motor vehicle traffic and Project construction traffic, a significant impact would occur.

The Project would require an upgrade to a segment of the existing Ince Boulevard sewer main from Hubbard Street to Lucerne Ave. (approximately 700 linear feet). Construction activities associated with this off-site improvement could potentially require the temporary closure of one lane of traffic or otherwise temporarily disrupt traffic along this segment of Ince Boulevard. However, per the Construction Management Plan required under PDF-TRAF-1, the timing and duration of all street and/or lane closures 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, with weekly updates during the duration of project construction, as determined necessary by the City. This would provide advance warning to area residents of any lane closure or traffic disruption associated with this improvement such that the residents could make alternative route plans during the construction (such as using Higuera Street located one block northeast of Ince Boulevard instead of Ince Boulevard to access Lucerne Avenue to the east and Washington

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<sup>17</sup> Based on the assumption that truck trips would occur evenly throughout the 6-hour daily haul window (generally 9:00 AM to 3:00 PM).

Boulevard to the west). Furthermore, any such temporary lane closure/disruption would be subject City-approved traffic diversion and emergency access plans as required by PDF-TRAF-1. Therefore, temporary construction activities associated with the Ince Boulevard sewer main improvement would not cause substantial delays and disruption of existing traffic flow and impacts in this regard would be less than significant.

There are no bus stops along the Project Site's Ince Boulevard, Washington Boulevard, and Van Buren Place frontages. Furthermore, construction workers and vehicles would primarily use Ince Boulevard to access the Project Site which does not have any bicycle facilities. Given this, and given that, per PDF-TRAF-1, Project construction staging would occur on-site, the Project would not require the temporary relocation of bus stops or other transit or bicycle facilities. Therefore, the impact would be less than significant.

As indicated in Table 4.11-4, the construction phase with the greatest number of construction-worker trips would be Phase III (Construction) during which up to 748 daily trips are projected, meaning a demand for up to 374 parking spaces for construction workers could be required at the height of Project construction activities. Furthermore, there is currently off-site street parking along Ince Boulevard, some of which could potentially be temporarily removed during Project construction (for example, due to construction site fencing or the temporary queuing of trucks at the Studio gates). These factors could adversely affect off-site parking in the Project vicinity during construction. However, per PDF-TRAF-1, construction worker parking would be accommodated on the Studio Campus and in off-site locations to be determined, potentially with shuttles to and from the Studio Campus, while construction staging would be accommodated on the Studio Campus. Furthermore, impacts would be temporary and intermittent, and per SB 742, the Project is exempt from findings of significance related to parking. For all these reasons, the Project would not result in the substantial loss of off-site street parking such that the parking needs of the Project area would not be met.

## Operations Impacts

### *Intersection Service Levels*

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**Threshold TRAF-2:** The Project would have a significant impact on intersection service levels if the Project would increase V/C ratios or delay above LOS standards set forth under Culver City and City of Los Angeles guidelines, as applicable during the AM or PM peak hours.

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**Impact Statement TRAF-2:** The Project would not require a traffic signal where a traffic signal is not already required at any of the four unsignalized intersections analyzed. However, the Project would result in significant operational level of service impacts at five intersections under Existing (2016) plus Project Conditions (three under the micro-simulation analysis), and at 10 intersections under Future (2021) plus Project Conditions (five under the micro-simulation analysis), during the AM and/or PM peak hours.

### **Existing (2016) plus Project Conditions**

As shown on **Table 4.11-7**, *Existing (2016) and Existing plus Project Conditions – Level of Service Impact Analysis*, seven study intersections are projected to operate at LOS E or F during one or both peak hours under Existing (2016) plus Project Conditions. As further indicated therein, after applying the aforementioned Culver City and City of Los Angeles level of service significant impact criteria, the Project would result in significant level of service impacts at the following five of these intersections:

8. Washington Blvd/Culver Blvd (Culver City, AM peak hour)
9. Main St/Culver Blvd (Culver City, AM peak hour)
13. Robertson Blvd/Exposition Blvd/Venice Blvd (City of Los Angeles, AM peak hour)
38. Robertson Blvd/National Blvd (City of Los Angeles, AM & PM peak hours)
42. Duquesne Ave/Braddock Dr (Culver City, AM & PM peak hours)

### **Existing (2016) plus Project Conditions – Micro-Simulation Analysis**

Details of key transportation system assumptions made for the Existing (2016) plus Project level of service micro-simulation analysis are described below:

- In connection with the Parcel B Project, approved project, Intersection 9 (Main St// Culver Blvd), would have a south leg. The intersection's geometry would be modified as follows: northbound and southbound approach would have one shared through/right-turn lane and one left-turn lane, the eastbound approach would have one left-turn, two through lanes, and one shared through/right-turn lane, and the westbound approach would have one left-turn, two through, and one right-turn lane.
- Per Project Design Feature PDF-TRAF-1, traffic signals were optimized (i.e., splits, offsets, and lead/lag phases) at Intersection 9 (Main St/Culver Blvd), Intersection 10 (Ince Blvd/Washington Blvd), and Intersection 11 (Canfield Ave/Washington Blvd/Culver Boulevard) to account for the new south leg at Main St/Culver Blvd.

As shown on **Table 4.11-8**, *Existing (2016) and Existing plus Project Conditions – Intersection Levels of Service Under Micro-Simulation Analysis*, under Existing plus Project Conditions, the following three intersections would operate at an undesirable LOS (LOS E or LOS F) during at least one of the analyzed peak hours:

6. Duquesne Ave/Culver Blvd (LOS F in the AM and PM peak hours)
10. Ince Blvd/Washington Blvd (LOS E in the AM peak hour and LOS F in the PM peak hours)
11. Canfield Ave//Washington Blvd/Culver Blvd (LOS E in the AM peak hours)

**TABLE 4.11-7  
EXISTING (2016) AND EXISTING PLUS PROJECT CONDITIONS – LEVEL OF SERVICE IMPACT ANALYSIS**

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Existing		Existing + Project		Project Increase In V/C or Delay	Significant Impact
				V/C or Delay	LOS	V/C or Delay	LOS		
1	Jefferson Blvd	Rodeo Rd/ Higuera St [a]	AM	0.719	C	0.719	C	0.000	NO
			PM	0.688	B	0.689	B	0.001	NO
2	Duquesne Ave	Jefferson Blvd	AM	0.832	D	0.848	D	0.016	NO
			PM	0.764	C	0.770	C	0.006	NO
3	Duquesne Ave	Lucerne Ave [b]	AM	0.785		0.814		0.029	NO
			PM	0.738		0.760		0.022	NO
			AM	28.300	D	33.300	D		-
			PM	22.000	C	24.800	C		-
4	Madison Ave	Culver Blvd	AM	0.646	B	0.649	B	0.003	NO
			PM	0.583	A	0.599	A	0.016	NO
5	Clarrington Ave	Washington Blvd	AM	0.578	A	0.587	A	0.009	NO
			PM	0.640	B	0.642	B	0.002	NO
6	Duquesne Ave	Culver Blvd	AM	0.666	B	0.698	B	0.032	NO
			PM	0.620	B	0.643	B	0.023	NO
7	Hughes Ave	Venice Blvd [a]	AM	0.612	B	0.629	B	0.017	NO
			PM	0.681	B	0.694	B	0.013	NO
8	Washington Blvd	Culver Blvd	AM	0.898	D	0.932	E	0.034	YES
			PM	0.856	D	0.874	D	0.018	NO
9	Main St	Culver Blvd	AM	0.676	B	0.761	C	0.085	YES
			PM	0.599	A	0.651	B	0.052	NO
10	Ince Blvd	Washington Blvd	AM	0.529	A	0.693	B	0.164	NO
			PM	0.571	A	0.680	B	0.109	NO
11	Canfield Ave/ Washington Blvd	Culver Blvd	AM	0.728	C	0.765	C	0.037	NO
			PM	0.651	B	0.686	B	0.035	NO
12	Culver Blvd	Venice Blvd [a]	AM	0.588	A	0.592	A	0.004	NO
			PM	0.596	A	0.619	B	0.023	NO
13	Robertson Blvd/ Exposition Blvd	Venice Blvd [a]	AM	0.863	D	0.939	E	0.076	YES
			PM	0.797	C	0.829	D	0.032	YES
14	National Blvd	Washington Blvd	AM	0.687	B	0.710	C	0.023	NO
			PM	0.741	C	0.755	C	0.014	NO
15	Higuera Street	Washington Blvd	AM	0.786	C	0.814	D	0.028	NO
			PM	0.656	B	0.682	B	0.026	NO
16	Higuera Street	Lucerne Ave [b]	AM	0.858		0.858		0.000	NO
			PM	0.726		0.726		0.000	NO
			AM	56.400	F	56.400	F		-
			PM	13.300	B	13.300	B		-
17	Ince Blvd	Lucerne Ave [b]	AM	0.586		0.586		0.000	NO
			PM	0.624		0.624		0.000	NO
			AM	12.100	B	12.100	B		-
			PM	13.900	B	13.900	B		-
18	Hayden Ave	National Blvd	AM	0.394	A	0.394	A	0.000	NO
			PM	0.431	A	0.439	A	0.008	NO
19	Overland Ave	Culver Blvd	AM	0.867	D	0.889	D	0.022	NO
			PM	0.872	D	0.883	D	0.011	NO
20	Overland Ave	Jefferson Blvd	AM	0.889	D	0.896	D	0.007	NO
			PM	0.925	E	0.927	E	0.002	NO
21	Main St/ Bagley Ave	Venice Blvd [a]	AM	0.642	B	0.652	B	0.010	NO
			PM	0.637	B	0.658	B	0.021	NO
22	National Blvd	Venice Blvd [a]	AM	0.835	D	0.836	D	0.001	NO
			PM	0.827	D	0.835	D	0.008	NO

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Existing		Existing + Project		Project Increase In V/C or Delay	Significant Impact
				V/C or Delay	LOS	V/C or Delay	LOS		
23	Ince Blvd	Culver Studios Gate 2 [c]	AM	12.600	B	17.100	C		-
			PM	12.000	B	20.000	C		-
24	Ince Blvd	Culver Studios Gate 3 [c]	AM	11.700	B	12.100	B		-
			PM	10.700	B	11.200	B		-
25	Jefferson Blvd	National Blvd [a]	AM	0.947	E	0.949	E	0.002	NO
			PM	0.527	A	0.527	A	0.000	NO
26	National Blvd	I-10 EB On Ramp [a]	AM	0.234	A	0.238	A	0.004	NO
			PM	0.463	A	0.486	A	0.023	NO
27	La Cienega Blvd	Washington Blvd	AM	0.870	D	0.883	D	0.013	NO
			PM	0.849	D	0.860	D	0.011	NO
28	Duquesne Ave	Washington Blvd	AM	0.615	B	0.632	B	0.017	NO
			PM	0.691	B	0.696	B	0.005	NO
29	La Cienega Blvd	Venice Blvd [a]	AM	0.820	D	0.821	D	0.001	NO
			PM	0.843	D	0.849	D	0.006	NO
30	Cattaraugus Ave	Venice Blvd [a]	AM	0.715	C	0.725	C	0.010	NO
			PM	0.537	A	0.545	A	0.008	NO
31	Motor Ave	Venice Blvd [a]	AM	0.704	C	0.706	C	0.002	NO
			PM	0.845	D	0.852	D	0.007	NO
32	Clarington Ave	Venice Blvd [a]	AM	0.558	A	0.566	A	0.008	NO
			PM	0.590	A	0.596	A	0.006	NO
33	Overland Ave	Venice Blvd [a]	AM	0.808	D	0.825	D	0.017	NO
			PM	0.782	C	0.785	C	0.003	NO
34	Motor Ave	Washington Blvd	AM	0.668	B	0.669	B	0.001	NO
			PM	0.642	B	0.650	B	0.008	NO
35	Overland Ave	Washington Blvd	AM	0.816	D	0.818	D	0.002	NO
			PM	0.907	E	0.910	E	0.003	NO
36	Cardiff Ave	Culver Blvd	AM	0.560	A	0.566	A	0.006	NO
			PM	0.554	A	0.589	A	0.035	NO
37	Lafayette Pl	Culver Blvd	AM	0.457	A	0.492	A	0.035	NO
			PM	0.433	A	0.444	A	0.011	NO
38	Robertson Blvd	National Blvd [a]	AM	1.164	F	1.189	F	0.025	<b>YES</b>
			PM	1.085	F	1.098	F	0.013	<b>YES</b>
39	Robertson Blvd	I-10 WB Off-Ramp/ Kincardine Ave [a]	AM	0.627	B	0.665	B	0.038	NO
			PM	0.842	D	0.844	D	0.002	NO
40	Midway Ave	Venice Blvd [a]	AM	0.466	A	0.466	A	0.000	NO
			PM	0.537	A	0.538	A	0.001	NO
41	Elenda St	Culver Blvd	AM	0.715	C	0.729	C	0.014	NO
			PM	0.617	B	0.621	B	0.004	NO
42	Duquesne Ave	Braddock Dr	AM	0.802		0.831		0.029	<b>YES</b>
			PM	0.709		0.731		0.022	<b>YES</b>
			AM	61.000	F	73.800	F		-
			PM	31.200	D	40.100	E		-

**Bolded** results indicate unacceptable operations.

<sup>a</sup> City of Los Angeles jurisdiction.

<sup>b</sup> Intersection is unsignalized and was analyzed using both ICU and HCM methodologies per Culver City Traffic Study Criteria

<sup>c</sup> Intersection is unsignalized and was evaluated to determine the need for a traffic signal or other traffic control device.

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

**TABLE 4.11-8  
EXISTING (2016) AND EXISTING PLUS PROJECT CONDITIONS – INTERSECTION LEVELS OF SERVICE UNDER  
MICRO-SIMULATION ANALYSIS**

Intersection	Traffic Control <sup>1</sup>	Peak Hour	Existing			Existing plus Project		
			Delay (sec/veh) <sup>2</sup>	LOS <sup>3</sup>	% Served	Delay (sec/veh) <sup>2</sup>	LOS <sup>3</sup>	% Served
6. Duquesne Ave & Culver Boulevard	Signal	AM	48.1	D	97%	<b>81.3</b>	<b>F</b>	94%
		PM	51.0	D	99%	<b>83.4</b>	<b>F</b>	94%
8. Washington Boulevard & Culver Boulevard	Signal	AM	18.1	B	97%	18.4	B	95%
		PM	21.5	C	99%	23.0	C	94%
9. Main St/Culver Boulevard	Signal	AM	22.7	C	97%	27.5	C	94%
		PM	20.9	C	99%	32.9	C	94%
10. Ince Boulevard & Washington Boulevard	Signal	AM	<b>80.6</b>	<b>F</b>	96%	<b>61.1</b>	<b>E</b>	93%
		PM	33.1	C	98%	<b>90.5</b>	<b>F</b>	93%
11. Canfield Ave/ Washington Boulevard & Culver Boulevard	Signal	AM	27.8	C	97%	<b>56.6</b>	<b>E</b>	93%
		PM	36.8	D	98%	40.2	D	93%
15. Higuera St & Washington Boulevard	Signal	AM	<b>60.3</b>	<b>E</b>	97%	35.6	D	96%
		PM	25.1	C	99%	33.7	D	96%
36. Cardiff Ave & Culver Boulevard	Signal	AM	5.1	A	97%	4.7	A	94%
		PM	6.8	A	99%	9.5	A	94%
37. Lafayette Pl & Culver Boulevard	Signal	AM	34.4	C	97%	54.5	D	92%
		PM	31.8	C	97%	38.6	D	91%

**Bolded** results indicate unacceptable operations.

<sup>1</sup> AWSC = All-way stop controlled, SSSC = Side-street stop controlled

<sup>2</sup> Whole intersection weighted average stopped delay expressed in seconds per vehicle for signalized and all-way stop-controlled intersections. The vehicular delay for the worst movement is reported for side-street stop-controlled intersections.

<sup>3</sup> Delay calculated using traffic simulation and LOS assigned using delay ranges from the 2010 *Highway Capacity Manual* (HCM).

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

It is generally considered acceptable if an intersection's percent volume demand served is within 2 to 3% of its baseline conditions, which in this instance is the Existing Condition. Based on this process, the following locations have a greater than 3% change in percent demand served with the Project in place:

- 6. Duquesne Ave/Culver Blvd (-5% change in the PM peak hours)
- 8. Washington Blvd/Culver Blvd (-5% change in the PM peak hours)
- 9. Main St/Culver Blvd (-5% change in the PM peak hours)
- 10. Ince Blvd/Washington Blvd (-5% change in the PM peak hours)
- 11. Canfield Ave/Washington Blvd/Culver Blvd (-4% change in the AM peak hour and -5% change in the PM peak hours)
- 36. Cardiff Ave/Culver Blvd (-5% change in the PM peak hours)

37. Lafayette Pl/Culver Blvd (-5% change in the AM peak hours and -6% change in the PM peak hours)

Generally, AM peak hour operations are better under Existing plus Project conditions because traffic demand is being constrained at upstream intersections and vehicles are not capable of traveling through the network during the simulation period. Specifically, traffic heading northbound is being constrained at Intersection 10 (Ince Blvd/Washington Blvd). Overall, these upstream constraints artificially improve the vehicular delay and LOS at some locations under the “plus Project” Condition (i.e., Intersections 10 and 15 (Higuera St/ Washington Blvd)).

Based on the above, Project operational level of service impacts under Existing (2016) plus Project Conditions would be significant according to the micro-simulation analysis.

### **Future (2021) plus Project Conditions**

Details of key transportation system assumptions made for Future (2021) With plus Project level of service analysis are described below:

- Proposed cycle track along Washington Blvd would result in the modification of Intersection 14 (National Blvd/Washington Blvd) and Intersection 15 (Higuera St/Washington Blvd):.
- At the intersection of National Blvd/Washington Blvd, the westbound leg would be reconfigured from and existing one left-turn, two through lanes, and one through/right to one left-turn, two through lanes, and one right-turn lane. The eastbound leg is proposed to be reconfigured from one left-turn, two through lanes, and one right-turn to one left-turn, one through, and one through/right lane.
- At the intersection of Higuera St/Washington Blvd, the westbound leg is proposed to be reconfigured from one left-turn, one through, and one through/right to one left-turn, two through lanes, and a right-turn lane.
- In connection with a planned, approved project, Intersection 9 (Main St/Culver Blvd) would have a south leg. The intersection’s geometry would be modified as follows: northbound and southbound approach would have one shared through/right-turn lane and one left-turn lane, the eastbound approach would have one left-turn, two through lanes, and one shared through/right-turn lane, and the westbound approach would have one left-turn lane, two through lanes, and one right-turn lane.

As shown on **Table 4.11-9, Future (2021) and Future plus Project Conditions – Level of Service Impact Analysis**, 18 study intersections are projected to operate at LOS E or F during one or both peak periods under Future (2021) plus Project Conditions. As further indicated therein, after applying the aforementioned Culver City and City of Los Angeles level of service significant impact criteria, the Project would result in significant level of service impacts at the following 10 of these intersections:

3. Duquesne Ave/Lucerne Ave (Culver City, AM & PM peak hours)
8. Washington Blvd/Culver Blvd (Culver City, AM peak hour)
10. Ince Blvd/Washington Blvd (Culver City, AM & PM peak hours)
13. Robertson Blvd/Exposition Blvd/Venice Blvd (City of LA, AM & PM peak hours)
14. National Blvd/Washington Blvd (Culver City, AM & PM peak hours)

- 15. Higuera St/Washington Blvd (Culver City, AM peak hour)
- 19. Overland Ave/Culver Blvd (Culver City, AM peak hour)
- 33. Overland Ave/Venice Blvd (City of Los Angeles, AM peak hour)
- 38. Robertson Blvd/National Blvd (City of Los Angeles, AM & PM peak hours)
- 42. Duquesne Ave/Braddock Dr (Culver City, AM & PM peak hours)

**TABLE 4.11-9  
FUTURE (2021) AND FUTURE PLUS PROJECT CONDITIONS – LEVEL OF SERVICE IMPACT ANALYSIS**

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Future		Future + Project		Project Increase In V/C or Delay	Significant Impact
				V/C or Delay	LOS	V/C or Delay	LOS		
1	Jefferson Blvd	Rodeo Rd/ Higuera St <sup>[a]</sup>	AM	0.840	D	0.846	D	0.006	NO
			PM	0.860	D	0.861	D	0.001	NO
2	Duquesne Ave	Jefferson Blvd	AM	1.017	F	1.033	F	0.016	NO
			PM	0.883	D	0.893	D	0.010	NO
3	Duquesne Ave	Lucerne Ave <sup>[b]</sup>	AM	0.849		0.878		0.029	<b>YES</b>
			PM	0.807		0.829		0.022	<b>YES</b>
			AM	43.900	E	49.800	E	-	-
			PM	33.800	D	39.200	E	-	-
4	Madison Ave	Culver Blvd	AM	0.693	B	0.695	B	0.002	NO
			PM	0.659	B	0.675	B	0.016	NO
5	Clarington Ave	Washington Blvd	AM	0.663	B	0.673	B	0.010	NO
			PM	0.703	C	0.705	C	0.002	NO
6	Duquesne Ave	Culver Blvd	AM	0.722	C	0.753	C	0.031	NO
			PM	0.689	B	0.715	C	0.026	NO
7	Hughes Ave	Venice Blvd <sup>[a]</sup>	AM	0.711	C	0.727	C	0.016	NO
			PM	0.806	D	0.819	D	0.013	NO
8	Washington Blvd	Culver Blvd	AM	0.971	E	1.005	F	0.034	<b>YES</b>
			PM	0.941	E	0.959	E	0.018	NO
9	Main St	Culver Blvd	AM	0.807	D	0.825	D	0.018	NO
			PM	0.706	C	0.746	C	0.040	NO
10	Ince Blvd	Washington Blvd	AM	0.569	A	0.732	C	0.163	<b>YES</b>
			PM	0.620	B	0.730	C	0.110	<b>YES</b>
11	Canfield Ave/ Washington Blvd	Culver Blvd	AM	0.791	C	0.829	D	0.038	NO
			PM	0.756	C	0.792	C	0.036	NO
12	Culver Blvd	Venice Blvd <sup>[a]</sup>	AM	0.681	B	0.685	B	0.004	NO
			PM	0.752	C	0.774	C	0.022	NO
13	Robertson Blvd/ Exposition Blvd	Venice Blvd <sup>[a]</sup>	AM	1.139	F	1.213	F	0.074	<b>YES</b>
			PM	1.047	F	1.091	F	0.044	<b>YES</b>
14	National Blvd	Washington Blvd	AM	0.909	E	0.935	E	0.026	<b>YES</b>
			PM	0.989	E	1.011	F	0.022	<b>YES</b>
15	Higuera Street	Washington Blvd	AM	0.874	D	0.902	E	0.028	<b>YES</b>
			PM	0.829	D	0.855	D	0.026	NO
16	Higuera Street	Lucerne Ave <sup>[b]</sup>	AM	0.898		0.898		0.000	NO
			PM	0.771		0.771		0.000	NO
			AM	72.800	F	72.800	F	-	-
			PM	14.800	B	14.800	B	-	-

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Future		Future + Project		Project Increase In V/C or Delay	Significant Impact
				V/C or Delay	LOS	V/C or Delay	LOS		
17	Ince Blvd	Lucerne Ave <sup>[b]</sup>	AM	0.618		0.618		0.000	NO
			PM	0.653		0.653		0.000	NO
			AM	12.900	B	12.900	B		-
			PM	15.600	C	15.600	C		-
18	Hayden Ave	National Blvd	AM	0.439	A	0.448	A	0.009	NO
			PM	0.526	A	0.534	A	0.008	NO
19	Overland Ave	Culver Blvd	AM	0.959	E	0.981	E	0.022	<b>YES</b>
			PM	0.962	E	0.972	E	0.010	NO
20	Overland Ave	Jefferson Blvd	AM	1.038	F	1.045	F	0.007	NO
			PM	1.077	F	1.079	F	0.002	NO
21	Main St/ Bagley Ave	Venice Blvd <sup>[a]</sup>	AM	0.751	C	0.760	C	0.009	NO
			PM	0.763	C	0.784	C	0.021	NO
22	National Blvd	Venice Blvd <sup>[a]</sup>	AM	1.081	F	1.083	F	0.002	NO
			PM	1.118	F	1.126	F	0.008	NO
23	Ince Blvd	Culver Studios Gate 2 <sup>[c]</sup>	AM	13.000	B	17.700	C		-
			PM	12.300	B	21.000	C		-
24	Ince Blvd	Culver Studios Gate 3 <sup>[c]</sup>	AM	11.900	B	12.400	B		-
			PM	10.800	B	11.400	B		-
25	Jefferson Blvd	National Blvd <sup>[a]</sup>	AM	1.102	F	1.104	F	0.002	NO
			PM	0.647	B	0.656	B	0.009	NO
26	National Blvd	I-10 EB On Ramp <sup>[a]</sup>	AM	0.282	A	0.286	A	0.004	NO
			PM	0.603	B	0.625	B	0.022	NO
27	La Cienega Blvd	Washington Blvd	AM	0.970	E	0.983	E	0.013	NO
			PM	0.947	E	0.957	E	0.010	NO
28	Duquesne Ave	Washington Blvd	AM	0.677	B	0.695	B	0.018	NO
			PM	0.760	C	0.766	C	0.006	NO
29	La Cienega Blvd	Venice Blvd <sup>[a]</sup>	AM	0.904	E	0.905	E	0.001	NO
			PM	0.963	E	0.968	E	0.005	NO
30	Cattaraugus Ave	Venice Blvd <sup>[a]</sup>	AM	0.809	D	0.819	D	0.010	NO
			PM	0.626	B	0.633	B	0.007	NO
31	Motor Ave	Venice Blvd <sup>[a]</sup>	AM	0.808	D	0.809	D	0.001	NO
			PM	0.976	E	0.982	E	0.006	NO
32	Clarrington Ave	Venice Blvd <sup>[a]</sup>	AM	0.676	B	0.683	B	0.007	NO
			PM	0.696	B	0.702	C	0.006	NO
33	Overland Ave	Venice Blvd <sup>[a]</sup>	AM	0.922	E	0.939	E	0.017	<b>YES</b>
			PM	0.992	E	0.993	E	0.001	NO
34	Motor Ave	Washington Blvd	AM	0.711	C	0.713	C	0.002	NO
			PM	0.702	C	0.709	C	0.007	NO
35	Overland Ave	Washington Blvd	AM	0.955	E	0.956	E	0.001	NO
			PM	1.005	F	1.012	F	0.007	NO
36	Cardiff Ave	Culver Blvd	AM	0.610	B	0.616	B	0.006	NO
			PM	0.627	B	0.662	B	0.035	NO
37	Lafayette Pl	Culver Blvd	AM	0.500	A	0.536	A	0.036	NO
			PM	0.484	A	0.495	A	0.011	NO
38	Robertson Blvd	National Blvd <sup>[a]</sup>	AM	1.331	F	1.355	F	0.024	<b>YES</b>
			PM	1.274	F	1.288	F	0.014	<b>YES</b>
39	Robertson Blvd	I-10 WB Off-Ramp/ Kincardine Ave <sup>[a]</sup>	AM	0.731	C	0.769	C	0.038	NO
			PM	0.893	D	0.895	D	0.002	NO

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Future		Future + Project		Project Increase In V/C or Delay	Significant Impact
				V/C or Delay	LOS	V/C or Delay	LOS		
40	Midway Ave	Venice Blvd [a]	AM	0.545	A	0.546	A	0.001	NO
			PM	0.626	B	0.628	B	0.002	NO
41	Elenda St	Culver Blvd	AM	0.772	C	0.785	C	0.013	NO
			PM	0.674	B	0.678	B	0.004	NO
42	Duquesne Ave	Braddock Dr	AM	0.848		0.877		0.029	<b>YES</b>
			PM	0.764		0.787		0.023	<b>YES</b>
			AM	92.900	F	110.700	F	17.800	-
			PM	33.800	D	61.500	F	27.700	-

**Bolded** results indicate unacceptable operations.

<sup>a</sup> City of Los Angeles jurisdiction.

<sup>b</sup> Intersection is unsignalized and was analyzed using both ICU and HCM methodologies per Culver City Traffic Study Criteria

<sup>c</sup> Intersection is unsignalized and was evaluated to determine the need for a traffic signal or other traffic control device.

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

### Future (2021) plus Project Conditions – Micro-Simulation Analysis

Details of key transportation system assumptions made for Future (2021) plus Project level of service micro-simulation analysis are described below:

- Cycle tracks along Washington Boulevard would modify the signal timings at Intersection 15 (Higuera St/Washington Blvd). Specifically, the eastbound and westbound left-turns at this intersection would change from permissive to protected phasing. Also the westbound right-turn would need to be signed “No Right Turn on Red” due to the protected phase provided to bicyclists and pedestrians.
- Proposed cycle track along Washington Blvd would result in the modification of Intersection 14 (National Blvd/Washington Blvd) and Intersection 15 (Higuera St/Washington Blvd):
- At the intersection of National Blvd/Washington Blvd, the westbound leg would be reconfigured from an existing one left-turn, two through lanes, and one through/right to one left-turn, two through lanes, and one right-turn lane. The eastbound leg is proposed to be reconfigured from one left-turn, two through lanes, and one right-turn to one left-turn, one through, and one through/right lane.
- At the intersection of Higuera St/Washington Blvd, the westbound leg is proposed to be reconfigured from one left-turn, one through, and one through/right to one left-turn, two through lanes, and a right-turn lane.
- In connection with a planned, approved project, Intersection 9 (Main St/Culver Blvd) would have a south leg. The intersection’s geometry would be modified as follows: northbound and southbound approach would have one shared through/right-turn lane and one left-turn lane, the eastbound approach would have one left-turn, two through lanes, and one shared through/right-turn lane, and the westbound approach would have one left-turn lane, two through lanes, and one right-turn lane.
- Signal optimization (i.e., splits, offsets, and lead/lag phases) at Intersection 9 (Main St/Culver Blvd), Intersection 10 (Ince Blvd/Washington Blvd), and Intersection 11 (Canfield Ave/Washington Blvd/Culver Blvd).

As shown on **Table 4.11-10, Future (2021) and Future plus Project Conditions – Intersection Levels of Service Under Micro-Simulation Analysis**, under Future plus Project Conditions, the following five intersections would operate at an undesirable LOS (LOS E or LOS F) during at least one of the analyzed peak hours:

- 6. Duquesne Ave/Culver Blvd (LOS F in the AM and PM peak hours)
- 10. Ince Blvd/Washington Blvd (LOS E in the PM peak hour)
- 11. Canfield Ave/Washington Blvd/Culver Blvd (LOS E in the PM peak hour)
- 15. Higuera St/Washington Blvd (LOS F in the AM and PM peak hours)
- 37. Lafayette Pl/Culver Blvd (LOS E in the AM and PM peak hours)

**TABLE 4.11-10  
 FUTURE (2021) AND FUTURE PLUS PROJECT CONDITIONS – INTERSECTION LEVELS OF SERVICE UNDER  
 MICRO-SIMULATION ANALYSIS**

Intersection	Traffic Control <sup>1</sup>	Peak Hour	Future			Future plus Project		
			Delay (sec/veh) <sup>2</sup>	LOS <sup>3</sup>	% Served	Delay (sec/veh) <sup>2</sup>	LOS <sup>3</sup>	% Served
6. Duquesne Ave & Culver Boulevard	Signal	AM	<b>87.6</b>	<b>F</b>	93%	<b>116.4</b>	<b>F</b>	88%
		PM	<b>116.4</b>	<b>F</b>	87%	<b>157.2</b>	<b>F</b>	76%
8. Washington Boulevard & Culver Boulevard	Signal	AM	18.6	B	93%	20.9	C	90%
		PM	29.6	C	88%	39.2	D	79%
9. Main St / Culver Boulevard	Signal	AM	25.6	C	93%	28.2	C	89%
		PM	42.4	D	87%	54	D	78%
10. Ince Boulevard & Washington Boulevard	Signal	AM	29.1	C	91%	41.5	D	87%
		PM	34.5	C	82%	<b>58.5</b>	<b>E</b>	76%
11. Canfield Ave / Washington Boulevard & Culver Boulevard	Signal	AM	18.5	B	92%	35.4	D	88%
		PM	30.9	C	86%	<b>62.4</b>	<b>E</b>	76%
15. Higuera St & Washington Boulevard	Signal	AM	<b>114.1</b>	<b>F</b>	90%	<b>117.5</b>	<b>F</b>	88%
		PM	<b>124.5</b>	<b>F</b>	81%	<b>127.6</b>	<b>F</b>	78%
36. Cardiff Ave & Culver Boulevard	Signal	AM	5.3	A	93%	5.9	A	89%
		PM	12.6	B	87%	16.5	B	78%
37. Lafayette Pl & Culver Boulevard	Signal	AM	47.7	D	90%	<b>64.1</b>	<b>E</b>	85%
		PM	44.2	D	82%	<b>56.1</b>	<b>E</b>	69%

**Bolded** results indicate unacceptable operations.

<sup>1</sup> AWSC = All-way stop controlled, SSSC = Side-street stop controlled

<sup>2</sup> Whole intersection weighted average stopped delay expressed in seconds per vehicle for signalized and all-way stop-controlled intersections. The vehicular delay for the worst movement is reported for side-street stop-controlled intersections.

<sup>3</sup> Delay calculated using traffic simulation and LOS assigned using delay ranges from the 2010 *Highway Capacity Manual* (HCM).

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

As previously mentioned, it is generally considered acceptable if an intersection’s percent volume demand served is within 2 to 3% of its baseline conditions. Overall the majority of the simulated

study intersections would experience a decrease in percent volume demand served greater than 3% under Future plus Project Conditions when compared to Future Base Conditions. It should be noted that traffic demand would already be constrained throughout the immediate project vicinity by Future Base Conditions, as the percent demand served would range from 81% to 93% at the study intersections. The completion of the Project would exacerbate congestion, especially during the PM peak hour, where the percent demand served would range from 69% to 79% at the study intersections. Therefore, Project operational level of service impacts under Future (2021) plus Project Conditions would be significant according to the micro-simulation analysis.

**Signal Warrants**

As indicated previously, the following four study intersections were selected for signal warrant analysis in consultation with Culver City staff:

- 3. Duquense Ave/Lucerne Ave (due to project-related significant traffic impacts)
- 23. Ince Blvd & Culver Studios Gate 2
- 24. Ince Blvd & Culver Studios Gate 3
- 42. Duquense Ave/Braddock Dr (due to Project-related significant traffic impacts)

As indicated in **Table 4.11-11, Signal Warrant Analysis**, signal warrants would be triggered at two of the four intersections analyzed: (1) at Intersection 3 (Duquense Ave/Lucerne Ave) during the AM and PM peak hours during all four analysis scenarios; and (2) at Intersection 42 (Duquense Ave/Braddock Drive during the AM peak hour during all four scenarios analyzed, and during the PM peak hour during two of the four analysis scenarios. However, in no instance would the Project trigger signal warrants where they do not already exist under Existing (2016) or Future (2021) without Project conditions. This includes at Culver Studios Gates 2 and 3 where signal warrants would not be triggered during any of the four analysis scenarios. Therefore, the Project would not generate the need for traffic signals where the need does not already exist, and the impact would be less than significant.

**TABLE 4.11-11  
 SIGNAL WARRANT ANALYSIS**

ID	N/S Street Name	E/W Street Name	Peak Period	Signal Warrant Met?			
				Existing (2016)	Existing + Project	Future (2021)	Future + Project
3	Duquesne Ave	Lucerne Ave	AM	YES	YES	YES	YES
			PM	YES	YES	YES	YES
23	Ince Blvd	Culver Studios Gate 2	AM	NO	NO	NO	NO
			PM	NO	NO	NO	NO
24	Ince Blvd	Culver Studios Gate 3	AM	NO	NO	NO	NO
			PM	NO	NO	NO	NO
42	Duquense Ave	Braddock Dr	AM	YES	YES	YES	YES
			PM	NO	NO	YES	YES

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

### ***Intersection Queuing***

**Impact Statement TRAF-3: Under Future (2021) plus Project conditions, additional turning pocket queuing distances would be required at the westbound left-turn lanes at Intersections 9 (Main St/Culver Blvd) and 10 (Ince Blvd/Washington Blvd), while adequate queuing distances would be available at 11 (Canfield Ave/Washington Blvd/Culver Blvd).**

For information purposes in accordance with the MOU, peak hour intersection queuing distance analysis was conducted at the westbound left-turn lanes at three intersections, including at Intersections 9 (Main St/Culver Blvd), 10 (Ince Blvd/Washington Blvd), and 11 (Canfield Ave/Washington Blvd/Culver Blvd). The results of the analysis are provided in **Table 4.11-12, *Intersection Queuing Distance Analysis Under Future Base (2021) and Future plus Project Conditions***, and are summarized below:

- **Intersection 9 (Main St/Culver Blvd):** Queues were studied at Intersection 9 to determine if there is adequate storage in the westbound left-turn lane during the Future plus Project scenario. The westbound queue length is being lengthened to 150 feet in the future, as part an adjacent project. As seen in Table 21, the storage length will not be able to accommodate the worst-case queues in both the AM and PM peak hour under Future plus Project conditions. In the future, without project, the storage length would not be able to accommodate the AM peak hour vehicles as well. Assuming a vehicle length of 25 feet, about four vehicles could spillback into the westbound through lane during the AM peak hours and two vehicles during PM peak hours. As a result, queues will interfere with westbound through vehicle movements during worst case traffic. Average queues during both peak hours in the future are estimated to be accommodated by a storage length of 150 feet.
- **Intersection 10 (Ince Blvd/Washington Blvd):** Queues were studied at Intersection 10 to determine if there is adequate storage in the westbound left-turn lane. In the future, the Project is expected to extend the westbound left turn from its current storage length of 125 feet to 165 feet. As shown in Table 22, the storage length will not be able to accommodate the worst-case queues in both the AM and PM peak hour under Future plus Project conditions. Assuming a vehicle length of 25 feet, up to four vehicles could spill back into the westbound through lanes during the AM and PM peak hours. Average queues during both peak hours in the future are expected to be accommodated by a storage length of 165 feet.
- **Intersection 11 (Canfield Ave/Washington Blvd):** Queues were studied at Intersection 11 to determine if there is adequate storage in the eastbound left-turn lane after it gets adjusted to 60 feet. Based on the results presented in Table 23, the eastbound left-turn storage length of about 60 feet is inadequate in accommodating the projected worst-case queues under both Future and Future plus Project conditions. This may result in queues interfering with eastbound through vehicle movements during worst case traffic. Average queues during both peak hours in the future are estimated to be accommodated by a storage length of 60 feet.

As indicated in Table 4.11-12, average queues during peak hours would be satisfied by all three intersections' storage lengths under Future plus Project Conditions.

**TABLE 4.11-12  
INTERSECTION QUEUING DISTANCE ANALYSIS UNDER FUTURE BASE (2021) AND FUTURE PLUS PROJECT  
CONDITIONS**

ID	N/S Street Name	E/W Street Name	95 <sup>th</sup> Percentile vs. Average Queues	Westbound Left-Turn Storage Length (ft)	Queues (ft)			
					Future Base AM Peak Hour	Future plus Project AM Peak Hour	Future Base PM Peak Hour	Future plus Project PM Peak Hour
9	Main St	Culver Blvd	95 <sup>th</sup> Percentile	150	<b>200</b>	<b>250</b>	150	<b>200</b>
			Average	150	50	75	50	50
10	Ince Blvd	Washington Blvd	95 <sup>th</sup> Percentile	165	150	<b>250</b>	150	<b>275</b>
			Average	165	50	150	50	125
11	Canfield Ave / Washington Blvd	Culver Blvd	95 <sup>th</sup> Percentile	60	<b>75</b>	<b>75</b>	<b>75</b>	<b>75</b>
			Average	60	25	25	25	25

<sup>a</sup> The 95<sup>th</sup> percentile queues represent the worst-case condition. Queues are rounded to the nearest multiple of 25 feet. SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

### **Public Transit**

**Threshold TRAF-3:** The Project would result in a significant impact on public transit if it would add substantial new ridership to the transit lines operating in excess of their capacity or if the Project would conflict with adopted policies, plans, or programs supporting alternative transportation.

**Impact Statement TRAF-4:** Transit ridership generated by the Project would not exceed the capacity of the Project area’s transit lines. Furthermore, the Project support adopted policies, plans, programs and requirements that promote alternative transportation. Therefore, Project operational public transit impacts would be less than significant.

As indicated previously and shown in Figure 4.11-2, the Project Site and greater traffic Study Area are well served by public transit routes, including the Metro Expo Line and 14 rapid, regional and local bus lines. As further indicated previously, the Metro Expo Line has an estimated seating capacity of approximately 8,470 persons, while the 14 bus lines have an estimated seating capacity of approximately 2,470 persons.

Without the 15 percent trip reduction credit afforded to the Project for being located within one-quarter mile of a designated CMP transit corridor and for assumed transit, bicycle use and getting to work by walking, the Project would generate an estimated 5,368 daily net trips, 577 net AM peak hour tips, and 550 net PM peak hour trips. Applying the CMP guidelines of converting the vehicle trips to person trips by multiplying by a 1.4 AVR (577 net AM peak hour trips x 1.4 = 808 and 550 net PM peak hour trips x 1.4 = 770), and applying the 15% transit credit (577 net AM peak hour person trips x 15% = 121 and 770 net PM peak hour person trips x 15% = 116),

would result in approximately 121 new Project-related transit person trips during the weekday AM peak hour and approximately 116 new Project-related transit person trips during the weekday PM peak hour. As the Project Site and greater traffic Study Area is well served by numerous established local and regional transit routes, and as the Project would utilize only approximately 2.8 percent of the combined capacity of the public transit system that would serve it, it is anticipated that adequate capacity exists in the public transit system to serve the Project.

The Project would also be consistent with applicable policies, plans, programs and requirements that support alternative transportation. In accordance with CCMC Section 7.05.015, the Project would implement required transportation demand and trip reduction measures (e.g., transit information, carpools/vanpools and associated preferential parking, bicycle parking/facilities, bus stop improvements if deemed required by the City, etc.) applicable to a projects with 100,000 gross sf or more of gross floor area which would reduce automobile usage in favor of alternative modes of transportation. The Project would also comply with CCMC Section 17.320.045 bicycle parking requirements; provide safe and attractive pedestrian walkways/sidewalks linking streets and parking areas to the entrances of the proposed buildings as called for by Circulation Element Policy 4.C; concentrate development along multiple designated bikeways (e.g., Venice, Culver and Washington Boulevards, etc.); and concentrate employment-generating uses in Downtown and within a quarter-mile of rail transit and 14 bus routes. The Project would also support SCAG's 2016 RTP/SCS by intensifying development in an area directly served by the Culver City Metro Station and Expo Line; multiple local and regional bus lines; through existing and future connectivity to multiple bicycle facilities; and, through proximity to an array of entertainment and commercial uses in downtown within convenient walking distance to the Project Site.

Lastly, the Project in concert with other development in the local area could potentially result in some travel time delays to local bus service in the Project area, but travel delays issues are addressed by the service providers as part of their ongoing planning efforts for bus service, routing, etc.

Based on the above, Project operational impacts on public transit would be less than significant.

## Access and Circulation

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**Threshold TRAF-4:** The Project would have a significant impact on access and circulation if it would substantially increase conflict of movement between vehicles and pedestrians or bicycles because of driveway design, the location of parking facilities, or other Project characteristics affecting visibility and turning movements.

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**Impact Statement TRAF-5:** **The Project would not substantially increase conflict of movement between vehicles and pedestrians or bicycles due to driveway design, the location of parking facilities, or other Project characteristics affecting visibility and tuning movements. Therefore, Project operational access and circulation impacts would be less than significant.**

## **Vehicles**

### **Access and Circulation**

As indicated previously, vehicular access to the Project Site would be provided by five gates, (four along Ince Boulevard and one along Washington Boulevard) and by the proposed Culver/Main Tunnel.

Existing Gate 1, on Washington Boulevard, would be changed to a vehicular emergency access only. This would allow for some separation of Project vehicular and pedestrian/bicycle traffic.

Existing Gate 2, on Ince Boulevard, would continue to be a staffed gate and the primary arrival and entry point for visitors, VIPs, and executives. It would accommodate controlled ingress and egress to/from Ince Boulevard using the existing, but modified, curb cut. Improved with increased capacity and efficiency measures, drive aisles, pick-up/drop-off area, turn-arounds, security gates, and vehicle queuing on the Studio Campus would be reoriented to direct motorists immediately to a ramp to the south to enter the proposed below-grade Central Parking Structure, or to continue below grade to the existing below-grade Rear Lawn Parking Structure, or to the replacement Van Buren Parking Structure on the east side of the Studio Campus.

New Gate 2A and associated curb cut would be located midway between existing Gates 2 and 3 on Ince Boulevard, and would serve as the primary employee entrance to the new Central Parking Structure beneath proposed buildings 1, 2, 4, and 5 and to the below-grade and above-grade replacement Van Buren Parking Structure on the east side of the Studio Campus. Gate 2A would be keycard entry-controlled and would allow ingress and egress at a four-way signed stop. Signage would discourage traffic from entering Gate 2A from Poinsettia Court, and the entrance would be angled to prevent such vehicular movements. The City would determine the type of traffic control required at the Ince Boulevard & Poinsettia Court intersection.

Existing Gate 3, improved as a component of CPA 6, would allow controlled employee ingress and egress for the replacement Van Buren Parking Structure and would become the primary service, loading, and delivery entrance for production vehicles and other trucks, and emergency vehicles. Signage would discourage traffic from entering Gate 3 from Krueger Street.

Gate 4, improved as a component of CPA 6, would be realigned and would provide for improved emergency access and maneuverability for emergency vehicles as well as limited egress for production vehicles unable to maneuver and exit via Gate 3. This would also provide for some separation of Project employee/visitor and truck traffic.

Furthermore, the proposed Culver/Main Tunnel would provide vehicular site access from Culver Boulevard, connecting Culver Boulevard, the Parcel B project parking structure, and the existing and proposed on-site parking structures via subterranean connections. This would provide an additional point of access to the Project Site that does not currently exist, and would effectively separate a portion of the Projects vehicular traffic from pedestrian and bicycle traffic in the area.

Lastly, in the future, the Project is expected to extend the westbound left turn lane of Intersection 10 (Ince Blvd/Washington Blvd) from its current storage length of 125 feet to 165 feet. This

extension would still allow access to other driveways along Washington Boulevard and also would continue to prevent left turns out of the Ince parking garage. The proposed extension by 40 feet would be consistent with approved Comprehensive Plan Amendment #6.

All the proposed on- and off-site roadway, driveway, and gate improvements would be designed and constructed in accordance with Culver City requirements, and would be reviewed and approved by the City during the Site Plan Review process specified under CCMC Sections 17.540.005 through 17.540.025. This would ensure that street cross-sections, site access, visibility, and other parameters are incorporated that provide safe vehicular travel and avoid vehicular, pedestrian and bicycle conflicts. The Project would also provide separate truck loading areas in accordance with CCMC Section 17.320.050, thereby further separating Project truck and employee/visitor traffic and reducing impediments to on-site vehicular circulation. Lastly, the Project would not require the removal or relocation of existing transit stops. Therefore, Project operational vehicular access and circulation impacts would be less than significant.

### **Project Driveway Queues**

A queuing analysis was conducted at three of the Project driveways (gates) to help determine the effect of traffic entering/exiting the Project Site under the Project, on through traffic along Ince Boulevard, and to identify any internal queuing on-site. **Table 4.11-13, Project Driveway spillback** along Ince Boulevard during the analyzed peak hours (while the required SBTR queuing distance at Gate 3 under future with Project conditions of 150 ft would exceed the existing turn pocket distance at this location, as indicated in Footnote C in Table 4.11-13, a 150 ft right turn pocket was approved at this location under CPA No. 6 and would be developed under the Project. Additionally, while internal queuing is difficult to quantify since the storage length of the internal roadway and circulation into the parking facilities are currently unknown: (1) queues equivalent to about 20 vehicles (assuming a vehicle length of 25 feet) are identified to be exiting Gate 2A in the PM peak hour under Future plus Project Conditions; and (2) as indicated previously, the proposed on-site vehicular circulation system would undergo City Site Plan review to ensure the adequacy of the on-site circulation system (including queuing distances). Therefore, operational Project driveway (gate) queuing impacts would be less than significant under Future (2021) plus Project conditions. *Queuing Distance Analysis Under Future (2021) plus Project Conditions*, presents the 95<sup>th</sup> Percentile (worst-case) queues at the Project driveways under future with Project Conditions. As indicated therein, vehicles turning into the Project Site would not cause substantial queuing spillback along Ince Boulevard during the analyzed peak hours. Additionally, internal queuing is difficult to quantify since the storage length of the internal roadway and circulation into the parking facilities are unknown; however, it should be noted that queues equivalent to about 20 vehicles (assuming a vehicle length of 25 feet) are identified to be exiting Gate 2A in the PM peak hour under Future plus Project conditions.

**TABLE 4.11-13  
 PROJECT DRIVEWAY QUEUING DISTANCE ANALYSIS UNDER FUTURE (2021) WITH PROJECT CONDITIONS**

Project Driveway	Movement <sup>a</sup>	Storage or Link Length (ft)	95 <sup>th</sup> Percentile Queues (ft) <sup>b</sup>	
			AM Peak Hour	PM Peak Hour
Gate 2	EBL	°	50	2250
	SBTR	200	25	
Gate 2A	EBL	°	50	400
	SBTR	575	0	0
Gate 3	EBL	°	25	200
	SBTR	150 <sup>d</sup>	0	0

- <sup>a</sup> EBL = eastbound left/right, SBR = southbound right, SBTR = southbound through/right
- <sup>b</sup> The 95<sup>th</sup> percentile queues represent the worst-case condition. Queues are rounded to the nearest multiple of 25 feet.
- <sup>c</sup> Unknown storage length in internal roadway.
- <sup>d</sup> A 150 foot SB right-turn pocket on Ince Blvd at Culver Studios Gate 3 is not yet constructed but was approved as part of CPA6 and would be developed under the Project.

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

### Neighborhood Traffic Impacts

When the Project trip distribution was determined, it was agreed in consultation with City of Culver City staff that the impact of Project trips on residential neighborhoods would be minimized. The Studios, in coordination with Culver City, is required to implement measures in order to accomplish the aforementioned objective. These measures were established as part of Culver Studios Comprehensive Plan Amendment No. 5, and include traffic signs directing traffic in/out of the studio towards major roadway and implementing a public relations program that informs all employees, vendors, tenants, and visitors of the designated routes to and from the Studio to help prevent vehicles using residential neighborhoods to access the Project Site.

Although the Project and its driveways are designed to discourage Project generated trips from traveling southbound on Ince Boulevard, it is possible that a nominal amount of Project vehicles could ignore the signage and street design. The neighborhood traffic impact analysis has accounted for this minor number of automobiles traveling in non-designated routes, and the 12 street segment counts were used as a baseline for the analysis. As seen in Table 4.11-6 and 4.11-7, the Project would not create a significant traffic impact in any of the streets in the residential neighborhoods adjacent to the Project Site in either the existing base or future year scenarios.

Based on the above, Project operational neighborhood traffic impacts would be less than significant.

### Pedestrians

#### General Pedestrian Impacts

As indicated previously, the streets surrounding Culver Studios, including Culver Boulevard, Ince Boulevard, Van Buren Place, and Lucerne Avenue, all have sidewalk facilities on both sides of the road. These sidewalks are ADA accessible and have crosswalk striping at major intersections with pedestrian countdown signals. Pedestrians can take Ince to Lucerne and then Duquesne

Avenue to reach the Ballona Creek path that is shared use for both bicyclists and pedestrians. The northern entrance of Culver Studios, Gate 1, provides a direct connection to downtown Culver City, via a pedestrian-only plaza.

Walk Score is a private company that provides walkability services and apartment search tools through a website and mobile applications. Walk Score uses a series of user inputs involving types of land uses, available pedestrian improvements, distances to shopping and other services, etc., to generate a walkability score ranging from 0 to 100 as follows:<sup>18</sup>

- 90-100 Walker's Paradise (daily errands do not require a car)
- 70-89 Very Walkable (most errands can be accomplished on foot)
- 50-69 Somewhat Walkable (some errands can be accomplished on foot)
- 25-49 Car-Dependent (most errands require a car)
- 0-24 Car-Dependent (almost all errands require a car)

The Studio has an existing Walk Score® of 93, which is much higher than the overall City average score of 72.

The Studio Campus is highly integrated into downtown Culver City and, under the proposed Project, would continue to provide enhanced walkability connections in coordination with the Parcel B project. An assortment of walkways, pathways, and promenades would provide a high level of connectivity and accessibility within the Studio Campus. The upgrades to the Front Lawn area would provide an opportunity to activate and celebrate the Studio, the City, and community participation by opening up the lawn area to public access with connectivity to Parcel B and Town Plaza, which would provide an expanded publicly accessible area for various periodic events and celebrations. As a component of the improved gates to the Studio Campus, pedestrian experience and access would be enhanced via newly painted striping and signage. Gate 1 would become the primary entrance for pedestrians and bicyclists, aided by a new bike share station and Downtown Bicycle Connector as proposed by the City.

An effort has been made to reduce the potential for vehicle, pedestrian, and bicycle conflicts through the design of the Project. As described previously, Gate 1 (the existing Studio gated located along Washington Boulevard) would be used primarily as a pedestrian and bicyclist access point. By limiting vehicle access to emergency use only, active transportation modes would be less likely to have interaction with motor vehicles. The proposed Expo to Downtown bicycle path would also provide a separated bicycle facility for workers and visitors to travel to Culver Studios along Washington Boulevard from National Boulevard to downtown Culver City. Lastly, the Project would retain the existing sidewalks around the Project Site, and would not remove any existing painted crosswalks.

Furthermore, the City's Bicycle Pedestrian Master Plan identified several areas in Culver City most appropriate for pedestrian improvements. Two relevant locations to Culver Studios include the Expo Light Rail Station and Downtown Culver City (from Madison Avenue to Main Street).

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<sup>18</sup> Redfin, How Walk Scores Works, <https://www.redfin.com/how-walk-score-works>. Accessed July 6, 2017.

These zones will receive prioritized pedestrian improvements and maintenance by the City, resulting in a likely increase in pedestrian mode split, and encouraging employees and visitors to walk to Culver Studios.

Along Ince Boulevard, pedestrians and bicyclists would be in greater conflict with vehicles as the three gates into Culver Studios force vehicles to cross over sidewalks on the western portion of the roadway. No bicycle facilities currently exist along Ince Boulevard, the primary path of vehicles traveling to and from Culver Studios. Adding bike sharrows and providing striped crosswalks across gate driveways, as required by PDF-TRAF-3, would minimize conflicts between vehicles and bicyclists/pedestrians.

Lastly, Culver Studios is expected to make ongoing contributions to the maintenance of sidewalks and pedestrian facilities along the perimeter of the Studio under the Project.

Based on the above, Project operational pedestrian impacts would be less than significant.

### **Pedestrian Safety & School Children**

Culver Studios is located within several hundred feet of Linwood E. Howe Elementary School. All entrances and exits for the Studio are located along Ince or Washington Boulevards. There is one emergency only access point along Van Buren Place. Linwood Elementary is located between Van Buren Place and Irving Place. The new traffic generation and distribution associated with the Project were studied to ensure that the Project would not result in pedestrian safety impacts to school children arriving at and departing from Linwood Elementary.

Linwood Elementary has a student drop-off time from 8:00 AM to 8:40 AM. During this time, parents drop-off on the school side of Van Buren Place (west side), and on the school side of Irving Place (east side). Security and school employees are present to assist with the unloading process. The curb lane's drop-off zones are coned-off to create a drop-off lane. This prevents potential cut-ins as well as mid-line exits, which would cause traffic disorder. Pick-up is from 3:15 PM to 3:30 PM, and looks similar in layout, with the exception that there are no school personnel assisting students getting into their vehicles. However, the school pick-up period occurs outside of peak hours such that traffic on area streets, including Studio traffic, is relatively low compared to during peak hours.

Culver City has a Safe Routes to School Program and Linwood Elementary has an official walking school bus that occurs every Friday. There are two routes that travel to the school. Route 1, which comes from the west, starts at Carlson Park and travels straight to the school via Braddock Drive. Route 2, to the east, meets at Carson Street & Ince Boulevard, and travels south on Ince Boulevard, makes a right onto Lucerne Ave, and then travels up Van Buren Place until it gets to the school. Figure 17 in the Traffic Study includes a map of these safe routes.

As described previously, the impact of Project trips on residential neighborhoods has been minimized by design and in coordination with the City. Traffic signs directing traffic in/out of the Studio towards major roadways and implementing a public relations program that informs all employees, vendors, tenants, and visitors of the designated routes to and from the Studio would help to prevent vehicles using residential neighborhoods to access the Project Site. Therefore,

none of the Linwood Elementary pick-up and drop-off locations would be substantially affected by Project traffic. Route 1 of the Safe Routes to School program does cross the intersection of Duquesne Ave & Braddock Drive. Project traffic has been predicted to travel down Duquesne Ave after turning from Culver Boulevard or from Jefferson Boulevard. Traffic calming infrastructure at this intersection helps in lessening pedestrian and vehicle interactions. Route 2 of the Safe Routes to School program start below the Culver Studios gates, and therefore receive no project traffic. Therefore, the Project would not result in a substantial safety hazard to children walking to and from Linwood Elementary School.

Based on the above, Project operational pedestrian impacts to school children at Linwood Elementary would be less than significant.

### ***Bicycles***

As indicated previously, the Project Site is well served by existing bicycle routes. Employees and visitors arriving to the Studio by bicycle would have use of the same bicycle routes in the Project vicinity that currently exist (e.g., the Ballona Creek Bicycle Path and the bike paths/routes along Van Buren Place, Lucerne Avenue, National Boulevard, Culver Boulevard, Washington Boulevard, Duquesne Avenue, etc.), and the Project would not adversely impact these bicycle routes. As indicated previously, Project construction workers and vehicles would use Ince Boulevard which does not have bicycle facilities. At the same time, bicycle access to the Project Site would be enhanced during Project operation by: (1) the proposed conversion of Gate 1 (off of Washington Blvd) to a pedestrian, bicycle and emergency vehicle only access point; (2) the development of the Class IV two-way cycle track along Washington Boulevard adjacent to the Project Site under the City-sponsored Expo-to-Downtown Bicycle Connector; (3) the City-sponsored bike share system, including a bike share station proposed at the Parcel B site adjacent to the Project Site; and (4) the provision of bicycle parking at the Project Site in accordance with CCMC requirements.

Along Ince Boulevard, pedestrians and bicyclists will be in greater conflict with vehicles as the three gates into Culver Studios force vehicles to cross over sidewalks on the western portion of the roadway. The Project will be responsible for studying appropriate sight distances for drivers entering and exiting the site. AASHTO standards will be used to make sure motorists are able to see pedestrians or bicyclists traveling along Ince Boulevard, with the angle of all the gates taken into consideration.

No bicycle facilities currently exist along Ince Boulevard, the primary path of vehicles traveling to and from Culver Studios. However, bike sharrows along the Project Site's Ince Boulevard frontage, and striped crosswalks across Studio gate driveways, would be provided as required by PDW-TRAF-3 to minimize conflicts between vehicles and bicyclists/pedestrians.

Based on the above, Project operational bicycle impacts would be less than significant.

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## **Parking**

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**Threshold TRAF-6:** The Project would result in a significant parking impact if it would provide less vehicle and bicycle parking than the projected demand.

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**Impact Statement TRAF-6:** The Project would provide at least the number of on-site vehicle and bicycle parking spaces required by Code. Therefore, adequate on-site vehicle and bicycle parking would be provided to serve the Project.

As indicated previously, per SB 743, the Project is exempt from findings of significance related to parking, as it is a qualifying infill project in proximity to transit. Therefore, the following analysis is provided for informational purposes.

As indicated previously, one existing on-site parking structure would be demolished, one existing on-site parking structure would be retained, and two new on-site parking structures (e.g., the subterranean Central Parking Structure and the below- and above-grade Van Buren Parking Structure) would be constructed under the Project, for a total of 2,370 on-site vehicle parking spaces. Based on the CCMC Section 17.320.020 requirement, the 760,676 sf (proposed plus existing to remain) of studio floor area under the Project would require an estimated 1,960 on-site vehicle parking spaces (see Table 27 in the Traffic Study for calculations). Therefore, the proposed number of on-site vehicle parking spaces would exceed that required by the CCMC. Furthermore, on-site vehicle parking spaces would be designed in accordance with Culver City requirements, including the accessible parking requirements of CCMC Section 17.320.030, and the Project's proposed parking plans would be reviewed and approved by the City under the Site Plan Review process outlined under CCMC Sections 17.540.005 through 17.540.025. Therefore, adequate on-site vehicle parking would be provided under the Project.

As indicated previously, bicycle parking and related amenities would be provided under the Project in compliance with the City's applicable ordinances and plans. Based on the CCMC Section 17.320.045 requirement for commercial uses of 5 percent of the required number of on-site vehicle parking spaces, the Project would require an estimated 93 on-site bicycle parking spaces. Given that the Project is proposing to provide 100 bicycle parking spaces, it would meet and exceed the number of on-site bicycle parking spaces required by Code. Furthermore, on-site bicycle parking spaces would be designed in accordance with Culver City requirements and reviewed/approved by the City under the City's Site Plan Review process.

Based on the above, adequate on-site vehicle and bicycle parking would be provided to meet projected Project demand.

## **Cumulative Impacts**

### **Construction**

Impacts on traffic associated with construction (e.g., an intermittent reduction in street and intersection operating capacity, potential conflicts with pedestrians/bicyclists, potential overlap with construction of the Parcel B project, potential conflict with transit operations) are typically considered short-term adverse impacts, but not significant. The Project would result in a less-

than-significant traffic impact during construction with the implementation of PDF-TRAF-1, Construction Management Plan, which would incorporate scheduling, notification, and safety procedures. Cumulative projects would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or conform with other City requirements related to traffic controls and scheduling, notification, and safety procedures, to reduce potential traffic impacts during construction. As indicated in PDF-TRAF-1, Construction Management Plan, biweekly construction management meetings with City Staff and other representatives of surrounding developments if under construction at around the same time as the Project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another. Accordingly, Project-related contributions to construction traffic impacts, considered together with the impacts of related projects, would be less than cumulatively considerable and cumulative impacts associated with construction would be less than significant.

## **Operation**

The Traffic Study (see Appendix K-1 of this Draft EIR) was developed to address Project impacts in the context of existing baseline conditions (2016) and future (2021) conditions. Future conditions take into account traffic caused by the 56 cumulative (related) projects identified in Chapter 3, as well as a growth factor to account for other ambient growth occurring in the region. Thus, the above Future (2021) and Future (2021) plus Project analyses above take into account the cumulative impacts associated with future growth. As indicated under Impact Statement TRAF-2 above, the Project would result in a potentially significant operational level of service impact at nine study intersections (Intersection Nos. 3, 8, 10, 13, 14, 15, 19, 33, and 38) during the AM and/or PM peak hours. Therefore, mitigation measures are proposed below which, as indicated in the following Significance After Mitigation subsection, would reduce the impacts to less than significant levels at some but not all of these intersections.

With regard to signal warrants and intersection queuing distances, similar to the level of service analysis, the signal warrant and queuing analyses for the Project provided above are also based on Future (2021) conditions and take into account cumulative impacts associated with future growth. As indicated under Impact Statement TRAF-2, signal warrants would not be met under future with Project conditions at either of the unsignalized study intersections evaluated, while as indicated under Impact Statement TRAF-3, while queuing distances at the three study intersections evaluated (Intersection Nos. 9, 10, and 11) would exceed available turning pocket distances under future and future with Project conditions, the queuing analysis is provided for informational purposes only (see the previous Methodology subsection for an explanation of why). Therefore, cumulative signal warrant impacts would be less than significant, while no significance determination is posited for queuing distance impacts.

With regard to the Regional Transportation System, the Project would result in a less-than-significant impact at CMP arterial monitoring stations and CMP freeway segments. As this analysis incorporates cumulative development, cumulative impacts would also be less than significant.

The public transit analysis is based on CMP procedures that have been developed to address countywide cumulative growth impacts on transit facilities. The CMP Guidelines contain procedures for monitoring land use development levels and transit system performance by local jurisdictions and Metro which are used to inform planning of infrastructure improvements to meet future needs, including development of the CMP Capital Improvement Program, Metro's Long Range Transportation Plan, and SCAG's RTP/SCS. As indicated in the discussion of Project impacts above, transit ridership generated by the Project would not exceed the capacity of the traffic Study Area's transit lines, and impacts would be less than significant. Given the available capacity, the Project would not result in a cumulatively considerable contribution to cumulative impacts on public transit. Furthermore, it is assumed that public transit providers would add additional service when required, in order to accommodate cumulative demand in the region. Therefore, cumulative impacts on public transit would be less than significant.

With regard to vehicular, pedestrian, and bicycle access and circulation, the Project would not result in a significant impact. Each cumulative project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access and circulation for vehicles, pedestrian and cyclists. Therefore, the Project would not contribute to a significant cumulative impact with regard to access and circulation.

With regard to vehicle and bicycle parking, the cumulative projects would be subject to the parking requirements of Culver City or the City of Los Angeles, as applicable. Therefore, cumulative impacts on parking would be less than significant.

## 4.11.5 Mitigation Measures

### **Construction**

Based on the significance thresholds and impact analyses provided previously, the Project would result in less than significant construction impacts under Future (2021) plus Project Conditions with respect to requiring temporary relocation of existing bus stops or resulting in the substantial loss of on-street parking

Based on the significance thresholds and impact analyses provided previously, the Project would result in significant construction impacts under Future (2021) plus Project Conditions with respect to causing substantial delays and disruptions of existing traffic flow and/or resulting in impacts based on the operational thresholds at intersections during peak hours. The mitigation measures below are proposed to mitigate these impacts:

**MM TRAF-1: Haul Truck Staging** - Any off-site haul truck staging shall be provided in a legal area furnished by the construction truck contractor. The route to and from the Project Site shall be identified in the Construction Management Plan. Trucks shall not be permitted to travel along residential streets to the south, east, and west of the Project Site.

**MM TRAF-2: Flagman** - Flagmen shall be placed at the truck entries and exits from the Project Site onto Ince Boulevard to control the flow of exiting trucks to coordinate the entering and exiting trucks with the traffic signal at Ince Boulevard and Washington Boulevard.

**MM TRAF-3: Truck Deliveries/Pick-Ups** - Deliveries and pick-ups of construction materials shall be scheduled during non-peak travel hours and coordinated to reduce the potential of trucks waiting to load or unload for protracted hours of time.

**MM TRAF-4: Access** - Access shall remain unobstructed for land uses in proximity to the Project Site during Project construction.

**MM TRAF-5: Lane Closures** - Temporary lane closures, if needed, shall be scheduled to avoid peak commute hours and peak school drop-off and pick-up hours to the extent possible. In the event of a lane closure, a worksite traffic control plan, approved by Culver City, shall be implemented to route traffic around any such lane closures.

## Operation

Based on the significance thresholds and impact analyses provided previously, the Project would result in the following less than significant impacts under Future (2021) plus Project Conditions: (1) signal warrants at the four study intersections analyzed (Intersection Nos. 3, 23, 24 and 42); (2) public transit; (3) access and circulation (e.g., vehicle/pedestrian/bicycle access/circulation, Project driveway queues, neighborhood traffic, and pedestrian impacts to school children); and (4) parking. No mitigation measures are required for these impacts.

Based on the significance thresholds and impact analyses provided previously, the Project would result in significant intersection level of service impacts at ten intersections (Intersection Nos. 3, 8, 10, 13, 14, 15, 19, 33, 38, and 42); and (2) intersection queuing distance impacts at three intersections (Intersection Nos. 9, 10, and 11). The mitigation measures listed below are proposed to mitigate these impacts.

**MM TRAF-6: Transportation Demand Management (TDM) Program** - TCS shall require the following TDM measures to be provided by each tenant, given the term of the tenancy is long enough for the programs to be implemented (for example, tenancy longer than six months). TCS shall integrate these TDM measures into standard lease documents for each respective tenant leasing over 25,000 gross square feet:

1. **Site Design** – The site perimeter shall be designed to encourage walking, biking, and transit. Amenities include wide sidewalks and pedestrian plaza/paseo accessible to neighborhood, street trees and landscaped pathways between buildings, improved street and pedestrian lighting and improved bus shelters, lighting and landscaping on the perimeter of the Project Site.
2. **Rideshare Programs** – Rideshare programs typically include the provision of an on-site transit and rideshare information center that provides assistance to help people form carpools or access transit alternatives. Rideshare programs often also include priority parking for carpools. The research literature shows that rideshare programs can reduce commuting VMT by up to 15% (CAPCOA, 2010).
3. **Bicycle Parking and other Complimentary Services** – Culver Studios plans to provide both long-term and short-term bicycle parking. In addition, the Project will provide complementary amenities such as shower facilities, lockers, and a self-service bike repair area to encourage bicycle use.
4. **Contribution to Bike Share Program** – Bike share service, available for employees and visitors to use, will be provided off-site, adjacent to the property.

5. Unbundled Parking – Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of leasing commercial space. Saving money on commercial space by forgoing a parking space acts as an incentive that minimizes auto usage. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making. The research literature shows that unbundled parking costs can reduce vehicle miles traveled (VMT) by up to 13%.
6. Transit Pass Discount Program – Transit pass discount programs are typically negotiated with transit service providers to purchase transit passes in bulk, and therefore at a discounted rate. Discounted passes are then sold to employees, helping them to obtain price discounts through the economies of scale of bulk purchasing. The Project tenants shall participate in the B-TAP+Green transit pass discount program and work with the City to participate in the future B-TAP+Green+Bike share transit/bike share pass discount program. The research literature shows that discounted transit passes can reduce commuting VMT by up to 20%.
7. Car Share Program – The Project shall allow space for a car-share service within its proposed parking facilities. A car share program is a model of car rental where people rent cars for short hours of time, often by the hour. The programs are attractive to tenants who make only occasional use of a vehicle, as well as others who would like occasional access to a vehicle of a different type than they use day-to-day.
8. Parking Cash-out – Tenants shall provide employees a choice to keep a parking space at work, or to accept a cash payment and give up the parking space.

**TRAF-7: Intersection 10 (Ince Blvd/Washington Blvd)** - Restripe the southbound approach from one left-only lane and one shared through/left-turn lane to two left-only turn lanes. Restripe the lane currently reserved for southbound right turns as a shared through/right-turn lane. Prohibit eastbound left-turn movement. These improvements are shown in Figure 12 of the Traffic Study. The Project shall be responsible for designing and implementation of restriping the approaches as described above. Implementation of this mitigation measure shall be required prior to the issuance of certificates of occupancy for the Project by the City.

**TRAF-8: Intersection 11 (Canfield Ave/Washington Blvd/Culver Blvd)** – Restripe the northbound approach from one left-turn lane, one shared through/left-turn lane, and one right-turn lane to two left-turn lanes and one shared through/right-turn lane. These improvements are shown in Figure 12 of the Traffic Study. Implementation of this mitigation measure shall be required prior to the issuance of certificates of occupancy for the Project by the City.

In order to address queuing issues at Intersection 10 and other mobility considerations, the following two optional mitigation measures are being considered:

**TRAF-9: Intersection 10 (Ince Blvd/Washington Blvd) – OPTIONAL MITIGATION:** A prohibition on left turns from westbound Ince Boulevard to southbound Washington Boulevard at Intersection 10.

**TRAF-10: Intersection 11 (Canfield Ave/Washington Ave & Culver Blvd) – OPTIONAL MITIGATION:** Reconfiguration of the westbound approach at Intersection 11 to include an exclusive westbound left-only lane, a share left/through lane, and a share through/right turn lane).

In addition to the mitigation measures listed above, several circulation alternatives and other mitigation measures were considered to mitigate the significant level of service impacts of the Project but were concluded to be infeasible or more impacting. These mitigation measures, and the reasons why they were concluded to be infeasible, are identified in Section 4 of the Traffic Study under “Improvements Determined to be Infeasible”).

## 4.11.6 Level of Significance After Mitigation

### **Construction**

Less than significant construction impacts under Future (2021) plus Project Conditions would occur with respect to requiring temporary relocation of existing bus stops or resulting in the substantial loss of on-street parking.

Mitigation Measures MM-TRAF-1 through MM-TRAF-5, along with implementation of proposed Project Design Features PDF-TRAF-1 and PDF-TRAF-3, would reduce the significant construction-related traffic congestion impacts under Future (2021) plus Project Conditions. Impacts of construction would be less than those cause by Project operation. However, significant and unavoidable construction-related traffic congestion impacts would remain, and there could be some temporary incompatibilities between existing motor vehicle traffic and Project construction traffic. Any such impacts would be temporary.

### **Operation**

Less than significant operational impacts under Future (2021) plus Project Conditions would occur with respect to signal warrants, public transit, access and circulation (e.g., vehicle/pedestrian/bicycle access/circulation, Project driveway queues, neighborhood traffic, and pedestrian impacts to school children), and parking. No mitigation measures are required for these impacts.

### **Intersection Service Levels**

The combined effect of the TDM strategies detailed as part of Mitigation Measure TRAF-6 would result in a reduction in peak hour trip generation by offering services, actions, specific facilities, incentives, and contributions aimed at encouraging use of alternative transportation modes (e.g., transit, bus, walking, bicycling, carpool, etc.). The cumulative reduction in trips due to these TDM measures would be high, but because TDM measures are often complementary, simply adding the percent reduction for each measure would result in an overestimation. However, to be conservative, a maximum 10% TDM credit was applied to the net new trips generated by Culver Studios.

**Table 4.11-14, *Project Trip Generation with TDM Reduction Program***, summarizes the estimated trip reduction during the peak hours. As indicated therein, total net new trips during the peak periods would be reduced to 442 and 421 in the AM peak period and PM peak period, respectively.

**TABLE 4.11-14  
PROJECT TRIP GENERATION WITH TDM REDUCTION**

Land Use	Size	Daily	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
Plan Buildout Net New Trips	413.127 KSF	4,562	433	58	491	131	337	468
10% TDM Credit	-	(456)	(43)	(6)	(49)	(13)	(34)	(47)
Total New Trips	-	4,106	390	52	442	118	303	421

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

**Table 4.11-15, Future (2021) and Future plus Project Mitigated Conditions - Level of Service Impact Analysis**, summarizes the results of the future with Project level of service analysis with implementation of Mitigation Measures TRAF-6 through TRAF-8. As indicated therein, the mitigation measures would avoid the significant AM and PM peak hour level of service impacts at Intersection 10 (Ince Blvd/Washington Blvd), the significant AM peak hour level of service impact at Intersection 15 (Higuera St/Washington Blvd), and the significant PM peak hour level of service impacts at both Intersection 14 (National Blvd/Washington Blvd) and Intersection 3 (Duquesne Ave/Lucerne Ave). Significant and unavoidable level of service impacts would remain after mitigation at the following eight intersections during the AM and/or PM peak hour under Future (2021) plus Project Conditions:

- 3. Duquesne Ave/Lucerne Ave (Culver City, AM peak hour)
- 8. Washington Blvd/Culver Blvd (Culver City, AM peak hour)
- 13. Robertson Blvd/Exposition Blvd/Venice Blvd (City of LA, AM & PM peak hours)
- 14. National Blvd/Washington Blvd (Culver City, AM peak hour)
- 19. Overland Ave/Culver Blvd (Culver City, AM peak hour)
- 33. Overland Ave/Venice Blvd (City of Los Angeles, AM peak hours)
- 38. Robertson Blvd/National Blvd (City of Los Angeles, AM & PM peak hours)
- 42. Duquesne Ave/Braddock Dr (Culver City, AM & PM peak hours)

An analysis was also conducted to evaluate traffic impacts resulting from potential implementation of optional Mitigation Measure TRAF-9 (a westbound left-turn restriction at Intersection 10 - Ince Blvd/Washington Blvd). The analysis assumed that all existing and future left turns occurring at this intersection would be shifted to other routes to access Ince Boulevard, south of Washington Boulevard. This shift in traffic was analyzed at the study intersections under both Future plus Project and Future plus Project with Mitigations, as compared to the Future base scenario.

An analysis was also conducted to evaluate traffic impacts resulting from potential implementation of optional Mitigation Measure TRAF-10 (reconfiguring the westbound approach at Intersection 11 - Canfield Ave/Washington Blvd & Culver Blvd to include an exclusive westbound left-only lane, a share left/through lane, and a share through/right turn lane). Under this mitigation scenario, volumes included the TDM credit assumed for the Project. A summary of LOS and significant impact analysis results is included in Appendix E of the Traffic Study.

Provided below is a list of pros and cons of implementing optional Mitigation Measures TRAF-9 and TRAF-10 as compared to the impacts of the proposed Project.

### Pros

- The following two intersections would no longer be significantly impacted by the Project under the Future plus Project scenario:
  - Intersection #14: National Boulevard/Washington Boulevard
  - Intersection #15: Higuera Street/Washington Boulevard
- Reduces vehicular traffic along Washington Boulevard, between National Boulevard and Ince Boulevard;
- Reduces vehicle/pedestrian/bicyclist conflicts at Ince Boulevard & Washington Boulevard and also eliminates queuing spillover from the westbound left-turn at this intersection; and
- Facilitates the Expo to Downtown Bicycle connection.

### Cons

- Additional significant traffic impacts are projected to occur at following intersections:
  - Intersections #11: Canfield Avenue/Washington Boulevard & Culver Boulevard
  - Intersection#22: National Boulevard & Venice Boulevard;
  - Intersection #29: La Cienega Boulevard & Venice Boulevard.
  - Intersection #10: Ince Boulevard & Washington Boulevard also remains significantly impacted after the implementation of mitigations, whereas the impact was removed with mitigations in the proposed project.
- Traffic originating from the east of the Project would shift to other already congested routes of Venice Boulevard and Culver Boulevard from Washington Boulevard.
- Increase in vehicles making left turns at Intersection #11: Canfield Avenue/Washington Boulevard

## Intersection Service Levels – Micro-Simulation Analysis

**Table 4.11-16, Future (2021) and Future plus Project Mitigated Conditions – Micro-Simulation Level of Service Impact Analysis**, summarize the results of the Future plus Project micro-simulation level of service analysis with implementation of Mitigation Measures TRAF-7 and TRAF-8. As indicated therein, the mitigation measures would avoid the significant PM peak hour level of service impacts at Intersections 11 (Canfield Ave/Washington Blvd/Culver Blvd) and 37 (Lafayette Pl/Culver Blvd). However, despite improved operation, significant and unavoidable level of service impacts would remain after mitigation at the following four intersections under Future (2021) plus Project Conditions:

6. Duquesne Ave/Lucerne Ave (Culver City, AM and PM peak hours)
10. Ince Blvd/Washington Blvd (Culver City, PM peak hour)
15. Higuera St/Washington Blvd (Culver City, AM and PM peak hours)
37. Lafayette Pl/Culver Blvd (Culver City, PM peak hour)

**TABLE 4.11-15  
FUTURE (2021) AND FUTURE WITH PROJECT MITIGATED CONDITIONS - LEVEL OF SERVICE IMPACT ANALYSIS**

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Future		Future + Project		Project Increase In V/C or Delay	Significant Impact	F+P plus Mitigation		Project Increase In V/C	Significant Impact
				V/C or Delay	LOS	V/C or Delay	LOS			V/C or Delay	LOS		
1	Jefferson Blvd	Rodeo Rd/ Higuera St <sup>[a]</sup>	AM	0.840	D	0.846	D	0.006	NO				
			PM	0.860	D	0.861	D	0.001	NO				
2	Duquesne Ave	Jefferson Blvd	AM	1.017	F	1.033	F	0.016	NO				
			PM	0.883	D	0.893	D	0.010	NO				
3	Duquesne Ave	Lucerne Ave <sup>[b]</sup>	AM	0.849		0.878		0.029	<b>YES</b>	0.874		0.025	<b>YES</b>
			PM	0.807		0.829		0.022	<b>YES</b>	0.827		0.020	<b>YES</b>
			AM	43.900	E	49.800	E		-	48.700	E		
			PM	33.800	D	39.200	E		-	38.900	E		
4	Madison Ave	Culver Blvd	AM	0.693	B	0.695	B	0.002	NO				
			PM	0.659	B	0.675	B	0.016	NO				
5	Clarington Ave	Washington Blvd	AM	0.663	B	0.673	B	0.010	NO				
			PM	0.703	C	0.705	C	0.002	NO				
6	Duquesne Ave	Culver Blvd	AM	0.722	C	0.753	C	0.031	NO				
			PM	0.689	B	0.715	C	0.026	NO				
7	Hughes Ave	Venice Blvd <sup>[a]</sup>	AM	0.711	C	0.727	C	0.016	NO				
			PM	0.806	D	0.819	D	0.013	NO				
8	Washington Blvd	Culver Blvd	AM	0.971	E	1.005	F	0.034	<b>YES</b>	1.002	F	0.031	<b>YES</b>
			PM	0.941	E	0.959	E	0.018	NO	0.957	E	0.016	NO
9	Main St	Culver Blvd	AM	0.807	D	0.825	D	0.018	NO				
			PM	0.706	C	0.746	C	0.040	NO				
10	Ince Blvd	Washington Blvd	AM	0.569	A	0.732	C	0.163	<b>YES</b>	0.647	B	0.078	NO
			PM	0.620	B	0.730	C	0.110	<b>YES</b>	0.675	B	0.055	NO
11	Canfield Ave/ Washington Blvd	Culver Blvd	AM	0.791	C	0.829	D	0.038	NO				
			PM	0.756	C	0.792	C	0.036	NO				
12	Culver Blvd	Venice Blvd <sup>[a]</sup>	AM	0.681	B	0.685	B	0.004	NO				
			PM	0.752	C	0.774	C	0.022	NO				
13	Robertson Blvd/ Exposition Blvd	Venice Blvd <sup>[a]</sup>	AM	1.139	F	1.213	F	0.074	<b>YES</b>	1.205	F	0.066	<b>YES</b>
			PM	1.047	F	1.091	F	0.044	<b>YES</b>	1.087	F	0.040	<b>YES</b>
14	National Blvd	Washington Blvd	AM	0.909	E	0.935	E	0.026	<b>YES</b>	0.933	E	0.024	<b>YES</b>
			PM	0.989	E	1.011	F	0.022	<b>YES</b>	1.008	F	0.019	NO
15	Higuera Street	Washington Blvd	AM	0.874	D	0.902	E	0.028	<b>YES</b>	0.899	D	0.025	NO
			PM	0.829	D	0.855	D	0.026	NO	0.853	D	0.024	NO

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Future		Future + Project		Project Increase In V/C or Delay	Significant Impact	F+P plus Mitigation		Project Increase In V/C	Significant Impact	
				V/C or Delay	LOS	V/C or Delay	LOS			V/C or Delay	LOS			
16	Higuera Street	Lucerne Ave <sup>[b]</sup>	AM	0.898		0.898		0.000	NO					
			PM	0.771		0.771		0.000	NO					
			AM	72.800	F	72.800	F			-				
			PM	14.800	B	14.800	B			-				
17	Ince Blvd	Lucerne Ave <sup>[b]</sup>	AM	0.618		0.618		0.000	NO					
			PM	0.653		0.653		0.000	NO					
			AM	12.900	B	12.900	B			-				
			PM	15.600	C	15.600	C			-				
18	Hayden Ave	National Blvd	AM	0.439	A	0.448	A	0.009	NO					
			PM	0.526	A	0.534	A	0.008	NO					
19	Overland Ave	Culver Blvd	AM	0.959	E	0.981	E	0.022	<b>YES</b>	0.979	E	0.020	<b>YES</b>	
			PM	0.962	E	0.972	E	0.010	NO	0.971	E	0.009	NO	
20	Overland Ave	Jefferson Blvd	AM	1.038	F	1.045	F	0.007	NO					
			PM	1.077	F	1.079	F	0.002	NO					
21	Main St/ Bagley Ave	Venice Blvd <sup>[a]</sup>	AM	0.751	C	0.760	C	0.009	NO					
			PM	0.763	C	0.784	C	0.021	NO					
22	National Blvd	Venice Blvd <sup>[a]</sup>	AM	1.081	F	1.083	F	0.002	NO					
			PM	1.118	F	1.126	F	0.008	NO					
23	Ince Blvd	Culver Studios Gate 2 <sup>[c]</sup>	AM	13.000	B	17.700	C		-					
			PM	12.300	B	21.000	C		-					
24	Ince Blvd	Culver Studios Gate 3 <sup>[c]</sup>	AM	11.900	B	12.400	B		-					
			PM	10.800	B	11.400	B		-					
25	Jefferson Blvd	National Blvd <sup>[a]</sup>	AM	1.102	F	1.104	F	0.002	NO					
			PM	0.647	B	0.656	B	0.009	NO					
26	National Blvd	I-10 EB On Ramp <sup>[a]</sup>	AM	0.282	A	0.286	A	0.004	NO					
			PM	0.603	B	0.625	B	0.022	NO					
27	La Cienega Blvd	Washington Blvd	AM	0.970	E	0.983	E	0.013	NO					
			PM	0.947	E	0.957	E	0.010	NO					
28	Duquesne Ave	Washington Blvd	AM	0.677	B	0.695	B	0.018	NO					
			PM	0.760	C	0.766	C	0.006	NO					
29	La Cienega Blvd	Venice Blvd <sup>[a]</sup>	AM	0.904	E	0.905	E	0.001	NO					
			PM	0.963	E	0.968	E	0.005	NO					
30	Cattaraugus Ave	Venice Blvd <sup>[a]</sup>	AM	0.809	D	0.819	D	0.010	NO					
			PM	0.626	B	0.633	B	0.007	NO					

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Future		Future + Project		Project Increase In V/C or Delay	Significant Impact	F+P plus Mitigation		Project Increase In V/C	Significant Impact
				V/C or Delay	LOS	V/C or Delay	LOS			V/C or Delay	LOS		
31	Motor Ave	Venice Blvd [a]	AM	0.808	D	0.809	D	0.001	NO				
			PM	0.976	E	0.982	E	0.006	NO				
32	Clarington Ave	Venice Blvd [a]	AM	0.676	B	0.683	B	0.007	NO				
			PM	0.696	B	0.702	C	0.006	NO				
33	Overland Ave	Venice Blvd [a]	AM	0.922	E	0.939	E	0.017	<b>YES</b>	0.938	E	0.016	<b>YES</b>
			PM	0.992	E	0.993	E	0.001	NO	0.993	E	0.001	NO
34	Motor Ave	Washington Blvd	AM	0.711	C	0.713	C	0.002	NO				
			PM	0.702	C	0.709	C	0.007	NO				
35	Overland Ave	Washington Blvd	AM	0.955	E	0.956	E	0.001	NO				
			PM	1.005	F	1.012	F	0.007	NO				
36	Cardiff Ave	Culver Blvd	AM	0.610	B	0.616	B	0.006	NO				
			PM	0.627	B	0.662	B	0.035	NO				
37	Lafayette Pl	Culver Blvd	AM	0.500	A	0.536	A	0.036	NO				
			PM	0.484	A	0.495	A	0.011	NO				
38	Robertson Blvd	National Blvd [a]	AM	1.331	F	1.355	F	0.024	<b>YES</b>	1.353	F	0.022	<b>YES</b>
			PM	1.274	F	1.288	F	0.014	<b>YES</b>	1.286	F	0.012	<b>YES</b>
39	Robertson Blvd	I-10 WB Off-Ramp/ Kincardine Ave [a]	AM	0.731	C	0.769	C	0.038	NO				
			PM	0.893	D	0.895	D	0.002	NO				
40	Midway Ave	Venice Blvd [a]	AM	0.545	A	0.546	A	0.001	NO				
			PM	0.626	B	0.628	B	0.002	NO				
41	Elenda St	Culver Blvd	AM	0.772	C	0.785	C	0.013	NO				
			PM	0.674	B	0.678	B	0.004	NO				
42	Duquesne Ave	Braddock Ave	AM	0.848		0.877		0.029	<b>YES</b>	0.874		0.026	<b>YES</b>
			PM	0.764		0.787		0.023	<b>YES</b>	0.784		0.020	<b>YES</b>
			AM	92.900	F	110.700	F	17.800	-	108.400	F		
			PM	33.800	D	61.500	F	27.700	-	60.100	F		

**Bolded** results indicate unacceptable operations.

<sup>a</sup> City of Los Angeles jurisdiction.

<sup>b</sup> Intersection is unsignalized and was analyzed using both ICU and HCM methodologies per Culver City Traffic Study Criteria.

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

**TABLE 4.11-16  
 FUTURE (2021) AND FUTURE PLUS PROJECT MITIGATED CONDITIONS –  
 MICRO-SIMULATION LEVEL OF SERVICE IMPACT ANALYSIS**

Intersection	Traffic Control <sup>1</sup>	Peak Hour	Future Plus Project			Future Plus Project with Improvements		
			Delay (sec/veh) <sup>2</sup>	LOS <sup>3</sup>	% Served	Delay (sec/veh) <sup>2</sup>	LOS <sup>3</sup>	% Served
6. Duquesne Ave & Culver Boulevard	Signal	AM	<b>116.4</b>	<b>F</b>	88%	<b>115.0</b>	<b>F</b>	87%
		PM	<b>157.2</b>	<b>F</b>	76%	<b>164.0</b>	<b>F</b>	76%
8. Washington Boulevard & Culver Boulevard	Signal	AM	20.9	C	90%	19.7	C	89%
		PM	39.2	D	79%	39.6	C	79%
9. Main St / Culver Boulevard	Signal	AM	28.2	C	89%	30.0	C	90%
		PM	54.0	D	78%	56.9	D	79%
10. Ince Boulevard & Washington Boulevard	Signal	AM	41.5	D	87%	30.0	C	88%
		PM	<b>58.5</b>	<b>E</b>	76%	<b>56.8</b>	<b>E</b>	76%
11. Canfield Ave / Washington Boulevard & Culver Boulevard	Signal	AM	35.4	D	88%	19.6	C	89%
		PM	<b>62.4</b>	<b>E</b>	76%	35.0	D	78%
15. Higuera St & Washington Boulevard	Signal	AM	<b>117.5</b>	<b>F</b>	88%	<b>114.5</b>	<b>F</b>	88%
		PM	<b>127.6</b>	<b>F</b>	78%	<b>137.8</b>	<b>F</b>	76%
36. Cardiff Ave & Culver Boulevard	Signal	AM	5.9	A	89%	6.3	A	89%
		PM	16.5	B	78%	16.9	B	79%
37. Lafayette Pl & Culver Boulevard	Signal	AM	<b>64.1</b>	<b>E</b>	85%	<b>63.2</b>	<b>E</b>	84%
		PM	<b>56.1</b>	<b>E</b>	69%	49.9	D	70%

**Bolded** results indicate unacceptable operations.

<sup>1</sup> AWSC = All-way stop controlled, SSSC = Side-street stop controlled

<sup>2</sup> Whole intersection weighted average stopped delay expressed in seconds per vehicle for signalized and all-way stop-controlled intersections. The vehicular delay for the worst movement is reported for side-street stop-controlled intersections.

<sup>3</sup> Delay calculated using traffic simulation and LOS assigned using delay ranges from the 2010 *Highway Capacity Manual* (HCM).

SOURCE: Fehr & Peers, Traffic Study for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

## 4.12 Utilities and Service Systems

### 4.12.1 Wastewater

#### 4.12.1.1 Introduction

This section analyzes potential impacts on wastewater collection and treatment infrastructure, with the focus on whether this infrastructure has sufficient capacity to serve the Project. This analysis is based, in part, on a Wastewater Infrastructure and Generation Analysis (Wastewater Report) prepared for the Project by KPF Consulting Engineers.<sup>1</sup> The Wastewater Report is included in Appendix L of this Draft EIR.

#### 4.12.1.2 Environmental Setting

##### *Wastewater Collection*

Wastewater collection within the City of Culver City (City) is provided by the City's Public Works Department which maintains the City's wastewater collection system. The conveyance of wastewater from the City's wastewater collection system to the Hyperion Treatment Plant (HTP) for treatment and disposal is provided by City of Los Angeles Department of Public Works (LADPW) conveyance facilities under an Amalgamated Agreement between the Cities of Culver City and Los Angeles.<sup>2</sup> Under this agreement, Culver City pays the LADPW a proportionate share of the costs for conveyance, operation, maintenance, repair and capital improvements to upgrade and improve the conveyance facilities jointly used by the two cities. This charge is collected annually from property owners in the City through an annual Sewer User Fee, and through payment of a one-time Sewer Facility Charge required for new development projects. The agreement does not place a cap on the amount of sewage the LADPW will accept from Culver City.

Culver City operates and maintains 85 miles of gravity and force main sewers and seven pump stations within the City limits. Culver Studios is served by an on-site system of public and privately owned 6- and 8-inch sewer lines. These lines connect, via City-owned laterals, to two off-site City-owned sewer mains: an 8-inch main in Ince Boulevard (which transitions to a 10-inch main at Hubbard Street), and a 6-inch main in between the western boundary of the Project Site and Van Buren Place (e.g., Western main). Both of these off-site mains flow south, with the Ince main flowing to a 21-inch City-owned sewer main in Lucerne Avenue and the Western main flowing to an 8-inch City-owned sewer main in Van Buren Place. Flow from the Lucerne Avenue sewer main is eventually discharged to the 60-inch Westwood Relief Sewer in Jackson Avenue, while flow from the Van Buren Place main is eventually discharged to the 114-inch LADPW-owned North Central Outfall Sewer in Jefferson Boulevard, with flows from both of these

<sup>1</sup> KPF Consulting Engineers, Culver Studios – Wastewater Infrastructure and Generation Analysis, September 2017.

<sup>2</sup> Culver City, Amalgamated Agreement Between the City of Los and the City of Culver City for the Conveyance, Treatment and Disposal of Wastewater, April 1999.

regional mains eventually discharging to the HTP for treatment.<sup>3</sup> Maps showing the locations of the existing on- and off-site sewer lines are provided as Exhibits 1, 3 and 4 in the Wastewater Report.

The capacity of the Ince sewer main was examined at the primary proposed point of connection between Hubbard Street and Carson Street. At this location, the Ince main was found to have a full flow capacity 1.46 cubic feet per second (cfs) and a half flow capacity 0.71 cfs.<sup>4</sup> The capacity of the Western sewer main was examined at the primary proposed point of connection near the existing stages. At this location, the Western main was found to have a full flow capacity of 0.54 cfs and a half flow capacity 0.27 cfs. This information is summarized in **Table 4.12.1-1, Existing Sewer Main Capacity.**<sup>5</sup>

**TABLE 4.12.1-1  
 EXISTING SEWER MAIN CAPACITY**

Sewer Main	Slope (percent)	Half Capacity (cfs)	Full Capacity (cfs)
Ince Blvd (10 inches)	0.49	0.71	1.46
Western (6 inches)	1.07	0.27	0.54

SOURCE: KPFF Consulting Engineers, Culver Studios – Wastewater Infrastructure and Generation Analysis, September 2017.

The approximately 14-acre Project Site is currently developed with The Culver Studios which consists of approximately 347,549 square feet (sf) of studio (e.g., office, support, and stage) uses. As indicated in **Table 4.12.1-2, Estimated Wastewater Generation,** The Culver Studios currently generates average and peak sewage flows of 46,542 gpd and 121,010 gpd, respectively.<sup>6</sup> Wastewater from the northern half of the Project Site and Building Y is currently conveyed by the on-site sewer lines east to the Ince sewer main, while wastewater from the southern half of the Project Site is currently conveyed west to the Western sewer main. A map showing the portions of the Project Site currently flowing to the Ince and Western sewer mains is provided as Exhibit 1 in the Wastewater Report.

In addition to the wastewater currently generated by existing uses at the Project Site, groundwater dewatering currently occurs at the Project Site whereby approximately 3,000 gpd (approximately 0.02 cfs) of treated dewatered groundwater, which at one time was discharged to the local sewer system, is now used as landscape irrigation at the Project Site. Therefore, existing dewatering at the Project Site does not currently affect the local sewer system. See Section 4.6, Hazards and

<sup>3</sup> Gensler Architecture & Planning, Plan Check Book for Culver Studios - Comprehensive Plan Amendment 7 (CPA 7), June 2017.

<sup>4</sup> Half-flow capacity is the capacity of a pipe when the normal depth of flow is half the diameter of the pipe. Pipes are normally designed to operate at half of flow capacity when the line has a diameter of 15 inches or smaller and at three-quarters of flow capacity for lines larger than 15 inches in diameter.

<sup>5</sup> KPFF Consulting Engineers, Culver Studios – Wastewater Infrastructure and Generation Analysis, September 2017.

<sup>6</sup> Ibid.

Hazardous Materials, of this Draft EIR for further discussion of the existing on-site dewatering operation.

**TABLE 4.12.1-2  
 EXISTING WASTEWATER GENERATION**

Land Use	Quantity (gsf)	Wastewater Generation Factor (gpd/unit) <sup>a</sup>	Average Flow (gpd)	Peak Flow (gpd) <sup>b</sup>
Studio Office	117,872	200 gpd/1,000 gsf	23,574	61,292
Support	74,197	100 gpd/1,000 gsf	7,420	19,292
Stage	155,480	100 gpd/1,000 gsf	15,548	40,426
<b>Total</b>	<b>347,549</b>	<b>--</b>	<b>46,542</b>	<b>121,010</b>

gsf = gross square feet, gpd = gallons per day

<sup>a</sup> The average daily flow based on 100% of City of Los Angeles BOS sewerage generation factors.

<sup>b</sup> PDWF is calculated by applying a peaking factor of 2.6 to the ADWF.

SOURCE: KPFF Consulting Engineers, Culver Studios – Wastewater Infrastructure and Generation Analysis, September 2017.

## **Wastewater Treatment**

### **Hyperion Treatment Conveyance System**

All wastewater generated within the LADWP service area (including Culver City) is transported through the HTP Conveyance System to one of four wastewater treatment plants owned and operated by LADPW: the Hyperion Treatment Plant (HTP) in Playa del Rey, Donald Tillman Water Reclamation Plant (DTWRP) in Van Nuys, Los Angeles-Glendale Water Reclamation Plant (LAGWRP) in Los Angeles, and Terminal Island Treatment Plant (TTP) in Los Angeles.

The HTP Conveyance System includes treatment plants, outfalls, and numerous sewer connections and major interceptors. The current treatment capacity of the entire HTP Conveyance System is approximately 550 million gallons per day (mgd), which consists of 450 mgd at HTP, 80 mgd at DTWRP, and 20 mgd at LAGWRP.<sup>7</sup> The HTP Conveyance System has a current average dry weather flow (ADWF) of approximately 449 mgd (consisting of 362 mgd at HTP, 67 mgd at DTWRP, and 20 mgd at LAGWRP), leaving approximately 101 mgd of available treatment capacity.<sup>8</sup>

Wastewater generated within Culver City is conveyed to and treated at the HTP. The HTP serves a total of 600 square miles of the LADPW service area. The HTP is the City’s largest wastewater treatment facility and provides preliminary, primary, and secondary treatment, and also treats flows bypassed from the DTWRP and LAGWRP. As stated above, the HTP has an existing treatment capacity of 450 mgd and an existing ADWF of approximately 362 mgd, leaving

<sup>7</sup> City of Los Angeles Department of Public Works, Bureau of Sanitation, “One Water LA Wastewater System Fact Sheet”: <https://www.lacitysan.org/cs/groups/public/documents/document/mhfh/mdax/~edisp/qa001435.pdf>, Accessed April 18, 2017.

<sup>8</sup> City of Los Angeles Department of Public Works, Bureau of Sanitation, “Customer Care Center Wastewater Facts and Figures”: <http://www.lacitysan.org/wastewater/factsfigures.htm>, Accessed April 18, 2017.

approximately 88 mgd of treatment capacity available. Following secondary treatment, the majority of effluent from the HTP is discharged into Santa Monica Bay, with the remaining treated effluent conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water.<sup>9</sup>

Effluent discharged to Santa Monica Bay from the HTP has historically had effects on water quality. However, according to the City of Los Angeles Environmental Monitoring Division (EMD), since the HTP's full secondary effluent discharge began in 1999 with a reduction in biosolids to Santa Monica Bay, water quality has improved with an increase in the number of species and the biodiversity in the Bay. HTP effluent is required to meet Los Angeles Regional Water Quality Control Board's (LARWQCB) requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act (CWA) permit administered under the system's National Pollution Discharge Elimination System (NPDES) permit. Accordingly, HTP effluent discharges to Santa Monica Bay are continually monitored by the EMD to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay.

### **Integrated Resources Plan Improvements**

In December 2006, the City of Los Angeles Integrated Resources Plan (IRP), developed by the LADPW, and its corresponding Final EIR, were approved by the Los Angeles City Council.<sup>10</sup> The IRP was developed to incorporate greater efficiency for future, water, wastewater, and runoff management within the LADPW service area. It accounts for projected needs and sets forth improvements and upgrades to wastewater systems, recycled water systems, and runoff management programs in the LADPW service area through the year 2020. The IRP includes wastewater flow projections based on population projections from the Southern California Association of Governments (SCAG).

As shown in **Table 4.12.1-3, *Population and Flow Projections for the HTP Conveyance System Service Area***, the IRP forecasts the population for the HTP Conveyance Systems service area of approximately 4,485,054 residents in 2010, approximately 4,641,928 residents in 2015, and approximately 4,854,483 residents in 2020. The wastewater flow projections account for planned levels of water conservation. The ADWF was estimated to be approximately 477.3 mgd in 2010, approximately 492.3 mgd in 2015, and approximately 511.5 mgd in 2020, with each amount falling within the current system-wide treatment capacity of 550 mgd. The HTP Conveyance

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<sup>9</sup> Ibid.

<sup>10</sup> City of Los Angeles Department of Public Works, Bureau of Sanitation, and Department of Water and Power, Integrated Resources Plan, December 2006.

**TABLE 4.12.1-3  
 POPULATION AND FLOW PROJECTIONS FOR THE HTP CONVEYANCE SYSTEM SERVICE AREA**

	2000	2005	2010	2015	2020
<b>SCAG Population</b>	4,138,567	4,331,109	4,485,054	4,641,928	4,854,483
<b>ADWF (mgd)</b>	443.1	461.8	477.3	492.3	511.5

Abbreviations: ADWF = average dry weather flow

SOURCE: City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, Integrated Resources Plan, December 2006.

System received an ADWF of 449 mgd in 2015. Hence the HTP Conveyance System has greater remaining capacity than anticipated in the 2006 IRP.

Despite the current and projected availability of system-wide treatment capacity, the IRP includes several proposals for improvements, additions, and expansions within the HTP Conveyance System to maintain adequate service over time. As the HTP is connected with the HTP Conveyance System and its components including other treatment plants (DTWRP, LAGWRP, and TTP), connecting outfalls, and numerous sewer connections and major interceptors, current and future implementation of the IRP and its corresponding expansion projects will support continued availability of capacity at HTP.

Certification of the Final EIR for the IRP included adoption of the "Approved Alternative" (Alternative 4). Alternative 4 is intended to increase wastewater collection and treatment capacity, water reclamation storage and beneficial use, water conservation, and runoff management opportunities. As part of the adopted IRP, proposed improvements include:<sup>11</sup>

- Expansion of HTP biosolids handling capacity (e.g., new digesters and truck loading facility);
- Addition of secondary clarifiers at HTP to meet existing treatment requirements;
- Expansion and upgrade of DTWRP capacity to 100 mgd with advanced treatment;
- Addition of 60 million gallons of wastewater storage at DTWRP;
- Construction of five million gallons of diurnal storage each for wastewater and recycled water at LAGWRP, and retention of the option to upgrade LAGWRP to advance treatment;
- Construction of new Glendale Burbank Interceptor Sewer (GBIS), North East Interceptor Sewer (NEIS) Phase 2, and Valley Spring Lane Interceptor Sewer (VSLIS).

Implementation of the IRP would increase treatment capacity in the HTP Conveyance System by 20 mgd, for a total of 570 mgd (DTWRP would have a new capacity of 100 mgd, while HTP's capacity of 450 mgd and LAGWRP's capacity of 20 mgd would stay the same).<sup>12</sup> Adoption of the IRP also includes the Adaptive Capital Improvement Program (CIP) which includes the

<sup>11</sup> Ibid.

<sup>12</sup> Ibid.

anticipated capital, operation and maintenance, project timing, and implementation strategy for tracking and monitoring triggers. According to the CIP, capital improvements have been completed at the treatment plants and sewer lines, and additional on-going improvements have been proposed, to meet the wastewater treatment needs of the City.<sup>13</sup>

With implementation of the IRP, LADPW expects to provide ample wastewater treatment services to the City of Los Angeles and contracting cities through 2020, and projections show that adequate wastewater treatment services are expected to be available through 2025.<sup>14</sup>

### **One Water LA 2040 Plan**

The City of Los Angeles is currently preparing the One Water LA 2040 Plan, an integrated approach for water supply, wastewater treatment, and stormwater management. The new plan builds upon the success of the City's IRP, and will set the bar for a more sustainable way to manage the City's future water, wastewater treatment, and stormwater management needs through a collaborative approach with other cities (including Culver City) that utilize City of Los Angeles water, wastewater and/or stormwater facilities (such as Culver City). Preparation of the One Water LA Plan is occurring in two phases and being managed by LA Sanitation in partnership with LADWP. The timeline for completing a draft of the One Water LA 2040 Plan is July 2017.<sup>15</sup>

### **4.12.1.3 Regulatory Framework**

This section provides a summary of federal, State, and local wastewater regulations and policies applicable to the Project Site.

#### ***Federal***

##### **Clean Water Act of 1972**

Wastewater treatment before effluent is discharged to Waters of the United States is required by the federal Clean Water Act (CWA), United States Code, Title 33, Sections 1251 et seq. The federal Clean Water Act is described in further detail in Section 4.7, Hydrology and Water Quality, of this Draft EIR.

#### ***State***

##### **Porter-Cologne Water Quality Control Act of 1969**

In California, State Water Resources Control Board (SWRCB) is responsible for ensuring the highest reasonable quality of waters of the State, while allocating those waters to achieve the optimum balance of beneficial uses. The 1969 Porter-Cologne Water Quality Control Act, codified in the California Water Code, authorizes the SWRCB to implement programs to control polluted discharges into State waters. This law essentially implements the requirements of the

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<sup>13</sup> Ibid.

<sup>14</sup> City of Los Angeles Department of Public Works, Bureau of Sanitation, and Department of Water and Power, Integrated Resources Plan - Executive Summary, December 2006.

<sup>15</sup> City of Los Angeles Department of Public Works, Bureau of Sanitation website: [https://www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-owla?\\_afLoop=1039921486717006&\\_afWindowMode=0&\\_afWindowId=yyy8a95tf\\_142#!%40%40%3F\\_afWindowId%3Dyyy8a95tf\\_142%26\\_afLoop%3D1039921486717006%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dyyy8a95tf\\_251](https://www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-owla?_afLoop=1039921486717006&_afWindowMode=0&_afWindowId=yyy8a95tf_142#!%40%40%3F_afWindowId%3Dyyy8a95tf_142%26_afLoop%3D1039921486717006%26_afWindowMode%3D0%26_adf.ctrl-state%3Dyyy8a95tf_251). Accessed April 18, 2017.

CWA. Pursuant to this law, the local Regional Water Quality Control Board (RWQCB) is required to establish the wastewater concentrations of a number of specific hazardous substances in treated wastewater discharge. The LARWQCB regulates wastewater discharges and water quality in the southern/coastal portions of Los Angeles County, including the Project Site.

### **Local**

#### **City of Los Angeles Integrated Resources Plan (2006)**

See the description of the IRP in the Environmental Setting subsection above.

#### **City of Los Angeles One Water LA 2040 Plan (2017 – Draft)**

See the description of the IRP in the Environmental Setting subsection above.

#### **City of Los Angeles Amalgamated Agreement (1999)**

The City of Los Angeles currently provides wastewater conveyance, treatment and disposal services on a wholesale basis to 20 agencies (the "Agencies") pursuant to a Universal Terms Contracts. The Agencies include the Cities of Beverly Hills, Burbank, Culver City, El Segundo, Glendale, La Canada Flintridge, Long Beach, San Fernando and Santa Monica, the Crescenta Valley Water District, the Las Virgenes Municipal Water District, several Los Angeles County Sanitation Districts, the community of Marina Del Rey and Universal City. The Universal Terms Contracts include the following key provisions: (i) the Agencies will pay shares of the costs of the City's amalgamated wastewater system facilities, including sewers with diameters that are 36 inches or larger and pay shares of half the costs of sewers with diameters that are 30 to 36 inches in diameter, regardless of which facilities actually treat and convey their wastewater, (ii) the Agencies' shares of treatment costs will reflect the flow and quality of their wastewater, (iii) the Agencies' shares of conveyance costs will reflect their flows and distances to the treatment plants, (iv) the Agencies' charges will be based on their actual wastewater flow and quality, (v) there will be no limitation on the wastewater that an Agency can discharge into the System, (vi) the Agencies and the City will share the connection fee income paid by new customers discharging to the System, (vii) interest and penalties will be added to late payments by the Agencies, (viii) each Agency may have access to a share of the reusable water produced by the City's water reclamation plants, and (ix) the contract will have a thirty-year term, except that the parties may initiate renegotiations after ten years for certain changed conditions.

#### **Culver City General Plan (1975)**

There are no wastewater collection and treatment Plan goals, policies, objectives or programs in the Culver City General Plan applicable to the Project.

#### **Culver City Municipal Code**

The Culver City Municipal Code (CMCC) sets specific wastewater collection and treatment facilities requirements. CMCC Section 5.02.005 requires a City-issued connection permit to connect to the City's wastewater collection system. CMCC Section 5.02.220 establishes a Sewerage Facilities Charge for new connections to the Culver City wastewater collection system which represents the proportionate cost of providing service to the new development. The City Engineer may require the project applicant to submit plans and other information necessary to determine the applicable sewage facilities fees during plan check review, with the fees based on a

standard formula that includes the proposed square footage and types of land uses. CMCC Section 5.02.035 establishes a Sewer User Fee, which is collected annual from Culver City property owners, for the cost, maintenance, repair and improvement of that portion of the City of Los Angeles sewerage system used jointly by Culver City and the City of Los Angeles under the Amalgamated Agreement.

#### **4.12.1.4 Environmental Impacts**

##### ***Methodology***

##### ***Wastewater Collection***

The analysis of wastewater collection capacity in this section is based on the analysis in the Wastewater Report prepared for the Project. In order to evaluate wastewater collection capacity, the Wastewater Report contains a preliminary analysis of local sewer conditions to determine if available wastewater conveyance capacity is available to accommodate the increase in wastewater under the Project. The Report's approach consisted of estimating wastewater generation associated with the Project based on BOS generation factors, adding this to a worst-case scenario envisioning peak wastewater generation from other development discharging to the same sewer lines as the Project, and apply the LACSD and LACDPW capacity analysis methodologies to determine capacity impacts.

The LACSD method uses empirically derived factors and very specific land use type to estimate sewer demand based on square feet of building footprints. The LACSD method is specific and appropriate when analyzing the on-site Project proposed conditions because the building footprints and exact uses are known. The LACSD No.22 mean loadings table utilized in the LACSD method is included in Attachment B of the Wastewater Report.

The LACDPW method uses empirically derived factors and broad land use types and land use acreage of entire regions (not just building foot prints) to estimate sewer demand. This method is appropriate when examining the large tributary area that contributes to the Ince sewer prior to the Project's point of connection. The area tributary to the Ince sewer can be estimated in acreage but the square footage of every house and building that is tributary to the sewer is not known. Additionally, the exact land use of the tributary area is known only to be either residential or commercial. It is not known exactly what each type of shop is that is tributary to the sewer, thus the more general land development division method is feasible but the LACSD method is not when looking at the offsite tributary areas. The LACDPW Land Development Division Study is included as Attachment C of the Wastewater Report.

Computed results from the FlowMaster software were used to assess the potential for impacts on wastewater conveyance capacity due to additional sewer discharge. As indicated previously, the Wastewater Report is included as Appendix L of this Draft EIR.

##### **Wastewater Treatment**

The analysis of wastewater treatment capacity in this section compares the wastewater generation associated with the Project, as estimated in the Wastewater Report, to the estimated remaining capacity of the HTP under existing and projected 2020 conditions as identified in the IRP and on

the BOS website.

### ***Thresholds of Significance***

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact associated with wastewater facilities would occur if the Project were to:

**WW-1:** Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

**WW-2:** Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

**WW-3:** Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

### ***Project Characteristics and Project Design Features***

#### **Project Characteristics**

The Project would include a net increase in floor area at the Project Site of 413,127 square feet. This would result in an increase in wastewater generation (see the Analysis of Project Impacts subsection below for estimates).

The Project would include several wastewater collection infrastructure improvements, including: (1) the improvement of several existing on-site sewer lines; (2) the development of several new 6-inch on-site sewer lines; and (3) the development of several new, and the abandonment of several existing, sewer laterals connecting the Project Site to the Ince sewer main. As indicated in Exhibit 2 of the Wastewater Report, a new primary point of connection is proposed to the Ince sewer main just after it transitions from an 8- to a 10-inch line at Hubbard Street, with the Ince main to provide the majority of the wastewater collection service for the Project. The existing Project Site connection to the Western sewer main would be retained to serve the existing stages and proposed Building Y, with the wastewater generated by the four adjacent houses currently served by the Western main to be redirected eastward across the Project Site to the Ince sewer main.

No off-site sewer improvements are proposed other than the connecting laterals, and all improvements/abandonments would occur in accordance with City regulations.<sup>16</sup>

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<sup>16</sup> Upsizing of a segment of the Ince Boulevard sewer main is an off-site improvement required for the Project. However, rather than being proposed as part of the Project, it appears as a mitigation measure later in this section.

## **Project Design Features**

The following Project Design Feature (PDF) is proposed to reduce the wastewater impacts of the Project:

**PDF-WW-1 (Dewatering):** Similar to the existing dewatering operation at the Project Site since 2014, any additional permanent dewatering required under the Project will be treated and used for on-site landscape irrigation rather than being treated and discharged to the local sewer system.

## ***Analysis of Project Impacts***

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**Threshold WW-1:** The Project would have a significant impact on wastewater facilities and services if it would result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

**Threshold WW-2:** The Project would have a significant impact on wastewater facilities and services if it would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

**Threshold WW-3:** The Project would have a significant impact on wastewater facilities and services if it would exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

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**Impact Statement WW-1: Project construction and operation would result in an increase in wastewater generation that would increase demands on wastewater collection and treatment facilities. While this increase would not exceed the available capacity of these facilities nor exceed the wastewater treatment facilities or wastewater treatment requirements of the LARWQCB during either construction or operation, it would exceed the half flow capacity of the Ince Boulevard sewer main during operation. Therefore, impacts would be significant with respect to wastewater collection and less than significant with respect to wastewater treatment.**

## **Construction**

### **Wastewater Collection**

Project construction activities would generate a small amount of wastewater associated with Project construction workers. However, any such wastewater generation would be minor and temporary, only lasting as long as Project construction activities occur. Furthermore, construction workers typically utilize portable restrooms, which would not contribute to wastewater flows to the local wastewater collection system. Lastly, when wastewater generation from the existing studio facilities to be removed is taken into account, wastewater generation at the Project Site would actually decrease during the construction period. Therefore, wastewater generation from Project construction activities would not be anticipated to cause a measurable increase in wastewater flows requiring collection. Therefore, Project construction impacts on wastewater collection capacity would be less than significant.

Project construction activities would include abandonment of some existing on-site sewer lines and some sewer laterals connecting the Project Site to the off-site wastewater collection system, the construction of new sewer lines, connections to the Ince and Western sewer mains, and potentially the temporary shutdown of existing sewer mains. However: (1) any such abandonments would occur in accordance with CCMC requirements; (2) the construction of new sewer lines and connections would occur in accordance with CCMC requirements; and (3) any shutdowns would be temporary, with accommodations made for any existing uses served by those lines during construction (e.g., portable toilets, use of temporary interim sewer lines that bypass the sewer segment being replaced, etc.) in accordance with City requirements. Therefore, Project construction activities would result in less than significant impacts to wastewater collection infrastructure during construction.

### Wastewater Treatment

As indicated previously, Project construction activities would generate a small amount of wastewater associated with Project construction workers. However, as indicated previously, this wastewater generation would be minor, temporary, and more than offset by the temporary reduction in existing wastewater generation at the Project Site during construction. Therefore, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows requiring treatment at the HTP, and Project construction impacts on wastewater treatment capacity would be less than significant.

## Operation

### Wastewater Collection

Under the Project, the Project Site would continue to be served by the Ince and Western sewer mains. As indicated previously, a new primary point of connection is proposed to the Ince sewer main just east of its transition from an 8- to a 10-inch line at Hubbard Street, with the Ince main to provide the majority of the wastewater collection service for the Project. The existing Project Site connection to the Western sewer main would be retained to serve the existing stages and proposed Y, with the wastewater generated by the four adjacent off-site houses currently served by the Western main to be redirected eastward across the Project Site to the Ince sewer main. A map showing the portions of the Project Site that would flow to the Ince and Western sewer mains under the Project is provided as Exhibit 2 in the Wastewater Report.

The Project would result in a gross (existing to remain plus proposed) peak wastewater flow from the Project Site of 364,047 gpd or 0.56 cfs (see Attachment A of the Wastewater Report for calculations).<sup>17</sup> As indicated in **Table 4.12.1-4, Project Wastewater Generation During Operation**, this would include a net increase in average wastewater flow of 93,476 gpd, and net increase in peak flow of 243,037 gpd or 0.37 cfs.

<sup>17</sup> KPFF Consulting Engineers, Culver Studios – Wastewater Infrastructure and Generation Analysis, September 2017.

**TABLE 4.12.1-4  
 PROJECT WASTEWATER GENERATION DURING OPERATION**

Land Use	Net Quantity (gsf)	Wastewater Generation Factor (gpd/unit) <sup>a</sup>	Net Increase		
			Average Flow (gpd)	Peak Flow (gpd) <sup>b</sup>	Peak Flow (cfs)
Studio Office	521,632	200 gpd/1,000 gsf	104,327	271,249	0.42
Support	(68,625)	100 gpd/1,000 gsf	(6,863)	(17,843)	(0.03)
Stage	(39,880)	100 gpd/1,000 gsf	(3,988)	(10,369)	(0.02)
<b>Total (net increase)</b>	<b>413,127</b>	<b>--</b>	<b>93,476</b>	<b>243,037</b>	<b>0.37</b>

gsf = gross square feet, gpd = gallons per day, cfs = cubic feet per second

<sup>a</sup> The average daily flow based on 100% of City of Los Angeles BOS sewerage generation factors.

<sup>b</sup> PDWF is calculated by applying a peaking factor of 2.6 to the ADWF.

SOURCE: KPFF Consulting Engineers, Culver Studios– Wastewater Infrastructure and Generation Analysis, September 2017.

Under the proposed Project, wastewater discharges from the Project Site would increase to the Ince sewer main and decrease to the Western sewer main. **Table 4.12.1-5, *Ince Sewer Main Capacity Analysis***, quantifies the increase in wastewater discharge to the Ince sewer main under the Project. As indicated therein, total wastewater flow to the Ince sewer main at the proposed primary point of connection at Hubbard Street would be 0.461 cfs from the Project Site and 0.391 cfs from the off-site tributary area under the Project, which when the 0.002 cfs of wastewater associated with the four existing residences west of the Project Site is redirected from the Western to the Ince sewer main under the Project, would total 0.854 cfs. This would be below the 1.46 cfs full capacity of the Ince main, but above the main’s half flow capacity of 0.71 cfs. Therefore, a significant impact would occur. This analysis is conservative because the Project would include water conservation features, and potentially include green roofs, which would reduce Project water consumption and associated wastewater generation.

With respect to the Western sewer main, **Table 4.12.1-6, *Western Sewer Main Capacity Analysis***, quantifies the decrease in wastewater discharge to the western sewer main under the Project associated with the redirection of sewage from the southwest portion of the Project Site and the four houses immediately west of the Project Site to the Ince sewer main. As indicated therein, total wastewater flow to the Western sewer main under the Project would be 0.102 cfs. This would be below the 0.27 cfs half flow capacity of the Western sewer main. Therefore, the impact would be less than significant.

**TABLE 4.12.1-5  
 INCE SEWER MAIN CAPACITY ANALYSIS**

Building Use	Area (sf)	Unit Flow (gpd/unit) <sup>a</sup>	Peaking Factor	Flow (gpd)	Flow (cfs)
Studio Office	639,504	200 gpd/1,000 gsf	2.6	332,542	0.515
Support	5,572	100 gpd/1,000 gsf	2.6	1,449	0.002
Stage	115,600	100 gpd/1,000 gsf	2.6	30,056	0.047
Building Y (office)	(84,700) <sup>b</sup>	200 gpd/1,000 gsf	2.6	(44,044)	(0.068)
Stages 11,12,14,15,16	(75,600) <sup>b</sup>	100 gpd/1,000 gsf	2.6	(21,975)	(0.034)
<b>Total Gross</b>	<b>600,376</b>	--	--	<b>297,858</b>	<b>0.461</b>
<b>Total from Off-Site Tributary Area east of Project Site</b>	--	--	--	<b>252,710<sup>c</sup></b>	<b>0.391<sup>c</sup></b>
<b>Total from Off-Site Tributary Area west of Project Site</b>	--	--	--	<b>1,293<sup>c</sup></b>	<b>0.002<sup>c</sup></b>
<b>Total at Point of Connection</b>	--	--	--	<b>551,955</b>	<b>0.854</b>

<sup>a</sup> Unit flow factors based on 100% of City of Los Angeles BOS sewerage generation factors.  
<sup>b</sup> Wastewater from these uses, which are included in the Studio Office and Stage sf in the previous rows of the table, to be discharged to the Western sewer main. Hence, they are netted out in this table.  
<sup>c</sup> See Attachment A of the Wastewater Report for basis of estimate.

SOURCE: KPFF Consulting Engineers, Culver Studios – Wastewater Infrastructure and Generation Analysis, September 2017.

**TABLE 4.12.1-6  
 WESTERN SEWER MAIN CAPACITY ANALYSIS**

Building Use	Area (sf)	Unit Flow (gpd/unit) <sup>a</sup>	Peaking Factor	Flow (gpd)	Flow (cfs)
Building Y (office)	84,700	200 gpd/1,000 gsf	2.6	44,044	0.068
Stages 11,12,14,15,16	75,600	100 gpd/1,000 gsf	2.6	21,975	0.034
<b>Total Gross</b>	<b>160,300</b>	--	--	<b>65,924</b>	<b>0.102</b>
<b>Total at Point of Connection</b>	--	--	--	<b>65,924</b>	<b>0.102</b>

<sup>a</sup> Unit flow factors based on 100% of City of Los Angeles BOS sewerage generation factors.  
<sup>b</sup> See Attachment A of the Wastewater Report for basis of estimate.

SOURCE: KPFF Consulting Engineers, Culver Studios – Wastewater Infrastructure and Generation Analysis, September 2017.

As indicated previously, groundwater dewatering operation currently occurs on the Project Site whereby approximately 3,000 gpd (approximately 0.02 cfs) of treated dewatered groundwater, which at one time was discharged to the local sewer system under permit, is now used for landscape irrigation at the Project Site. Under the Project, there is a likelihood that additional dewatering would be required associated with the proposed subterranean parking structures. However, as required by PDF-WW-1, any additional dewatered groundwater from the Project would be treated and used as landscape irrigation rather than being discharged to the local sewer system. Therefore, no impact would occur to the local sewer system associated with dewatering under the Project.

### Wastewater Treatment

As discussed previously, Project operation would result in a net increase in average wastewater

flow (ADWF) of approximately 93,476 gpd. This wastewater would be conveyed to the HTP for treatment. Also as discussed previously, the existing treatment capacity of the HTP is 450 mgd, the ADWF projected by the IRP to be treated by the HTP in 2020 is 435 mgd, and the remaining available treatment capacity projected by the IRP at the HTP in 2020 is 15 mgd. Because the wastewater generated by the proposed Project would represent only about 0.6 percent of the HTP's projected remaining available treatment capacity in 2020, the HTP would have adequate treatment capacity to serve the Project. This is a conservative analysis because: (1) it does not take into account the reductions in wastewater generation that would occur through compliance with the proposed water conservation features; and (2) as indicated previously, based on a comparison of the estimates of the City's 2020 population in the IRP and SCAG RCP/SCS, the population estimates in the IRP have over-estimated the City's 2020 population and thus the City's projected 2020 wastewater treatment demand.

Furthermore, in accordance with CCMC Sections 5.02.220 and 5.02.035, the Project would pay the required Sewerage Facilities Charge and Sewer User Fees to help offset the Project's contribution to City wastewater treatment demand (with payments to the LACDPW per the Amalgamated Agreement for future improvements to the HTP).

Lastly, Project wastewater conveyed to the HTP would not have a significant effect on the water quality of Santa Monica Bay, where the HTP discharges the majority of its treated wastewater, because the Project would not generate pollutant constituents (such as those most often associated with industrial facilities, power plants, etc.) that could potentially interfere with the HTP meeting the water quality requirements of its discharge permit.

Based on the above, Project operation would result in a less than significant impact on wastewater treatment capacity.

### ***Cumulative Impacts***

#### **Wastewater Collection**

Chapter 3, General Description of Environmental Setting, of this Draft EIR identifies 56 related projects, all of which lie within the area served by the HTP Conveyance System and the HTP. These related projects would cumulatively contribute, in conjunction with the proposed Project, to wastewater generation in the Project area. As indicated in **Table 4.12.1-7, *Estimated Cumulative Wastewater Generation***, the Project and the related projects would cumulative generate an estimated 985,301 gpd ADWF of wastewater, with the Project's contribution of 93,476 gpd ADWF representing approximately 9.5 percent of the total. This wastewater would require collection by the Culver City's wastewater collection system, and conveyance by the City of Los Angeles wastewater conveyance system to the HTP for treatment.

**TABLE 4.12.1-7  
 ESTIMATED CUMULATIVE WASTEWATER GENERATION**

Land Uses	Quantity	Conversion Where Required <sup>a</sup>	Generation Factor <sup>b</sup>	ADWF (gpd)
Residential	2,309 du	--	150 gpd/du	346,350
Assisted Living	110 beds	--	70 gpd/bed	7,700
Commercial	681,930sf	--	25 gpd/ksf	17,048
Office	1,181,010 sf	--	170 gpd/ksf	200,772
Restaurant	95,720 sf	3,829 seats <sup>c</sup>	30 gpd/seat	114,879
Hotel	148 rm	--	120 gpd/rm	17,760
Manufacturing/Warehouse	0 sf	--	--	--
Industrial	0 sf	--	--	--
Theater	4,000 sf	364 seats <sup>e</sup>	3 gpd/seat	1,092
Theater	200 seats	--	3 gpd/seat	600
School	225 stu	--	20 gpd/stu	4,500
College	92,000 sf	3,067 stu <sup>d</sup>	20 gpd/stu	61,340
Museum	1,260,000 sf	--	30 gpd/ksf	37,800
Light Rail Station Expansion	1 station	--	f	--
Park	4 ac	--	f	--
Parking	11,712 spaces <sup>g</sup>	4,099,200 <sup>g</sup>	20 gpd/ksf	81,984
<b>Subtotal</b>	--	--	--	<b>891,825</b>
<b>Proposed Project</b>	--	--	--	<b>93,476</b>
<b>Total</b>	--	--	--	<b>985,301</b>

sf = square feet, gpd – gallons per day, ksf = 1,000 square feet, du = dwelling unit = room, stu = student, ADWF = average dry weather flow

- <sup>a</sup> Where the quantity of a particular use is provided in a term (e.g., sf, seats, etc.) that is inconsistent with the term in the wastewater generation factor for the given use, the quantity of that use has been converted to allow for application of the generation factor.
- <sup>b</sup> Wastewater generation factors are from LACSD as provided in Attachment B of the Wastewater Report, which in turn is included as Appendix L of this Draft EIR.
- <sup>c</sup> Assumes 25 sf per seat.
- <sup>d</sup> Assumes 30 sf per student.
- <sup>e</sup> Assumes 11 sf per seat.
- <sup>f</sup> The LACSD does not identify a wastewater generation factor for light rail stations and parks.
- <sup>g</sup> The number of parking spaces was estimated for the cumulative development based on the 2002 LADBS Summary of Parking Regulations as follows: 2 spaces per residential unit; 1 space per 250 sf of retail; 1 space per 100 sf of restaurant; 1 space per hotel room; 1 space per 500 sf of office, warehouse/manufacturing, child care, library and museum; 1 space per 5 seats for schools, theaters, and event centers; 0.2 spaces per bed for assisted living; and 1 space per 100 sf for gym. 350 sf is assumed for each parking space.

SOURCE: ESA PCR, April 2017.

As discussed above, adequate half flow wastewater collection capacity would not be available in the Ince sewer main to serve the increase in flows under the Project. However, as discussed later in this section, with implementation of the identified mitigation measure MM WW-1, requiring an upgrade to a segment of the Ince sewer main, the capacity would be adequate to serve the Project. The related projects would similarly be required to demonstrate to the City that adequate wastewater collection capacity is available to serve them (either before or after mitigation).

Furthermore, if system upgrades are required as a result of a given related project's wastewater demand, the CCMC-required Sewerage Facilities Charge and Sewer User Fees paid by each of the related projects would help pay their fair share of the required City improvements (as well as their fair share of any improvements required to the City of Los Angeles' wastewater conveyance system between Culver City and the HTP through payments by Culver City to the LADPW under the Amalgamated Agreement).

Lastly, both Culver City and the City of Los Angeles implement and continually update their Capital Improvement Plans to keep abreast of utility infrastructure requirements, including required improvements to the wastewater collection and conveyance systems. In this way, no cumulative projects would be developed without the required wastewater collection and conveyance capacity to serve them.

Based on the above, cumulative operational impacts on wastewater collection capacity would be less than significant.

### **Wastewater Treatment**

As indicated above, the Project together with the related projects would cumulatively generate an estimated 985,301 gpd (0.99 mgd) ADWF of wastewater, with the Project's contribution of 93,476 gpd ADWF representing approximately 9.5 percent of the total. As further indicated above, the HTP has an existing treatment capacity of 450 mgd and currently treats an estimated 362 mgd ADWF. According to the IRP, the ADWF treated at the HTP is projected to increase to 435 mgd by 2020. With the addition of the 0.99 mgd of cumulative wastewater generated by the Project and the related projects, the projected amount of wastewater requiring treatment at the HTP in 2020 would increase to approximately 436 mgd ADWF. This is below the existing 450 mgd treatment capacity of the HTP.

Furthermore, these estimates are conservative because: (1) the 2020 HTP ADWF projections already take into account future population growth, including growth such as that represented by the proposed Project and the related projects, such that there is some double counting of growth here; (2) as indicated previously, the IRP overestimates the 2020 treatment demand on the HTP; and (3) as with the proposed Project, these estimates do not account for reductions in wastewater generation that would occur with compliance with ever-increasing water conservation requirements. Lastly, as with the proposed Projects, those related projects located in Culver City would be required to pay the CCMC-required Sewerage Facilities Charge and Sewer User Fees, a portion of which would go to the LADPW under the Amalgamated Agreement to help pay for impacts to the HTP. Therefore, adequate capacity exists at the HTP to serve the proposed Project and the related projects, and cumulative operational impacts on wastewater treatment capacity would be less than significant.

The HTP currently meets applicable water quality standards as set forth by the NPDES. Furthermore, as indicated in Table 4.12-1-4, the proposed Project and the related projects would not include the types of uses (e.g., industrial, manufacturing, power plants, etc.) most often associated with industrial wastewater flows that can interfere with wastewater treatment plants achieving their waste discharge requirements under their NPDES discharge permits. Furthermore,

implementation of the IRP, upgrades in the advanced treatment processes at HTP, and continual monitoring by the EMD, ensure that HTP effluent discharged into Santa Monica Bay are within applicable limits. As such, the Project in combination with the related projects would not exceed the wastewater treatment requirements of the LARWQCB, and cumulative operational impacts on the water quality of Santa Monica Bay would be less than significant.

#### **4.12.1.5 Mitigation Measures**

The following mitigation measure is proposed to address the Project's significant wastewater collection impact on the Ince sewer main:

**MM WW-1:** Unless further sewer flow monitoring determines to the satisfaction of the City that the Project would not trigger exceedance of the half flow capacity of the Ince sewer main, the Project Applicant shall upsize the existing 10" Ince sewer main with a 12" line from Hubbard Street to Lucerne Ave. (approximately 700 linear feet) (Exhibit 4 of the Wastewater Report shows the recommended sewer line segment to be upsized). The upsizing shall occur prior to the issuance of occupancy permits for the proposed new buildings.

#### **4.12.1.6 Level of Significance after Mitigation**

Project wastewater collection impacts would be less than significant with implementation of both PDF-WW-1 and MM WW-1, identified above.

Project wastewater treatment impacts would be less than significant. Therefore, no mitigation measures associated with wastewater treatment are required.

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## 4.12.2 Water Supply

### 4.12.2.1 Introduction

This section analyzes whether there are adequate water supplies to meet the Project's estimated demand based on a Water Supply Assessment (WSA) prepared by Golden State Water Company (GSWC), the water purveyor for most of the City and for the Project Site. This section also describes the existing and proposed water distribution infrastructure in the Project area, and evaluates whether this infrastructure has sufficient capacity to serve the Project. The WSA prepared by GSWC and a Water Infrastructure and Demand Analysis prepared by KPFF Consulting Engineers (KPFF), are contained in Appendices M-1 and M-2, respectively, of this Draft EIR.

### 4.12.2.2 Environmental Setting

#### *Existing Conditions*

#### **Water Supply**

##### *Existing Water Sources and Supply*

Water for the City of Culver City and the Project Site is provided by the GSWC. GSWC is a public water utility regulated by the California Public Utilities Commission (CPUC). It develops, acquires, treats, and distributes water to more than 260,000 customers in 21 service areas throughout California. The majority of GSWC's service areas are connected to California's statewide water conveyance infrastructure, which allows GSWC to transfer water supplies between service areas, if necessary, to ensure water supply reliability.

##### *Culver City Service Area*

The Project Site is located within GSWC's Culver City Service Area (CCSA). The CCSA is located entirely within the County of Los Angeles and serves almost all of the City of Culver City, a small portion of the City of Los Angeles, and West Los Angeles Community College, which is located within an unincorporated area of the County. The CCSA is within the boundaries of the West Basin Municipal Water District (WBMWD) and the Metropolitan Water District of Southern California (MWD). The CCSA currently obtains its water supply from WBMWD, which in turn purchases all of its potable water supplies from the MWD.

As of December 2016, the CCSA served 9,757 customer connections, consisting of a wide variety of land uses, ranging from single-family residential to heavy industry. The CCSA is largely built out; however, occasional redevelopment of properties and minor infill development have occurred in recent years. GSWC has met this gradual population growth and increase in water supply needs without any major changes in operation.

Population within the CCSA is projected to increase by approximately three percent from the current estimate of 36,321 to an estimated 37,345 by 2040. Because the CCSA is generally built out, most of this projected growth is expected to be associated with urban infill and redevelopment projects. The projected growth and development within the CCSA are based on population, housing, and employment data developed by SCAG from the 2010 U.S. Census, and information gathered from planning officials, including the Culver City Planning Department.

Between 2015 and 2040, connections are expected to increase from 9,757 to 10,369,<sup>1</sup> an increase of approximately 6.27 percent. CCSA’s projected water demand is described in greater detail in the GSWC’s *2015 Urban Water Management Plan - Culver City (UWMP)*, discussed below. In addition to projected water demand and supply, the UWMP describes demand management (conservation) measures (DMMs) required for the Culver City system that were implemented prior to 2015 and DMMs planned up to 2020.

#### *West Basin Municipal Water District*

WBMWD is a wholesale purveyor in Southern California that provides wholesale water to several agencies including GSWC. WBMWD was established in 1947 to help mitigate the over pumping of groundwater in the area by providing imported water from the MWD as replenishment. Treated water imported from WBMWD is delivered to the CCSA through the following three connections:

- MWD WB-23 connection with a maximum capacity of 9,000 gallons per minute (gpm);
- MWD WB-24 connection with a maximum capacity of 9,000 gpm; and
- MWD WB-34 connection with a maximum capacity of 4,500 gpm.

These connections have a combined active maximum capacity of 22,500 gpm, which could supply 36,293 acre feet per year (AFY) if used continuously at their maximum capacity. Water imported from WBMWD is treated by MWD prior to delivery. Four reservoirs, with a total volume of 2.7 million gallons, are available to serve the CCSA.

Since its formation in 1947, WBMWD has met increasing regional demands, which had previously relied on groundwater sources alone. Beginning in the 1970’s, WBMWD received a combination of Colorado River Aqueduct (CRA) and State Water Project (SWP) supplies from MWD. However, in the 1990s, WBMWD began increasing its development of local supplies in response to declining reliability of imported water. Regulatory constraints on CRA supplies from the Bay-Delta, the increasing frequency of cyclical droughts, and uncertainties surrounding climate change justified the continued need to develop local supplies and to aggressively pursue water demand reductions through conservation. Restrictions have resulted in shortage allocations for WBMWD in three of the past eight years and limited availability of water for basin replenishment. Because WBMWD’s supply reliability can be impacted by fluctuating supply due to climatic or infrastructure changes, as well as the need to use supplies more efficiently during both average and dry periods, WBMWD completed water shortage contingency planning. Water contingency planning includes MWD’s Water Surplus and Drought Management Plan (WSDM) and Water Supply Allocation Plan (WSAP).<sup>2</sup> The WSDM plan provides MWD with a sequence of resource management actions to execute during surpluses and shortages to minimize the probability of severe shortages and to reduce the possibility of extreme shortages and shortage allocations. The WSAP provides MWD with a method for determining imported water

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<sup>1</sup> Golden State Water Company, Culver City Service Area, Water Supply Assessment for Culver Studios Innovation Plan, April 26, 2017, page 6, included in Appendix M-1 of this EIR.  
<sup>2</sup> Golden State Water Company, Culver City Service Area, Water Supply Assessment for Culver Studios Innovation Plan, April 26, 2017, page 6, included in Appendix M-1 of this EIR, page 16.

allocations for its member agencies, including the WBMWD, relative to the amount of supplies available.

To meet retail and replenishment demands, WBMWD purchased 105,569 AF of water from MWD to meet retail demand in 2015. WBMWD entered into a new ten-year purchase order with MWD effective January 1, 2015 through December 31, 2024. For the first five years of the new purchase order term, MWD staff recommended that no purchase agreements be entered into with its customer agencies. However, at the five-year point (2020), MWD staff is slated to reevaluate the need to implement purchase orders with the customer agencies.

With an unprecedented fourth consecutive dry year in 2015 and challenges to MWD's imported water reliability and the likelihood of similar severe droughts and similar levels of MWD cutbacks, WBMWD also continues to develop hydrologically-independent local supplies such as ocean water desalination and additional recycled water. These new drought-resilient supplies would improve reliability for WBMWD customers by reducing the need for MWD supplies, and protect important storage reserves during future droughts to the benefit of the entire MWD service area.

WBMWD's goal is to reduce its projected need for imported water supplies from about 57 percent at present to 43 percent by 2025. The overall imported water use is expected to be reduced from current levels by 17 percent within the next 20 years.<sup>3</sup> WBMWD has supported the diversification of supplies primarily through the development of conserved water supplies. These conserved supplies benefit its customer agencies indirectly as replenishment supplies necessary to maintain groundwater production. WBMWD is projected also to improve the reliability of its supplies by increasing recycled water supplies by investing in over 20,000 AFY of desalinated ocean water.

#### *Metropolitan Water District of Southern California*

In addition to providing water to the CCWS through the WBMWD, MWD is responsible for meeting all drinking water standards as water leaves the treatment plant and at all inter-connections with the CCWS. MWD's water supplies primarily originate from the CRA and SWP. In recent years, MWD's imported supplies have become increasingly restricted given more frequent and prolonged droughts, and court-ordered Bay-Delta export restrictions that limit the amount of SWP water available for use. With the varying availability of water supplies, MWD recognizes the importance of stored water to improve regional reliability. MWD, in conjunction with its member agencies, conducts a resources planning process based on diversification of the region's water supply portfolio and continued efficient water use. This integrated resource planning process recognizes, that only through a mix of imported and member agency local supplies along with aggressive implementation of water conservation, can the MWD service area attain overall reliability of water supply. The need for diversification and drought-resilient local supplies has been reinforced in recent years as California and MWD's service area has experienced two severe droughts resulting in water shortages and cutbacks.

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<sup>3</sup> Golden State Water Company, Culver City Service Area, Water Supply Assessment for Culver Studios Innovation Plan, April 26, 2017, page 13, included in Appendix M-1 of this EIR.

**Colorado River Aqueduct:** MWD owns and operates the CRA, which connects the Colorado River to MWD’s regional distribution system. The CRA has a capacity of 1.25 million AFY to transport MWD’s current contracted entitlement of 550 thousand AFY of Colorado River water. MWD maintains a full aqueduct of deliveries in most years through a variety of innovative partnerships and programs with other Colorado River users.

MWD and the State of California have acknowledged that they could obtain less water from the Colorado River in the future. The U.S. Secretary of Interior asserted that California had to limit its use of Colorado River supplies to 4.4 million AFY, plus any available surplus water. California’s Colorado River Water Use Plan characterizes how California would develop a combination of programs to meet this limit as well as how to use any available surplus water. In 2003, the Quantification Settlement Agreement (QSA) among California agencies with Colorado River rights established the baseline water use for each of the agencies and facilitates the transfer of water from agricultural agencies to urban uses. The QSA is currently ruled as invalid due to multiple legal proceedings that have taken place over the past eight years. MWD has filed appeals that will stay the ruling until the outcome of the appeal. If the ruling stands, it could delay and potentially increase the cost of the QSA’s supply development programs.

MWD has developed a number of supply and conservation programs to increase the amount of supply available from the CRA. However, other users along the river have rights that will allow their water use to increase as their water demands increase. The Colorado River faces long-term challenges of water demands exceeding available supply with additional uncertainties due to climate change. Because MWD holds the lowest priority rights in California during normal year, Lake Mead storage condition, future supplies could decrease.

In addition, the Colorado River Basin has been experiencing a prolonged drought, where runoff above Lake Powell has been below average for twelve of the last sixteen years. Within those sixteen years, runoff in the Colorado River Basin above Lake Powell from 2000 through 2007 was the lowest eight-year runoff on record. While runoff returned to near normal conditions during 2008-2010, drought returned in 2012 with runoff in 2012 being among the four driest in history. During these drought conditions, Colorado River system storage has decreased to 50 percent of capacity.

**State Water Project Resources:** The SWP is operated by California Department of Water Resources (DWR) and is an integral part of the effort to ensure that business and industry, urban and suburban residents, and farmers throughout much of California have sufficient water. The SWP is the largest state-built, multipurpose, user-financed water project in the United States. Nearly two-thirds of residents in California receive at least part of their water from the SWP with approximately 70 percent of SWP’s contracted water supply allocated to urban users and 30 percent to agricultural users. The primary purpose of the SWP is to divert and store water during wet periods in Northern and Central California and to distribute it to areas of need in Northern California, the San Francisco Bay area, the San Joaquin Valley, the Central Coast, and Southern California.

The availability of water supplies from the SWP can be highly variable. A wet water year may be followed by a dry or critically dry year. Depending on the water supply availability, water supply agencies may implement increased conservation measures or explore new local projects and supplies. During the current drought, SWP allocations were at record lows with 5 percent of requested deliveries being met in 2014 and 20 percent of requested deliveries in 2015.

The Sacramento-San Joaquin River Delta is key to the SWP's ability to deliver water to its agricultural and urban contractors. All but five of the 29 SWP contractors receive water deliveries below the Delta (pumped via the Harvey O. Banks or Barker Slough pumping plants). However, the Delta faces many challenges concerning its long-term sustainability such as climate change posing a threat of increased variability in floods and droughts. Sea level rise complicates efforts in managing salinity levels and preserving water quality in the Delta to ensure a suitable water supply for urban and agricultural use. Furthermore, other challenges include continued subsidence of Delta islands, many of which are below sea level, and the related threat of a catastrophic levee failure as the water pressure increases, or as a result of a major seismic event.

Ongoing regulatory restrictions, such as those imposed by federal biological opinions on the effects of SWP and the federal Central Valley Project (CVP) operations on certain marine life, also contributes to the challenge of determining the SWP's water delivery reliability. In dry, below-normal conditions, MWD has increased the supplies delivered through the California Aqueduct by developing flexible CVP/SWP storage and transfer programs. The goal of the storage/transfer programs is to develop additional dry-year supplies that can be conveyed through the available Harvey O. Banks pumping plant capacity to maximize deliveries through the California Aqueduct during dry hydrologic conditions and regulatory restrictions. In addition, the California State Water Resources Control Board (SWRCB) has set water quality objectives that must be met by the SWP including minimum Delta outflows, limits on SWP and CVP Delta exports, and maximum allowable salinity level.

The California WaterFix program, formerly the Bay Delta Conservation Plan or BDCP, was developed through a collaboration of state, federal, and local water agencies, state and federal fish agencies, environmental organizations, and other interested parties for the purpose of identifying a set of water flow and habitat restoration actions that would contribute to the recovery of endangered and sensitive species and their habitats in California's Bay-Delta. The goal of the BDCP was to provide for both species/habitat protection and improved reliability of water supplies. The new water conveyance facilities would be constructed and operated under WaterFix, which proposes design changes to the water conveyance facilities. Refinements to the design reduce the overall environmental/construction impacts, and increase long term operational and cost benefits. Some of the engineering configuration improvements include moving the tunnel alignment away from local communities and environmentally sensitive areas. Also, reconfiguration of intake and pumping facilities lessen construction impacts in local communities and longer term operational impacts.

### Current Conditions at the Project Site

#### Water Supply and Demand

The approximately 14-acre Studio Campus comprises approximately 347,549 gross square of office and support buildings and below-grade, at-grade, and above-grade structured parking. The Project Site houses 14 sound stages and support facilities leased for use on a short-term basis. Estimated existing water demand for the Project Site is based on overall studio, office, and support uses. As shown in **Table 4.12.2-1, *Estimated Existing Potable Water Demand***, existing uses are anticipated to generate a demand of approximately 51,197 gallons per day (gpd) or 57 AFY. No recycled water is available in the CCSA.

**TABLE 4.12.2-1  
 EXISTING ESTIMATED POTABLE WATER DEMAND**

Use	Existing Floor Area	Demand Factor (GPD/SF)	Total Existing Demand (GPD)	Total Existing Demand (AFY)
Office	117,872	0.22	25,932	29
Support	74,197	0.11	8,162	9
Stage	155,480	0.11	17,103	19
<b>Total</b>	<b>347,549</b>		<b>51,197</b>	<b>57</b>

SOURCE: KPFF Consulting Engineers, Culver Studios – Water Infrastructure and Demand Analysis, September 2017

#### Water Infrastructure

As stated previously, the GSWC is the potable water purveyor for the Project Site. Existing water service lines, which are owned by the City of Culver City, are provided in the Project Area, and include a 12-inch main in Ince Boulevard, a 12-inch main in Washington Boulevard, and an 8-inch main in Van Buren Place. Additional lines are provided throughout the Studio Campus, which connect to several water meters served by the City’s lines accessing the surrounding public water mains. Meters include a two-inch meter at the northwest corner of the Project Site connecting to an existing water main in Washington Boulevard. Two two-inch meters are located along the easterly property line at the northeast and southeast corners of Building J and L, respectively. These meters are served by the 12-inch water main in Ince Boulevard, which connected to the 12-inch main in Washington Boulevard. Three two-inch water meters, including a two-inch meter for landscaping, are located near the center of the westerly property line. These meters are served by an 8-inch water main in Van Buren Place. A loop of existing fire service lines also serve the Studio Campus, with a fire service connection at Washington Boulevard, where two lines, 10-inch and 6-inch laterals, connect to an existing on-site pump house for distribution around the Project Site. It was noted during the development of Building J on the Studio Campus that the existing water system exhibited low pressure and may require a future booster system.

### 4.12.2.3 Regulatory Framework

This section provides a summary of federal, State, regional, and local water supply regulations and policies applicable to the Project Site.

#### ***Federal***

The primary federal legislation concerning domestic water supply is the Safe Drinking Water Act (SDWA) of 1974. The SDWA provides the U.S. Environmental Protection Agency (USEPA) with the authority to regulate the quality of water supplies. The SDWA required USEPA to set interim primary drinking water regulations that establish recommended maximum contamination levels (RMCLs) for each contaminant that may have an adverse effect on human health. Since promulgation of the National Primary Drinking Water Regulations, USEPA has developed additional drinking water quality standards for volatile organic chemicals, fluoride, surface water treatment, total coliform bacteria, lead, copper, synthetic organic contaminants, and inorganic contaminants. All domestic water supplies are required to meet these standards.

#### ***State***

##### **California Urban Water Management Planning Act**

The Urban Water Management Planning Act (UWMP Act) was passed in 1983 and codified as California Water Code (CWC) Sections 10610 through 10657. Since its adoption in 1983, the Act has been amended on several occasions. In 2004, the Act was amended to require additional discussion of transfer and exchange opportunities, non-implemented demand management measures, and planned water supply projects. In 2005, the Act was amended to require water use projections (required by CWC Section 10631) to include projected water use for single-family and multi-family residential housing needed for lower income households. In addition, Government Code Section 65589.7 was amended to require local governments to provide a copy of the adopted housing element to water and sewer providers. The Act requires “every urban water supplier providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 AFY of water annually, to prepare and adopt, in accordance with prescribed requirements, an urban water management plan. Urban water suppliers must file these plans with the California Department of Water Resources every five years, describing and evaluating reasonable and practical efficient water uses, reclamation, and conservation activities.” As required by the Memorandum of Understanding Regarding Urban Water Conservation in California and Assembly Bill 11 (Filante, 1991), the 2005 UWMP Act incorporated water conservation initiatives and a Water Shortage Contingency Plan.

##### **Senate Bill 610, Senate Bill 221, and Senate Bill X7-7**

State legislation addressing water supply, Senate Bill (SB) 610 and SB 221, became effective January 1, 2002. SB 610 (codified in CWC Section 10910 et seq.), describes requirements for both water supply assessments (WSAs) and UWMPs applicable to the California Environmental Quality Act (CEQA) process. SB 610 requires that for projects subject to CEQA, which meet specific size criteria, the water supplier must prepare a WSA that determines whether the projected water demand associated with a proposed project is included as part of the most recently adopted UWMP. Specifically, a WSA shall identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years’ water

deliveries received by the public water system. In addition, it must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610 and Section 10912 of the CWC, such projects subject to CEQA requiring completion of a WSA include the following:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500 dwelling unit project.

The WSA must be approved by the public water system at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA. The Project would result in an overall net increase in floor area of approximately 413,127 square feet and, as such, is subject to the requirements of SB 610. SB 610 requires the water supplier (GSWC) to review the Project's estimated water demand and to prepare as WSA for the future development.

Under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: 1) a groundwater management plan; 2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; 3) a description and analysis of groundwater use in the past five years; and 4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

Complementary legislation to SB 610 was enacted on November 10, 2009, with the passage of SB X7-7. SB X7-7 mandates new water conservation goals for UWMPs, requiring urban water suppliers to achieve a 20 percent per capita water consumption reduction by the year 2020 statewide, as described in the "20 x 2020" State Water Conservation Plan.<sup>4</sup> As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will

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<sup>4</sup> California State Water Resources Control Board, 20 x 2020 Water Conservation Plan, February 2010. [http://www.swrcb.ca.gov/water\\_issues/hot\\_topics/20x2020/docs/20x2020plan.pdf](http://www.swrcb.ca.gov/water_issues/hot_topics/20x2020/docs/20x2020plan.pdf). Accessed April 28, 2017.

quantitatively implement this water conservation mandate, in addition to the requirements of SB 610.

### **California Code of Regulations**

#### **Title 20**

Title 20, Sections 1605.1(h) and 1605.1(i) of the California Code of Regulations (CCR) establishes efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including such fixtures as showerheads, lavatory faucets and water closets. Amongst the standards, the maximum flow rate for showerheads and lavatory faucets are 2.5 gpm at 80 pounds per square inch (psi) and 2.2 gpm at 60 psi, respectively. The standard for water closets is 1.8 gallons per flush. In addition, Section 1605.3(h) establishes State efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.

#### **Title 24, Part 11**

Part 11 of Title 24, the title that regulates the design and construction of buildings, establishes the California Green Building Standards Code (CALGreen). The purpose of CALGreen is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. CalGreen includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

### **State Executive Order B-40-17**

April 7, 2017, Governor Edmund G. Brown Jr. ended the State of Emergency associated with recent drought in most of California, while maintaining water reporting requirements and prohibitions on certain wasteful practices. Executive Order B-40-17 rescinded two emergency proclamations from January and April 2014 and four drought-related Executive Orders issued in 2014 and 2015. Executive Order B-40-17 builds on actions taken in Executive Order B-37-16, which remains in effect, to continue observing water conservation as a way of life in California. The State Water Resources Control Board maintains urban water use reporting requirements and prohibitions on wasteful practices such as watering during or after rainfall, hosing of sidewalks and irrigating ornamental turf on public street medians. As directed by Governor Brown in Executive Order B-37-16, the Board will separately take action to make reporting and wasteful water practices permanent.<sup>5</sup>

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<sup>5</sup> State of California Water Resources Control Board. [http://www.waterboards.ca.gov/water\\_issues/programs/conservation\\_portal/emergency\\_regulation.shtml](http://www.waterboards.ca.gov/water_issues/programs/conservation_portal/emergency_regulation.shtml). Accessed April 28, 2017.

**Regional**

**Urban Water Management Plan – Culver City**

GSWC is responsible for the preparation of the UWMP for the CCSA in accordance with 6, Part 2.6, CWC, Sections 10608 through 10657. The original bill requiring preparation of an UWMP was enacted in 1983. GSWC prepared an UWMP for the Culver City System in 1985, 1990, 1995, 2000, 2005, 2010, and 2015. The purpose of the UWMP-Culver City is to provide the supporting documentation to meet the stated concerns and declarations of the UWMP Act. The UWMP Act requires reporting agencies to describe its water supply reliability under single dry-year, multiple dry-year, and average year conditions, with projected information in five-year increments for a minimum of 20 years. One of the purposes of the UWMP-Culver City is to ensure the efficient use of available water supplies, as required by the Act. The UWMP Act states that urban water suppliers should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The UWMP-Culver City describes the availability of water and discusses water use, reclamation, and water conservation activities. The 2015 UWMP-Culver City concludes that the water supplies available to the CCSA customers are adequate over the next 25-year planning period (up to 2040).

The 2015 UWMP-Culver City requires GSWC to demonstrate compliance with the estimated water demand established for 2015 and demonstrate that the agency is on track to achieve its 2020 water demand target. The DWR SBX7-7 Verification Tables submitted as Appendix D of the 2015 UWMP-Culver City are prepared in compliance with SB X7-7. As shown in the UWMP’s Verification Table (Table 8), GSWC achieved its targeted reduction for 2015.

In order to meet potential reductions in supplies, GSWC has grouped reduction actions according to water shortage conditions. The five-stage response approach contained in the current GSWC water shortage contingency plan (WSCP) provides GSWC with flexibility to address any given water shortage condition up to the 50 percent shortage level. **Table 4.12.2-2, *Water Shortage Contingency Plan Stages***, provides an overview of the staged response GSWC could follow during a given water shortage condition including sequential stages (I-V) based on shortage severity. At present, GSWC is not in a water shortage so none of the stages identified below for mandatory water conservation for its water customers are in place.

**TABLE 4.12.2-2  
 WATER SHORTAGE CONTINGENCY PLAN STAGES**

<b>Stage</b>	<b>Percent Supply Reduction<sup>a</sup></b>	<b>Water Supply Condition</b>
I	Up to 10%	Alert
II	11-20%	Moderate
III	21-30%	Severe
IV	31-40%	Critical
V	41-50%	Catastrophic

<sup>a</sup> One stage in the WSCP must address a water shortage of 50%.

SOURCE: 2015 Urban Water Management Plan – Culver City

### *Stage I - Up to 10 Percent Shortage*

Under Stage I, water alert conditions are declared and voluntary conservation is encouraged. The drought situation is explained to the public and governmental bodies. GSWC explains the possible subsequent water shortage stages in order to forecast possible future actions for the customer base. The focus is on customers with high per capita water usage to achieve proportionally greater reduction than those with low use. The activities performed by GSWC during this stage include, but are not limited to:

- Public information campaign consisting of distribution of literature, speaking engagements, website updates, bill inserts, and conversation messages printed in local newspapers.
- Educational programs in area schools.
- Conservation Hotline, a toll-free number with trained Conservation Representatives to answer customer questions about conservation and water use efficiency.
- Voluntary outdoor irrigation restrictions including limiting number of watering days per week, and time when irrigation can occur (e.g., between 7:00 P.M. and 8:00 A.M.).
- Discussion of equitable water waste response policy.

### *Stage II - 11 - 20 Percent Shortage*

Stage II represents is a moderate shortage and would be implemented if Stage I restrictions are deemed insufficient to achieve reductions due to water supply shortages or to achieve identified water usage goals established by an authorized government agency or official. Stage II includes all actions undertaken in Stage I. In addition, GSWC may propose voluntary conservation allotments and/or require mandatory conservation rules. The severity of actions depends upon the percentage of shortage and customer response. The level of voluntary or mandatory water use reduction requested from the customers is also based on the severity. Prior to implementation of any mandatory reductions, GSWC must obtain approval from the CPUC. If necessary, GSWC may also support passage of drought ordinances by appropriate governmental agencies or officials. The activities performed by GSWC during this stage include, but are not limited to:

- All measures implemented in Stage I.
- Establishing customer baseline use period to be used as basis for usage reductions.
- Usage in excess of customer baseline to be charged at regular rate plus a drought emergency surcharge (to be determined as approved by the CPUC).

### *Stage III - 21 - 30 Percent Shortage*

Stage III is a severe shortage that entails or includes allocations and mandatory conservation rules. Stage III would be implemented if the Stage II allocations and drought emergency surcharges are deemed insufficient to achieve reductions resulting from water supply shortages or to achieve identified water usage goals established by an authorized government agency or official. This phase becomes effective upon notification to customers by the GSWC that water usage is to be reduced by a mandatory percentage. GSWC implements mandatory reductions after receiving approval from the CPUC. Rate changes are implemented to penalize excessive water usage. Water use restrictions are put into effect, i.e., prohibited uses can include restrictions of daytime hours for watering, excessive watering resulting in gutter flooding, using a hose without

a positive shutoff device, use of decorative fountains with non-recirculating pumps, washing down sidewalks or patios, not repairing leaks in a timely manner. GSWC monitors water production weekly for compliance with necessary reductions. The use of flow restrictors would be implemented if abusive practices are persistent and documented. The activities performed by GSWC during this stage include, but are not limited to, the following:

- All measures implemented in Stages I and II.
- Adherence to customer baselines and actual water use reductions.
- Usage in excess of customer baseline to be charged at regular rate plus an additional drought emergency surcharge amount (to be determined as approved by the CPUC).

#### *Stage IV - 31 - 40 Percent Shortage*

Stage IV conditions represent a critical shortage. Actions include all steps taken in prior stages regarding allocations and mandatory conservation. Stage IV would be implemented if the Stage III allocations and drought emergency surcharges are deemed insufficient to achieve reductions due to water supply shortages or to achieve identified water usage goals established by an authorized government agency or official. All activities are intensified and production is monitored daily by GSWC for compliance with necessary reductions. The activities performed by GSWC during this stage include, but are not limited to:

- All measures implemented in Stages I-III.
- Possible reductions in customer baselines and actual water use reductions.
- Usage in excess of customer baseline to be charged at regular rate plus an additional drought emergency surcharge amount (to be determined as approved by the CPUC).

#### *Stage V - 41 - 50 Percent Shortage*

Stage V is an emergency shortage that includes all steps taken in prior stages regarding allotments and mandatory conservation. This stage would be implemented in the event that the source of supply for the Culver City System were severely curtailed to the level that requires each customer to restrict their water usage for only human health and safety purposes. All activities are intensified and production is monitored daily by GSWC for compliance with necessary reductions. The activities performed by GSWC during this stage include, but are not limited to:

- All measures implemented in Stages I-IV.
- Possible reductions in customer baselines and actual water use reductions.
- Usage in excess of customer baseline to be charged at regular rate plus an additional drought emergency surcharge amount (to be determined as approved by the CPUC).
- GSWC may update current water shortage condition response measures based on CPUC approvals and direction, state policy directives, emergency conditions, or to improve customer response.

*Consumption Reduction Methods*

In addition to prohibitions and penalties, GSWC can use other consumption reduction methods to reduce water use up to 50 percent. **Table 4.12.2-3, Summary of Consumption Reduction Methods**, summarizes the methods that can be used by GSWC in order to enforce a reduction in consumption, where necessary (subject to CPUC approval). The UWMP may update the consumption reduction methods as required, and if approved by the CPUC.

**TABLE 4.12.2-3  
 SUMMARY OF CONSUMPTION REDUCTION METHODS**

<b>Stages</b>	<b>Reduction Method</b>
I-V	Expand public information campaign
III-V	Offer water use surveys
III-V	Decrease line flushing
III-V	Reduce system water loss
III-V	Increase water waste patrols
III-V	Implement or modify drought rate structure or surcharge

SOURCE: 2015 Urban Water Management Plan – Culver City, based on Department of Water Resources Guidebook, Table 8-3

In addition to the specific actions that GSWC can undertake to verify levels of water use and conservation achieved, GSWC can monitor long-term water use through regular meter readings, which gives GSWC the ability to flag exceptionally high usage for verification of water loss or abuse. Additional monitoring may be undertaken as needed depending on water shortage conditions or need to improve the precision of monitoring efforts.

Although GSWC does not have rule-making authority, it supports member agencies and local cities in efforts to adopt ordinances that would reduce water waste.

*Future Water Supply*

Growth projections for the number of service connections and water use were calculated for the year 2020 through 2040 in 5-year increments using a SCAG-based approach. The SCAG-based water use projections are based on the population and housing growth rates. Employment growth projections were used to determine the growth for commercial, industrial, institutional/government, landscape, and other service connections. The SCAG-based methodology applies a growth rate to a consistent system boundary through 2040; therefore, it is assumed that the metered service connection growth rate accounts for system in-fill only and does not include geographic growth.

The UWMP indicates a gradual decline in water use beginning in 2007 with an approximate 19 percent decline from 2008 to 2015, resulting in the lowest total water use in the system since 1994. According to the UWMP, the recent decline in water use is not yet fully understood, but may be a result of several factors, including the implementation of tiered water rates, changes in

plumbing codes, the economic downturn beginning in 2008, and the statewide drought beginning in 2012.<sup>6</sup>

**Table 4.12.2-4, *Existing and Projected Water Use***, illustrates the CCSA’s historical total retail water service connections from 1994 through 2015 and the projected total retail water service connections from 2020 through 2040 employing the SCAG-based growth rate. Water use is based on 2015 connection data and average water use factors. Losses are projected based on a historical average of 6 percent loss. As shown in Table 4.12.2-4, water demand is anticipated to increase approximately 26.6 percent between 2015 and 2040.

**TABLE 4.12.2-4  
 EXISTING AND PROJECTED WATER USE**

Use Type	Water Use in Acre Feet/Year					
	2015	2020	2025	2030	2035	2040
Single Family	1,435	1,831	1,842	1,853	1,864	1,865
Multi-Family	1,026	1,227	1,234	1,242	1,249	1,257
Commercial	1,102	1,288	1,311	1,333	1,357	1,380
Industrial	182	187	190	194	197	201
Institutional/Governmental	313	372	380	388	397	405
Landscape	557	713	726	739	753	766
Other	**	5	5	5	5	5
Losses	325	349	353	357	361	365
Agricultural Irrigation	*	1	2	3	3	4
<b>Totals</b>	<b>4,941</b>	<b>5,973</b>	<b>6,043</b>	<b>6,114</b>	<b>6,185</b>	<b>6,258</b>

\*No agricultural irrigation data is available for 2015.

SOURCE: 2015 Urban Water Management Plan – Culver City

*Regional Supply Reliability*

GSWC is currently assessing the feasibility of potential groundwater development projects within several local basins. If developed, each of these projects would provide some increment of local groundwater and would improve the reliability of or displace the use of imported water within the CCSA. WBMWD, which the provider for GSWC, focuses on water resource diversification, including a planned reduction in dependence on MWD imported water. According the CCSA UWMP, this would be accomplished by employing a diversified water resources portfolio incorporating increased supply from recycled water, desalination, and conservation-derived supply initiatives. WBMWD has also proceeded with a desalination demonstration in the last five years, and has begun the permitting process for the construction of a desalination facility.<sup>7</sup>

<sup>6</sup> Golden State Water Company, 2015 Urban Water Management Plan – Carson, page 4-3.

<sup>7</sup> 2015 Urban Water Management Plan – Carson, page 7-5.

### **West Basin Municipal Water District Urban Water Management Plan**

WBMWD's 2015 UWMP provides the DWR with a detailed summary of present and future water resources and demands within WBMWD's service area and assesses WBMWD's water resource needs. As with the 2015 UWMP for the CCSA, the UWMP provides water supply planning for a 25-year planning period in five-year increments and identifies water supplies needed to meet existing and future demands. The demand analysis identifies supply reliability under three hydrologic conditions: an average year, a single-dry year, and multiple-dry years. WBMWD's 2015 UWMP updates the 2010 UWMP in compliance with the requirements of the Act as amended in 2009. As with GSWC's Culver City UWMP, WBMWD's UWMP includes total demand projections and water use reduction measures. Water demand is based on the sum of demand by retail agencies served by the WBMWD, including the GSWC. Gross water use for each year is provided by each agency. To determine demand, the UWMP calculates base per capita demand by dividing the actual potable water produced for each agency. As discussed in the WBMWD UWMP, the GSWC exhibited a reduction in demand of 13 percent between 2006 and 2015.

The evaluation of multiple year demand assumes that MWD would be in a similar condition subject to drought, environmental, and legal concerns and that it would allocate water according to policies. MWD has approximately 1.7 million AF available (a Regional Shortage Level 3 cutback under the WSAP). Under the WSAP, WBMWD would receive approximately 5 percent of available supplies. State policy requires the use of water for domestic use as the highest use of water and that the next highest use is for irrigation. In Southern California, the development of such policies has occurred at both the wholesale and retail level. As such, MWD and WBMWD have water supply shortage policies in place to respond to events including catastrophic interruption and up to a 50 percent reduction in water supply. As discussed in the WBMWD's UWMP, water supply reliability is affected by legal, water quality, climate change, groundwater quality, and other factors.

Consumptive water use in the WBMWD service area has been trending lower in recent years after decades of historical increases. The UWMP's Table ES-1, Projected West Basin Service Area Retail Demand, indicates that, although the WBMWD's service area population is projected to increase, the overall baseline potable demand is expected to decrease given further water efficiency and recycled water program implementation. Annual reductions experienced in recent years are attributed to the economic downturn and aggressive extraordinary conservation program implementation due to drought conditions in 2008-11 and 2014-15. Wet weather and dry, hot weather also contributed to fluctuations in annual demands during this period.

### **Local**

#### **City of Culver City General Plan**

The General Plan Conservation Element (1972) describes water pollution as a continuing problem, which is addressed by state regulations to prevent further pollution. According to the Conservation Element, local regulations related to sewage disposal in conjunction with the City

of Los Angeles serve to future the purposes of state-wide pollution control regulations.<sup>8</sup> The Conservation Element does not address water supply or further water conservation measures.

### **City of Culver City Municipal Code**

The City's policies regarding water supply are set forth in Chapter 5.03, Water Conservation and Water Supply Shortage Program. The purpose of this chapter is to adopt and enforce a conservation and supply shortage program as necessary to manage the City's potable water supply in the short- and long-term, and to avoid or minimize the effects of drought and shortage within the City. According to Chapter 5.03.C, careful water management that includes active water conservation measures not only in times of drought, but at all times, is essential to ensure a reliable minimum supply of water to meet current and future water supply needs.<sup>9</sup>

The water conservation and supply shortage program established under Chapter 5.03, is intended to reduce water consumption through conservation, and to enable effective water supply planning, assure reasonable and beneficial use of water, prevent waste of water, and maximize the efficient use of water within the City to avoid and minimize the effect and hardship of water shortage to the greatest extent possible.

Under Section 5.03.030, permanent water conservation requirements and prohibition against waste include limits on watering hours (Section 5.03.030.A), which prohibit watering or irrigating of lawn, landscape or other vegetated area with potable water between the hours of 8:00 A.M. and 7:00 P.M.; limit on watering duration (Section 5.03.030.B), which limit watering to no more than 10 minutes of watering per day, per station; prevention of excessive water flow or runoff (Section 5.03.030.C); and prohibition of washing down hard or paved surfaces (Section 5.03.030.D). Other measures (Section 5.03.030.E through O) include the obligation to fix leaks, breaks or malfunctions (Section 5.03.030.E); required re-circulation of water for decorative water fountains and decorative water features (Section 5.03.030.F), and prohibition of single-pass cooling systems (Section 5.03.030.J). The Code also requires that all pool and spa must be covered in a manner to reduce evaporation (Section 5.03.030.N) and prohibit irrigation of ornamental turf on public street medians (Section 5.03.030.O).

Section 5.03.035, 5.03.040, and 5.03.045, respectively, pertain to Level 1, Level 2, and Level 3 water supply shortage emergency conditions. The stages are cumulative and include permanent measures as well as measures from the preceding level. Level 1 water supply shortage requires additional water conservation measures including limits on watering days; a 72-hour time limit on repairs of leak, breaks or malfunctions. Level 2 requires more stringent limits on watering days, a 48-hour time limit on repairs of leak, breaks or malfunction; prohibition on filling ornamental lakes or ponds (except under specified conditions); and limits on washing vehicles at commercial car washing facilities. The use of potable water to wash or clean a vehicle, whether motorized or not, is prohibited at a commercial car washing facility that does not utilize a re-circulating water system. Level 3 prohibits watering or irrigating, unless maintenance of vegetation, including trees

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<sup>8</sup> City of Culver City General Plan, <http://www.culvercity.org/home/showdocument?id=782>. Accessed May 3, 2017.

<sup>9</sup> City of Culver City, Municipal Code, Chapter 5.03. [http://library.amlegal.com/nxt/gateway.dll/California/culver/themunicipalcodeofthecityofculvercityca?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:culvercity\\_ca](http://library.amlegal.com/nxt/gateway.dll/California/culver/themunicipalcodeofthecityofculvercityca?f=templates$fn=default.htm$3.0$vid=amlegal:culvercity_ca). Accessed May 3, 2017

and shrubs, are watered with a hand-held bucket or similar container or a hand-held hose equipped with a positive, self-closing, water-shut-off nozzle or device. Maintenance of existing landscape necessary for fire protection, erosion control, or protection of protected species or certain other landscaped areas, such as public parks and playing fields, is allowed provided that such irrigation does not exceed two days per week and is conducted in accordance with the time restrictions. Level 3 also requires that all leaks, breaks, or other malfunctions in the water user's plumbing or distribution system be repaired within 24 hours of notification. At present, Culver City is observing Level 1 water restrictions; however, GSWC's local water-use and outdoor irrigation restrictions have been lifted.<sup>10</sup>

#### **4.12.2.4 Environmental Impacts**

##### ***Methodology***

The Project would result in an overall net increase of approximately 413,127 square feet of new Digital Media floor space over existing conditions. New Digital Media buildings anticipate a variety of uses, of which office have the highest water demand per square foot. Because the precise ratios of future uses are not known and can vary over time, the water demand analysis assumes that all the floor area would be for office purposes. In this way, the estimated water demand would represent a conservative demand assessment.

The Project's net increase in estimated office floor area would exceed 250,000 square feet, and as such, the Project would be subject to the requirements of SB 610, which requires a WSA. A WSA has been prepared that addresses the ability of GSWC to provide water service to the Project pursuant to the legislative requirements. The WSA data and findings, included as Appendix M-1 of this Draft EIR, are summarized within this EIR section.

The Project's demand for water resources was evaluated in relation to GSWC's ability to supply water pursuant to its approved 2015 UWMP-Culver City and is based on the findings of GSWC's WSA. The water demand was calculated based on generation factors provided by the Los Angeles County Sanitation District No. 22. This method of calculating future water demand for new development is a common practice in the Los Angeles region. Water demand was calculated by dividing each flow factor from the Sanitation District's loading tables by 0.9, which represents a return-to-sewer ratio of 90 percent. Under this methodology, office uses are estimated to generate 220 gpd per 1,000 square feet of floor area, support uses are estimated to generate 110 gpd per 1,000 square feet of floor area, and stage uses are estimated to generate 110 gpd per 1,000 square feet of floor area.

The analysis of impacts with regard to the availability of water infrastructure identifies the water lines available to serve the Project Site, and identifies the available water pressure capacity along those lines and the City's procedures for providing needed infrastructure. The analysis identifies the available water infrastructure to serve the Project's domestic water demand.

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<sup>10</sup> City of Culver City Website. <http://www.culvercity.org/live/home-property/water-conservation>. Accessed May 15, 2017.

### **Thresholds of Significance**

The significance threshold below is derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact to water supply would occur if:

**WS-1** The City’s water supplies would not adequately serve the Project or water distribution capacity would be inadequate to serve the proposed uses after appropriate infrastructure improvements have been installed.

### ***Project Characteristics and Project Design Features***

#### **Project Characteristics**

The Project would include a net increase in floor area at the Project Site of 413,127 square feet. This would result in an increase in water consumption (see the Analysis of Project Impacts subsection below for estimates). Water-conserving fixtures would be installed throughout and infrastructure for future gray water would be provided. Landscaping would be responsibly watered through drip irrigation or similar practices.

#### **Project Design Features**

The following Project Design Features (PDFs) are proposed to reduce the water impacts of the Project:

**PDF-WATER-1 (Water Conservation):** The Project shall implement conservation measures related to landscape irrigation. Conservation measures include the following:

- Low water-demand and drought tolerant planting will be used on the Project Site.
- Irrigation runoff on the Project Site will be collected and treated on site.
- Irrigation will have weather sensor input to determine need of irrigation.
- All irrigation will be drip irrigation.
- Irrigation will be on timers.

**PDF-WATER-2 (Water Lines):** Rerouting and/or and potential future reconnection of the on-site 4-inch service line to the City’s water main shall be coordinated with GSWC prior to construction of the proposed parking building.

**PDF-WATER-3 (Water Service):** Prior to construction of additional buildings, the need for new connections to City lines or on-site service lines to maintain adequate on-site domestic water service and pressure levels shall be coordinated with GSWC.

**PDF-WATER-4 (Fire Flow):** Prior to construction, building plans shall be submitted to the Culver City Fire Department (CCFD) to determine fire flow and time period requirements based on tenant type, building size, and building type. If additional fire service lines and hydrants are required to maintain adequate fire flow, the Project shall install fire service lines and hydrants as required.

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## ***Analysis of Project Impacts***

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**Threshold WS-1:** The Project would have a significant impact if the City’s water supplies would not adequately serve the Project or water distribution capacity would be inadequate to serve the proposed uses after appropriate infrastructure improvements have been installed.

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### **Construction**

**Impact Statement WS-1: Water demand during construction would be less than significant as the demand would be modest compared to current use on the Project Site and would more than offset by the temporary removal or relocation of most occupants currently on the Studio Campus. Furthermore, implementation of PDF-WATER-2 and PDF-WATER-3 would prevent impacts to the public water service lines serving the Project Site during construction.**

Water, such as soil watering for soil compacting and fugitive dust control, masonry, painting, clean-up, and other related activities, would be required during construction. Project construction activities are expected to occur over an approximately 50-month construction period, with construction of the Culver/Main Tunnel beginning in the third quarter of 2017 following anticipated Project approval, with the balance of construction anticipated to commence in the first quarter of 2018 and completion is expected in 2020. Construction water demand would be temporary given that project construction activities would be temporary. Non-potable water could be used for soil compacting and dust control purposes, if required, and would represent the majority of the water used during construction. Such practices are implemented by the contractor and use non-potable water trucked to a construction site. While Project construction activities would create a demand for some potable water, such as drinking, cleaning of brushes and other items, and lavatories, this demand would be more than offset by the temporary relocation of Studio Campus occupants during construction. It is, therefore, expected that Project construction activities would generate minimal potable water demand, and would not require water supplies that could not be met by existing water entitlements and resources available to the City’s water purveyor and supply sources such as the WBMWD. As such, impacts related to water demand would be less than significant during construction.

### **Operation**

**Impact Statement WS-2: Impacts of Project operation on water supply would be less than significant. The Project’s demand for water associated with potable supplies is within GSWC’s water demand projections. Sufficient water infrastructure to serve the Project is available within the roadway right-of-ways adjacent to the Project Site.**

### **Water Demand**

The Project’s existing floor area and uses, as well as anticipated net new floor area, are illustrated in **Table 4.12.2-5, *Net Floor Area Increase in Square Feet***. As shown in Table 4.12.2-5, with proposed demolitions, the Project would result in a net increase in floor area of 413,127 square feet, all of which is represented by new Digital Media space which is conservatively assumed to be used as office space.

**TABLE 4.12.2-5  
 NET FLOOR AREA INCREASE IN SQUARE FEET**

Use	Existing Floor Area	Proposed New	Total	Demolition	Net Increase
Office	117,872	609,420	639,504	87,788	521,632
Support	74,197	0	5,572	68,625	-68,625
Stage	155,480	40,000	115,600	79,880	-39,880
<b>Total</b>	<b>347,549</b>	<b>649,420</b>	<b>760,676</b>	<b>236,293</b>	<b>413,127</b>

SOURCE: KPFF Consulting Engineers, Culver Studios – Water Infrastructure and Demand Analysis, September 2017

**Table 4.12.2-6, *Project’s Estimated Water Consumption***, shows the net increase in potable water that would be required for the Project. As shown in Table 4.12.2-6, gpd estimates are based on approximately 220 gpd for each 1,000 square feet of floor area, or a unit flow of 0.22 gallons per day per square foot. The entire post-development Project would result in a demand of approximately 155,576 gpd, or approximately 174.26 AFY. Subtracting for existing uses that would be removed, the net increase generated by the Project would be approximately 103,862 gpd, or approximately 116.33 AFY. The WSA prepared for the Project found that water demand in the CCSA would increase by approximately 1,032 AFY between 2015 and 2020. As determined in the WSA, the Project would not add any increments of demand in excess of those that were anticipated at the time the 2015 UWMP was published.<sup>11</sup>

The Project would comply with State Title 24 and Title 20 State water efficiency standards, such as the use of low flow faucets and other mandated water efficiency standards. In addition, the Project would implement PDF-WATER-1, which requires the use of drought tolerant planting, weather-sensor irrigation, collection and treatment of irrigation runoff onsite, and the use of timers to control irrigation duration.

The Project would comply with the City and GSWC’s water conservation requirements, which apply to periods of water shortage. Code-required conservation features include reduction of irrigation during designated stages and recirculation of water for landscaped features such as ponds or fountains. Because the Project would incorporate water conservation measures under the PDF-WATER-1, implement City and State conservation measures, and would not exceed GSWC’s anticipated supply to 2040, the Project would have a less than significant impact on water supply.

<sup>11</sup> Golden State Water Company, Water Supply Assessment for Culver Studios Innovation Plan, April 26, 2017, page 11, include in Appendix M-1 of this EIR.

**TABLE 4.12.2-6  
 PROJECT'S ESTIMATED WATER CONSUMPTION**

Use	Total Post Development Floor Area (Square Feet)	Demand Factor (GPD/SF)	Total Post Development Demand (GPD)	Total Post Development Demand (AFY)	Net New Floor Area (Square Feet)	Net New Water Demand (GPD) <sup>a</sup>	Net New Water Demand (AFY)
Office	639,504	0.22	142,112	159.18	521,632	115,918	129.84
Support	5,572	0.11	619	0.69	-68,625	(7,625)	(8.54)
Stage	115,600	0.11	12,844	14.40	-39,880	(4,431)	(4.96)
<b>Total</b>	<b>760,676</b>		<b>155,576</b>	<b>174.26</b>	<b>413,127</b>	<b>103,862</b>	<b>116.33</b>

<sup>a</sup> One GPD is approximately equal to 0.00112014 AFY

SOURCE: KPFF Consulting Engineers, Culver Studios – Water Infrastructure and Demand Analysis, September 2017

### Water Infrastructure

As described previously, water service is available to the Project Site via domestic and fire service water service lines located in Ince Boulevard, Washington Boulevard, and Van Buren Place, adjacent to the Project Site. As such, water service to the site from surrounding lines is considered adequate and the construction of new lines off-site is not anticipated. At present, however, the majority of the Studio Campus's existing buildings are served by a 4-inch water service line, which connects to the existing 8-inch main in Van Buren Place. The proposed parking structure in the south portion of the Project Site would conflict with the location of this line. As such, the water line would need to be rerouted or a new service connection to the Van Buren Plan water main would be needed to maintain service. In addition, water pressure in the on-site system in the vicinity of Building J exhibited low pressure during the construction of that building, accordingly, it has been recommended that, as new development occurs a booster system or new public connection be required.<sup>12</sup> Project Design Feature PDF-WATER-2 requires coordination with GSWC for the rerouting and potential reconnection to the City's main of the 4-inch service line. PDF-WATER-3, requires that the need for any new water connections or booster pump systems to maintain adequate service to new buildings be assessed and coordinated with GSWC prior to construction. With the implementation of these two PDFs, impacts to the City's water infrastructure would be less than significant.

Fire flow requirements are based on building size and construction type. The Project Site is served by a loop system that connects to two 10-inch and 6-inch laterals in Washington Boulevard. Existing fire hydrants are present around the Project boundary. Although fire service lines are provided to the Project Site, additional hydrants may be required depending on the Fire Department's review of development plans. In addition, current fire regulations require that all buildings be equipped with sprinkler systems, which may also increase fire flow demand. PDF-WATER-4 requires that, prior to construction, building plans be submitted to the CCFD to determine fire flow and time period requirements based on tenant type, building size, and building type. If additional fire service lines and hydrants are required to maintain adequate fire flow, the Project shall install fire service lines and hydrants as required. With implementation of

<sup>12</sup> KPFF, Comprehensive Plan Amendment 7, February 2017.

PDF-WATER-2 through PDF-WATER-4, impacts to the City’s domestic and fire water service facilities and infrastructure would be less than significant.

### Climate Change and Water Supply

Potential impacts of climate change on California’s water resources include changes in snow pack, sea level rise, and river flows. Climate change is also expected to result in more variable weather patterns that can lead to longer and more severe drought. In addition, sea level rise will continue to threaten the sustainability of the Sacramento-San Joaquin Delta.

As described above, in May 2009, DWR prepared a report entitled “Using Future Climate Projections to Support Water Resources Decision Making in California,” which presents an overview of the advances that DWR has made toward using future climate projection information to support decision making by quantifying possible impacts to water resources for a range of future climate scenarios.<sup>13</sup> In December 2010, DWR prepared a survey which presents summaries of 13 different reports and studies prepared by DWR addressing climate change entitled “Climate Change Characterization and Analysis in California Water Resources Planning Studies - Final Report.”<sup>14</sup>

In 2014, DWR released up-to-date climate change information, including hydrologic impacts and projections at the statewide and regional levels, adaptation strategies, and energy intensity of water supplies in the California Water Plan. The California Water Plan is the strategic plan for managing and developing water resources statewide for current and future generations by providing a collaborative planning framework to develop findings and recommendations and make informed decisions for California's water future.

As indicated above and as reflected in the various DWR reports and technical memoranda prepared in response to Governor’s Executive Order S-3-05, there are substantial uncertainties regarding the effects of global warming on California’s water supplies. Although experts agree that the earth’s atmosphere has warmed over the last century and will likely continue to warm in the future, how this warming will quantitatively affect future water supplies, and specifically, how this warming will affect State Water Project supplies remains speculative. This is a global phenomenon contributed to by innumerable sources around the world and the potential effects of global climate change on water supply are more appropriately considered within the context of cumulative impact consideration.

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<sup>13</sup> California Department of Water Resources, “Using Future Climate Projections to Support Water Resources Decision Making in California,” May 2009, page 2. Available at:<http://www.energy.ca.gov/2009publications/CEC-500-2009-052/CEC-500-2009-052-D.PDF>. Accessed May 3, 2017.

<sup>14</sup> California Department of Water Resources, “Climate Change Characterization and Analysis in California Water Resources Planning Studies - Final Report,” December 2010, page v. Available at:  
<http://www.water.ca.gov/climatechange/docs/ClimateChangeWhitePaper.pdf>. Accessed May 3, 2017.

## **Cumulative Impacts**

### **Water Demand**

Chapter 3, General Description of Environmental Setting, of this Draft EIR identifies 56 projects that are anticipated to be developed within the vicinity of the Project Site. Of these 48 are located within Culver City and the GSWC service area. The exceptions in the of 56 identified related projects are Related Projects No. 35 through 42, as listed in Table 3-3 and illustrated in Figure 3-1, of this EIR. These related projects are located within the City of Los Angeles and are not within the boundaries of the CCSA. The boundaries of the CCSA are shown in Figure 2-1 of the WSA, attached as Appendix M-1 to this EIR.<sup>15</sup> The 48 related projects located within the CCSA, in conjunction with the Project, would contribute to water demand in the CCSA. The projected cumulative demand is provided in **Table 4.12.2-7, *Estimated Cumulative Water Demand***. Water demand is estimated according to generation factors set forth by the Los Angeles County Sanitation District No. 22 or the City of Los Angeles Bureau of Sanitation, depending on the availability of generation rates. The estimated water demand associated with related projects is approximately 684,316 gpd or approximately 766.50 AFY. In combination with the Project total cumulative water demand (103,862 gpd or 116.2 AFY), the cumulative water demand would be approximately 788,180 gpd or 883 AFY. It is noted that the table is highly generalized because of the non-specific definition of many of the related projects. In regard to Related Project No. 9 (Light Rail Station – Phase II), restroom facilities are not currently provided for Metro stations. As such, any future restrooms, should Metro change its policy, are not accounted for. However, the difference would be an incremental increase in the totals represented in Table 4.12.2-7. The WSA prepared for the Project stated that water demand in the CCSA is estimated to increase by approximately 1,032 AFY between 2015 and 2020. Because the cumulative water demand (883 AFY) is not expected to exceed the projections of the 2015 UWMP, the water demand of related projects in combination with the Project would not result in a cumulative significant impact.

### **Water Infrastructure**

Development of the Project in conjunction with the related projects in the City would incrementally increase the demand for capacity in the City's existing potable water lines. However, like the proposed Project, the larger related projects would be subject to CEQA review, and be reviewed by the City's Department of Public Works to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. All projects are required to meet City fire flow and other standards based on flow testing of facilities to verify the availability of service. As such, development would proceed with appropriate verification and approval. Furthermore, Culver City's Public Works Department conducts ongoing evaluations to ensure that water infrastructure in the City is adequate, and undertakes infrastructure system improvements when required. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

<sup>15</sup> Golden State Water Company, Water Supply Assessment – Culver City Studios Innovation Plan, April 26, 2017, page 5, Figure 2-1, included in Appendix M-1 of this EIR.

**TABLE 4.12.2-7  
 ESTIMATED CUMULATIVE WATER DEMAND**

Related Projects	Quantity	Generation Factor	Average Daily Water Demand (GPD) <sup>a</sup>	Water Demand (AFY)
Residential	852 du	162 gpd/unit	138,024	154.60
Retail <sup>b</sup>	362,171 sf	25 gpd/1,000 sf	9,054	10.14
Restaurant	46,220 sf	1,100 gpd/1,000 sf	50,842	56.95
Office	950,020 sf	220 gpd/1,000 sf	209,004	234.11
Hotel <sup>b</sup>	148 rooms	120 gpd/room	17,760	19.89
Park Multi-purpose Room	4,000 sf	110 gpd/1,000 sf	440	0.53
Vehicle Maintenance, gas station	4,770 sf	110 gpd/1,000 sf	525	0.59
School <sup>b</sup>	150 students	11 gpd/student	1,650	1.85
Community College	92,000 sf	110 gpd/1,000 sf	10,120	11.34
Museum <sup>b</sup>	12,600 sf	30 gpd/1,000 sf	378	0.42
Assisted Living	110 beds	135 gpd/bed	14,850	16.64
Live Theater <sup>c</sup>	200 seats	11 gpd/seat	2,200	2.46
Park	4 acres	20 gpd/1,000 sf	229,471	257.24
Light Rail Station <sup>d</sup>	N/A		N/A	N/A
<b>Total</b>			<b>684,318</b>	<b>766.50</b>
<b>Proposed Project (net increase)</b>			<b>103,862</b>	<b>116.33</b>
<b>Cumulative Wastewater Generation</b>			<b>788,180</b>	<b>883 AFY</b>

<sup>a</sup> One GPD is approximately equal to 0.00112014 AFY

<sup>b</sup> Generation rates are based on City of Los Angeles Department of Public Works, Sewage Facilities Charge, Sewage Generation Factor for Residential and Commercial Categories, 2012.

<sup>c</sup> Generation factors for the live theater, which would not have daily use, are not available. It is estimated that the live theater would generate approximately 11 gpd per seat, based on average use of facilities at a school.

<sup>d</sup> Public restrooms are generally not provided at light rail stations.

SOURCE: ESA PCR, 2017

### 4.12.2.5 Mitigation Measures

Based on the analysis above, with implementation of Project Design Features PDF-WATER-1 through PDF-WATER-4, the Project would not result in significant impacts related to domestic water supply and infrastructure. No mitigation measures would be required.

### 4.12.2.6 Level of Significance after Mitigation

Not applicable. Impacts to water supply and infrastructure would be less than significant.

## 4.12.3 Solid Waste

### 4.12.3.1 Introduction

This section addresses potential impacts on the existing and planned capacity of designated Class III (non-hazardous municipal solid waste) and inert (non-hazardous earth and earth-like products such as yard waste, trash, direct, concrete and asphalt) landfills, and whether sufficient capacity exists at these landfills to serve the Project. Consistency with applicable requirements to divert waste and increase recycling of the waste stream, these issues are also evaluated. This section incorporates information from sources including but not limited to the California Department of Resources, Recycling and Recovery (CalRecycle), Los Angeles County Integrated Waste Management Plan (CoIWMP), the CoIWMP 2015 Annual Reports (published in December 2016), and the City of Culver City Public Works Department.

### 4.12.3.2 Environmental Setting

#### *Existing Conditions*

##### **Existing Site Conditions**

The approximately 14-acre Project Site is currently occupied by The Culver Studios which includes 347,549 of television- and movie-production-related office, stage, support and parking uses.<sup>1</sup> The Culver Studios currently implements a property-wide solid waste and recycling program. Rather than solid waste facilities being independently provided for each building, trash collection, compacting and recycling activities are housed at a single centralized location on the Project Site, within the current bungalow parking lot area. As required by the Culver City Municipal Code (CCMC), separate trash containers are provided on the Project Site for Class III solid waste, recyclable, and green waste.<sup>2</sup>

Existing Class III solid waste generation estimates for the Project Site are included in **Table 4.12.3-1, Existing Operational Class III Solid Waste Generation**. As indicated therein, the Project Site currently generates an estimated 339.10 tons of Class III solid waste per year. According to The Culver Studios, the Studio Campus currently diverts and recycles approximately 83.5% of its solid waste stream.<sup>3</sup>

##### **Solid Waste Disposal Services**

Per CCMC Section 5.01.01, solid waste handling and recyclable waste material handling shall be performed exclusively by the City or its authorized agents. In accordance with this section, all trash collection in the City is managed by the City's Public Works Department (PWD), Environmental Programs and Operations Division (EPO), with all residential, commercial and industrial solid waste in the City collected by the EPO or its authorized agents.

<sup>1</sup> Support uses include machine/carpentry/paint shops, planning mills, electrical/grips/props, cameras, film processing and cutting rooms, dressing rooms, wardrobe, hair/makeup, the commissary, first aid, storage, and other uses.

<sup>2</sup> City of Culver City, Initial Study for Culver Studios Comprehensive Plan Amendment No. 6, November 18, 2015.

<sup>3</sup> The Culver Studios, CPA#6 Trash Management Plan, October 26, 2015.

**TABLE 4.12.3-1  
 EXISTING OPERATIONAL CLASS III SOLID WASTE GENERATION**

Land Use	Quantity (sf)	Generation Factor <sup>a</sup>	Solid Waste Generation (lbs./day)	Solid Waste Generation (tons/day)	Solid Waste Generation (tons/year)
Office	117,872	6 lbs/ksf/day	707	0.354	129.21
Support <sup>b</sup>	70,631	5 lbs/ksf/day	353	0.177	64.61
Stage	155,480	5 lbs/ksf/day	777	0.389	141.99
Restaurant (Commissary)	3,566	5 lbs/ksf/day	18	0.009	3.29
<b>Total</b>	<b>347,549</b>	<b>--</b>	<b>1,855</b>	<b>0.929</b>	<b>339.10</b>

sf = square feet; ksf = thousand square feet; lbs. = pounds

<sup>a</sup> Generation factors from the CalRecycle website, Estimated Solid Waste Generation Rates, <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed February 24, 2017. For purposes of the analysis, the CalRecycle light industrial generation factor is applied to the support and stage uses.

<sup>b</sup> Support uses include: machine shops, carpentry shops and planning mills, paint shops, electrical/grips/props, cameras, film processing and cutting rooms, dressing rooms, wardrobe, hair and makeup, the commissary, first aid, storage, and other uses.

SOURCE: ESA PCR, February 2017

The EPO also provides a curbside recycling program for paper, cardboard, cans/aluminum, plastic, and glass, with recyclable and green waste hauled to private recycling facilities.<sup>4</sup> Currently, the City picks up solid and recyclable waste from the Project Site twice a week, with set demolition waste picked-up with 24-hour notice by Waste Management (a private hauler) under special dispensation from the City for TCS tenants who have an immediate need to clear set waste.<sup>5</sup>

The City does not own or operate any landfill facilities. Class III solid waste from the City is disposed of at the Chiquita Canyon Landfill in Castaic (11.5 percent) and the Simi Valley Landfill in Simi Valley (88.5 percent), while City inert solid waste is disposed of at the Arcadia Reclamation Facility in Irwindale.<sup>6</sup>

### Regional Class III Landfill Capacity

Regional planning for the provision of landfill services is provided by the County of Los Angeles which, in response to the California Integrated Waste Management Act of 1989, prepared and administers the ColWMP. As part of its obligations, Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of ColWMP Annual Reports. Within

<sup>4</sup> City of Culver City website, Trash Collections, <http://www.culvercity.org/live/home-property/residential-recycling-trash-services/trash-collections>. Accessed February 25, 2016.

<sup>5</sup> City of Culver City, Initial Study for Culver Studios Comprehensive Plan Amendment No. 6, November 18, 2015. Also, Jim Suhr, Suhr and Associates, e-mail dated April 21, 2017.

<sup>6</sup> Catherine Vargas, City of Culver City Public Works Department, Environmental Programs and Operations Division, March 1, 2017.

each annual report, future landfill disposal needs over the ensuing 15-year planning horizon are addressed, in part by determining the available landfill capacity.<sup>7</sup>

As discussed in the ColWMP 2015 Annual Report, due to lack of consumer demand for materials, slowdown in the construction industry, and the production and manufacturing of goods, the amount of waste that residents and business generated and disposed of in Los Angeles County has continued to decrease substantially since 2006 and has generally stayed even from 2009 through 2015. In 2015, Los Angeles County and the cities in the County that dispose of solid waste at County landfills (like Culver City) disposed of 9,457,378 tons of materials, compared to approximately 12 million tons in 2005. Of that amount, the majority was accommodated by in-County Class III landfills (4,772,823 tons), followed by exports to out-of-County landfills (4,127,261 tons) and transformation facilities (557,294 tons). The remaining disposal capacity for the County’s Class III landfills is estimated at approximately 114 million tons as of December 31, 2015 (the latest date for which information is available).<sup>8</sup>

It is estimated that by year 2030, the cumulative demand for disposal capacity will have reached a total of approximately 103 million tons, or approximately 90 percent of the existing remaining capacity. As such, projected cumulative County disposal demands (and the demands of cities that dispose of solid waste at County landfills such as Culver City) would continue to be met even without the provision of additional disposal capacity at the various permitted facilities through at least 2030. However, as further discussed below, additional disposal capacity is being sought through a number of options, including in-County landfill expansions, exports to out-of-County facilities, and source reduction and recycling to ensure adequate long-term capacity.<sup>9</sup>

Of the various landfills serving the County and the cities within the County that dispose of solid waste at County landfills (like Culver City), Sunshine Canyon landfill is the largest. This landfill received 2,402,704 tons of solid waste in 2015, which accounts for approximately 25% of the total solid waste disposed in 2015. This landfill had a remaining capacity 72,610,972 tons in 2015, with a remaining life expectancy of 22 years.<sup>10</sup>

With respect to the Chiquita Canyon and Simi Valley landfills, in 2015 Chiquita Canyon received 1,075,207 tons of solid waste, had a remaining capacity of 758,146 tons, and had a remaining life expectancy of one year (which was fully used in 2016), while the Simi Valley landfill received 1,100,000 tons of solid waste, had a remaining capacity of 67,500,000 tons, and had a remaining life expectancy of 35 years. However, with respect to Chiquita Canyon, the County is currently processing an application to increase the landfill’s capacity by 48,000,000 tons which would give the landfill an additional 45 years of capacity, and the County has issued a “Clean Hands” Waiver

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<sup>7</sup> County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2015 Annual Report, published December 2016.

<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

<sup>10</sup> Ibid.

to the landfill operator to permit the landfill to continue to operate while the application is being processed.<sup>11</sup>

As described in the Regulatory Framework section below, the County has prepared and is updating its CoIWMP, including annual reports and a master plan for meeting waste disposal needs over the next 20 years. The most recent Annual Report (2015, published in December 2016) indicates that the County can adequately meet future Class III disposal needs through at least 2030 through a combination of: (1) expansion of existing in-County Class III landfills; (2) studying, promoting, and developing conversion technologies; (3) expansion of transfer and processing infrastructure; (4) development of a waste-by-rail system; and (5) maximization of waste reduction and recycling.<sup>12</sup>

### **Regional Inert Landfill Capacity**

The annual amount of disposed inert waste materials in the County in 2015, such as earth, landscaping, concrete and asphalt, was 263,933 tons. As of 2015, the Azusa Land Reclamation Facility is the only permitted Inert Waste Landfill in Los Angeles County with a full solid waste facility permit. The remaining capacity of this landfill is estimated at 57.56 million tons. Given the remaining permitted capacity and at the average disposal rate of 846 tons per day (tpd) in 2015, this capacity would be exhausted in approximately 189 years. In addition to the County-permitted facility, there are a number of Inert Debris Engineered Fill Operation facilities operating under State permit provisions that provide additional capacity in the County, processing approximately 2.36 million tons in 2015.<sup>13</sup> Among these is the Arcadia Reclamation Facility, which serves jurisdictions including but not limited to Culver City. No capacity or remaining life expectancy was available for this facility, but those jurisdictions which currently utilize this facility, such as the City of Culver City, would always have the option of disposing of their inert solid waste at the Azusa Land Reclamation Facility which has ample remaining capacity or at any of the other State-permitted Inert Debris Engineered Fill Operations in the County.

### **Waste Diversion and Recycling Efforts**

As discussed further below under California Senate Bill 1374 and Assembly Bills (ABs) 939 and 341, all cities and counties in the State are currently required to divert 50 percent of their solid waste streams from landfills, and this requirement will increase to 75 percent by 2020. Los Angeles County and multiple cities in the County have already achieved the 50 percent goal, with the County diversion rate currently at 65 percent.<sup>14</sup> The City of Culver City achieved a 70 percent diversion rate in 2015 as a result of a combination of measures required in the City's Source Reduction and Recycling Element (SRRE), including but not limited to: residential backyard

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<sup>11</sup> Data for the Chiquita Canyon Landfill from: (1) County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2015 Annual Report, published December 2016; and (2) Waste Connections website, Chiquita Canyon tab, <http://chiquitacanyon.com>, accessed March 9, 2017. Data for the Simi Valley Landfill from: (1) Megan Emslander, CalRecycle, March 9, 2017; and (2) Peter Bozek, Ventura County Environmental Health Division, March 9, 2017.

<sup>12</sup> County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2015 Annual Report, published December 2016.

<sup>13</sup> Ibid.

<sup>14</sup> Ibid.

composting; residential recycling/green waste sorting, collection and disposal; school and government source reduction; concrete/asphalt/rubble sorting, collection and disposal; and source reduction/recycling outreach and education.<sup>15</sup>

### 4.12.3.3 Regulatory Framework

This section provides a summary of State, regional, local, and other solid waste regulations and policies applicable to the Project Site.

#### **State**

The following State regulations are made applicable to development in Culver City through the City's SREE and Municipal Code.

#### **Assembly Bill 939 - California Integrated Waste Management Act of 1989**

The State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939) to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 25 percent by 1995 and 50 percent by 2000.<sup>16</sup>

AB 939 requires that all counties have to prepare a COIWMP. The COIWMP had to include had to include a Source Reduction and Recycling Element (SRRE) to address waste characterization, source reduction, recycling, composting, solid waste facility capacity, education and public information, funding, special waste (asbestos, sewage sludge, etc.), and household hazardous waste. The COIWMP also had to include a Nondisposal Facility Element (NDFE) to identify nondisposal facilities to be used in order to assist counties in reaching AB 939's diversion mandates. Nondisposal facilities include material recovery facilities, transfer stations, large-scale composting facilities, and other facilities that require a solid waste facility permit. Lastly, the COIWMP has to include a Household Hazardous Waste Element (HHWE) to reduce the amount of hazardous household waste generated and to provide the County with convenient collection services and promote waste minimization/ reduction techniques. It also requires counties to develop a Siting Element that addresses how each county, and cities within that county, will manage their solid waste disposal over 15-year planning periods. The Siting Elements also include goals and policies to ease the use of out-of-County/remote landfills and foster the development of alternatives to landfill disposal (e.g. conversion technologies). See further discussion of the Los Angeles County Siting Element below under Los Angeles County regulations. Oversight of these activities was set up under the charge of the California Integrated Waste Management Board (CIWMB). The duties and responsibilities of CIWMB were transferred to the California Department of Resources, Recycling, and Recovery (CalRecycle) as of January 1, 2010.

#### **Assembly Bill 1327 - California Solid Waste Reuse and Recycling Access Act of 1991**

The California Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327), passed on

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<sup>15</sup> Catherine Vargas, City of Culver City Public Works Department, Environmental Programs and Operations Division, March 1, 2017.

<sup>16</sup> [https://www.edcgov.us/Government/EMD/SolidWaste/The\\_Intergrated\\_Waste\\_Management\\_Act\\_AB\\_939.aspx](https://www.edcgov.us/Government/EMD/SolidWaste/The_Intergrated_Waste_Management_Act_AB_939.aspx). Accessed February 26, 2017.

October 11, 1991, required CalRecycle to develop a model ordinance for adoption of recyclable materials in development projects by March 1, 1993. Local agencies were then required to adopt the model, or an ordinance of their own, governing adequate areas for collection and loading of recyclable materials in development projects by September 1, 1993. If, by that date, a local agency had not adopted its own ordinance, the model ordinance adopted by the CalRecycle took effect and shall be enforced by the local agency.

### **Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements**

Senate Bill 1374 was signed into law in 2002 to assist jurisdictions with diverting their construction and demolition (C&D) waste material. The legislation requires that the CIWMB complete five items in regards to the diversion of construction and demolition waste: 1) adopt a model ordinance for diverting 50 percent to 75 percent of all construction and demolition debris from landfills; 2) consult with multiple regulators and waste entities (e.g. California State Association of Counties, private and public waste services, building construction materials industry, etc.) during the development of the model ordinance; 3) compile a report on programs that can be implemented to increase diversion of C&D debris; 4) post a report on the agency's website for general contractors on methods that contractors can use to increase diversion of C&D waste materials; 5) post on the agency's website a report for local governments with suggestions on programs to increase diversion of C&D waste materials. The model ordinance was adopted by CalRecycle on March 16, 2004.

### **Assembly Bill 341 – Amendments to the California Integrated Waste Management Act of 1989**

AB 341, adopted on October 6, 2011, amends AB 939 by mandating that jurisdictions meet a solid waste diversion goal of 75 percent by the year 2020, and requires commercial enterprises and public entities that generate four or more cubic yards (cy) per week of solid waste, and multi-family housing complexes with five or more units, to adopt recycling practices that achieve a 75 percent reduction in their waste streams.

### **Assembly Bill 1826 – Organic Recycling**

Effective April 1, 2016, AB 1826 requires businesses that generate more than four cubic yards of organic waste (food, green and non-hazardous wood waste) per week, and multi-family properties with five units or more, to provide separate recycling bins for organic waste, and requires that local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses. Furthermore:

- a) Effective April 1, 2016, all businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services.
- b) Effective January 1, 2017, all businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services.
- c) Effective January 1, 2019, all businesses that generate four cubic yards or more of commercial solid waste per week shall arrange for organic waste recycling services.
- d) Effective January 1, 2020, if statewide disposal of organic waste has not been reduced to 50 percent of the level of disposal during 2014, all businesses that generate two cubic yards or more of commercial solid waste per week shall arrange for organic waste recycling services.

## ***Regional***

The following regional regulations are made applicable to development in Culver City through the City’s SREE and Municipal Code.

### **Countywide Integrated Waste Management Plan**

Pursuant to AB 939, each County is required to prepare and administer a ColWMP, including preparation of an Annual Report. The ColWMP, per AB 939, is to comprise of the various counties’ and cities’ solid waste reduction planning documents, plus an Integrated Waste Management Summary Plan (Summary Plan) and a Countywide Siting Element (CSE). The Summary Plan describes the steps to be taken by local agencies, acting independently and in concert, to achieve the mandated state diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. The County’s Department of Public Works is responsible for preparing and administering the Summary Plan and the CSE. The Summary Plan for the County was approved by CalRecycle on June 23, 1999. The latest CSE was approved by CalRecycle in 2012. An EIR for this document was scheduled to be released for public review in early 2016, but as of March 2016 the document has not been published.

In addition, as part of its regulatory efforts, the County has prepared a long-term master plan which describes how the County will manage solid waste through the year 2050. The 2050 Plan identifies measures to meet the landfill needs over the time horizon and includes such measures as conserving in-County disposal capacity, implementing waste diversion programs, fostering alternatives to landfills, and identifying funding resources to carry out the plan.

## ***Local***

### **Culver City Municipal Code**

The Culver City Municipal Code (CCMC) addresses solid waste management in Chapter 5.01. Section 5.01.010 through 5.01.040 require that: (1) only refuse containers provided or authorized by the City shall be utilized; 2) separate containers are to be provided for Class III solid waste, recyclables, and green waste; 3) new commercial construction ~~contain~~ must have refuse containers within an enclosed container area that is cement paved and enclosed with a six-foot high masonry walls with a six-foot minimum width opaque door for ready removal of the containers; and 4) solid and recycling waste material handling occur per the Environmental Programs and Operation Division’s exclusive franchise for services. Per CCMC Section 5.01.100, City Building and Demolition Permits are issued with the condition that the permittee agrees to abide by the provisions of Chapter 5.01.

## ***Other***

### **Leadership in Energy and Environmental Design**

Leadership in Energy and Environmental Design (LEED) is a rating system devised by the United States Green Building Council (USGBC) to evaluate the environmental performance of a building and encourage market transformation towards sustainable design. The system is credit-based, allowing projects to earn points for environmentally friendly actions taken during construction and use of a building. LEED was launched in an effort to develop a “consensus-based, market-

driven rating system to accelerate the development and implementation of green building practices.” The program is not rigidly structured; not every project must meet identical requirements to qualify.

Many cities and states either provide tax credits or grants for green buildings, or require green building certification for public buildings. The U.S. government is adopting LEED or similar green building standards for the General Services Administration (which owns or leases over 8300 buildings), the U.S. Army, the Department of State, the Department of Energy (DOE), and the U.S. Environmental Protection Agency (USEPA). Numerous states including California, New York, Oregon, and Washington have adopted LEED for public buildings. Many agencies are requiring LEED silver certification as a minimum.

Points for environmentally friendly actions taken during construction of a building can be obtained under LEED by multiple methods. Methods specifically relevant to solid waste include: 1) use of post-consumer salvaged or recycled materials (e.g., crushed concrete masonry from demolished buildings, fly ash, slag cement, etc.) in building construction; and 2) use of materials in construction that can later be recycled should the buildings eventually be demolished.

#### **4.12.3.4 Environmental Impacts**

##### ***Methodology***

The analysis of impacts on solid waste disposal addresses the amount of solid waste that would be generated by the Project and whether sufficient landfill capacity is available to receive that solid waste. The amount of solid waste to be generated by the Project is estimated by applying CalRecycle solid waste generation factors to the proposed land uses, and identifying the net (proposed minus existing) increase in solid waste generation at the Project Site under the Project, taking account the prevailing diversion rate. The availability of existing landfill capacity to accommodate this net increase in solid waste is based on the existing and projected future remaining landfill capacity identified for County landfills in the CoIWMP 2015 Annual Report.

The analysis also addresses the Project’s consistency with policies and programs to increase diversion of solid waste from landfills and increase the recycling of materials in support of sustainability/green growth. Applicable policies and programs are summarized, and their goals and standards are noted. The Project’s characteristics and Project Design Features are reviewed for consistency with those goals and standards.

##### ***Thresholds of Significance***

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact associated with solid waste disposal would occur if the Project were to:

- **SW-1:** Generate solid waste in excess of the permitted capacity of the landfill(s) serving the Project Site.
- **SW-2:** Conflict with federal, state, and local statutes, ordinances, policies, and regulations related to solid waste.

## **Project Characteristics and Project Design Features**

### **Project Characteristics**

Project construction would include demolition of approximately 236,293 square feet of existing buildings, the export of approximately 432,912 cy of excavated soil, and the construction of approximately 649,420 square feet new buildings. A summary of the land uses to be removed, and the new uses to be constructed, is provided in Table 2-2, *Existing Development and Proposed Development Program*, in Chapter 2, Project Description, of this Draft EIR. Construction is anticipated to start in the first quarter of 2018 and be completed in mid-2020.

The long-term operations of the Project assumes continued operation of Culver Studios in a generally similar manner to existing conditions, except: 1) with more emphasis on modern film and television production techniques (digital media, etc.) in place of traditional techniques (e.g., use of film, physical set building, etc.); and 2) in accordance with CCMC Chapter 5.01 and increasingly stringent solid waste diversion and recycling requirements. The changes in use on the Project Site (e.g., going to digital film production) would result in less solid waste generated per square foot of studio space requiring disposal in County landfills, although overall solid waste production would still increase.

As indicated previously, Culver Studios currently implements a site-wide solid waste and recycling program with a centralized trash and recycling area, with trash collection, compaction and recycling activities housed at a single centralized location at the Project Site (e.g., within the bungalow parking lot area). Under the Project, dedicated service zones for trash and recycling activities would instead be provided on the B1 level of the Central parking structure. Two locations, serving Building J and O, and Buildings K and L, would contain area for both trash compaction and storage. Service vehicles would access the B1 level via the service ramp, located adjacent to Gate 3. In addition, a service area adjacent to Building Y would be provided to accommodate bins for trash storage only. If necessary, a location within the Van Buren parking structure could accommodate six bins and provide for both trash compaction and storage.

### **Project Design Features**

There are certain practices and features of the Project that would serve to reduce or avoid environmental impacts. The following Project Design Features (PDFs) would serve to reduce or avoid potential impacts associated with solid waste disposal and have been accounted for in the impact analysis:

**PDF-SW-1 (Solid Waste Diversion):** In accordance with Senate Bill 1374 and Assembly Bills 939 and 341, Project construction will achieve at least a 65 percent solid waste diversion rate until 2020, Project operation will achieve at least a 50 percent solid waste diversion rate until year 2020, and Project construction and operation will achieve at least a 75 percent solid waste diversion rate thereafter, through source reduction, recycling, composting and other methods. Furthermore, in accordance with Assembly Bill 1826, the Project will provide separate recycling bins for organic waste and arrange for organic waste recycling services.

**PDF-SW-2 (Solid Waste Refuse Bins and Enclosed Refuse Areas):** In accordance with the requirements of CCMC Chapter 5.01 and AB 1826, separate Class III solid waste, recyclable, and green waste/organics refuse bins approved by EPO for size and type of containers, and enclosed minimum 6’x 6’ cement-paved refuse areas, will be provided on-site during Project operation, and Project solid and recyclable waste material handling will be in accordance with the EPO’s exclusive franchise for services.

**PDF-SW-3 (Green Building and Sustainability):** The Project will be designed to meet the standards for LEED certification, which identifies and give credit for green building techniques and other sustainability features. Green building practices will be integrated into all building design, construction, and operation. This could potentially include: 1) use of post-consumer recycled materials (e.g., crushed concrete masonry from demolished buildings, fly ash, slag cement, etc.) in building construction; and 2) use of materials in construction that can later be recycled should the buildings eventually be demolished.

**PDF-SW-4 (Demolition Debris Recycling Plan for Construction):** Reasonable efforts will 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 will be provided to the Culver City Building Official prior to the issuance of a demolition permit.<sup>17</sup> The Plan will list the materials to be recycled and the name, address, and phone number of the facility of organization accepting the materials. As required by CCMC Section 5.01.01, EPO or its agents shall be the exclusive hauler of all demolition debris (unless an exemption is granted by EPO, in which case EPO would need to approve the processing and disposal sites along with requires to show proof of disposal vs. recycling of these materials).

**PDF-SW-5 (Trash/Recycling Management Plan for Operations):** The Culver Studios will submit a Trash/Recycling Management Plan (Plan) for studio operations to the City for review and approval. Elements of the Plan will include, but will not necessarily be limited to: 1) projections of Project waste generation by type; 2) calculations of the bin and bin sizes required for each type of waste given the waste generation projections and frequency of collection; 3) plans for the location(s) and type(s) of trash enclosures/trash rooms; and 4) a mechanism for demonstrating over time that the studio is diverting at least 50 percent of its solid waste until 2020 and at least 75 percent thereafter.<sup>18,19</sup>

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<sup>17</sup> This is CPA 6 Condition of Approval 30.

<sup>18</sup> This is based on CPA 6 Condition of Approval 58.

<sup>19</sup> The EPO has indicated that it can assist in providing information for the proposed Trash/Recycling Management Plan for Operations.

## Analysis of Project Impacts

**Threshold SW-1:** The Project would have a significant impact if it would generate solid waste in excess of the permitted capacity of the landfill(s) serving the Project Site.

### Construction

**Impact Statement SW-1A:** While the Project would generate construction and demolition waste during construction, it would comply with the diversion requirements of AB 939 and AB 341, and adequate disposal capacity exists at the County’s C&D disposal sites to accommodate this waste. Therefore, the impact would be less than significant.

Project construction would include the demolition of approximately 236,293 square feet of existing buildings, the export of approximately 432,912 cy of excavated soil, and the construction of approximately 649,420 square feet of new buildings. As indicated in **Table 4.12.3-2, Estimated C&D Solid Waste Generation**, these construction activities would generate an estimated 35,832 tons of inert demolition debris (e.g., concrete, asphalt, metal, wood, glass, plastic, cardboard, etc.), 467,545 tons of exported soil, and 2,465 tons of inert construction debris (e.g., metal, wood, glass, plastic, cardboard, sheetrock, etc.). These estimates are prior to the diversion of Project C&D waste required by SB 1374 and Project Design Features PDF-SW-1 and PDF-SW-4. These estimates also do not reflect any benefits to C&D waste disposal capacity associated with the proposed LEED certification for the Project under Project Design Feature PDF-SW-3 which could potentially include (1) use of post-consumer recycled materials (e.g., crushed concrete masonry from demolished buildings, fly ash, slag cement, etc.) in building construction; and (2) use of materials in construction that can later be recycled should the buildings eventually be demolished.

**TABLE 4.12.3-2  
 FUTURE ESTIMATED C&D SOLID WASTE GENERATION**

Debris Type	Quantity	Generation Factor	Waste Generation (tons)
<b>Site Preparation</b>			
Demolition Material <sup>a</sup>	--	N/A	35,832
Exported Soil	432,912	1 cy = 1.08 tons <sup>a</sup>	467,545
<i>Site Preparation Subtotal</i>	--	--	503,377
<b>Building Construction</b>			
Total New Building Area	1,135,803	1 sf = 0.00217 tons <sup>b</sup>	2,465
<i>Building Subtotal</i>	--	--	2,465
<b>Grand Total</b>	--	--	<b>505,842</b>

Abbreviations: cy = cubic yards; sf = square feet

<sup>a</sup> CalRecycle Diversion Study Guide, <http://www.calrecycle.ca.gov/LGCentral/Library/DSG/ICandD.htm>, Accessed February 24, 2017. Factors converted from 80 lbs/cf to 1.08 tons/cy; and 45 lbs/cf to 0.6075 tons/cy.

<sup>b</sup> Generation factor obtained from U.S. EPA, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003, Page 8. Factor converted from 4.34 lbs/sf for non-residential uses to 0.00217 tons/sf.

SOURCE: ESA PCR, May 2017

The inert solid waste and soil would require disposal at the County's only operating inert landfill (Azusa Land Reclamation) or at any of a number of State-permitted Inert Debris Engineered Fill Operation in the County such as the Arcadia Reclamation Facility where the City of Culver City currently disposes of its inert solid waste. This does not include any asbestos-containing materials (ACMs), lead-based paints (LBPs), polychlorinated biphenyl (PCB), contaminated soil, or other contaminated waste which would be disposed of at facilities licensed to accept such waste (see Section 4.6, Hazards and Hazardous Materials, of this Draft EIR for further discussion).

Per Project Design Feature PDF-SW-1, the Project would divert at least 65 percent of C&D waste in accordance with applicable regulations. Assuming this diversion rate, the Project would generate an estimated 177,045 tons of C&D waste requiring disposal at landfills. As indicated previously, the remaining disposal capacity for the Azusa Land Reclamation Facility is 57.56 million tons. The Project's total solid waste disposal need during construction would represent approximately 0.3 percent of the estimated remaining capacity at the Azusa Facility, not taking even into account the additional capacity provided by the Inert Debris Engineered Fill Operations. Therefore, the County's inert fill landfills would have adequate capacity to accommodate Project-generated inert C&D waste.

Lastly, consistent with Project Design Feature PDF-SW-4, the Project would implement reasonable efforts to reuse and recycling C&D waste and implement a Demolition Debris Recycling Plan during Project construction that lists what C&D waste from Project construction is to be recycled and where this waste is to be sent for processing. As required by CCMC Section 5.01.01, the EPO would haul this material unless an exemption is granted.

Based on the above, construction impacts relative to solid waste would be less than significant.

## Operation

**Impact Statement SW-1B: While the Project would generate a net increase in Class III solid waste during operation, it would comply with the waste diversion requirements of AB 939 and AB 341, and adequate disposal capacity exists at the County's Class III landfills to accommodate this waste. Therefore, the impact would be less than significant.**

The estimated Class III solid waste generation for the Project during operation is shown in **Table 4.12.3-3, Project Operational Class III Solid Waste Generated During Operation**. As indicated therein, it is estimated that the Project would generate a net increase in Class III solid waste generation of 416.82 tons per year. This increase would represent a negligible proportion (approximately 0.004 percent) of the County's 2015 annual Class III solid waste generation total of 9.457 million tons, and a negligible proportion (approximately 0.0004 percent) of the remaining 114 million ton capacity of the County's Class III landfills.<sup>20</sup> These estimates are conservative because they do not take into account the required 50 percent diversion of Project operational solid waste to year 2020 and the required 75 percent diversion required thereafter by Assembly Bills 939 and 341 and Project Design Features PDF-SW-1 and PDF-SW-5. The estimates also do not take into account the reduction set demolition debris to result by converting

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<sup>20</sup> County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2015 Annual Report, published December 2016.

much of the existing television and movie production that currently occurs on-site to digital production methods.

**TABLE 4.12.3-3  
 PROJECT OPERATIONAL CLASS III SOLID WASTE GENERATION**

Land Use	Quantity (sf)	Generation Factor <sup>a</sup>	Solid Waste Generation (lbs./day)	Solid Waste Generation (tons/day)	Solid Waste Generation (tons/year)
<b>Proposed Uses</b>					
New Media Space	639,504	6 lbs/ksf/day	3,837	1.919	700.44
Support <sup>b</sup>	5,572	5 lbs/ksf/day	28	0.014	5.11
Stage	115,600	5 lbs/ksf/day	578	0.138	50.37
<b>Total Proposed</b>	<b>760,676</b>	--	<b>4,443</b>	<b>2.071</b>	<b>755.92</b>
Existing	347,549	--	1,855	0.929	339.10
<b>Net Increase</b>	<b>413,127</b>	--	<b>2,588</b>	<b>1.142</b>	<b>416.82</b>

Abbreviations: sf = square feet; ksf = thousand square feet; lbs. = pounds

<sup>a</sup> Generation factors from the CalRecycle website, Estimated Solid Waste Generation Rates, <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed February 24, 2017. For purposes of the analysis, the CalRecycle light industrial generation factor is applied to the support and stage uses.

<sup>b</sup> Support uses include: machine shops, carpentry shops and planning mills, paint shops, electrical/grips/props, cameras, film processing and cutting rooms, dressing rooms, wardrobe, hair and makeup, the commissary, first aid, storage, and other uses.

SOURCE: ESA PCR, February 2017

In year 2030, approximately five years after the anticipated mid-2020s buildout of the proposed Project, the County expects that cumulative demand for use of the currently available 114 million tons of County Class III disposal capacity would have reached approximately 103 million tons or approximately 90 percent of the remaining capacity.<sup>21</sup> This would leave an available remaining capacity in 2030 of approximately 11 million tons to serve the Project, even without the provision of additional capacity compared to existing conditions, with the Project’s annual Class III solid waste generation representing a negligible proportion (approximately 0.004) of this remaining capacity. With the 75 percent diversion required by PDF-SW-1 starting in year 2020, this percentage would drop to approximately 0.0009 percent.

As noted previously, the Sunshine Canyon Landfill is the primary recipient of Class III solid waste from the County. The maximum daily capacity for this landfill is 12,100 tpd, and the 2015 disposal rate was 6,583 tpd, indicating a residual daily capacity of 5,517 tpd of capacity.<sup>22</sup> If all of the Project’s waste were taken to Sunshine Canyon Landfill, the Project’s respective addition to the daily disposal, 1.142 tons, would represent a negligible (approximately 0.02 percent) amount of this residual daily capacity, assuming no diversion. With the 50 percent diversion required by PDF-SW-1 to year 2020, this percentage would drop to approximately 0.01 percent. Furthermore, as indicated previously, the Sunshine Canyon Landfill has an estimated remaining

<sup>21</sup> Ibid.

<sup>22</sup> Ibid.

life expectancy of 22 years meaning that, should Project solid waste be diverted to this landfill, the landfill would still continue to operate for several more decades at least.

As noted previously, Class III solid waste from the City is currently disposed at both the Chiquita Canyon and Simi Valley Landfills. Under the current “Clean Hands” waiver, the Chiquita Canyon Landfill currently has a maximum permitted disposal capacity of 10,000 tpd, and in 2015 had an average daily disposal of 3,446 tpd, indicating a residual disposal capacity of 6,554 tpd (assuming approval of the landfill expansion currently in process).<sup>23</sup> The Simi Valley Landfill currently has a permitted maximum disposal capacity of 9,250 tpd, in 2015 had an average daily disposal of 3,014 tpd, indicating a residual disposal capacity of 6,236 tpd.<sup>24</sup> Assuming that the Class III solid waste from the Project were distributed to these two landfills in the same proportions as the City’s solid waste as a whole is currently distributed (e.g., 11.5 percent at Chiquita Canyon and 88.5 percent at Simi Valley), the Project would result in an increase in disposal of 0.131 tpd at Chiquita Canyon and 1.011 tpd at Simi Valley. These increases would represent negligible (0.002 and 0.016 percent, respectively) amounts of the residual daily capacity at these landfills assuming no diversion. With the 50 percent diversion required by Project Design Features PDF-SW-1 and PDF-SW-5 to year 2020, these percentages would drop to 0.001 and 0.008 percent, respectively, and these percentages would drop even further starting in 2020 with the 75 percent reduction required by PDF-SW-1. Furthermore, as indicated previously, the Chiquita Canyon Landfill has an estimated remaining life expectancy of 45 years (assuming approval of the landfill expansion currently in process), while the Simi Canyon Landfill has an estimated remaining life expectancy of 35 years, such that both of these landfills will continue to operate for several more decades at least.

As described in the CoIWMP 2015 Annual Report, future disposal needs over the next 15-year planning horizon (2030) would be adequately met through the use of in-County and out-of-County facilities through a number of strategies that would be carried out over the years. 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.

Based on the above, Project operation would not generate Class III solid waste in sufficient quantities to substantially reduce the County’s existing estimated landfill capacity or otherwise limit the County’s ability to address ongoing landfill capacity needs via existing capacity and other options for increasing capacity. Therefore, impacts on solid waste disposal from Project operations would be less than significant.

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**Threshold SW-2:** The Project would have a significant impact if it would conflict with federal, state, and local statutes, ordinances, policies, and regulations related to solid waste.

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<sup>23</sup> Ibid.

<sup>24</sup> CalRecycle, Facility/Site Summary Details, Simi Valley Landfill, <http://www.calrecycle.ca.gov/SWFacilities/Directory/56-AA-007/Detail/>. Accessed March 1, 2017.

**Impact Statement SW-2: The Project would be implemented in compliance with all applicable regulatory requirements regarding diversion and recycling of landfill materials and efficient use of County landfill facilities. Thus, impacts would be less than significant.**

The Project would comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling, as summarized above in the Regulatory Framework and Project Characteristics and Project Design Features subsections. In accordance with Senate Bill 1374 and Assembly Bills 939 and 341, and as required by Project Design Features PDF-SW-1, PDF-SW-4 and PDF-SW-5, Project construction and operation would achieve at least a 50 percent solid waste diversion rate until year 2020, and at least a 75 percent solid waste diversion rate thereafter, through source reduction, recycling, composting and other methods. In accordance with Culver City Municipal Code Section 5.01, and as required by Project Design Features PDF-SW-2 and PDF-SW-5, separate Class III solid waste, recyclable, and green waste refuse bins and enclosed cement-paved refuse areas would be provided on-site during Project operation. Furthermore, as required by Project Design Feature PDF-SW-3, the Project would be designed to meet the requirements of LEED certification, and this could potentially include: 1) use of post-consumer recycled materials (e.g., crushed concrete masonry from demolished buildings, fly ash, slag cement, etc.) in building construction; and 2) use of materials in construction that can later be recycled should the buildings eventually be demolished. In addition, consistent with the City's standard conditions of approval, it is anticipated that the Project would be required to implement reasonable efforts to reuse and recycling C&D waste and implement a Demolition Debris recycling Plan that lists what C&D waste from Project construction is to be recycled and where this waste is to be sent for processing.

Lastly, the Project would include a City-approved Demolition Debris Recycling Plan during construction and a Trash/Recycling Management Plan during operation as required by Project Design Features PDF-SW-4 and PDF-SW-5, respectively, and the EPO would haul this material in unless an exemption is granted in accordance with CCMC Section 5.01.01.<sup>25</sup> Therefore, the Project would comply with applicable solid waste regulatory requirements, and the impact would be less than significant.

**Cumulative Impacts**

Cumulative impacts associated with disposal of solid waste on landfill facilities are a regional issue addressed by regional agencies, in this case the County of Los Angeles in the CoIWMP. County planning for future landfill capacity addresses expected cumulative demand over 15-year planning increments. The CoIWMP 2015 Annual Report anticipates that County population growth will increase from approximately 10.17 million to approximately 11.18 million between years 2015 and 2030 (a 9.0 percent increase), and that employment will increase from approximately 4.32 million to approximately 4.93 million (a 12.4 percent increase) during the same period.<sup>26</sup>

<sup>25</sup> City of Culver City, Project Review Committee Comments on The Culver Studios Innovation Plan, March 10, 2017.

<sup>26</sup> County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan 2015 Annual Report, published December 2016.

With regard to future construction solid waste generation from new development, the Project analysis above indicates that the Project's contribution to cumulative impacts would include 467,545 tons of exported soil, 35,832 tons of construction and demolition debris, and 2,465 tons of building construction debris, for a combined total of 505,842 tons of C&D waste, or 177,045 tons after accounting for 65 percent mandatory diversion. The 56 related projects identified in Table 3-1 in Chapter 3.0 of this Draft EIR would also contribute to the generation of C&D waste. All of the related projects would be subject to the same SB 1374 C&D waste diversion and recycling requirements as the proposed Project. Furthermore, all of the related projects would have the same options for disposal as the proposed Project (e.g., the County's Azusa Land Reclamation landfill or one of the State-permitted Inert Debris Engineered Fill Operation facilities in the County). As indicated above, the remaining disposal capacity for the Azusa Land Reclamation facility is 57.56 million tons and the Department of Public Works estimates that the remaining life span of the Azusa Land Reclamation is 189 years. Given this future capacity, independent of the additional capacity at the State-permitted Inert Debris Engineered Fill Operation facilities in the County, it is expected that all C&D waste from the Project and the related project would be able to be accommodated at the Azusa Land Reclamation facility, and thus the cumulative construction-related solid waste impact would be less than significant.

With regard to future operational solid waste generation from new development, the solid waste from the 56 related project and the proposed Project would together contribute to the overall County-wide demand for Class III solid waste disposal capacity. As shown in **Table 4.12.3-4, Cumulative Operational Solid Waste Generation**, the estimated Class III solid waste requiring landfill disposal for the 56 related projects plus the proposed Project, would be 5,947 tons per year. This would represent negligible amounts (approximately 0.005 percent and 0.05 percent, respectively) of the County's existing (114 million tons) and projected future 2030 (11 million tons) remaining Class III disposal capacity. Therefore, the County has sufficient existing and projected future Class III solid waste disposal capacity to serve the related projects plus the proposed Project, and the cumulative operational solid waste impact would be less than significant.

**TABLE 4.12.3-4  
 CUMULATIVE OPERATIONAL SOLID WASTE GENERATION**

Land Use	Quantity	Generation Factor <sup>a</sup>	Solid Waste Generation (lbs./day)	Solid Waste Generation (tons/day)	Solid Waste Generation (tons/year)
Residential	2,308 du	7 lbs/du/day <sup>b</sup>	16,163	8.08	2,949
Assisted Living	110 beds	5 lbs/bed/day	550	0.28	102
Commercial	681,930 sf	6 lbs/ksf/day	4,092	2.05	748
Office	1,181,010 sf	6 lbs/ksf/day	7,086	3.54	1,292
Restaurant	95,720 sf	5 lbs/ksf/day	479	0.24	88
Hotel	148 rms	2 lbs/room/day	296	0.15	55
Manufacturing/Warehouse	0 sf	14.2 lbs/ksf/day	0	0	0
Industrial	0 sf	5 lbs/ksf/day	0	0	0
Theater	4,000 sf	5 lbs/ksf/day	20	0.01	4
Theater	200 seat	0.5 lbs/seat/day	100	0.05	18
School	225 stu	1.0 lbs/stu/day	225	0.11	40
College	92,000 sf	7 lbs/ksf/day	644	0.32	117
Museum	1,260,000 sf	0.5 lbs/ksf/day	630	0.32	117
Light Rail Station Expansion	1 station	c	c	c	c
Park	4 ac	c	c	c	c
<b>Subtotal</b>	--	--	<b>30,285</b>	<b>15.15</b>	<b>5,530</b>
<b>Proposed Project</b>	--	--	<b>2,588</b>	<b>1.14</b>	<b>417</b>
<b>Total</b>			<b>32,873</b>	<b>16.29</b>	<b>5,947</b>

du = dwelling units; sf = square feet; rms = rooms; ksf = thousand square feet; ac = acres; stu = students; lbs. = pounds

<sup>a</sup> Generation factors from the CalRecycle website, Estimated Solid Waste Generation Rates, <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed February 24, 2017. For purposes of the analysis, the CalRecycle light industrial generation factor is applied to the support and stage uses.

<sup>b</sup> Because the related projects list does not differentiate between single-family and multi-family residential units, and because CalRecycle identifies to different solid waste generation factors for these units (e.g., 10 lbs/unit/day for single-family and 4 lbs/unit/day for multi-family), this table uses an average of the two generation factors (e.g., 7lbs/unit/day).

<sup>c</sup> CalRecycle does not identify solid waste generation factors for light rail stations and parks.

SOURCE: ESA PCR, April 2017

The above analysis is conservative because: (1) some proportion of the related projects have already been accounted for in the growth projections and associated solid waste generation projections in the 2015 CoIWMP Annual Report; and (2) the analysis does not account for required solid waste diversion and recycling which is currently 50 percent and will reach 75 percent by 2020.

### 4.12.3.5 Mitigation Measures

No mitigation measures are required, as impacts would be less than significant with compliance with regulatory requirements and the proposed Project Design Features related to solid waste disposal and recycling.

### **4.12.3.6 Level of Significance after Mitigation**

Not applicable. Project-specific and cumulative impacts related to solid waste disposal would be less than significant.

## 4.2 Air Quality

### 4.2.1 Introduction

This section addresses air emissions generated by construction and operation of the Project. The analysis also addresses consistency of the Project with air quality policies set forth within the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), and the City of Culver<sup>1</sup>. The analysis of Project-generated air emissions focuses on whether the Project would cause an exceedance of an ambient air quality standard or a SCAQMD significance threshold. Details regarding the air quality analysis are provided in the Air Quality Technical Report in Appendix C of this Draft EIR.

### 4.2.2 Environmental Setting

#### Existing Conditions

##### *Regional Context*

##### **Criteria Pollutants**

The Project Site is located within the South Coast Air Basin (Air Basin), which is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Air Basin consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside counties, in addition to the San Geronio Pass area in Riverside County. The terrain and geographical location determine the distinctive climate of the Air Basin, as it is a coastal plain with connecting broad valleys and low hills.

The Air Basin lies in the semi-permanent high-pressure zone of the eastern Pacific Ocean. The usually mild climatological pattern is interrupted by periods of hot weather, winter storms, or Santa Ana winds. The extent and severity of pollutant concentrations in the Air Basin is a function of the area's natural physical characteristics (weather and topography) and man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential. The Air Basin's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of ozone, which is a secondary pollutant that forms through photochemical reactions in the atmosphere. Thus, the greatest air pollution impacts throughout the Air Basin typically occur from June through September. This condition is generally attributed to the emissions occurring in the Air Basin, light winds, and shallow vertical atmospheric mixing. These factors reduce the potential for pollutant dispersion causing elevated air pollutant levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day.

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<sup>1</sup> The Culver City General Plan does not have an Air Quality Element, however, in the General Plan's Circulation Element are measures and policies that encourage use of alternative modes of transportation that would reduce single occupancy vehicles and VMT. Project consistency with the VMT-reducing (and thus air pollution emissions reducing) aspects of these policies is evaluated in the impact analysis later in this section.

Concentrations of ozone, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert.

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the United States Environmental Protection Agency (USEPA) and are subject to emissions control requirements adopted by federal, state and local regulatory agencies. These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, which have been adopted for them. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for each of the monitored pollutants and their effects on health are summarized in **Table 4.2-1, *Ambient Air Quality Standards***. The NAAQS and CAAQS have been set at levels considered safe to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. A brief description of the health effects of these criteria air pollutants are provided below.

**Ozone (O<sub>3</sub>):** Ozone is a secondary pollutant formed by the chemical reaction of volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>) under favorable meteorological conditions such as high temperature and stagnation episodes. Ozone concentrations are generally highest during the summer months, when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of ozone irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower the lung efficiency.

**Volatile Organic Compounds (VOCs):** VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids. Some VOCs are also classified by the State as toxic air contaminants (TACs). These are compounds comprised primarily of atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons, as are architectural coatings. Emissions of VOCs themselves are not “criteria” pollutants; however, they contribute with nitrogen oxides (NO<sub>x</sub>) to formation of O<sub>3</sub> and are regulated as O<sub>3</sub> precursor emissions.

**Nitrogen Dioxide (NO<sub>2</sub>) and Nitrogen Oxides (NO<sub>x</sub>):** NO<sub>x</sub> is a term that refers to a group of compounds containing nitrogen and oxygen. The primary compounds of air quality concern include NO<sub>2</sub> and nitric oxide (NO), which can quickly oxidize in the atmosphere to form NO<sub>2</sub>. Ambient air quality standards have been promulgated for NO<sub>2</sub>, which is a reddish-brown, reactive gas. The principle form of NO<sub>x</sub> produced by combustion is NO, but NO reacts quickly in the atmosphere to form NO<sub>2</sub>, creating the mixture of NO and NO<sub>2</sub> referred to as NO<sub>x</sub>. Major sources of NO<sub>x</sub> emissions include power plants, large industrial facilities, and motor vehicles. Emissions

of NO<sub>x</sub> are a precursor to the formation of ground-level ozone. NO<sub>2</sub> can potentially irritate the nose and throat, aggravate lung and heart problems, and may increase susceptibility to respiratory infections, especially in people with asthma. According to the California Air Resources Board (CARB), “NO<sub>2</sub> is an oxidizing gas capable of damaging cells lining the respiratory tract. Exposure to NO<sub>2</sub> along with other traffic-related pollutants, is associated with respiratory symptoms, episodes of respiratory illness and impaired lung functioning. Studies in animals have reported biochemical, structural, and cellular changes in the lung when exposed to NO<sub>2</sub> above the level of the current state air quality standard. Clinical studies of human subjects suggest that NO<sub>2</sub> exposure to levels near the current standard may worsen the effect of allergens in allergic asthmatics, especially in children.”<sup>2</sup> NO<sub>2</sub> also contributes to the formation of particulate matter (PM<sub>10</sub>). The terms “NO<sub>x</sub>” and “NO<sub>2</sub>” are sometimes used interchangeably. However, the term “NO<sub>x</sub>” is primarily used when discussing emissions, usually from combustion-related activities. The term “NO<sub>2</sub>” is primarily used when discussing ambient air quality standards. More specifically, NO<sub>2</sub> is regulated as a criteria air pollutant under the Clean Air Act and subject to the ambient air quality standards, whereas NO<sub>x</sub> and NO are not. In cases where the thresholds of significance or impact analyses are discussed in the context of NO<sub>x</sub> emissions, it is based on the conservative assumption that all NO<sub>x</sub> emissions would oxidize in the atmosphere to form NO<sub>2</sub>.

**Carbon Monoxide (CO):** CO is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions, lower the amount of oxygen carried by the blood, and are especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations, and can be fatal at high concentrations.

**Sulfur Dioxide (SO<sub>2</sub>):** Major sources of SO<sub>2</sub> include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of SO<sub>2</sub> aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO<sub>2</sub> potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO<sub>2</sub>, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

**Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>):** The human body naturally prevents the entry of larger particles into the body. However, small particles including fugitive dust, with an aerodynamic diameter equal to or less than 10 microns (PM<sub>10</sub>) and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns (PM<sub>2.5</sub>), can enter the body and are trapped in the nose, throat, and upper respiratory tract. These small particulates could potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM<sub>10</sub> and PM<sub>2.5</sub>. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids. In children,

<sup>2</sup> California Air Resources Board, “Nitrogen Dioxide – Overview,” <http://www.arb.ca.gov/research/aaqs/caaqs/no2-1/no2-1.htm>. Accessed March 2017.

studies have shown associations between PM exposure and reduced lung function and increased respiratory symptoms and illnesses.<sup>3</sup>

**Lead (Pb):** Lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting or processing of lead is the primary source of lead emissions. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

**TABLE 4.2-1  
 AMBIENT AIR QUALITY STANDARDS**

Pollutant	Average Time	California Standards <sup>a</sup>		National Standards <sup>b</sup>		
		Concentration <sup>c</sup>	Method <sup>d</sup>	Primary <sup>e,e</sup>	Secondary <sup>e,f</sup>	Method <sup>g</sup>
O <sub>3</sub> <sup>h</sup>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )		0.070 ppm (137 µg/m <sup>3</sup> )		
NO <sub>2</sub> <sup>i</sup>	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	Gas Phase Chemi- luminescence	100 ppb (188 µg/m <sup>3</sup> )	None	Gas Phase Chemi- luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )		53 ppb (100 µg/m <sup>3</sup> )	Same as Primary Standard	
CO	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m <sup>3</sup> )	None	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		—	—	
SO <sub>2</sub> <sup>j</sup>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	75 ppb (196 µg/m <sup>3</sup> )	—	Ultraviolet Fluorescence; Spectrophotometr y (Pararosaniline Method) <sup>9</sup>
	3 Hour	—		—	0.5 ppm (1300 µg/m <sup>3</sup> )	
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>j</sup>	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) <sup>j</sup>	—	

<sup>3</sup> California Air Resources Board, “Particulate Matter – Overview,”  
<http://www.arb.ca.gov/research/aaqs/caaqs/pm/pm.htm>. Accessed May 2017.

Pollutant	Average Time	California Standards <sup>a</sup>		National Standards <sup>b</sup>		
		Concentration <sup>c</sup>	Method <sup>d</sup>	Primary <sup>e,e</sup>	Secondary <sup>e,f</sup>	Method <sup>g</sup>
PM <sub>10</sub> <sup>k</sup>	24 Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		—		
PM <sub>2.5</sub> <sup>k</sup>	24 Hour	No Separate State Standard		35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	12.0 µg/m <sup>3</sup> k		
Lead <sup>l,m</sup>	30 Day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	—	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m <sup>3</sup> (for certain areas) <sup>m</sup>		
	Rolling 3-Month Average <sup>m</sup>	--		0.15 µg/m <sup>3</sup>		
Visibility Reducing Particles <sup>n</sup>	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards		
Sulfates (SO <sub>4</sub> )	24 Hour	25 µg/m <sup>3</sup>	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence			
Vinyl Chloride <sup>l</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chromatography			

- a California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- b National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM<sub>10</sub>, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms/per cubic meter (µg/m<sup>3</sup>) is equal to or less than one. For PM<sub>2.5</sub>, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.
- c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- d Any equivalent procedure which can be shown to the satisfaction of the California Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.
- e National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- f National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- g Reference method as described by the USEPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the USEPA.
- h On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- i To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb.

Pollutant	Average Time	California Standards <sup>a</sup>		National Standards <sup>b</sup>		
		Concentration <sup>c</sup>	Method <sup>d</sup>	Primary <sup>e,e</sup>	Secondary <sup>e,f</sup>	Method <sup>g</sup>
j	On June 2, 2010, a new 1-hour SO <sub>2</sub> standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO <sub>2</sub> national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.					
k	On December 14, 2012, the national annual PM <sub>2.5</sub> primary standard was lowered from 15 µg/m <sup>3</sup> to 12.0 µg/m <sup>3</sup> .					
l	The California Air Resources Board has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.					
m	The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m <sup>3</sup> as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.					
n	In 1989, the California Air Resources Board converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.					
SOURCE: CARB, Ambient Air Quality Standards (10/11/15), <a href="http://www.arb.ca.gov/research/aaqs/aaqs2.pdf">http://www.arb.ca.gov/research/aaqs/aaqs2.pdf</a> . Accessed June 2017.						

**Air Toxics**

In addition to criteria pollutants, the SCAQMD periodically assesses levels of toxic air contaminants (TACs) in the Air Basin. A TAC is defined by California Health and Safety Code Section 39655:

*Toxic air contaminant” means an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412(b)) is a toxic air contaminant.*

Between July 2012 and June 2013, the SCAQMD conducted the Multiple Air Toxics Exposure Study (MATES IV), which is a follow-up to previous air toxics studies conducted in the Air Basin. The MATES IV Final Report was issued in May 2015. The study, based on actual monitored data throughout the Air Basin, consisted of several elements. These included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Air Basin from exposure to TACs. The study applied a two-kilometer (1.24-mile) grid over the Air Basin and reported carcinogenic risk within each grid space (covering an area of four square kilometers or 1.54 square miles). The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Air Basin equates to a background cancer risk of approximately 418 in 1,000,000 primarily due to diesel exhaust, which is about 65 percent lower than the previous MATES III cancer risk. <sup>4</sup> Subsequent to the SCAQMD’s risk calculations estimates performed for MATES IV, the California Environmental Protection Agency Office of Environmental Health Hazard Assessment (OEHHA) updated the methods for estimating cancer risks.<sup>5</sup> The updated method utilizes higher

<sup>4</sup> South Coast Air Quality Management District, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, (2015) ES-2.  
<sup>5</sup> California Environmental Protection Agency, Office of Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, (2015).

estimates of cancer potency during early life exposures and uses different assumptions for breathing rates and length of residential exposures. When combined together, SCAQMD staff estimates that risks for the same inhalation exposure level will be about 2.5 to 2.7 times higher using the updated methods. This would be reflected in the average lifetime air toxics risk estimated from the monitoring sites data going from 418 per million to 1,023 per million.<sup>6</sup> Under the updated OEHHA methodology, adopted in March of 2015, the relative reduction in risk from the MATES IV results compared to MATES III would be the same (about 65 percent).

Approximately 68 percent of the risk is attributed to diesel particulate emissions, approximately 22 percent to other toxics associated with mobile sources (including benzene, butadiene, and formaldehyde), and approximately 10 percent of all airborne carcinogenic risk is attributed to stationary sources (which include industries and other certain businesses, such as dry cleaners and chrome plating operations).<sup>7</sup> The study also found lower ambient concentrations of most of the measured air toxics compared to the levels measured in the previous study conducted during 2004 and 2006. Specifically, benzene and 1,3-butadiene, pollutants generated mainly from vehicles, were down 35 percent and 11 percent, respectively.<sup>8</sup> The reductions were attributed to air quality control regulations and improved emission control technologies. In addition to air toxics, MATES IV included continuous measurements of black carbon and ultrafine particles (particles smaller than 0.1 microns in size), which are emitted by combustion of diesel fuels. Sampling sites located near heavily-trafficked freeways or near industrial areas were characterized by increased levels of black carbon and ultrafine particles compared to more rural sites.

As part of the MATES IV, the SCAQMD prepared maps that show regional trends in estimated outdoor inhalation cancer risk from toxic emissions, as part of an ongoing effort to provide insight into relative risks. The maps represent the estimated number of potential cancers per million people associated with a lifetime of breathing air toxics (24 hours per day outdoors for 70 years). The Project Site has a background potential cancer risk estimated at 1,138 per million (compared to an overall South Coast Air Basin-wide risk of 1,023 per million).<sup>9</sup> Generally, the risk from air toxics is lower near the coastline: it increases inland, with higher risks concentrated near diesel sources (e.g., freeways, airports, and ports).

## ***Local Air Quality***

### **Existing Criteria Pollutants Levels at Nearby Monitoring Stations**

The SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. The Project Site is located in SCAQMD Source Receptor Area (SRA) 2; therefore, the monitoring station most representative of the Project Site is the Northwest Coastal LA County Monitoring Station which is approximately 4 miles west of the Project Site. Criteria pollutants monitored at this station include ozone, NO<sub>2</sub>,

<sup>6</sup> South Coast Air Quality Management District, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, (2015) 2-11.

<sup>7</sup> Ibid. ES-2.

<sup>8</sup> South Coast Air Quality Management District, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, (2015) 6-1.

<sup>9</sup> South Coast Air Quality Management District, Multiple Air Toxics Exposure Study, MATES IV Carcinogenic Risk Interactive Map, <http://www.aqmd.gov/home/library/air-quality-data-studies/health-studies/mates-iv>. Accessed May 2016.

and CO. The Southwest Coastal LA County Monitoring Station, approximately 8 miles south of the Project Site was used to report data for SO<sub>2</sub>, lead, and PM<sub>10</sub>. The Central LA station, approximately 8 miles east of the Project Site, was used for PM<sub>2.5</sub> monitoring data. The most recent data available from the SCAQMD for these monitoring stations are from years 2010 to 2015. The pollutant concentration data for these years are summarized in **Table 4.2-2, Ambient Air Quality Data.**

**TABLE 4.2-2  
 AMBIENT AIR QUALITY DATA**

<b>Pollutant/Standard</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>
<b>O<sub>3</sub> (1-hour)</b>						
Maximum Concentration (ppm)	0.099	0.098	0.093	0.088	0.116	0.102
Days > CAAQS (0.09 ppm)	2	0	0	0	1	2
<b>O<sub>3</sub> (8-hour)</b>						
Maximum Concentration (ppm)	0.078	0.065	0.073	0.075	0.094	0.072
4 <sup>th</sup> High 8-hour Concentration (ppm)	0.069	0.068	0.065	0.059	0.077	0.069
Days > CAAQS (0.070 ppm)	4	0	1	0	6	3
Days > NAAQS (0.075 ppm)	1	0	0	0	4	0
<b>NO<sub>2</sub> (1-hour)</b>						
Maximum Concentration (ppm)	0.071	0.081	0.061	0.051	0.064	0.068
98 <sup>th</sup> Percentile Concentration (ppm)	0.057	0.058	0.054	0.049	0.054	0.049
<b>NO<sub>2</sub> (Annual)</b>						
Annual Arithmetic Mean (0.030 ppm)	0.016	0.014	0.014	0.015	0.013	0.012
<b>CO (1-hour)</b>						
Maximum Concentration (ppm)	2.0	--	--	--	2.0	1.6
<b>CO (8-hour)</b>						
Maximum Concentration (ppm)	1.4	1.3	1.4	1.3	1.3	1.4
<b>SO<sub>2</sub> (1-hour)</b>						
Maximum Concentration (ppm)	0.026	0.012	0.005	0.010	0.015	0.015
99 <sup>th</sup> Percentile Concentration (ppm)	--	0.008	0.005	0.007	0.009	0.007
<b>SO<sub>2</sub> (24-hour)</b>						
Maximum Concentration (ppm)	0.035	--	--	--	--	--
<b>PM<sub>10</sub> (24-hour)</b>						
Maximum Concentration (µg/m <sup>3</sup> )	37	41	31	38	46	43
Samples > CAAQS (50 µg/m <sup>3</sup> )	0	0	0	0	0	0
Samples > NAAQS (150 µg/m <sup>3</sup> )	0	0	0	0	0	0
<b>PM<sub>10</sub> (Annual Average)</b>						
Annual Arithmetic Mean (20 µg/m <sup>3</sup> )	20.6	21.7	19.8	20.8	22.0	21.2
<b>PM<sub>2.5</sub> (24-hour)</b>						
Maximum Concentration (µg/m <sup>3</sup> )	39.2	49.3	58.7	43.1	59.9	56.4
98 <sup>th</sup> Percentile Concentration (µg/m <sup>3</sup> )	27.1	31.5	31.8	29.0	34.5	38.0
Samples > NAAQS (35 µg/m <sup>3</sup> )	2	4	4	1	6	7
<b>PM<sub>2.5</sub> (Annual)</b>						
Annual Arithmetic Mean (12 µg/m <sup>3</sup> )	11.9	13.00	12.55	11.95	12.36	12.38
<b>Lead</b>						
Maximum 30-day average (µg/m <sup>3</sup> )	0.010	0.008	0.005	0.005	0.008	0.008

ppm = parts per million; µg/m<sup>3</sup> = micrograms per cubic meter

SOURCE: SCAQMD, 2017

## Existing Project Site Emissions

The Studio Campus houses the headquarters of The Culver Studios as well as 14 sound stages and support facilities leased for use on a short-term basis.

The Studio Campus operates 24 hours per day, with the majority of current operations, including office operations, shooting, editorial, writing, and screenings, as well as transportation returning from local location shoots, typically occurring between 6:00 A.M. and 10:00 P.M. Although daily operations can vary considerably depending on scheduled activities, typically production company employees arrive, stages are opened, and crews prepare for shoots on the stages beginning at 4:00 A.M.; the Studio Campus gates open at 6:00 A.M.; office employees arrive between 8:00 A.M. and 10:00 A.M.; and visitors arrive beginning at 8:00 A.M. and continue throughout the day. Office employees typically leave at 5:00 P.M.; production companies conclude activities and stages are locked at 11:00 P.M.

Outdoor activities including but not limited to shoots, concerts, and outdoor dining, as well as periodic special events, also take place on the Studio Campus on the Front Lawn and Rear Lawn and in the central courtyard (the Central Courtyard). All outdoor events currently end by 10:00 P.M.

Emissions are estimated using the California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas 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.<sup>10</sup> Building electricity and natural gas usage rates are adjusted to account for prior Title 24 Building Energy Efficiency Standards.<sup>11</sup> Mobile source emissions are estimated based on CARB's updated version of the on-road vehicle emissions factor (EMFAC) model. The most recent version is EMFAC2014, which "represents ARB's current understanding of motor vehicle travel activities and their associated emission levels."<sup>12</sup> The current site usage generates air quality emissions from vehicle trips to the Project site and daily studio operations activities at the site. The Project would remove portions of the existing buildings and their associated emissions. **Table 4.2-3, *Estimated Existing Site Emissions***, identifies the emissions from the Project Site's existing usage and emissions removed due to the Project. The emissions removed from the existing conditions will be applied as a credit and will be subtracted from the Project's overall operational emissions. As shown, the primary source of emissions is from transportation.

<sup>10</sup> See: <http://www.caleemod.com>.

<sup>11</sup> California Air Resources Board, CalEEMod User's Guide, Appendix F, Section 5, July 2013, <http://caleemod.com/>. Accessed November 2015. Factors for the prior Title 24 standard are extrapolated based on the technical source documentation.

<sup>12</sup> California Air Resources Board, Mobile Source Emissions Inventory, <http://www.arb.ca.gov/msei/categories.htm#emfac2014>. Accessed April 2016.

**TABLE 4.2-3  
 ESTIMATED EXISTING SITE EMISSIONS (POUNDS PER DAY)<sup>a</sup>**

Source	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM10	PM2.5
<b>Existing Site Emissions</b>						
Area	7	<1	<1	0	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	4	21	57	<1	14	4
<b>Total</b>	<b>12</b>	<b>21</b>	<b>57</b>	<b>&lt;1</b>	<b>14</b>	<b>4</b>
<b>Existing Site Emissions Removed</b>						
Area	5	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Motor Vehicles	3	15	40	<1	10	3
<b>Total</b>	<b>8</b>	<b>15</b>	<b>40</b>	<b>&lt;1</b>	<b>10</b>	<b>3</b>

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C-1.

SOURCE: ESA PCR, August 2017

### Sensitive Receptors and Locations

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others. Sensitive land uses include the following:

- Residences immediately south, east, and west of the Project Site;
- Linwood E. Howe Elementary School approximately 300 feet to the southwest;

All other air quality sensitive receptors are located at greater distances from the Project Site, and would be less impacted by Project emissions. Impacts are quantified for the sensitive receptors listed here.

### 4.2.3 Regulatory Framework

A number of statutes, regulations, plans, and policies have been adopted that address air quality issues. The Project is subject to air quality regulations developed and implemented at the federal, state, and local levels. This section provides a summary of pertinent air quality regulations affecting the Project at the federal, state, and local levels.

#### Federal

The Clean Air Act (CAA) of 1963 was the first federal legislation regarding air pollution control and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, USEPA is responsible for implementation of certain

portions of the CAA including mobile source requirements. Other portions of the CAA, such as stationary source requirements, are implemented by state and local agencies.

The CAA establishes federal air quality standards and specifies future dates for achieving compliance. The CAA also mandates that the state submit and implement a State Implementation Plan (SIP) for areas not meeting these standards. SIPs must include pollution control measures that demonstrate how the NAAQS will be met. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA which are most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

Title I requirements are implemented for the purpose of attaining NAAQS for the following criteria pollutants: O<sub>3</sub>; NO<sub>2</sub>; CO; SO<sub>2</sub>; PM<sub>10</sub>; and lead. The NAAQS were amended in July 1997 to include an 8-hour standard for O<sub>3</sub> and to adopt a NAAQS for PM<sub>2.5</sub>. The NAAQS were also amended in September 2006 to include an established methodology for calculating PM<sub>2.5</sub> as well as revoking the annual PM<sub>10</sub> threshold.

Table 4.2-1 shows the NAAQS currently in effect for each criteria pollutant. The Project is located within an area designated as non-attainment because it does not currently meet NAAQS for the 8-hour ozone, PM<sub>2.5</sub>, and one area of the Air Basin for lead. The violation was based on 2007-2009 air quality monitoring data near lead-acid battery recycling facilities in the City of Vernon and City of Industry.<sup>13</sup> The lead-acid battery recycling industry is the main source of lead emissions in Los Angeles County, all other ambient measurements of lead across the county are well below the 2008 standard.<sup>14</sup> In 2012, a state implementation plan was introduced with strategies and pollution control activities that would be necessary to demonstrate attainment of the lead NAAQS. In addition to criteria pollutants, Title I also includes air toxics provisions which require the USEPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112, the USEPA establishes National Emission Standards for Hazardous Air Pollutants (NESHAPs). The list of hazardous air pollutants (HAPs), or air toxics, includes specific compounds that are known or suspected to cause cancer or other serious health effects.

Title II of the CAA pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have strengthened in recent years to improve air quality. For example, the standards for NO<sub>x</sub> emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent.

<sup>13</sup> South Coast Air Quality Management District, 2017. Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 2012. <http://www3.aqmd.gov/hb/attachments/2011-2015/2012May/2012-May4-030.pdf>

<sup>14</sup> Ibid.

## State

### **California Clean Air Act**

The California Clean Air Act, signed into law in 1988, requires all areas of the State to achieve and maintain the California Ambient Air Quality Standards by the earliest practical date. The CAAQS apply to the same criteria pollutants as the federal Clean Air Act but also include State-identified criteria pollutants, which include sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride. The California Air Resources Board has primary responsibility for ensuring the implementation of the California Clean Air Act,<sup>15</sup> responding to the federal Clean Air Act planning requirements applicable to the state, and regulating emissions from motor vehicles and consumer products within the state. Table 4.2-1 shows the CAAQS currently in effect for each of the criteria pollutants as well as the other pollutants recognized by the state. As shown in Table 4.2-1, the CAAQS include more stringent standards than the NAAQS for most of the criteria air pollutants. Currently CO, NO<sub>2</sub>, SO<sub>2</sub>, and PM<sub>10</sub> are in attainment for NAAQS, however PM<sub>10</sub> is designated at non-attainment for CAAQS. Ozone and PM<sub>2.5</sub> are designated as non-attainment for NAAQS and CAAQS. Lead is designated as attainment for CAAQS. For NAAQS, lead is designated as non-attainment for a portion of Los Angeles County due to lead-acid battery recycling facilities, however, all other ambient air monitoring stations beyond these facilities have levels lower than the 2008 standard.

Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. **Table 4.2-4, South Coast Air Basin Attainment Status (Los Angeles County)**, provides a summary of the attainment status of the Los Angeles County portion of the Air Basin with respect to the state standards. The Air Basin is designated as attainment for the California standards for sulfates and unclassified for hydrogen sulfide and visibility-reducing particles. Because vinyl chloride is a carcinogenic toxic air contaminant, CARB does not classify attainment status for this pollutant.

### **California Air Resources Board On-Road and Off-Road Vehicle Rules**

In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time.

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<sup>15</sup> Chapter 1568 of the Statutes of 1988.

**TABLE 4.2-4  
SOUTH COAST AIR BASIN ATTAINMENT STATUS (LOS ANGELES COUNTY)**

<b>Pollutant</b>	<b>National Standards</b>	<b>California Standards</b>
O <sub>3</sub> (1-hour standard)	N/A <sup>a</sup>	Non-attainment – Extreme
O <sub>3</sub> (8-hour standard)	Non-attainment – Extreme	Non-attainment
CO	Attainment	Attainment
NO <sub>2</sub>	Attainment	Attainment
SO <sub>2</sub>	Attainment	Attainment
PM <sub>10</sub>	Attainment	Non-attainment
PM <sub>2.5</sub>	Non-attainment	Non-attainment
Lead	Non-attainment (Partial, Los Angeles County)	Attainment
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride	N/A	N/A <sup>b</sup>

N/A = not applicable

<sup>a</sup> The NAAQS for 1-hour ozone was revoked on June 15, 2005, for all areas except Early Action Compact areas.

<sup>b</sup> In 1990 the California Air Resources Board identified vinyl chloride as a toxic air contaminant and determined that it does not have an identifiable threshold. Therefore, the California Air Resources Board does not monitor or make status designations for this pollutant.

SOURCE: United States Environmental Protection Agency, California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants, [https://www3.epa.gov/airquality/greenbook/anayo\\_ca.html](https://www3.epa.gov/airquality/greenbook/anayo_ca.html) Accessed June 2017.

In 2008 CARB approved the Truck and Bus regulation to reduce NO<sub>x</sub>, PM10, and PM2.5 emissions from existing diesel vehicles operating in California. The requirements were amended in December 2010 and apply to nearly all diesel fueled trucks and busses with a gross vehicle weight rating greater than 14,000 pounds. For the largest trucks in the fleet, those with a gross vehicle weight rating greater than 26,000 pounds, there are two methods to comply with the requirements. The first way is for the fleet owner to retrofit or replace engines, starting with the oldest engine model year, to meet 2010 engine standards, or better. This is phased over 8 years, starting in 2015 and would be fully implemented by 2023, meaning that all trucks operating in the State subject to this option would meet or exceed the 2010 engine emission standards for NO<sub>x</sub> and PM by 2023. The second option, if chosen, requires fleet owners, starting in 2012, to retrofit a portion of their fleet with diesel particulate filters achieving at least 85 percent removal efficiency, so that by January 1, 2016 their entire fleet is equipped with diesel particulate filters. However, diesel particulate filters do not typically lower NO<sub>x</sub> emissions. Thus, fleet owners choosing the second option must still comply with the 2010 engine emission standards for their trucks and busses by 2020.

In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation adopted by the CARB on July 26, 2007, aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older,

dirtier engines with newer emission controlled models. Implementation is staggered based on fleet size (which is the total of all off-road horsepower under common ownership or control), with the largest fleets to begin compliance by January 1, 2014. Each fleet must demonstrate compliance through one of two methods. The first option is to calculate and maintain fleet average emissions targets, which encourages the retirement or repowering of older equipment and rewards the introduction of newer cleaner units into the fleet. The second option is to meet the Best Available Control Technology (BACT) requirements by turning over or installing Verified Diesel Emission Control Strategies (e.g., engine retrofits) on a certain percentage of its total fleet horsepower. The compliance schedule requires that BACT turn overs or retrofits be fully implemented by 2023 in all equipment in large and medium fleets and across 100 percent of small fleets by 2028.

## **Regional**

### ***South Coast Air Quality Management District***

The SCAQMD has jurisdiction over air quality planning for all of Orange County, Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The Air Basin is a subregion within SCAQMD jurisdiction. While air quality in the Air Basin has improved, the Air Basin requires continued diligence to meet the air quality standards.

### **Air Quality Management Plan**

The SCAQMD has adopted a series of AQMPs to meet the CAAQS and NAAQS. In December 2012, the SCAQMD adopted the 2012 Air Quality Management Plan, which incorporates scientific and technological information and planning assumptions, including growth projections.<sup>16</sup> The 2012 AQMP incorporates a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, and on-road and off-road mobile sources. The 2012 AQMP builds upon improvements in previous plans, and includes new and changing federal requirements, implementation of new technology measures, and the continued development of economically sound, flexible compliance approaches. In addition, it highlights the significant amount of emission reductions needed and the urgent need to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the timeframes allowed under the federal Clean Air Act.

The key undertaking of the 2012 AQMP is to bring the Air Basin into attainment with the NAAQS for the 24-hour PM<sub>2.5</sub> standard. It also intensifies the scope and pace of continued air quality improvement efforts toward meeting the 2024 8-hour O<sub>3</sub> standard deadline with new measures designed to reduce reliance on the federal CAA Section 182(e)(5) long-term measures for NO<sub>x</sub> and VOC reductions. The SCAQMD expects exposure reductions to be achieved

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<sup>16</sup> South Coast Air Quality Management District, 2012 Air Quality Management Plan, <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan>. Accessed April 2016.

through implementation of new and advanced control technologies as well as improvement of existing technologies.

The SCAQMD released the Draft 2016 AQMP on June 30, 2016 for public review and comment. A revised Draft 2016 AQMP was released in October 2016 and the SCAQMD Governing Board adopted the 2016 AQMP on March 3, 2017.<sup>17</sup> CARB approved the 2016 on March 23, 2017. Key elements of the 2016 AQMP include implementing fair-share emissions reductions strategies at the federal, state, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of zero and near-zero-emissions technologies; and taking credit from co-benefits from greenhouse gas, energy, transportation and other planning efforts.<sup>18</sup> The strategies included in the 2016 AQMP are intended to demonstrate attainment of the NAAQS for the federal non-attainment pollutants ozone and PM<sub>2.5</sub>.<sup>19</sup> While the 2016 AQMP was adopted by the SCAQMD and CARB, it has not been yet received USEPA approval for inclusion in the SIP. Therefore, until such time as the 2016 AQMP is approved by the USEPA, the 2012 AQMP remains the applicable AQMP.

### **SCAQMD Air Quality Guidance Documents**

The CEQA Air Quality Handbook was published by the SCAQMD in November 1993 to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. The CEQA Air Quality Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. However, the SCAQMD is currently in the process of replacing the CEQA Air Quality Handbook with the Air Quality Analysis Guidance Handbook. While this process is underway, the SCAQMD recommends that lead agencies avoid using the screening tables in Chapter 6 (Determining the Air Quality Significance of a Project) of the CEQA Air Quality Handbook, because the tables were derived using an obsolete version of CARB's mobile source emission factor inventory, and the trip generation characteristics of the land uses identified in these screening tables were based on the fifth edition of the Institute of Transportation Engineer's Trip Generation Manual, instead of the most current edition. Additionally, the lead agency should avoid using the on-road mobile source emission factors in Table A9-5-J1 through A9-5-L (EMFAC7EP Emission Factors for Passenger Vehicles and Trucks, Emission Factors for Estimating Material Hauling, and Emission Factors for Oxides of Sulfur and Lead). The SCAQMD instead recommends using other approved models to calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod) software, initially released in 2011 and updated in 2016.<sup>20</sup>

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<sup>17</sup> South Coast Air Quality Management District, Air Quality Management Plan (AQMP). Available: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>. Accessed March 2017.

<sup>18</sup> Ibid.

<sup>19</sup> South Coast Air Quality Management District, NAAQS/CAAQS and Attainment Status for South Coast Air Basin, (2016). Available at <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=2>. Accessed March 2017.

<sup>20</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook (1993), [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). Accessed April 2016.

The SCAQMD has published a guidance document called the Localized Significance Threshold Methodology for CEQA Evaluations that is intended to provide guidance in evaluating localized effects from mass emissions during construction.<sup>21</sup> The SCAQMD adopted additional guidance regarding PM<sub>2.5</sub> in a document called Final Methodology to Calculate Particulate Matter (PM)<sub>2.5</sub> and PM<sub>2.5</sub> Significance Thresholds.<sup>22</sup> This latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and Localized Significance Threshold Methodology.

### **SCAQMD Rules and Regulations**

Several SCAQMD rules adopted to implement portions of the AQMP may apply to the proposed Project. For example, SCAQMD Rule 403 requires implementation of best available fugitive dust control measures during active construction periods capable of generating fugitive dust emissions from on-site earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads. The Project may be subject to the following SCAQMD rules and regulations:

**Regulation IV – Prohibitions:** This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events. The following is a list of rules which may apply to the Project:

Rule 402 – Nuisance: This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Rule 403 – Fugitive Dust: This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM<sub>10</sub> emissions to less than 50 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA.

**Regulation XI – Source Specific Standards:** Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to the Project:

Rule 1113 – Architectural Coatings: This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

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<sup>21</sup> South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, (2008).

<sup>22</sup> South Coast Air Quality Management District, Final Methodology to Calculate Particulate Matter (PM)<sub>2.5</sub> and PM<sub>2.5</sub> Significance Thresholds, (2006).

Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters: This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NOX emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.

Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations: This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

**Regulation XIV – Toxics and Other Non-Criteria Pollutants:** Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other non-criteria pollutants. The following is a list of rules which may apply to the Project:

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities: This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

### ***Southern California Association of Governments***

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the federally designated Metropolitan Planning Organization for the majority of the Southern California region and is the largest Metropolitan Planning Organization in the nation. With regard to air quality planning, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy in April 2016, which addresses regional development and growth forecasts and forms the basis for the land use and transportation control portions of the AQMP. The growth forecasts are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. The Regional Transportation Plan/Sustainable Communities Strategy and AQMP are based on projections originating within local jurisdictions.

SCAG’s Sustainable Communities Strategy provides specific strategies for successful implementation. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and culture and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a “Complete Streets” policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.

In 2008, SCAG released the Regional Comprehensive Plan which addresses regional issues such as housing, traffic/transportation, water, and air quality. The Regional Comprehensive Plan serves as an advisory document to local agencies in the Southern California region for their information and voluntary use for preparing local plans and handling local issues of regional significance. The Regional Comprehensive Plan presents a vision of how southern California can balance air quality with growth and development by including goals such as: reducing emissions of criteria pollutants to attain federal air quality standards by prescribed dates and stated ambient air quality standards as soon as practicable; reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas; and to minimize land uses that increase the risk of adverse air pollution-related health impacts from exposure to TACs, particulates (PM10 and PM2.5) and CO.

## Local

Local jurisdictions, such as the City of Culver City, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. The City reviews project plans for consistency with environmental regulations and other conditions applicable to proposed development. The City is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA, the City has the authority to obtain input from other local agencies and may consult with any person with special expertise relating to the Project environmental impacts to assess air quality impacts of new development projects. If significant impacts are found, the City has the authority to require mitigation of potentially significant air quality impacts for discretionary projects along with associated monitoring and implementation of such mitigation measures.

The City's General Plan was originally adopted in 1995 and is periodically amended as the City grows in population and physical development. The current General Plan does not have an Air Quality Element. However, the Circulation Element of the General Plan contains objectives and associated policies focused on public transit (Objective #2), bikeways (Objective #3), pedestrian access (Objective #4), participating in regional system improvements (Implementation Measure #1), and roadway improvement (Implementation Measure #2).<sup>23</sup> Consistency with these objectives and associated policies would have the potential to reduce single occupancy vehicle trips and vehicle miles traveled (VMT), thus reducing air pollutants from mobile sources. The growth projections within the General Plan inform the development of SCAQMD's AQMP.

In 2009, the City adopted the Green Building program which contains a number of features that would indirectly reduce air pollution emissions through features such as enhanced building insulation, low-flow fixtures, efficient lighting and HVAC systems. The City's Green Building Program also includes a specific feature for parking garages which requires all new lighting to be motion sensor controlled and minimum base level lighting is permitting using efficient lighting.

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<sup>23</sup> Culver City General Plan, Circulation Element (1995).

## 4.2.4 Environmental Impacts

### **Methodology**

The evaluation of potential impacts to regional and local air quality that may result from the construction and long-term operations of the Project is conducted as follows. Additional details are provided in the Air Quality Technical Report in Appendix C.

### ***Consistency with Air Quality Management Plan***

The SCAQMD is required, pursuant to the CAA, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., ozone and PM<sub>2.5</sub>). The SCAQMD's 2012 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS. These strategies are developed, in part, based on regional growth projections prepared by the SCAG. Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because the growth is included in the projections utilized in the formulation of the AQMP. Thus, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they were to exceed the SCAQMD's significance thresholds.

### ***Construction Impacts***

Construction of the Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators, and through vehicle trips generated from workers and haul trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NO<sub>x</sub> and PM, would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The emissions are estimated using CalEEMod (Version 2016.3.1) 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 on- and off-road vehicles. The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions values for each construction activity.

Construction of the Project is estimated to require approximately 32 months, starting as early as the first quarter of 2018. Sub-phases of construction would include demolition of most of the existing structures and features on-site, site clearing, grading, excavation, and building construction. Demolition activities would generate approximately 35,832 tons of demolition

debris (asphalt and general construction debris). The Project would export approximately 432,912 cubic yards of soil during grading and excavation activities. The majority of soil excavation and export would be associated with the construction of the proposed two new parking structures. The Central Parking Garage would have 836 spaces and both parking levels would be below-grade. The Van Buren Parking Garage would have 1,109 spaces and would also have two parking levels below-grade. Heavy-duty equipment, vendor supply trucks and concrete trucks would be used during construction of foundations, parking structures, and buildings. Landscaping and architectural coating would occur during the finishing activities. The maximum daily regional emissions from these activities are estimated by construction phase and compared to the SCAQMD significance thresholds. The maximum daily regional emissions are predicted values for the worst-case day and do not represent the emissions that would occur for every day of Project construction.

The localized effects from the on-site portion of the construction emissions are evaluated at nearby sensitive receptor locations potentially impacted by the Project according to the SCAQMD's Localized Significance Threshold Methodology.<sup>24</sup> The localized significance thresholds are only applicable to NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The SCAQMD has established screening criteria for projects that disturb 5 acres or less that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The localized analysis is based on this SCAQMD screening criteria. The screening criteria depend on: (1) the area in which the Project is located, (2) the size of the Project Site, and (3) the distance between the Project Site and the nearest sensitive receptor. The Project Site is located in the SCAQMD SRA 2 and would generally disturb up to 5.7 acres on a given day. The off-site air quality sensitive receptors would be located adjacent to the Project Site to the north, south, and east and Linwood E. Howe Elementary School would be approximately 300 feet to the southwest. Therefore, the SCAQMD localized significance threshold (LST) screening criteria applicable to a 5-acre site in SRA 2 with sensitive receptors located adjacent to the Project Site was used. The SCAQMD screening criteria increase with increasing disturbed acreage. Therefore, while the Project could disturb more than 5 acres on a given day, the use of the 5-acre screening criteria would result in a conservative assessment as the allowable emissions would be set at a lower level than would otherwise be allowed for a larger disturbed area.

### ***Operational Impacts***

Operation of the Project has the potential to generate criteria pollutant emissions through vehicle trips traveling to and from the Project Site. In addition, emissions would result from area sources on-site such as natural gas combustion, landscaping equipment, and use of consumer products. Operational impacts were assessed for the Project buildout year (i.e., as early as 2020 assuming construction begins at the earliest possible time in the fourth quarter of 2017).

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<sup>24</sup> South Coast Air Quality Management District, Localized Significance Thresholds, (2003, revised 2008), <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed June 2017.

The operational emissions are also estimated using the CalEEMod software. CalEEMod was used to forecast the Project's daily regional emissions from area sources that would occur during long-term Project operations. Mobile source emissions are estimated based on CARB's updated version of the on-road vehicle emissions factor (EMFAC) model. The most recent version is EMFAC2014, which "represents [California Air Resources Board's] current understanding of motor vehicle travel activities and their associated emission levels."<sup>25</sup> Mobile source emissions are based on the trip generation rates provided in the Project's Transportation Study, which accounts for trip reductions from public transportation options.<sup>26</sup> In calculating mobile-source emissions, the trip length values were based on the distances provided in CalEEMod.

Area source emissions are based on natural gas (building heating and water heaters), landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod. Natural gas usage factors in CalEEMod are based on the California Energy Commission (CEC) California Commercial End Use Survey (CEUS) data set, which provides energy demand by building type and climate zone.<sup>27</sup> However, since the data from the CEUS is from 2002, correction factors are incorporated into CalEEMod to account for the appropriate version of the Title 24 Building Energy Efficiency Standards in effect.

Operational air quality impacts are assessed based on the incremental increase in emissions compared to baseline conditions. As discussed previously, the Project Site is currently developed with existing studio office, sound stages and support facilities which are currently in use and have existing operational emissions, see Table 4.2-3. Therefore, the Project's operational emissions analysis subtracts the emissions from the existing uses that would be removed as part of the Project to estimate the total net new emissions from the Project. The maximum daily net emissions from operation of the Project are compared to the SCAQMD daily regional significance thresholds.

The localized effects from the onsite portion of the operational emissions are evaluated at nearby sensitive receptor locations potentially impacted by the Project according to the SCAQMD's Localized Significance Threshold Methodology, which relies on on-site mass emission rate screening tables and project-specific dispersion modeling, where appropriate. Similar to construction, the SCAQMD LST screening criteria applicable to a 5-acre site in SRA 2 with sensitive receptors located adjacent to the Project Site was used.

### ***Toxic Air Contaminants Impacts (Construction and Operations)***

The greatest potential for TAC emissions during Project construction would be related to diesel particulate matter emissions associated with heavy-duty equipment during demolition, excavation, grading, and building construction activities. Construction activities associated with the Project would be sporadic, transitory, and short term in nature. OEHHA is responsible for developing and revising guidelines for performing health risk assessments (HRAs) under the

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<sup>25</sup> California Air Resources Board, Mobile Source Emissions Inventory, <http://www.arb.ca.gov/msei/categories.htm#emfac2014>. Accessed March 2017.

<sup>26</sup> Culver Studios Modified Comprehensive Plan Update #7. Fehr and Peers, May 2017.

<sup>27</sup> California Energy Commission, California Commercial End-Use Survey, <http://capabilities.itron.com/CeusWeb/Chart.aspx>. Accessed March 2017.

State's the Air Toxics Hot Spots Program Risk Assessment (AB 2588) regulation. In March 2015, OEHHA adopted revised guidelines that update the previous guidance by incorporating advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (ASF). The construction HRA was performed in accordance with the revised OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidance).<sup>28</sup> The analysis incorporates the estimated construction emissions, as previously discussed, and dispersion modeling using the USEPA AERMOD model with meteorological data from the closest SCAQMD monitoring station.

During long-term operations, TACs could be emitted as part of periodic maintenance operations, cleaning, painting, etc., and from periodic visits from delivery trucks and service vehicles. However, these uses are expected to be occasional and result in minimal exposure to off-site sensitive receptors. As the project consists of digital media and sounds stages for movie and television production, the project would not include sources of substantive TAC emissions identified by the SCAQMD or CARB siting recommendations. Thus a qualitative analysis is appropriate.

## Thresholds of Significance

### ***Appendix G of the State CEQA Guidelines***

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the *State CEQA Guidelines*. Accordingly, a significant air quality impact would occur if the Project would:

**AIR-1:** Conflict with or obstruct the implementation of the applicable air quality plan.

**AIR-2:** Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

**AIR-3:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

**AIR-4:** Expose sensitive receptors to substantial pollutant concentrations;

**AIR-5:** Create objectionable odors affecting a substantial number of people.

As discussed in the Initial Study, which is contained in Appendix A, and in Chapter 6, Other CEQA Considerations, of this Draft EIR the Project would have a less than significant impact with regard to odors. According to the SCAQMD, facilities that are typically associated with sources of odors include: wastewater treatment plants, landfills, waste transfers and recycling stations, composting operations, petroleum operations, food and byproduct processes, and agricultural operations. The Project is commercial in nature and would not introduce new

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<sup>28</sup> California Environmental Protection Agency, Office of Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, (2015).

substantial sources of odors and is not associated with any of the uses or operations as described above. As such, no further analysis of this topic is necessary.

Pursuant to the State CEQA Guidelines (Section 15064.7), a lead agency may consider using, when available, the significance criteria established by the applicable air quality management district or air pollution control district when making determinations of significance. The Project would be under the SCAQMD's jurisdiction. SCAQMD has established air quality significance thresholds in its CEQA Air Quality Handbook. These thresholds are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.<sup>29</sup> The potential air quality impacts of the Project are, therefore, evaluated according to the most recent thresholds adopted by the SCAQMD in connection with its CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook, and subsequent SCAQMD guidance as discussed previously.<sup>30</sup>

### **Construction Emissions**

The SCAQMD has established numerical emission indicators of significance for construction. The numerical emission indicators are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.<sup>31</sup> Given that construction impacts are temporary and limited to the construction phase, the SCAQMD has established numeric indicators of significance specific to construction activity. Based on the indicators in the SCAQMD CEQA Air Quality Handbook, the Project would potentially cause or contribute to an exceedance of an ambient air quality standard if the following would occur:

- Regional construction emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed daily regional emissions thresholds:<sup>32</sup>
  - 75 pounds a day for VOC;
  - 100 pounds per day for NO<sub>x</sub>;
  - 550 pounds per day for CO;
  - 150 pounds per day for SO<sub>2</sub>;
  - 150 pounds per day for PM<sub>10</sub>; or
  - 55 pounds per day for PM<sub>2.5</sub>.

<sup>29</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook (1993) 6-2.

<sup>30</sup> While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, Project construction and operation would not include sources of lead emissions and would not exceed the established thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial and residential land use projects such as the Project. As a result, lead emissions are not further evaluated in this Draft EIR.

<sup>31</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook (1993) 6-2.

<sup>32</sup> South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, (March 2015), <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed June 2017.

In addition, the SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards or ambient concentration limits. Impacts would be considered significant if the following would occur:

- Maximum daily localized emissions of NO<sub>x</sub> and/or CO during construction are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for NO<sub>2</sub> and/or CO.<sup>33</sup>
- Maximum daily localized emissions of PM<sub>10</sub> and/or PM<sub>2.5</sub> during construction are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 10.4 µg/m<sup>3</sup> over 24 hours (SCAQMD Rule 403 control requirement).

As discussed previously under Methodology, the SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards or ambient concentration limits without project-specific dispersion modeling. This analysis uses the screening criteria to evaluate impacts from localized emissions.

### ***Operational Emissions***

The SCAQMD has established numerical emission indicators of significance for operations. The numerical emission indicators are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.<sup>34</sup> The SCAQMD has established numeric indicators of significance in part based on Section 182(e) of the Clean Air Act which identifies 10 tons per year of VOC as a significance level for stationary source emissions in extreme non-attainment areas for ozone.<sup>35</sup> As shown in Table 4.2-4, the Air Basin is designated as extreme non-attainment for ozone. The SCAQMD converted this significance level to pounds per day for ozone precursor emissions (10 tons per year × 2,000 pounds per ton ÷ 365 days per year = 55 pounds per day). The numeric indicators for other pollutants are also based on federal stationary source significance levels. Based on the indicators in the SCAQMD CEQA Air Quality Handbook, the Project would potentially cause or contribute to an exceedance of an ambient air quality standard if the following would occur:

- Regional operational emissions exceed any of the following SCAQMD prescribed daily regional emissions thresholds:<sup>36</sup>
  - 55 pounds a day for VOC;
  - 55 pounds per day for NO<sub>x</sub>;

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<sup>33</sup> South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, (2008). Available: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed March 2017.

<sup>34</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook (1993) 6-2.

<sup>35</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook (1993) 6-1.

<sup>36</sup> South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, (March 2015), <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed June 2017.

- 550 pounds per day for CO;
- 150 pounds per day for SO<sub>2</sub>;
- 150 pounds per day for PM<sub>10</sub>; or
- 55 pounds per day for PM<sub>2.5</sub>.

In addition, the SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards. Impacts would be considered significant if the following were to occur:

- Maximum daily localized emissions of NO<sub>x</sub> and/or CO during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the project site greater than the most stringent ambient air quality standards for NO<sub>2</sub> and/or CO.<sup>37</sup>
- Maximum daily localized emissions of PM<sub>10</sub> and/or PM<sub>2.5</sub> during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the project site to exceed 2.5 µg/m<sup>3</sup> over 24 hours (SCAQMD Rule 1303 allowable change in concentration).

As discussed previously, the SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards or ambient concentration limits without project-specific dispersion modeling. This analysis uses the SCAQMD screening criteria to evaluate impacts from localized emissions.

### ***Carbon Monoxide Hotspots***

With respect to the formation of CO hotspots, the Project would be considered significant if the following would occur:

- The Project would cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 parts per million (ppm), respectively.

### ***Toxic Air Contaminants***

Based on criteria set forth by the SCAQMD, the project would expose sensitive receptors to substantial concentrations of toxic air contaminants if any of the following were to occur:<sup>38</sup>

- The Project would emit carcinogenic materials or TACs that exceed the maximum incremental cancer risk of ten in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) or an acute or chronic hazard index of 1.0.

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<sup>37</sup> South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, (March 2015), <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed June 2017.

<sup>38</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants), (1993); SCAQMD Air Quality Significance Thresholds, (March 2011), <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed June 2017.

As discussed previously, construction impacts from TACs are evaluated quantitatively in a refined HRA due to the use of heavy-duty, diesel equipment. For operations, the impacts are analyzed qualitatively due to the limited and minimal sources of TACs associated with operation of the proposed land uses.

## Project Characteristics and Project Design Features

**Project Characteristics** The Project would represent an urban infill development, since it would be undertaken on a currently developed property, and would be located near existing public transit stops, which would result in reduced vehicle trips and VMT compared to model default assumptions. The Project Traffic Study<sup>39</sup> includes transit credit from public transit stops in the form of 15 percent reduced trips compared to default trips rates in the Institute of Transportation Engineers, *Trip Generation, 9<sup>th</sup> Edition*. An additional 10 percent reduction was applied to new net trips due to MM-TRAF-6.<sup>40</sup> These transit credits and associated emissions reductions are accounted for in the operational emissions modeling. At Project buildout, hours of operation and periods of peak activity would be substantially similar to those currently existing on the Studio Campus, which vary in large part from a traditional office campus with large A.M. and P.M. peaks.

## Project Design Features

The Project incorporates many project design features (PDFs) that would reduce construction emissions: and target sustainable site development, water savings, energy efficiency, green-oriented materials selection, and improved indoor environmental quality. PDFs are part of the Project design, and are not mitigation measures. The PDFs proposed for the Project include, but are not limited to the following:

**PDF-AIR-1 (Construction Features):** Construction equipment operating at the Project Site would 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 equipment greater than 50 horsepower (hp) used for this Project to meet USEPA Tier 4 off-road emission standards. Welders would also meet USEPA Tier 4 off-road emission standards or will be electric-powered. All equipment shall be outfitted with Best Available Control Technology (BACT) devices including a California Air Resources Board (CARB)-certified Level 3 Diesel Particulate Filter or equivalent. This PDF would allow for a reduction in diesel particulate matter and NOx emissions during construction activities.
- Consistent with CPA No. 6, the Project shall utilize low-VOC coatings during construction activities to avoid excessive VOC emissions.

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<sup>39</sup> Culver Studios Modified Comprehensive Plan Update #7. Fehr and Peers, May 2017.

<sup>40</sup> MM TRAF-6 is a mitigation measure for Section 4.11 Transportation and Traffic. The mitigation measure would implement a Transportation Demand Management Program. The Traffic Study applied a conservative 10 percent reduction to new net project trips.

- Consistent with CPA No. 6 Condition of Approval #140, trucks and other vehicles in loading and unloading queues shall be parked with engines off to reduce vehicle 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 use water efficient landscaping and native drought tolerant plants.
- 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 USEPA WaterSense specifications.
- The parking structures shall be designed with occupancy-sensor controlled lighting that would place lighting fixtures in a low power state in unoccupied zones.<sup>41</sup>

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

- The Project design would meet criteria for the LEED Certification level.
- The Project shall install 100 bicycle parking spaces.
- The Project shall install infrastructure for future gray water uses.
- 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 kW of solar photovoltaics per 10,000 sf of new development.

## Analysis of Project Impacts – Air Quality Management Plan

**Threshold AIR-1:** The Project would result in a significant impact if the Project would conflict with or obstruct the implementation of the applicable air quality plan.

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<sup>41</sup> A demonstration project by the United States Department of Energy indicated that the use of occupancy-sensor controlled lighting achieved a reduction of greater than 50 percent in lighting energy use compared to a similarly lighted parking structure without occupancy-sensor controls. For the purposes of this assessment, compliance with this feature is assumed to achieve a minimum 50 percent reduction in the energy required for the parking structures. United States Department of Energy, Building Technologies Office, SSL Demonstration: Parking Garage Lighting, Washington DC, June 2013. Available at [https://www1.eere.energy.gov/buildings/publications/pdfs/ssl/deptoflabor\\_brief.pdf](https://www1.eere.energy.gov/buildings/publications/pdfs/ssl/deptoflabor_brief.pdf). Accessed May 2017.

**Impact Statement AIR-1: The Project would not conflict with or obstruct implementation of relevant air quality policies in the adopted Air Quality Management Plan. Therefore, impacts would be less than significant.**

### ***Construction***

Under this criterion, 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 upon which the air quality plan is based. The Project would result in an increase in short-term employment compared to existing conditions. Although the Project would require many workers over the construction process, these jobs would be 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. Project construction would not conflict with implementation of these strategies. Additionally, Project construction would comply with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment. Project construction 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 Project construction activities would not conflict with the control strategies intended to reduce emissions from construction equipment, Project construction would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

### ***Operations***

The AQMP was prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used in the formulation of the AQMP. The Project Site is located Culver City and currently zoned as “S” (Studio) based on the City’s Zoning Map. The Project would be upgrading its current facilities with state-of-the art digital media spaces and sound stages. The uses of these upgrades would be consistent with the current zoning designation. Also, the Project is committed to providing strong pedestrian connections to Downtown Culver City and nearby transit Metro. Also, the Project would be consistent with the Circulation Element of the City’s General Plan. The Project is located within reasonable walking distance to Downtown Culver City, as well as the Culver City Expo Line and multiple bus routes provided by Culver City, Los Angeles Department of Transportation, and Los Angeles Metro. The Project is well served by existing bicycle routes and would install 100 bicycle parking spaces. Bicycle access would also be improved due to conversion of Gate1 (off of Washington Blvd) to a pedestrian, bicycle, and emergency vehicle only access point. Roadways improvements, such as, restriping turn lanes would also be implemented.

The Project would generate indirect growth associated with construction employment and up to 524 new employees (refer to Chapter 6, Other CEQA Considerations, Section 6.4, Growth-Inducing Impacts, of this Draft EIR for additional details regarding new employees generated by the Project). According to the Southern California Association of Governments (SCAG), Culver City's forecast population, household, and employment growth of 1,600 persons, 700 households, and 8,900 jobs is predicted between 2012 and 2040, respectively. As such, the estimated 524 new 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.

The Project would concentrate employment growth in an area served by the Culver City Metro Station and Expo Line, regional and local bus lines, and bicycle facilities. As such, the Project would be consistent with SCAG's 2016 RTP/SCS policies for the concentration of growth in proximity to transit.

Therefore, 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.

## Regional Impacts

**Threshold AIR-2:** The Project would result in a significant impact if the Project would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

**Impact Statement AIR-2: Construction of the Project would not exceed the applicable SCAQMD significance thresholds. Operation of the Project would not exceed the applicable SCAQMD significance thresholds. Therefore, construction and operational emission impacts would be less than significant.**

### **Construction**

Maximum daily construction emissions were estimated for each construction phase of the Project. Some individual construction phases potentially overlap and the maximum daily emissions take into account potential for overlapped emissions. The maximum daily emissions are predicted values for a representative worst-case day and do not represent the emissions that would occur for every day of construction. Results of the criteria pollutant calculations are presented in **Table 4.2-5, Maximum Unmitigated Regional Construction Emissions**. As shown therein, construction-related daily emissions for the criteria and precursor pollutants (VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) would not exceed SCAQMD significance thresholds. These calculations include appropriate dust control measures required to be implemented during each phase of development, as required by SCAQMD Rule 403 (Control of Fugitive Dust). Therefore, with respect to regional emissions from construction activities, impacts would be less than significant.

**TABLE 4.2-5  
 MAXIMUM UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY) <sup>a</sup>**

Source	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM10 <sup>b</sup>	PM2.5 <sup>b</sup>
Demolition	3	44	90	<1	9	2
Site Preparation/Shoring Beams	<1	1	9	<1	<1	<1
Excavation/Tie Backs/Rakers Foundations/Drainage/Basement Slab	4	73	64	<1	6	2
Concrete Pour	1	5	44	<1	1	<1
Subterranean Parking Structure	1	8	25	<1	1	<1
Building Shell/core Van Buren Garage	4	44	93	<1	5	1
Building Shell/core Van Buren Garage Landscape Architectural Coating	44	50	125	<1	7	2
<b>Maximum Daily Construction Emissions</b>	<b>44</b>	<b>73</b>	<b>125</b>	<b>&lt;1</b>	<b>10</b>	<b>2</b>
SCAQMD Significance Threshold	75	100	550	150	150	55
Over/(Under)	(31)	(27)	(425)	(150)	(140)	(53)
Exceeds Threshold?	No	No	No	No	No	No

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Combined rows account for overlapping emissions from the listed activities. Detailed emissions calculations are provided in Appendix C.

<sup>b</sup> Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

<sup>c</sup> Analysis accounted for emissions from overlapping phases.

SOURCE: ESA PCR, August 2017

## Operations

Operational criteria pollutant emissions were calculated for mobile, area, and stationary sources for the Project buildout year (2020). Daily trip generation rates for the Project were provided by the Project Traffic Study<sup>42</sup> and include trips associated with the daily studio operations. Results of the criteria pollutant calculations are presented in **Table 4.2-6, Maximum Unmitigated Regional Operational Emissions**. The net increase in operational-related daily emissions (Project emissions minus existing emissions) criteria and precursor pollutants (VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM10, and PM<sub>2.5</sub>) would be substantially below the SCAQMD thresholds of significance. Therefore, Project-related operational emissions would result in a less than significant impact.

<sup>42</sup> Culver Studios Modified Comprehensive Plan Update #7. Fehr and Peers, May 2017.

**TABLE 4.2-6  
MAXIMUM UNMITIGATED REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)<sup>a</sup>**

Source	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM10	PM2.5
Area	15	<1	<1	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Mobile	11	55	140	<1	38	10
Total Project Operational Emissions	26	56	142	<1	38	10
Existing Site Emissions Removed	8	15	40	<1	10	3
<b>Net Maximum Regional Operational Emissions</b>	<b>18</b>	<b>41</b>	<b>102</b>	<b>&lt;1</b>	<b>28</b>	<b>8</b>
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(37)	(14)	(448)	(150)	(122)	(47)
Exceeds Thresholds?	No	No	No	No	No	No

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C.

SOURCE: ESA PCR, August 2017

## Non-Attainment Criteria Pollutants

**Threshold AIR-3:** The Project would result in a significant impact if the Project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

**Impact Statement AIR-3: The South Coast Air Basin is designated as non-attainment for O<sub>3</sub>, PM10, and PM2.5 under federal and/or state ambient air quality standards. Construction and operation of the Project would not exceed the applicable SCAQMD significance thresholds for ozone precursor emissions (i.e., VOCs and NO<sub>x</sub>), PM10, or PM2.5. Therefore, construction and operational emissions would be less than significant.**

### Construction

The Project would result in the emission of criteria pollutants for which the project area is in non-attainment during both construction and operation. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. The Air Basin is currently in non-attainment under federal or state standards for ozone, PM10, and PM2.5. The emissions from construction of the Project are not predicted to exceed any applicable SCAQMD regional or local impact threshold and therefore, are not expected to result in ground level concentrations that exceed the NAAQS or CAAQS. Therefore, the project would not result in a cumulatively considerable net increase for non-attainment pollutants or ozone precursors and would result in a less than significant impact for construction emissions.

### Operation

Future operations would generate ozone precursors (i.e., VOCs and NO<sub>x</sub>), CO, PM10, and PM2.5. Operational emissions would not exceed the SCAQMD regional or local thresholds and

would not be expected to result in ground level concentrations that exceed the NAAQS or CAAQS. Therefore, operation of the Project would not result in a cumulatively considerable net increase for non-attainment of criteria pollutants or ozone precursors. As a result, the project would result in a less than significant impact for operational emissions.

## **Expose Sensitive Receptors to Substantial Pollutant Concentrations**

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**Threshold AIR-4:** The Project would result in a significant impact if the Project would expose sensitive receptors to substantial pollutant concentrations.

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**Impact Statement AIR-4: Construction and operation of the Project would not exceed the localized significance thresholds at off-site sensitive receptors. The Project would not cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 parts per million (ppm), respectively. Therefore, CO hotspots impacts would be less than significant. Construction of the Project would not generate emissions of TACs (i.e., diesel particulate matter) that would result in a significant health impact to off-site sensitive receptors. Operation of the Project would not include permanent sources (equipment, etc.) that would generate substantial long-term TAC emissions in excess of the health risk thresholds. Therefore, construction and operational TAC impacts would be less than significant.**

### ***Localized Construction***

The localized construction air quality analysis was conducted using the methodology described in the SCAQMD Localized Significance Threshold Methodology (June 2003, revised July 2008). The screening criteria provided in the methodology were used to determine localized construction emissions thresholds for the Project. The maximum daily localized emissions for each of the construction phases and localized significance thresholds are presented in **Table 4.2-7, *Maximum Unmitigated Localized Construction Emissions***. As shown therein, maximum localized construction emissions for sensitive receptors would not exceed the localized thresholds for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. Therefore, with respect to localized construction emissions, impacts would be less than significant.

### ***Localized Operations***

The localized operational air quality analysis was conducted using the methodology described in the SCAQMD Localized Significance Threshold Methodology (June 2003, revised July 2008). The screening criteria provided in the Localized Significance Threshold Methodology were used to determine localized operational emissions thresholds for the Project. The maximum daily increase in localized emissions (Project emissions minus existing emissions) and localized significance thresholds are presented in **Table 4.2-8, *Maximum Unmitigated Localized Operational Emissions***. As shown therein, the increase in maximum localized operational emissions for sensitive receptors would not exceed the localized thresholds for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. Therefore, with respect to localized operational emissions, impacts would be less than significant.

**TABLE 4.2-7  
UNMITIGATED LOCALIZED CONSTRUCTION EMISSIONS ANALYSIS (POUNDS PER DAY) <sup>a</sup>**

Source <sup>c</sup>	NO <sub>x</sub>	CO	PM10 <sup>b</sup>	PM2.5 <sup>b</sup>
Demolition	6	75	4	1
Site Preparation/Shoring Beams	1	7	<1	<1
Excavation/Tie Backs/Rakers	5	44	<1	<1
Foundations/Drainage/Basement Slab				
Concrete Pour	3	42	<1	<1
Subterranean Parking Structure	5	20	<1	<1
Building Shell/core Van Buren Garage	38	75	<1	<1
Building Shell/core Van Buren Garage				
Landscape	43	101	<1	<1
Architectural Coating				
<b>Maximum Daily Emissions</b>	<b>43</b>	<b>101</b>	<b>4</b>	<b>1</b>
SCAQMD Significance Threshold	221	1531	13	6
Over/(Under)	(178)	(1430)	(9)	(5)
Exceeds Threshold?	No	No	No	No

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Combined rows account for overlapping emissions from the listed activities. Detailed emissions calculations are provided in Appendix C.

<sup>b</sup> Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

<sup>c</sup> Analysis accounted for emissions from overlapping phases.

SOURCE: ESA PCR, August 2017

**TABLE 4.2-8  
MAXIMUM UNMITIGATED LOCALIZED OPERATIONAL EMISSIONS (POUNDS PER DAY) <sup>a</sup>**

Source	NO <sub>x</sub>	CO	PM10 <sup>b</sup>	PM2.5 <sup>b</sup>
Project Operational Emissions				
Area	<1	<1	<1	<1
Energy	2	1	<1	<1
Total Localized Project Operational Emissions	2	2	<1	<1
Localized Existing Site Emissions Removed	<1	<1	<1	<1
<b>Net Maximum Localized Operational Emissions</b>	<b>1</b>	<b>1</b>	<b>&lt;1</b>	<b>&lt;1</b>
SCAQMD Significance Threshold	221	1531	3	2
Over/(Under)	(220)	(1530)	(3)	(2)
Exceeds Thresholds?	No	No	No	No

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C.

SOURCE: ESA PCR, August 2017

### ***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 shown previously in Table 4.2-2, CO levels in the Project area are substantially below the federal and state standards. Maximum CO levels in recent years are 2.0 ppm (one-hour average) and 1.4 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 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 Interstate 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 6.6 ppm (one-hour average) and 4.6 ppm (eight-hour average).

Based on the Project's Traffic Study,<sup>43</sup> of the studied intersections that are predicted to operate at a Level of Service (LOS) F under future operational year plus Project conditions, one intersection would potentially have peak traffic volumes of approximately 69,340 per day. 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 Project's health risk assessment focused on impacts of diesel exhaust particulate matter (DPM) from onsite construction activities to sensitive receptors which included nearby residences

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<sup>43</sup> Culver Studios Modified Comprehensive Plan Update #7. Fehr and Peers, May 2017.

and a school. As indicated in **Table 4.2-9, *Maximum Increase in Carcinogenic Risk for Off-site Sensitive Receptors***, the cancer risk from DPM emissions from construction of the Project is estimated to result in a maximum carcinogenic risk of approximately 6.1 per million. The maximum impact would occur at a residential property adjacent to the Project Site to the west. Cancer risk to students and staff at the Linwood E. Howe Elementary School southwest of the Project site would be 0.09 per million and 0.01 per million, respectively.

**TABLE 4.2-9  
MAXIMUM INCREASE IN CARCINOGENIC RISK FOR OFF-SITE SENSITIVE RECEPTORS**

<b>Sensitive Receptor</b>	<b>Maximum Cancer Risk (# in one million)</b>	<b>Hazard Index</b>
Residential Land Use	6.1	0.001
Linwood E. Howe Elementary		
Students	0.09	0.0003
Staff	0.01	0.0003
Maximum Individual Cancer Risk Threshold	10	1.0
Exceeds Threshold?	No	No

SOURCE: ESA PCR, August 2017.

## Operations

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 current load and unload media production equipment and cargo on adjacent streets. With implementation of the Project, truck loading and unloading of media production equipment and cargo would be moved to the interior of the Project Site in dedicated loading areas. This would create greater separation between trucks and off-site sensitive receptors, thus reducing the impacts of TACs on sensitive receptors, relative to existing conditions. Furthermore, implementation of required PDF-NOISE-9 (refer to Section 4.9, Noise) would prohibit truck idling within the loading areas thereby eliminating emissions associated with truck idling. Therefore, based on the limited activity of TAC sources and the reduction in TAC emissions 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 are expected to be less than significant.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). Therefore, the Project is not expected to release substantial amounts of TACs, and no significant impact on human health would occur.

## Cumulative Impacts

The SCAQMD CEQA Air Quality Handbook states that the “Handbook is intended to provide local governments, project proponents, and consultants who prepare environmental documents with guidance for analyzing and mitigating air quality impacts of projects.”<sup>44</sup> The SCAQMD CEQA Air Quality Handbook also states that “[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District.”<sup>45</sup> The SCAQMD has also provided guidance on an acceptable approach to addressing the cumulative impacts issue for air quality as discussed below:<sup>46</sup>

*“As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR... Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.”*

Because the City has not adopted specific Citywide significance thresholds for air quality impacts, it is appropriate to rely on thresholds established by the SCAQMD (refer to CEQA Guidelines Section 15064.7). While it may be possible to add emissions from the list of related projects and the Project, it would not provide meaningful data for evaluating cumulative impacts under CEQA because neither the City nor the SCAQMD have established numerical thresholds applicable to the summation of multiple project emissions for comparison purposes. Additionally, regional emissions from a project have the potential to affect the Air Basin as a whole, and unlike other environmental issues areas, such as aesthetics or noise, it is not possible to establish a geographical radius from a specific project site where potential cumulative impacts from regional emissions would be limited. Meteorological factors, such as wind, can disperse pollutants, often times tens of miles downwind from a project site. Therefore, consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the potential for the Project to result in cumulative impacts from regional emissions is assessed based on the SCAQMD thresholds.

### **Construction**

The Project would result in emissions of criteria air pollutants for which the region is in non-attainment during both construction and operation. The Air Basin fails to meet the NAAQS for O<sub>3</sub> and PM<sub>2.5</sub>, and therefore is considered a federal “non-attainment” area for these pollutants. The Air Basin also does not meet the CAAQS for PM<sub>10</sub>. The SCAQMD has designed significance thresholds to assist the region in attaining the applicable CAAQS and NAAQS, apply to both

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<sup>44</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, p. iii.

<sup>45</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, p. 6-1.

<sup>46</sup> South Coast Air Quality Management District, Cumulative Impacts White Paper, Appendix D, <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4>, accessed May 2017.

primary (criteria and precursor) and secondary pollutants (ozone). Although the Project Site is located in a region that is in non-attainment for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>, the emissions associated with Project construction would not be cumulatively considerable, as the emissions would fall below SCAQMD daily regional significance thresholds shown above in Table 4.2-5.

With respect to the Project's short-term construction-related air quality emissions and cumulative conditions, SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal CAA mandates. Construction of the Project would comply with SCAQMD Rule 403 requirement, which focuses on reducing fugitive dust emissions and the ATCM to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time. In addition, the Project would utilize a construction contractor(s) that complies with required and applicable BACT and the In-Use Off-Road Diesel Vehicle Regulation. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects in the Air Basin, which would include the cumulative projects in the Project Area. The related projects would be subject to these same requirements. Also, the Project would implement PDF-TRAF-1 (Construction Management Plan) found in Section 4.11 of this EIR. The Construction Management Plan, which would be subject to review and approval by various City departments, prior to issuance of any Project demolition, grading or excavation permit, would alleviate construction-period traffic impacts. Collaboration with surrounding developments would be required if Project construction would occur simultaneously with surrounding construction activities. Furthermore, consistent with SCAQMD guidance for cumulative impacts, regional and localized emissions would be less than SCAQMD significance thresholds as shown above in Table 4.2-5 and Table 4.2-7. As such, the Project's contribution to cumulatively significant construction impacts to air quality would not be cumulatively considerable and cumulative impacts would be less than significant for regional and localized criteria pollutants during construction.

### **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 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<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, 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 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. 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 and localized emissions would be below SCAQMD significance thresholds as shown in Table 4.2-6 and Table 4.2-8. Therefore, the Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable, and therefore the cumulative impact of the Project would be less than significant.

## 4.2.5 Mitigation Measures

### **Construction**

Mitigation measures not required since Project construction impacts were found to be less than significant with compliance with applicable regulations and implementation of the proposed Project Design Features.

### **Operation**

Mitigation measures not required since Project operational impacts were found to be less than significant with compliance with applicable regulations and implementation of the proposed Project Design Features.

## 4.2.6 Level of Significance after Mitigation

Not applicable. Impacts would be less than significant.

## 4.3 Cultural Resources

### 4.3.1 Historical Resources

#### 4.3.1.1 Introduction

This section evaluates potential Project impacts on historical resources and is based on a Historical Resources Technical Report (Technical Report) prepared by ESA PCR and included in Appendix D-1 of this Draft EIR. Project impacts on other cultural resources are evaluated in Section 4.3.2, Archaeological and Tribal Cultural Resources, and in Section 4.3.3, Paleontological Resources, of this Draft EIR.

#### 4.3.1.2 Environmental Setting

##### *Existing Conditions*

##### **Historical Background**

The Culver Studios was founded in 1918 on the Project Site as Ince Studios by Thomas Ince, who left nearby Ince/Triangle Studios, founded in 1915 with partners Mack Sennet and D. W. Griffith, to form his own production company. Harry Culver, the founder of Culver City, was instrumental in convincing Ince, who by then had shot several hundred silent westerns and other films from a base of operations in Santa Monica, to locate his studio in Culver's new downtown district. Culver sought to expand Culver City's fledgling motion picture industry to secure the City's economic stability and cement its status as an entertainment capital.

Ince died unexpectedly in 1924 while vacationing with William Randolph Hearst and the studio changed hands numerous times in subsequent years, passing first to Cecil B. DeMille in 1925, and then to Radio-Keith-Orpheum (RKO) in 1928. One of a number of major motion picture production studios established in southern California by the 1920s, The Culver Studios, under the ownership of RKO, grew to become one of the Big Eight major motion picture studios that operated under a management model called the "studio system", controlling their own production, distribution, and theaters. RKO owned and operated the studio for 30 years, leasing it to studio executive David O. Selznick in 1935 and continuing to operate its own productions alongside Selznick International Pictures, and, later, Selznick's Vanguard Pictures. In 1939, RKO-Pathé relocated operations to its Gower Street Studios but retained ownership of the Culver City property, which they continued leasing to Selznick. In 1949, Selznick's Vanguard Pictures went bankrupt. One year later, RKO was acquired by Howard Hughes, whose Hughes Aircraft Company was headquartered in Culver City beginning in 1932. The property was purchased in 1957 by Desilu Productions, which operated it until 1967, by which time it had transitioned to predominantly television production. Since then the studio has been sold several times, including to Sony Pictures, and is currently owned by a private investment group headed by Hackman Capital Partners, a local, private studio operator and involved stakeholder in Culver City.

The first building constructed on the Studio Campus, in 1918, was the Mansion (also known as Building C) facing Washington Boulevard, followed by the Ince-era administrative buildings adjacent to the Mansion, four of which remain today (one relocated within the Studio Campus). The majority of the sound stages on the Studio Campus were constructed between 1925 and 1928

under DeMille’s ownership, reflecting the advent of “talkies” and artificial lighting which required – and permitted – highly controlled conditions. Of the sound stages extant today, Stages 2/3/4 were constructed in 1926, followed by Stages 11/12/14 in 1927 and 7/8/9 in 1929. Four bungalows housing dressing rooms and a gym for use by major film stars were constructed on or relocated to the Studio Campus starting in 1929, with the first one constructed for Gloria Swanson. Assessor records document that the Cecil B. DeMille Theater was constructed in 1929 for private film screenings, although the historic property designation has a 1927 construction date for the building. Additional improvements were implemented during subsequent studio ownership. A number of buildings and structures from the Ince, DeMille, and RKO-Pathé/Selznick eras still remain in their original locations or have been relocated within the Studio Campus, while other characteristic studio lot features, such as early glass stages employed when sunlight was the only reliable source of illumination, a water tower, a pool, and film vaults, have gradually been demolished and replaced to accommodate changing studio needs and emerging technologies in response to transformative industry shifts – analogous to the industry’s current shift to digital technologies and sustainable practices.

### **Existing Conditions – General Overview**

The Studio Campus is a narrow, wedge-shaped, relatively flat parcel and is generally divided into three distinct subareas: the Mansion Area, which contains the public face of the studio; the central Production and Support Area (the Central Area), which occupies the majority of the approximately 14-acre Campus and contains the sound stages, offices, and support services/facilities; and the Western Area, forming the property boundary along Van Buren Place, which contains a three-level above-grade parking structure, and until recently contained bungalow Buildings S, T, U, and V, which have been relocated to the area south of the Mansion. Each is briefly characterized below.

The existing Mansion Area, the northernmost portion of the Studio Campus, contains the prominent and historically significant American Colonial Revival-style Mansion, set back from Washington Boulevard behind a deep fenced front lawn (the Front Lawn), associated administrative buildings designed in the same style and arrayed on either side of the lawn; and a sweeping internal driveway paved with asphalt. The Front Lawn is set behind a low brick and lattice fence and secured pedestrian gate along its Washington Boulevard frontage and is lined around its perimeter by low clipped hedges. Hedges also line a brick walkway bisecting the Front Lawn. The southern edge of the driveway is planted with a line of six mature sycamore trees (*Platanus racemosa*); there are also two large Deodar cedar trees (*Cedrus deodora*) at the eastern end of the Mansion at the southeast corner of the Front Lawn.

Immediately south of the Mansion, a Rear Lawn contains trees, shrubs and brick paving that comprise an internal courtyard for the use of Studio employees and visitors. This area sits atop a below-grade parking structure (the Rear Lawn Parking Structure) and is not visible from off-site. A small wood-frame elevator building provides pedestrian access to the below-grade parking structure while vehicular access is provided by a ramp just northwest of Gate 2. In addition, the four existing bungalow Buildings S, T, U, and V, previously located along the western edge of the Studio Campus, were recently relocated to this area as approved under CPA No. 6. Their relocation, orientation and configuration in this area retains the historic grouping of the

Bungalows within the Studio Campus in keeping with their original setting. One-story Building S was constructed in 1929 in the American Colonial Revival Style as dressing rooms. One-story Building T was constructed elsewhere in 1942 as an Army barracks and relocated to the Studio Campus in 1946 and converted to offices. One-story Building U, constructed in 1949 in the Moderne style, was originally used as a gym. One-and-a-half-story Building V, constructed in 1929 for Gloria Swanson, was initially used for dressing rooms and later housed offices. The Bungalows are now in the process of being rehabilitated for continued use as offices. The rehabilitation work is being undertaken by a team of qualified consultants and contractors in conformance with the Secretary of the Interior's Standards for Rehabilitation to reduce and mitigate adverse impacts pursuant to CEQA and the requirements set forth in the Mitigated Negative Declaration approved for CPA No. 6. Although the Bungalows relocation is nearing completion, it is being evaluated in this EIR to ensure that the combined environmental effects of CPA No. 6 and CPA No. 7 are fully considered.

The Central Area, which comprises most of the Studio Campus, contains 14 sound stages, production support facilities, offices, and a commissary, housed in 16 buildings (Buildings A through Y), plus a central plant. The largest sound stages and central plant are arrayed along the west side of the Studio Campus, while offices, the smaller sound stages, and the commissary line the eastern side of the Studio Campus; support facilities are scattered throughout and include Building Y at the southernmost property boundary. The spine of the Studio Campus accommodates production vehicle circulation and parking and outdoor production support functions in an internal courtyard.

The Western Area, forming the western-central property boundary along Van Buren Place, contains a three-level above-grade parking structure and until recently contained bungalow Buildings S, T, U, and V, which have been relocated to the area south of the Mansion.

Existing facilities total approximately 347,599 gross square feet. Office and support buildings on the Studio Campus range in height from single-story to approximately 56 feet, exclusive of rooftop mechanical and stairway housings and architectural projections, while sound stages are up to 64 feet in height, all with varying setbacks from the property boundaries. The Campus also contains below-grade, at-grade, and above-grade structured parking.

### **Resources Identified within the Project Site and Vicinity**

As further described in the Technical Report, included in Appendix D-1 of this Draft EIR, the Studio Campus has seen many changes over the years and no longer retains the historic character of an early twentieth-century motion picture studio. Although not eligible as a historic district due to significant loss of buildings from the Studio Campus and substantial alterations of remaining buildings, several buildings are still intact and individually eligible at the federal, state, and local level, as shown in the table below. Six on-site buildings have been designated individually at the local level as Landmark and Significant structures and also appear eligible for the National Register and California Register. Building C and D are designated by the City of Culver City as Landmark structures. Culver City has designated Building S, T, U, and V as Significant Structures. In addition, Stages 2/3/4, Stages 7/8/9, Stages 11/12/14, and Stages 15/16 appear

eligible individually for the National Register, California Register and local listing, and Buildings E, H, and I also appear individually eligible for local listing.

**TABLE 4.3.1-1  
 RESOURCES IDENTIFIED AND THEIR ELIGIBILITY**

<b>Address</b>	<b>Date</b>	<b>Eligibility</b>	<b>Criteria</b>	<b>HRI Status Code</b>
Building C and DeMille Theatre	1918-19 Building C 1929 DeMille Theatre	National/California Register Eligible Designated Local Landmark Structure	A/1, C/3, City Ordinance	3S, 3CS, 5S1
Building D	1919	National/California Register Eligible Designated Local Landmark Structure	A/1, C/3, City Ordinance	3S, 3CS, 5S1
Building E	1925	Eligible for Local Listing	City Ordinance	5S3
Building H	1925	Eligible for Local Listing	City Ordinance	5S3
Building I	1919	Eligible for Local Listing	City Ordinance	5S3
Building S	1936	National/California Register Eligible Designated Locally Significant Structure	A/1, City Ordinance	3S, 3CS, 5S1
Building T	1942	National/California Register Eligible Designated Locally Significant Structure	A/1, City Ordinance	3S, 3CS, 5S1
Building U	1941	National/California Register Eligible Designated Locally Significant Structure	A/1, City Ordinance	3S, 3CS, 5S1
Building V	1929	National/California Register Eligible Designated Locally Significant Structure	A/1, City Ordinance	3S, 3CS, 5S1
Stage 2/3/4	1926	National/California Register Eligible Eligible for Local Listing	A/1, City Ordinance	3S, 3CS, 5S3
Stage 7/8/9	1929	National/California Register Eligible Eligible for Local Listing	A/1, City Ordinance	3S, 3CS, 5S3
Stage 11/12/14	1927	National/California Register Eligible Eligible for Local Listing	A/1, City Ordinance	3S, 3CS, 5S3
Stage 15/16	1940	National/California Register Eligible Eligible for Local Listing	A/1, City Ordinance	3S, 3CS, 5S3

Source: ESA PCR, August 2017.

### Building C (Mansion)

Constructed in 1918, Building C (The Mansion) is an excellent example of the American Colonial Revival style and remains the oldest structure on the lot. As the most iconic representation of the studio, “The Mansion” is a designated Culver City Landmark Structure and is eligible for the both the National and California Registers for both its architectural and historical significance beginning in the Ince Era (1918-1924). Building C faces west towards W. Washington and Culver Boulevards and is the most visible and distinctive building on the Studio Campus. The use of this building has remained substantially the same, as administrative offices, over the years.

The Mansion is built of wood frame on a brick and concrete foundation and is clad with wide wood shiplap siding. The Mansion’s main block has two symmetrical red brick interior-end chimneys and a green asphalt (composition) shingle side gable roof (replaced). It has decorative pilasters on the front elevation marking the outer dimensions of the front portico and decorative corner boards marking the outer corners of both the main block and symmetrical side wings. A classical horizontal entablature unites the composition at cornice level under the roof overhang and boxed eaves. The Mansion has six-over-six double-hung windows flanked with wood shutters. The Mansion’s two-and-a-half-story, seven-bay, side-gable main block projecting two-and-a-half-story, three-bay side-gable wings with similar cladding and trim. The wings have two symmetrical shed-roofed dormers and brick interior-end chimneys.

Character-defining features of Building C include the monumental two-story, seven-bay classical front portico featuring colossal (two-story high) Tuscan Doric columns supporting a horizontal entablature with molded architrave and unadorned frieze. The frieze has large lettering attached that reads “The Culver Studios”. The portico is surmounted by a triangular three-bay pediment centered over the front entrance, and the pediment is flanked by four symmetrical gabled dormers with triangular pediments. The portico is crowned by a Chippendale-style balustrade. The primary entrance is centered under the portico and has a six-panel wood door topped with an arched transom window. The door is framed by a classical frontispiece with a molded arched cornice and returns supported by a pair of Tuscan Doric pilasters.

Building C is set deeply into the lot from Washington Boulevard, within a formal landscape, which includes a center brick pedestrian pathway that bisects a broad front lawn. The brick path is adorned by low clipped hedges and rose bushes and leads directly from the public sidewalk through an entrance gate and perimeter wall (brick) and fence. The brick pathway leads to the brick steps of the Mansion’s front portico. A wide semi-circular driveway of asphalt borders a manicured lawn dotted with a row of sycamore trees.

The Mansion has several additions on the west and east ends that project forward forming a U-shaped footprint that frames the front lawn landscape. A one-and-a-half-story addition containing the “ship room” is attached to the west end of the Mansion; and a front-facing gabled wing addition extends forward from the Mansion’s west wing. On the other side of the Mansion the DeMille Theatre and Selznick wing extend from Building C’s east wing.

By 1929, the DeMille Theatre was added to the east end of the Mansion and in 1936 the “Selznick wing” (Building D) was also added to the east end. The east wing has a single-story hyphen with a flat roof, bordered by a Chippendale-style wooden balustrade, connecting the east end of the Mansion to the DeMille Theatre.

#### *Cecil B. DeMille Theatre*

Assessor records document the Cecil B. DeMille Theatre, an addition to Building C, was constructed in 1929 (after DeMille sold the studio) but newspaper accounts suggest the Cecil B. DeMille Theatre was built in 1927 as a screening room (consistent with 1926-1928 period of DeMille ownership). Attached to the east wing of Building C, the primary entrance to the Cecil B. DeMille Theatre is on the east primary elevation of the theatre which faces onto a brick courtyard south of Building D. The theater entrance is sheltered by a front-gabled porch that is supported by five chamfered square wooden posts with molded capitals and square bases. The entrance is framed by a classical frontispiece and has a pair of paneled wooden doors lead into the small lobby and theater. The classical revival theme continues on the interior which has decorative wood detailing, coved ceiling, theater seating, and a large movie screen. On July 27, 1984 the DeMille Theatre was dedicated to the famous movie director and producer. The DeMille Theatre is a designated local Landmark Structure and is eligible for the National and California Registers for its architectural and historical significance in association with the Cecil B. DeMille/RKO Era (1925-1935).

#### *Front Lawn Landscape*

The Mansion and associated landscape is a significant attribute of the Studio Campus in public view from Washington Boulevard at the intersections of Canfield Avenue and Washington, Culver, and Ince boulevards. The Front Lawn landscape reinforces the historic character of the Mansion and associated Studio Campus by maintaining the relationship between the studio buildings and the surrounding neighborhood. Thus, the Front Lawn of the Mansion is a commanding element within the City’s urban setting and is the public’s “front door” to The Culver Studios. The Front Lawn is part of the Landmark Structure designation of Building C and contributes to the eligibility of the Mansion for listing in the National and California Registers.

Existing original character-defining features of the Front Lawn landscape from ca.1919–1920, installed shortly after the Mansion was completed, include the front brick steps to the Mansion’s front portico, an earthen berm along the front of the Mansion’s foundation sloping down to a broad manicured lawn, circular driveway (resurfaced), and six existing sycamore trees dotting the manicured Front Lawn, of which five are remaining original plantings. The circular driveway which enters and exits from Washington Boulevard (the gates are later non-contributing additions). The Front Lawn is bordered along Washington Boulevard by a low brick wall (original) topped by a wood lattice fence (rebuilt) and bordered by a clipped hedge (original) behind the fence. The Front Lawn is bisected by a formal processional brick walkway added ca. 1924, which is adorned by the original low clipped boxwood hedges (ca. 1924). The processional walkway is composed of a double brick pathway edged on its outer and inner edges by low clipped boxwood hedges. The Front Lawn landscape has a formal bilateral symmetry and a strong axis to Washington Boulevard. There are several large mature cedar trees in the northeastern corner of the landscape which date from the 1950s, after the period of significance, which are

non-contributing. The restricted landscape palette with manicured lawns and hedges is formal and restrained in character, providing an appropriate contributing setting for the Colonial Revival architecture of the Mansion.

Although generally unchanged, the condition of the Front Lawn landscape has declined over the last 96 years due to maturation, alteration, and addition of landscape materials and structural improvements to the Mansion and grounds. For example, the trunks of the boxwood hedges have become thick with age making it difficult to clip the hedges down to their original size and design. All foundation plantings along the front of the Mansion and the ornamental shrubs bordering the front stairs have been replaced several times over the years and are not original. Additional plantings of ornamental shrubs and trees added after the period of significance at the corners of the Front Lawn have now matured and diminish the formal clarity of the original landscape design. Furthermore, structural additions to the east and west wings of the Mansion, construction of new east and west gates to the circle drive, and introduction of a new gatehouse and underground parking entrance on the west side of the Front Lawn area are non-contributing alterations.

#### Building D Selznick Wing

Building D located at the perimeter of the front lawn immediately east of Building C and north of the Cecil B. DeMille Theater, is also an excellent example of the American Colonial Revival style. Building D was constructed in three sections; the south section was constructed in 1919; the middle section was constructed in 1935, housing David O. Selznick's offices; and the north section was constructed in 1937. Building D is an individually designated Local Landmark Structure and is eligible for the National and California Registers for its architectural and historical significance beginning in the Ince Era (1918-1924) and extending through the Selznick Era (1935-1949). Character defining-features include its irregular footprint; one- and two-story scale; low-pitched intersecting gable roofs covered in green composition asphalt shingles (replaced); horizontal wood siding; six-over-six double-hung wood windows; paneled wood doors; and several features such as a brick exterior end chimney, two multi-pane curved bay windows; and a one-story, one-bay gabled entrance porch with triangular pediment supported by wood columns.

#### Building E

Located directly across from the DeMille Theater, Building E was constructed in 1925 as an ancillary support building for Buildings C and D, functioning as a casting office. Building E retains integrity and appears individually eligible for local listing as a good example of the American Colonial Revival style as applied to an ancillary structure and for its historical association with The Culver Studios beginning in the Cecile B. DeMille/RKO Era (1925-1935). The single-story wood-frame building has a rectangular footprint with side-facing gable roof, narrow ship-lap siding, single and paired six-over-six double-hung sash windows, and gabled center-front entrance porch. A gabled wing with a recessed porch across the back extends from the south side.

### Building H

Attributed in previous evaluations with a construction date of 1925, Building H was relocated from another area of the Studio Campus to its current location south of Building C in the Rear Lawn area at an unknown date. Building H retains integrity and appears individually eligible for local listing as a good example of the American Colonial Revival style as applied to an ancillary structure and for its historical association with The Culver Studios beginning in the Cecil B. DeMille/RKO Era (1925-1935). The one-story wood-frame building has a rectangular plan and massing and is covered by a medium-pitch side-gable roof and sheathed with shiplap wood siding. It has six-over-six double-hung windows and an off-center gabled front porch with a broken pediment supported by Tuscan Doric wood columns.

### Building I

Constructed in 1919 on the Studio Campus and relocated in 1936 to its current location in the south of Building C, Building I is an ancillary support building or office. While Building I does not meet the eligibility threshold for listing in the National or California Registers, it retains integrity and does appear eligible for local listing as a good example of the American Colonial Revival style as applied to an ancillary structure and for its historical association with The Culver Studios beginning in the Ince Era (1918-1924). Building I is a one-story wood-frame building sheathed in shiplap siding with a rectangular plan and side-gable roof. The entrance is sheltered by a gabled front porch and the building is lighted by single and paired six-over-six double-hung sash windows.

### Bungalows S, T, U and V

The four existing bungalow Buildings S, T, U, and V, used historically and until relocation as talent facilities, are not only designated locally but are also eligible for the National and California Registers (see Table 4.3.1-1 above) for their historical significance in association with The Culver Studios. The following provides descriptions of each bungalow building.

Building S is a one-story American Colonial Revival style bungalow constructed in 1936 was originally used as dressing rooms and consists of a rectangular floor plan on a concrete foundation. The bungalow is clad in wood clapboard siding and topped with a hipped roof with wood shingles and boxed eaves with a cornice. Building S is associated with the David O. Selznik Era (1935-1949) within the overall period of significance as a residence for stars like Clark Gable and Vivian Leigh during the filming of *Gone with the Wind*. The structure has been designated at the local level as a Significant Structure and appears eligible for the National and California Registers for its historical significance.

Building T was originally constructed in 1942 as army barracks but was moved to the Western Area sometime around 1946 when it was converted into office spaces. The bungalow has a rectangular footprint with concrete foundation and wood clapboard siding. It has a forward facing gabled roof with wood shingles and boxed eaves with a decorative cornice with cornice returns. Building T is associated with the David O. Selznik Era (1935-1949) within the overall period of significance. The structure has been locally designated as a Significant Structure and also appears eligible for the National and California Registers for its historical significance.

Constructed in 1941, assessor records note Building U was used as a gym. Designed in the Moderne style, it is a one-story with a square footprint and is covered in stucco. The front portion of the building is taller than the back, as the side elevations step down to the rear. Building U is associated with Orson Welles during the filming of “Citizen Kane.” The building retains integrity from its period of significance, the Selznik Era (1935-1949), to express its association with the studio and Orson Welles while he directed Citizen Kane. Building U appears eligible for the National and California Registers and has been locally designated a Significant Structure.

Constructed in 1929, the assessor records note Building V was used as a dressing room for Gloria Swanson and the 1950 Sanborn map notes it was a publicity office. Originally Building V had a living room, two dressing rooms, a bathroom, and a kitchen. The one-and-a-half story Moderne style building has a rectangular plan and massing covered in stucco with narrow horizontal Moderne banding accenting the primary and side elevations. The flat roof has metal coping at the roofline. There is a second-story towards the rear of the building historically noted as a “sun room.” Building V has enough integrity to exemplify its historical significance in association with the Cecil B. DeMille/RKO Era (1925-1935) and appears individually eligible for National and California Registers and has been designated a locally Significant Structure.

#### Sound Stage 2/3/4

Sound Stage 2/3/4 is housed in a large utilitarian structure on the northwest portion of the lot. The three-story structure has a rectangular footprint that is oriented fronting north towards the Administration Building. Constructed in 1926, Sound Stage 2/3/4 is an early sound stage associated with the DeMille/Early RKO Era (1925-1935) and is the earliest remaining stage constructed on the lot. Sound Stage 2/3/4 is an undistinguished utilitarian structure common to other studio lots. Historically however, Sound Stage 2/3/4 represents a change in stage construction, abandoning glass walls and relying on an increased use of artificial lighting, and was altered to accommodate the Studio’s transition from the Silent Film Era into the Era of the “Talkies.” While Sound Stage 2/3/4 facilitated the filming of the early “talkies,” it should be noted that it is the films made there that are of primary historical importance and the stages provided a supporting role as a location for filming and production activities. As an early film industry stage, the building appears individually eligible for the National and California registers for its historical importance and also appears eligible for local listing, representing the studio’s adaptation to new technology and its transition into the sound era. The addition of several ground level offices in 1943 are associated with the David O. Selznik era; elevator shafts have been added to the east and west elevations, but their design conforms to the Secretary of the Interior’s Standards; although the building’s setting has changed from its original date of construction in 1926, the building retains enough integrity to convey its significance as an early sound stage. The structure is clad with stucco and topped with a low pitched roof with a cupola that runs the length of the building. Each end of the building contains three floors of office space, accessed via metal stairs (alteration). Four large wooden freight doors located along the east side of the structure provide access to the sound stages. Recessed porches supported by wood posts run halfway along each side of the building on the third floor, providing access to various office spaces. Where the recessed porch ends, a row of metal frame double hung windows begins. An elevator shaft made of metal framing and glass (alteration) is attached to the east side of the building. There are multiple doorways located along each side of the building, consisting of a variety of door types,

including wood paneled doors and partially glazed wood panel doors. Fenestration throughout varies as well with a combination of wood frame double-hung windows, metal frame double hung windows, metal frame sliding windows, and metal frame tilt windows.

### Sound Stage 7/8/9

Sound Stage 7/8/9 was built in 1929 and is located on the east side of the lot next to Building X. Oriented fronting west towards the interior of the compound, Sound Stage 7/8/9 is housed in a one story, utilitarian structure with a rectangular footprint on a concrete foundation. The stage has no apparent alterations and retains enough integrity to convey its significance as an early sound stage. Constructed in 1929, Sound Stage 7/8/9 is associated with the DeMille/Early RKO Era (1925-1935) and is an early sound stage constructed on the lot. As an early film industry sound stage, the building is architecturally undistinguished and is an example of a utilitarian sound stage found on studio lots throughout Southern California; however, Sound Stage 7/8/9 played an important role in the studio's development and appears eligible individually for the National and California Registers and is eligible for local listing for its historical significance in association with the early DeMille/Early RKO Era and with the films produced during this time. The existing structure is clad with stucco and topped with a low pitched Dutch Colonial style roof. A large wooden freight door and concrete ramp are located at the center of the main façade. In addition to the freight door, four walk-in doors provide access to the sound stages via concrete stairs with metal railings. The walk-in doors are specially made sound proof doors situated below flat metal Moderne-style canopies (alterations). The north elevation consists of another concrete ramp leading to a wooden freight door. A walk-in entrance is situated on the east side of the freight door and includes a wood paneled door with flat wooden canopy and wooden stairs. On the west side of the freight door is a large metal ladder leading to the building's roof. The south elevation consists of a large wooden freight door and a concrete ramp. A pair of ventilation ducts extends from the façade on the east side of the freight entrance. Also on the east side of the freight entrance is a walk-in door with concrete steps, metal railing, and a metal Moderne-style canopy (alteration).

### Stage 11/12/14

Constructed in 1927 as Stage 6, Stage 11/12/14 is one story and utilitarian in appearance and has a concrete foundation, rectangular plan and massing, steel frame, stucco sheathing, and low-pitch steel truss roof. The primary (south) elevation is located within an enclosed entry porch with a shed roof centered on the primary (south) elevation. A concrete ramp (alteration) leads to the entrance, consisting of tall, floor-to-ceiling wood double doors. Flanking the entry porch are two additions. In 1934, an addition with the approximate dimensions of twenty-four feet by eight feet was constructed just west of the primary entrance. At an unknown date, an addition was constructed just west of the primary entrance and appears to have been derived from canopy and shed additions built in 1943. Both of these additions are one-story and have shed roofs, vertical slider windows, and paneled wood entry doors. Both side (west and east) elevations have secondary entrances into the stage. The overall building is divided into three stages, which are accessed via three oversized openings on the primary (east) elevation. The oversized entrances consist of metal-clad freight doors accessed from a concrete platform with a side ramp (alteration, appears to be a recent addition). There are two regular pedestrian doors (alteration, doors appear to be replaced) accentuated by Streamline style awnings and concrete platforms and stairs

(alteration) that open into Stage 14 and Stages 11/12. Rectangular vents nearly aligned with the top of the oversized doors punctuate the east elevation at regular intervals. A fourth oversized opening is located on the side (north) elevation and to the west is a pedestrian door (alteration, door appears to be replaced) that leads into Stage 11. The rear elevation is a flat, stucco surface with several gutters leading to the roof.

Stage 11/12/14 is attached to Stages 15/16, constructed in 1940, at the side (south) elevation. Stage 11/12/14 was sound proofed in 1931, and a rear one-story addition (dressing rooms) was added in 1932. This addition remains extant and runs the entire length of the side (west) elevation. The shed roof extends past the front elevation of the dressing room addition to create a covered walkway. The dressing room addition is covered in stucco and has rows of clerestory wood-frame single-light fixed windows, vertical aluminum slider windows (alteration), and wood panel doors (alteration, replaced). Stage 15 was added to the south elevation in 1940, and the original Stage 6 was divided into three sound studios sometime before 1950. As a whole, Stage 11/12/14 retains enough integrity as a sound studio to represent the historical significance of the Cecil B. DeMille Era (1925-1935) and David O. Selznick Era (1935-1949) and is eligible individually for the National and California Register and for local listing.

#### Stage 15/16

In 1940, Stage 15/16 was constructed onto the side (south) elevation of Stage 11/12/14. Stage 15/16 has a concrete foundation, wood-frame, concrete piers, steel columns, steel truss roof, and wood sash windows and doors. Stage 15/16 is sheathed in stucco and is devoid of ornamentation. The original structure had two-inch wool blanket insulation/interior finish, which appears to be intact. The primary (east) elevation is set back from Stage 11/12/14 approximately thirteen feet. At the corner created by the intersection of Stage 11/12/14 and Stage 15/16, is a one-story bathroom (original, constructed in 1940). Two oversize metal sliding doors punctuate the east elevation. Located in between the oversize metal sliding doors, is a 20 foot by 29-foot storage addition with a shed roof added in 1943. The secondary south and west elevations are utilitarian in appearance and plain stucco surfaces. Located on the south elevation is a screen dock constructed of wood in 1942 and a fan protected by a shed roof near the roofline. A process screen stage room protrudes from the northern end of the rear elevation and has a heavy metal door and wall light. To the west of the east elevation along the parcel line is another scene dock. Stage 15/16 retains is highly intact as an example of a sound stage and is individually eligible for the National and California Registers and for local listing for its historical contribution to the David O. Selznick Era (1935-1949).

#### Evaluation of the Studio Campus as a Potential District

National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (National Register Bulletin 15) states “the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.”<sup>1</sup>

<sup>1</sup> National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, 5, <http://www.nps.gov/nr/publications/bulletins/pdfs/nrb15.pdf>, accessed April 11, 2017.

Previous evaluations of the Studio Campus resulted in identification of The Culver Studios as a potential historic district, eligible for the National Register, California Register, and local listing. The initial survey of the Studio occurred in 1976 and was limited in its approach and only documented the Administration Building (Building C).

A Citywide Survey conducted by Thirtieth Street Architects in 1987 included a more detailed historic context and assessment of potential contributing buildings and features within the property. However, the 1987 report did not consider how the uses of each building contributed to the district and identified buildings as contributors despite severe and moderate alterations.

In 2006, Historic Resources Group (HRG) conducted a new survey of the Studio reviewing the Project Site's existing conditions in a more comprehensive manner. The report acknowledged that the studio had been reorganized since the earlier 1987 survey, including the removal of 12 buildings previously identified as contributors. The 2006 report analyzed the remaining buildings based on six general components of studio lots (stages; administrative; dressing rooms/bungalows; process; support; and service). The 2006 survey was a reconnaissance survey identifying the Studio Campus as a potential district significant for its historic association with filmmaking, and assigning a period of significance from 1918, the Studio's establishment, through 1946. The period of significance was chosen to include the ownership periods of Thomas H. Ince, Cecil B. DeMille, and RKO-Pathé, as well as the period when David O. Selznik leased the property from RKO.

A subsequent survey in 2010, ICF Jones & Stokes determined that the Studio remained eligible as a historic district based on the previous 2006 analysis and despite the demolition of contributing Buildings J and R.

In 2015, PCR Services Corporation prepared an Assessment Report for CPA No. 6. The Assessment Report identified many changes to the Studio Campus over the years and determined that, due to an erosion of integrity over time, it no longer retains the historical character of an early twentieth-century major motion picture studio. PCR Services (PCR) reviewed the previously conducted surveys and determined that additional analysis of the potential district was necessary to study the history of site development more closely given that research findings showed that so many buildings had come and gone from the property, calling into question the viability of the potential historic district. This analysis uncovered the physical development history of the Studio which was driven by its ascension as one of the Big Eight major motion picture studios under RKO's management during the 1920s and 1930s. During this period, eighteen buildings and features were added to the property, reflecting RKO's growth and success. After this period, although the Studio Campus remained the property of RKO until 1956, the company began consolidating its film production efforts to its Gower Street Studio in Hollywood and leased the Culver City property to smaller independent producers. The period of significance for a potential historic district in the PCR study was expanded to 1918-1949, to include periods in which the property was also associated with significant persons, Thomas H. Ince (1918-1924), Cecil B. DeMille (1925-1928) and David O. Selznik (1935-1949).

While the Studio Campus appeared significantly associated with historic events and personages, it was found to lack integrity necessary to convey those significant themes. The chain of motion picture production has become fractured due to losses of significant and contributing building types over time. Alterations to features such as the original gate houses and water tower along with later infill intrusions have further eroded the historical character of the Studio Campus. These alterations have substantially changed the historic appearance and function of the Studio and materially detract from its integrity and ability to convey its significant historical associations.

Although not eligible as a potential historic district due to lack of integrity, several intact buildings were found individually eligible at the federal, state, and local level, as shown in **Table 7**, below. Six on-site buildings have been designated individually at the local level as Landmark and Significant structures and also appear eligible for the National Register and California Register. Buildings C and D are designated by the City of Culver City as Landmark structures. Culver City has designated Buildings S, T, U, and V as Significant structures. In addition, Stages 2/3/4, Stages 7/8/9, Stages 11/12/14, and Stages 15/16 appear eligible individually for the National Register, California Register and local listing, and Buildings E, H, and I also appear individually eligible for local listing.

The results of the PCR study involved new information gleaned from additional research. Particularly important was review of historic aerials and Sanborn maps documenting the physical evolution of the Studio Campus over time, as well as review of original assessor's records. A comprehensive site survey was conducted by PCR that documented all existing buildings, structures, infrastructure, circulation, views and landscape features. While the Studio Campus was identified as a potentially eligible historic district under the national, state and local criteria, the PCR study found the Studio Campus did not retain enough integrity to convey its significant historical or architectural associations with the Ince Era (1918-1924), Cecil B. DeMille/Early RKO Era (1925-1935) or Selznick Era (1935-1949) either alone or combined.

Additional research on the question of a potential historic district was conducted by ESA PCR in association with this EIR, as further detailed in the Technical Report. This effort included research on the history of television production at The Culver Studios (1957-1967). The small production company founded by Lucille Ball and Desi Arnaz (Desilu) acquired The Culver Studios from RKO including RKO's Gower Street and RKO-Pathe's Culver City lots and a 29-acre back-lot known as "40 Acres". Production companies were able to lease space on 40 acres for production of popular television shows. Out of this evolved the telefilm business, of which Desilu was near the forefront by 1959, continuing to operate at The Culver Studios until 1966 when the company was purchased by Paramount. However, the Studio Campus does not appear to have attained significance during the Desilu era. Portions of the property were rented to smaller independent television and film production companies. When they purchased the Studio in 1957, Desilu Productions had already begun to established itself in the telefilm industry. Desilu's purchase of the RKO studios reflects their success as a television production company. However, that success was derived years earlier by events that took place at other studios like Jimmy Nasser's General Services Studio and Motion Picture Center, both located in Hollywood. General Services Studio was the location where Desi Arnaz and Karl Freund developed a three-

camera shooting style before a live audience for *I Love Lucy* in the early 1950s. Aerial images of the property from the Desilu period revealed no significant additions, alterations, or demolition of significant buildings. Furthermore, the Studio Campus was one of three properties operated by Desilu during the 1950s and was valued for its large backlot, which is no longer extant.

Review and documentation of both extant and non-extant structures from the Ince, DeMille/RKO, and Selznik eras are documented in the Technical Report, included in Appendix D-1 of this EIR. Although PCR's 2015 survey and the Technical Report completed for this EIR identified the Studio Campus as significant under national, state and local criteria, it was still found after further research and analysis that the Studio Campus lacks integrity of design, feeling and association as an early twentieth-century motion picture studio. The Studio's chain of production is no longer conveyed by the Studio Campus as a whole due to missing building types associated with motion picture production. The Studio Campus has changed over time in such a way that many of the essential physical characteristics dating to its period of significance have either been lost or altered. Its Film Processing Facilities, Construction Facilities, Storage Facilities, Service Facilities, Gates and Gatehouses, and its Water Tower no longer exist. Despite these deficiencies, the American Colonial Revival Mansion, DeMille Theater, Building D (Selznik Wing), the iconic Front Lawn landscape, and the grouping of historic ancillary buildings (relocated) behind the Mansion (E, H, I, S, T, U, V) and several stages, 2/3/4, 7/8/9, 11/12/14, and 15/16, continue to convey their historical and architectural significance as individual resources.

### **4.3.1.3 Regulatory Framework**

This section provides a summary of pertinent historical resources regulations affecting the Project at the federal, State and local levels.

#### ***Federal***

The National Register of Historic Places was established by the National Historic Preservation Act (NHPA) as “an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.”<sup>2</sup> The National Register recognizes properties that are significant at the national, State, and/or local levels.

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

- A. It is associated with events that have made a significant contribution to the broad patterns of our history;
- B. It is associated with the lives of persons significant in our past;

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<sup>2</sup> 36 CFR Section 60.2.

- C. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;
- D. It yields, or may be likely to yield, information important in prehistory or history.<sup>3</sup>

Districts, sites, buildings, structures, and objects that are 50 years in age must meet one or more of the above criteria and retain integrity (this is, convey their significance) to be eligible for listing. Under the National Register, a property can be significant not only for the way it was originally constructed, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.<sup>4</sup> Within the concept of integrity, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity: Location, Design, Setting, Materials, Workmanship, Feeling, and Association.

To retain historic integrity, a property will always possess most of the aspects and depending upon its significance, retention of specific aspects of integrity may be paramount for a property to convey its significance.<sup>5</sup> Determining which of these aspects are most important to a particular property requires knowing why, where and when a property is significant.<sup>6</sup> For properties that are considered significant under National Register Criteria A and B, National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (National Register Bulletin 15) explains, “a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).”<sup>7</sup> In assessing the integrity of properties that are considered significant under National Register Criterion C, National Register Bulletin 15 states, “a property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.”<sup>8</sup>

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<sup>3</sup> “Guidelines for Completing National Register Forms,” in National Register Bulletin 16, U.S. Department of Interior, National Park Service, September 30, 1986. This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the NRHP.

<sup>4</sup> National Register Bulletin 15, page 19.

<sup>5</sup> The National Register defines a property as an “area of land containing a single historic resource or a group of resources, and constituting a single entry in the National Register of Historic Places.” A “Historic Property” is defined as “any prehistoric or historic district, site, building, structure, or object at the time it attained historic significance. Glossary of National Register Terms, [http://www.nps.gov/nr/publications/bulletins/nrb16a/nrb16a\\_appendix\\_IV.htm](http://www.nps.gov/nr/publications/bulletins/nrb16a/nrb16a_appendix_IV.htm), accessed June 1, 2013.

<sup>6</sup> National Register Bulletin 15, page 44.

<sup>7</sup> “A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property’s historic character. Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register.” Ibid., page 46.

<sup>8</sup> “A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.” Ibid., page 46.

## **State**

The State Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation (DPR), implements the policies of the NHPA on a Statewide level. The OHP also carries out the duties as set forth in the PRC and maintains the HRI and the California Register of Historical Resources. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the State’s jurisdictions. Also implemented at the State level, CEQA requires projects to identify any substantial adverse impacts which may affect the significance of identified historical resources.

The California Register was created by Assembly Bill 2881 which was signed into law on September 27, 1992. The California Register is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.”<sup>9</sup> The criteria for eligibility for the California Register are based upon National Register criteria.<sup>10</sup> Certain resources are determined by the statute to be automatically included in the California Register by operation of law, including California properties formally determined eligible for, or listed in, the National Register.<sup>11</sup>

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally Determined Eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward;
- Those Points of Historical Interest (“PHI”) that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.<sup>12</sup>

Other resources which may be nominated to the California Register include:

- Individual historical resources;
- Historical resources contributing to historic districts;
- Historical resources identified as significant in historical resources surveys with significance ratings of Category 1 through 5;
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an HPOZ.<sup>13</sup>

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<sup>9</sup> PRC Section 5024.1(a).

<sup>10</sup> PRC Section 5024.1(b).

<sup>11</sup> PRC Section 5024.1(d).

<sup>12</sup> Ibid.

<sup>13</sup> PRC Section 5024.1(e).

To be eligible for the California Register, a historic resource must be significant at the local, State, or national level, under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Additionally, a historic resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing. Integrity is evaluated with regard to the retention of seven aspects of integrity similar to the National Register, location, design, setting, materials, workmanship, feeling, and association. Also like the National Register, it must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance. It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.<sup>14</sup>

## ***Local***

### **City of Culver City**

The City enacted a Historic Preservation Ordinance in 1991 which defines Cultural Resources. The Historic Preservation Ordinance (Chapter 15.05 of the City's Municipal Code) is administered through the City's Community Development Department by Cultural Affairs. The Ordinance outlines a designation process, criteria, and procedures for altering or modifying designated Cultural Resources. Pursuant to the City's Ordinance, a Cultural Resource is a property that has aesthetic, cultural, architectural or historical significance to the city, state, or nation, and may have been designated as a Landmark Structure, Significant Structure, or Recognized Structure. After satisfying at least one of the threshold criteria, classification is based on a ranking system, currently outlined in Resolution No. 91-R015.

A Landmark Structure is defined as a structure designated as an exceptional example of the highest architectural, historical, or cultural significance of the community. A Landmark structure or district may be designated without owner consent.

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<sup>14</sup> Codified in California Code of Regulations, Title 14, Chapter 11.5, Section 4852(c) which can be accessed on the internet at <http://ohp.parks.ca.gov>

A Significant Structure is defined as a structure designated as being of substantial architectural, historical, or cultural significance to the community. If residential, a “Significant” structure or district shall be designated with written consent of the owner, provided that the consent of only a majority of the owners shall be required for a “Significant district” designation. Once the designation has been made and the designation document has been filed for recondition, owner consent is irrevocable. If the owner consent is not obtained, a residential structure or district may be designated “Recognized.” If nonresidential, a structure may be designated without owner consent.

All structures with "Landmark" or "Significant" designations are required to display a plaque identifying that building or district as either "Landmark" or "Significant.”

A Recognized Structure is defined as a structure designated as being of architectural, historical, or cultural interest. A structure or district may be designated as “Recognized” without the consent of the owner. No other requirements apply to Recognized structures.

The Ordinance also identifies historic districts as a “Landmark District,” a “Significant District,” or a “Recognized District” with similar criteria for designation. A historic district is described as a designated area consisting of one (1) or more contiguous parcels improved with structures at which events occurred that made a significant contribution to the city, state, or national history or culture, or an area that contains structures that are collectively significant examples of period, style, or method of construction that provide distinguishing characteristics of the architectural type or period represented.

The Culver City Historic Preservation Ordinance (Section 15.02.020) establishes criteria for designating local historical resources and districts as Cultural Resources. To be considered for designation, a structure must be at least fifty (50) years old and the exterior of the structure is accessible or visible to the public, or the structure or district has special importance to the City.

After satisfying the threshold criteria, a structure or district must meet at least one of the following criteria:

1. Is the structure(s) of architectural significance”?
2. Is the structure(s) of “historical or cultural significance”?
3. Do the structures in the district collectively meet 1 or 2 above?

#### **4.3.1.4 Environmental Impacts**

##### ***Methodology***

The analysis in this section was conducted by ESA PCR personnel who meet and exceed the Secretary of the Interior’s Professional Qualification Standards in history and architectural history. The cultural resources evaluation involved a review of the National Register and its annual updates, the California Register, the Statewide Historical Resources Inventory database maintained by OHP and the California Historical Resources Information System (CHRIS), and the City’s inventory of historic properties to identify any previously recorded properties within or near the Project Site, as well as environmental review assessments for other projects in the

vicinity. An intensive pedestrian survey was also undertaken to document the existing conditions of the Project Site and Project vicinity. The following tasks were performed for the study:

- Searched records of the National Register, California Register, California Historical Resources Inventory Database, and Culver City Landmark or Significant designations.
- Conducted intensive field inspections of the study area and the Subject Property, and utilized the survey methodology of the State OHP and SurveyLA.
- Specifically, utilized SurveyLA guidelines for evaluation of the Major Motion Picture Studio property sub type (The Big Eight); identified and classified character-defining buildings, structures and features important for the production of motion pictures; and conducted intensive-level survey and integrity assessments.
- Photographed The Culver Studios and examined other properties in the area that exhibited potential architectural and/or historical associations.
- Conducted site-specific research on the property utilizing building permits, assessor's records, Sanborn fire insurance maps, historical photographs, Online Archive of California, USC Digital Collections, historical *Los Angeles Times*, and other published sources. Conducted research at the City of Culver City Division of Building Safety, Los Angeles County Assessor, and Culver City Historical Society.
- Researched and documented both extant and non-extant structures from the Ince, DeMille/RKO, and Selznik eras. Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation, designation assessment processes, and related programs.
- Evaluated potential historical resources based upon criteria used by the National Register, California Register, and the City Historic Preservation Ordinance.
- Assessed the Project against the CEQA thresholds for determining the significance of impacts to historical resources.

### ***Thresholds of Significance***

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines.

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historic resource. The Standards were developed as a means to evaluate and approve work for federal grants for historic buildings and then for the federal rehabilitation tax credit (see 36 Code of Federal Regulations [CFR] Section 67.7). Therefore, the Standards are used for regulatory approvals for designated resources but not for resource evaluations. Similarly, CEQA recognizes the value of the Standards by using them to demonstrate that a project may be approved without an EIR. In effect, CEQA has a “safe harbor” by providing either a categorical exemption or a negative declaration for a project which meets the Standards (see State CEQA Guidelines Section 15331 and 15064.5(b)(3)). Accordingly, a significant impact to historical resources would occur if the Project were to:

**HIST-1** Demolish, destroy, relocate, or alter a historical resource such that eligibility for listing on a register of historical resources would be lost (i.e., no longer eligible for listing as a historic resource); or

**HIST-2** Through indirect effects reduce the integrity or significance of important historical resources on the Project Site or in the vicinity such that eligibility for listing on a register of historical resources would be substantially changed.

### ***Analysis of Project Impacts***

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**Threshold HIST-1:** The Project would result in a significant impact on historical resources if it would demolish, destroy, relocate, or alter a historical resource such that eligibility for listing on a register of historical resources would be lost (i.e., no longer eligible for listing as a historic resource).

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**Impact Statement HIST-1: The Project would require removal of Stage 2/3/4 and Stage 7/8/9, both of which are recommended eligible at the national, State and local levels, and therefore, there would be significant unavoidable Project impacts on historical resources. Impacts associated with relocation of the bungalows and interior rehabilitation of the Mansion would be less than significant with implementation of mitigation measures.**

#### **Direct Impacts**

Consistent with CPA No. 6 four existing bungalows (Buildings S, T, U and V) were recently relocated behind the Mansion in conformance with the Secretary of the Interiors Standards as required under the adopted conditions of CPA No. 6. The configuration and site plan for the four bungalows retains their historic grouping within the Studio Campus. Potential impacts associated with relocation of the bungalows are being reduced to less than significant levels through implementation of required recordation, relocation and rehabilitation plans, subject to a mitigation monitoring and reporting program required under CPA No. 6. After relocation and the currently underway rehabilitation, the bungalows would still retain their eligibility as National and California Register resources and as locally designated historical resources.

There are other individually eligible historical resources that would be directly impacted by the Project. The Project would demolish Stage 2/3/4 constructed in 1926 and Stage 7/8/9 constructed in 1929. Both buildings are eligible for the National Register, California Register, and local listing for their significant historical association with RKO Pictures and the Studio's transition into the production of sound films (Talkies) under National Register Criterion A, California Register Criterion 1, and the Culver City Ordinance. Although mitigation measures are provided below that include recordation, salvage and an interpretive program, impacts associated with removal of Stage 2/3/4 and Stage 7/8/9 would remain significant and unavoidable.

The Project would include minor changes and upgrades to the Front Lawn area where needed that would be carried out in a manner that would reflect the period of historic significance for Buildings C and D and the associated historic Front Lawn landscape. Given the limited nature of the changes and the expectation that they would be carried out with respect to and in keeping with the original landscape design, the minor alterations to the landscape including resurfacing the

entrance drive, replacing entrance gates, removing non-historic landscape plantings and replacing them with in-kind historic period plant materials where needed are expected to enhance the appearance of the landscape in a manner consistent with its historic appearance. The Project is expected to enhance the appearance of the landscape in a manner consistent with its historic appearance and in conformance with the Standards. Accordingly, impacts associated with landscape changes are considered less than significant.

No major exterior changes are proposed to the Mansion or adjacent Buildings D, E, H, and I under the Innovation Plan. Minor exterior changes being proposed include the addition of two wheelchair lifts (reversible) on the rear (south) elevations of the Mansion and Building D, and regrading of pathways to meet accessibility requirements for the DeMille Theater and Buildings E, H, and I. The accessibility upgrades and lift have been designed in conformance with the standards, are compatible in design, and are fully reversible should they be removed in the future. Accordingly, impacts associated with exterior changes to the Mansion are considered less than significant.

Interior tenant improvements currently underway for Buildings C (the Mansion), D, E, H and I, are limited in nature to support continued use as offices and bring the building up to current standards, including security, structural and accessibility upgrades. The interior rehabilitation work is retaining and preserving character-defining features and spaces and is being undertaken in a manner that would protect the eligibility of these buildings as historical resources under the City's preservation ordinance. The changes are being carried out in compliance with the Secretary of the Interior's Standards for rehabilitation, and are being reviewed and monitored by a qualified preservation consultant and City Staff. Accordingly, impacts associated with interior tenant improvements are considered less than significant.

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**Threshold HIST-2:** The Project would result in a significant impact on historical resources if it would through indirect effects reduce the integrity or significance of important historical resources on the Project Site or in the vicinity such that eligibility for listing on a register of historical resources would be substantially changed.

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**Impact Statement HIST-2: The Project would not reduce or materially impair the integrity or significance of important historical resources in the Project vicinity such that their eligibility for listing on a register of historical resources would be substantially changed. Therefore, indirect impacts would be less than significant.**

### **Indirect Impacts**

Indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity of historic resources on the Studio Campus and the immediate surroundings that would detract from their significance and undermine their eligibility. For purposes of this assessment, the Indirect Impacts Study Area is defined as the area occupied by properties within viewing range of the subject property. Multiple buildings on the Studio Campus have been determined eligible for the National Register, California Register, and local listing. There are currently six buildings on the Studio Campus that are locally listed as Landmark or Significant resources. Changes to the Studio Campus proposed by the Project would potentially

indirectly impact the setting of Buildings C and D and the grouping of historic buildings behind them to the south.

The Project's proposed removal of Stage 2/3/4 would alter the immediate setting of Building C (the Mansion). Currently, only a small portion of Stage 2/3/4 is visible above Building C, when viewed from the public right-of-way along Culver and Washington Boulevards to the north. Removal of Stage 2/3/4 would not detract from the eligibility of Building C and the design of the new construction is of a compatible scale, massing and design.

The north façade of Stage 2/3/4 doubles as a sign for the Studio due to its visibility over the roof of the Mansion. Although Stage 2/3/4's removal would result in an adverse impact to Building C's setting, it would be a less than significant impact because it is not considered one of Building C's character defining features. Furthermore, the use of Stage 2/3/4's north elevation as a sign is a modern phenomenon and historic photographs demonstrate the stage was not used this way during the period of significance.

Building S, T, U, and V (Bungalows) have been relocated to an area behind Building C in accordance with the adopted conditions of CPA No. 6. This aspect of the Project would result in an indirect impact to the setting of Building C's rear elevation. However, the impact is considered less than significant, because Building C's rear elevation is substantially altered and has never been visible from public view, and the Rear Lawn area was substantially altered by the 1980s construction of a sub-surface parking structure, and reconfiguration of pedestrian and vehicular parking and access from Gate 2. Furthermore, the area adjacent to Building C's rear elevation has experienced multiple alterations throughout the Studio's history. Historic photographs show sound stages and a pool, as well as other support buildings that have occupied the space during various periods. Originally, Stage 1 was located behind Building C, along with a pool and laboratory building, all of which have been demolished. The area is currently occupied by a subterranean parking garage, surface parking area, a small support building and landscaping. The Bungalows relocated to the site are smaller in stature than Building C, compatible in design, style and materials, and are not visible from the public right-of-way. The new landscaping surrounding the Bungalows is designed to be similar to their original location along the western boundary of the Studio. Both the Bungalows and their landscaping are historically related to the Studio. The landscaping outside of the Bungalow grouping would reflect the formal nature of Building C's American Colonial Revival architectural style. Primary views of the Mansion's rear elevation from inside the Studio Campus would be retained and the design, workmanship, materials, feeling and association of the Mansion and associated historic grouping of ancillary buildings would be preserved.

Although the Project would remove multiple studio buildings, all of the buildings being removed are located further to the south within the Studio property. In contrast, Building D is located on the property's northeastern corner, isolated from a majority of the areas affected by the Project. The nearest buildings to Buildings C and D being removed from the Studio Campus are Stage 2/3/4 and Building J (modern building). Neither of these buildings contributes to Buildings C or D's significance and their removal would not alter the primary views of either building. Further, the new construction proposed by the Project to replace Stage 2/3/4 and Building J would not

impede primary views of either Building C or Building D from the south from within the Studio Campus.

As stated previously, the Project would update the landscaping of the front lawn area. However, the upgrades and changes to the landscape would be minor and would reflect the original landscaping of the front lawn and the formal arrangement of Buildings C and D's American Colonial Revival style. The indirect impacts caused by the upgraded landscape would be less than significant and would not materially affect either Building C or Building D's eligibility for the National Register, California Register, or local designation.

### ***Cumulative Impacts***

Cumulative impacts to historical resources evaluate whether impacts of the Project and related projects, when taken as a whole, substantially diminish the number of historic resources within the same or similar context or property type. Impacts to historic resources, if any, tend to be site specific. However, cumulative impacts would occur if the Project and related projects cumulatively affect historic resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same style or property type as those within the Project Site. A significant cumulative impact would occur if the impact would render a historic resource or district as no longer eligible for listing and the Project's contribution to the impact would be cumulatively considerable.

Of the three (3) related projects located near the Project Site, only one (1) would impact a historical resource. The project at 9355 Culver Boulevard (Related Project No. 22) would remodel an existing building listed on the National Register. Review of available on-line sources suggests that Related Project No. 22, which involves the rehabilitation of the Citizen Publishing Company Building, a 1929 Art Deco department store, would adhere to the Standards, and therefore impacts on this resource would be less than significant. Furthermore, the Citizen Publishing Company Building has no historic association with the Studio Campus and does not contribute to the significance of the historic resources on the Project Site.

Related Project 24 would redevelop a vacant lot to the north of the Project Site, which would alter the current setting of the eligible resources within the Studio Campus, specifically Building C and Building D. However, the area being developed by Related Project 24 was historically occupied by commercial buildings. The condition of the project's location has changed over time as the City's streets were realigned. Therefore, by adding retail space to the vacant lot, Related Project 24 would actually improve the setting by returning a commercial use to the property.

Related Project 54 at 4227 Ince Boulevard is located south of the Project Site and features new construction of two-story townhouses. Related Project 54 is small in scale and distant enough that it would not negatively impact the setting of historic resources in the area.

Accordingly, the Project's contribution to cumulatively significant impacts on historic resources in the Project vicinity would not be cumulatively considerable and cumulative impacts would be less than significant.

### 4.3.1.5 Mitigation Measures

Mitigation measures are provided below to record, interpret and commemorate the Studio's historical significance in a meaningful and accessible way for the benefit of the public. Incorporation of these mitigation measures would reduce potential impacts to historical resources to less than significant. The recommended mitigation and interpretive programs include, HABS/HAER documentation programs for the eligible resources and the Studio as a whole, pertinent fly-through videos, laser scanning of significant buildings and features, and permanent museum installations and exhibits in publicly accessible locations, particularly with respect to Thomas Ince, Cecile B. DeMille, RKO Pictures, and David O. Selznik, and their contributions to the motion picture industry. The incorporation of the following appropriate mitigation measures to reduce potential adverse impacts to affected historical resources and the historic setting is recommended.

#### ***Removal of Stage 2/3/4 and Stage 7/8/9***

The Project would remove several of the buildings occupying the Project Site, including some dating from the Studio's period of significance (1918-1949). Multiple buildings within the Studio Campus were recognized for individual significance. The Project would remove two of the individually eligible buildings, Stages 2/3/4 and Stages 7/8/9 (sound stages). Historically, the portions of the Studio that are being altered or removed by the Project were not accessible to the public. The sound stages, construction facilities, dressing rooms, and production offices were all isolated behind the Studio's walls and gatehouse. However, with the implementation of robust recordation and interpretive programs the public would be able to experience the history of the Studio for the first time in its 100-year history.

Relocation is a common recommendation for mitigation when retention of a historic resource is determined unfeasible for implementation and development of a project. In this case, relocation was considered but determined impractical because the sound stages being removed are very large in scale and occupy a large area of the Project Site. Relocating the sound stages on the existing property would be infeasible under the proposed Project. Because the sound stages were identified as significant for their association with RKO Pictures, relocation to another site would significantly impact their integrity of setting, location, and association. Furthermore, relocating the sound stages to an off-site location would substantially change in an adverse manner their eligibility for nation, state, or local listing. Therefore, relocation was not considered an appropriate mitigation measure.

The following mitigation measures MM-HIST-1 through MM-HIST-4, address impacts associated with removal of Stages 2/3/4 and Stages 7/8/9, while also helping to mitigate other potential impacts associated with future rehabilitation or improvement projects to protect the integrity of historical resources.

**MM-HIST-1 (Recordation).** Perform a Level II Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) documentation of The Culver Studios (interior and exterior of all structures dating from the period of significance to be removed). Documentation shall include selective laser scanning, 3-D modeling, narrative text and appropriate photographs per HABS/HAER requirements

describing existing conditions and summarizing the relevant construction history and use of the buildings, structures, and features. Documentation shall be prepared by a qualified historic preservation consultant who meets the Secretary of the Interior’s Professional Qualifications Requirements in history and/or architectural history. Documentation shall be provided to the Library of Congress where it will be appropriately archived and publically accessible. The HABS/HAER documentation shall be completed and submitted to the Library of Congress within 180 days of issuance of the first demolition permit issued by the City of Culver City for removal of a building from the Studio Campus.

**MM-HIST-2 (Salvage Plan).** Applicant shall prepare a Salvage Plan that shall be filed with the City of Culver City Planning Division. Prior to demolition, key character-defining physical features of the two individually eligible sound stages (Stage 2/3/4 and Stage 7/8/9) to be demolished shall be identified and made available for use in an interpretive program to be developed for the Project or donated for curatorial and/or educational purposes to a local historical society, preservation organization, or the like. Unsound, decayed, or toxic materials (e.g. asbestos, lead paint, etc.) need not be included in the salvage process. The salvage materials which will not be reused for the Project shall be offered for donation or shall be advertised for a period of not less than thirty (30) days in historic preservation websites and the Culver City News, as well as by posting on the Project Site itself and by other means as deemed appropriate. Salvage efforts shall be conducted by the Applicant. These efforts shall be documented in writing by summarizing all measures taken to encourage receipt of salvage materials by the public. Copies of notices, evidence of publication of such notices, along with a summary of results from the publicity efforts, a list of salvage offers (if any) that were made, and an explanation of why the features were not or could not be accepted shall be included in this salvage summary document.

**MM-HIST-3 (Interpretive Program).** The Applicant shall, in consultation with an expert in museum curation and/or the history of the motion picture industry, develop a publicly accessible interpretive and commemorative program with enforceable performance standards (“Interpretive and Commemorative Program” or “Program”), commemorating and actively illustrating:

- the significant creative, production, and administrative activities and events that took place and films produced during the Thomas H. Ince, Cecile B. DeMille/RKO Pictures, and David O. Selznik eras of the Studio’s history,
- how these activities and events were associated with the continued evolution of the motion picture industry through the pioneering era of independent studios, the emergence of The Big Eight major motion picture studios and the “studio system,” and the rise of smaller independent production companies in the post-war era,
- significant innovations, technical approaches, and technology developed at the Studio and how these important events contributed significantly to the physical development of the site and the evolving motion picture studio.

Program elements may be located on-site, entirely off-site or in a combination of on-site and one or more off-site locations such as new or existing museums and exhibition spaces; provided, however, that at least one publically accessible element of the Program be placed or housed on the Studio Campus property and incorporated as part of any

future use and development of the property (e.g., commemorative elements incorporated as part of publically accessible open space features).

**Substantive Program Requirements.** This Interpretative and Commemorative Program shall be based on a research phase to identify and/or determine the availability of the following resources:

- An inventory of museums, exhibition spaces or other institutions (such as the Academy Museum of Motion Pictures currently under development, The Culver City Public library, or The Culver City Historical Society) that provide public programming regarding the motion picture industry, with which the Interpretative and Commemorative Program might share resources or house Program components;
- An inventory of physical assets or artifacts extant in public or private collections that may be available for exhibition as part of the Interpretive and Commemorative Program;
- Sources of supplementary funding, such as foundation grants.
- With knowledge of such availability, the Interpretative and Commemorative Program shall contain recommendations for programming, which collectively commemorate the history of motion picture production, development, administration, and technical engineering achievements at The Culver Studios and may, by way of example, include:
  - exhibition locations,
  - artifacts for display,
  - thematic content,
  - audio presentations,
  - video-based interpretive virtual tour or 3-D modeling of the most significant areas of the Studio, and database accessibility.

[Note: The above mitigation measure is intended to supersede and replace Mitigation Measure **CR-5, Virtual Museum/Exhibition**, required under CPA No. 6. In the event the proposed Project is not approved Mitigation Measure CR-5 would be implemented].

**MM-HIST-4 (Studio Campus Preservation Plan).** A Studio Campus Preservation Plan shall be completed by a qualified preservation consultant to govern maintenance, rehabilitation, or improvement of historical resources on the Studio Campus. The Studio Campus Preservation Plan shall comply with the methodology called for by the Standards and would specify the maintenance and treatment of character-defining features, materials and finishes and provide appropriate guidelines for future rehabilitation or improvement projects to protect the integrity of historical resources. The Studio Campus Preservation Plan shall serve as a primary planning document for long-term decision-making about treatments and improvements, and would: a) serve as a basis for design of recommended work; b) provide a summary of information known and conditions observed at the time of the survey; and c) provide a bibliography of archival documentation relevant to the structures. The Studio Campus Preservation Plan shall be reviewed by Cultural Affairs for comment prior to approval and issuance of a permit.

### ***Bungalows Relocation (Reproduced from CPA No. 6)***

These mitigation measures have been initiated and are currently in progress under the adopted conditions of CPA No. 6. A draft HABS report for Bungalows S, T, U and V has been completed and submitted to the Library of Congress and the City of Culver City where it is currently under review. A Relocation and Rehabilitation Plan has been prepared and submitted to the City, and monitoring of the relocation and rehabilitation process is ongoing.

**MM-HIST-5 (Recordation).** Prior to the issuance of a relocation permit for the bungalows, a recordation document in accordance with Historic American Buildings Survey (HABS) Level III requirements shall be completed for the existing buildings. The HABS document shall be prepared by a qualified architectural historian or historic preservation professional. This document shall include a historical narrative on the architectural and historical importance of the subject property and record the existing appearance of the four bungalows in professional large format HABS photographs. The building exteriors, representative interior spaces, character-defining features, as well as the setting and contextual views shall be documented. All documentation components shall be completed in accordance with the Secretary of the Interior’s Standards and Guidelines for Architectural and Engineering Documentation (HABS standards). Original archivally-sound copies of the report shall be submitted to the HABS collection at the Library of Congress, and South Central Coastal Information Center, California State University, Fullerton, CA. Non-archival copies will be distributed to the City of Culver City and Public Library. In addition, any existing and available design and/or as-built drawings shall be compiled, reproduced, and incorporated into the recordation document. [Note: This mitigation measure has been implemented as of the date of publication of this EIR.]

**MM-HIST-6 (Relocation, Storage and Rehabilitation).** Prior to relocation, the bungalows shall be recorded (see MM-HIST-5 (Recordation)) before being moved to an appropriate on-site location with compatible setting and association qualities. A Relocation and Rehabilitation Plan shall be commissioned by the applicant and developed by a qualified historic preservation consultant. The Plan shall include relocation methodology recommended by the National Park Service (NPS), which are outlined in the booklet entitled “Moving Historic Buildings,” by John Obed Curtis (1979). The Plan shall include an assessment of the building condition by a qualified engineer, and a shoring plan for relocation and storage, and relocation to the final site. If temporary storage is required, the storage conditions should closely follow the recommendations of NPS Preservation Brief 31: Mothballing Historic Buildings with regard to recommendations for structural stabilization, pest control, protection against vandalism, fire, and moisture, adequate ventilation which should be applied to the building at the temporary storage location to ensure the safety of the building during storage. A periodic maintenance and monitoring plan shall also be included in the Plan and implemented during the storage period in accordance with the guidance outlined in NPS Preservation Brief 31. The Relocation and Rehabilitation Plan shall be reviewed and approved by the City of Culver City prior to its implementation.

Upon relocation of the structures to the new site, any maintenance, repair, stabilization, rehabilitation, preservation, conservation, or reconstruction work performed in conjunction with the relocation of the building shall be undertaken in a manner consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic

Properties. In addition, a plaque describing the date of the move and the original location shall be placed in a visible location on each of the buildings. The removal, storage, relocation and rehabilitation process shall be monitored by a qualified historic preservation consultant at key intervals to ensure conformance with the Standards and NPS guidelines. The preservation consultant shall also be available to provide technical expertise to reduce potential impacts to historical resources from unforeseen circumstances. [Note: This mitigation measure has been partially implemented as of the date of publication of this EIR. The bungalows have been relocated and rehabilitation is underway in accordance with this mitigation measure required under CPA No. 6]

**MM-HIST-6 (Interpretive Plaque/Marker).** A permanent metal plaque will be affixed to the primary elevation of the relocated buildings or a marker will be imbedded in the pavement in front, which will briefly explain that the buildings were relocated and its original site.

### **4.3.1.6 Level of Significance after Mitigation**

With implementation of the above mitigation measures the Project would result still result in a significant unavoidable impact to potentially eligible historical resources due to the demolition of Stage 2/3/4 and Stage 7/8/9. However, the Project would result in a better overall understanding of the Studio's historical significance and contributions to the motion picture industry through the interpretive program set forth under MM-HIST-3. Furthermore, the Project would retain two sound stages from the period of significance - Stage 11/12/14 (1927) and Stage 15/16 (1940). Stage 11/12/14 was constructed around the same time as the two stages being removed by the Project and shares the same potential significance for its association with RKO Pictures and the Studio's transition into sound films. Nonetheless, after completion of the Project, impacts to historical resources would remain significant and unavoidable due to the demolition of the two eligible historical resources.

Impacts associated with relocation of the bungalows would be less than significant after implementation of the above mitigation measures.

## 4.3.2 Archaeological and Tribal Cultural Resources

### 4.3.2.1 Introduction

This section evaluates potential impacts on archaeological and tribal cultural resources. The analysis of archaeological resources provided in this section is based in part on a Phase 1 Archaeological/Paleontological Resources Survey and Impact Assessment (Phase 1 Archaeological/Paleontological Resources Report).<sup>1</sup> The report is provided in Appendix D-2 of this Draft EIR. To supplement this report, a Sacred Lands File (SLF) search was commissioned through the Native American Heritage Commission (NAHC) and additional information regarding the land use history of the Project Site was reviewed. The results of the SLF are included in Appendix D-3, Sacred Lands File Search and Native American Consultation Documentation.

The analysis of tribal cultural resources provided in this section is based on Project notification and request to consult letters dated September 16, 2016 that the City Planning Division submitted to Native American individuals and organizations and follow-up Native American consultations pursuant to Assembly Bill (AB) 52. The Native American consultation documentation is provided in Appendix D-3 of this Draft EIR.

Archaeology is the recovery and study of material evidence of human life and culture. Over time, this material evidence becomes buried, fragmented or scattered, or otherwise hidden from view. In urban areas such as the Project Site and environs, archaeological resources may include both prehistoric remains (before 1769 A.D.) and remains dating to the historical period (1769 to 1950 A.D.). Prehistoric resources can include village sites, temporary camps, lithic (stone tool) scatters, rock art, roasting pits/hearths, milling features, rock features, and burials. Historic archaeological resources can include refuse heaps, bottle dumps, ceramic scatters, privies, foundations, and burials and are generally associated in California with the Spanish Mission Period (after 1769) to the mid-20th century of the American Period.

A tribal cultural resource is a new type of resource that is addressed during the environmental review process that was created with the passage of Assembly Bill 52 (AB 52). It is defined in Public Resource Code Section 21074(c) and is discussed in the Regulatory Framework portion of this section. The Native American community is tasked with providing the lead agency information regarding the identification and evaluation of tribal cultural resources, and with developing mitigation measures to address impacts to them. Tribal cultural resources may include prehistoric archaeological resources mentioned above or landscape resources that include natural features (such as mountain peaks) that extend beyond a project footprint and that might lack physical evidence (e.g., prehistoric artifacts) that a prehistoric activity took place there. In considering whether a resource is a tribal cultural resource, a lead agency must consider the significance of a resource and its cultural value to Native American tribes.

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<sup>1</sup> Boxt, Matthew, A Phase-1 Archaeological/ Paleontological Resource Survey and Impact Assessment of the Culver Studios Project, 9336 W. Washington Boulevard, Culver City, California, 90232, April 27, 2015.

### 4.3.2.2 Environmental Setting

#### *Existing Conditions*

##### **Archaeological Resources**

Archaeologists generally divide the human history of the southern California coast region into three major time intervals: Prehistoric, Protohistoric, and Historic (refer to **Table 4.3.2-1, *Cultural Chronology of the Southern California Coast Region***, below). Prehistory is subdivided into the Paleocoastal, Milling Stone, Intermediate, and Late Prehistoric periods. Protohistory is a transitional period between prehistory and history and is not subdivided into other periods. History is subdivided into the Spanish, Mexican, and American periods.

**TABLE 4.3.2-1  
 CULTURAL CHRONOLOGY OF THE SOUTHERN CALIFORNIA COAST REGION**

<b>Date Range</b>	<b>Period</b>
AD 1847-1960	American
AD 1822-1847	Mexican
A.D. 1769-1822	Spanish
A.D. 1542-1769	Protohistoric
1500 BPa to AD 1542	Late Prehistoric
4,000-1,500 BP	Intermediate
7,000-4,000 BP	Milling Stone
More Than 7,000 BP	Paleocoastal

<sup>a</sup> BP = Before Present. By convention, "present" is set at AD 1950

SOURCE: Adapted from Elsasser (1978) and Schuyler (1978), and modified.

The cultural chronology of the region is a subject of ongoing investigation. The dating of cultural change continues to undergo refinement using the results of new excavations, as does our understanding of the processes of cultural change. The need for further research accounts for the use of some broad date ranges and the presentation of some key but untested hypotheses within the following discussion.

#### **Prehistory, Early Holocene to AD 1542**

The Project Site is located in the coastal zone of the northernmost Peninsular Ranges portion of the Southern California Coast prehistoric culture area, which encompasses the Transverse Ranges, the northern Peninsular Ranges, and the coastal zone and near-shore islands from Point Conception in the north to San Diego Bay in the south.<sup>2</sup> The subsistence of prehistoric hunter-

<sup>2</sup> Elsasser, Albert B., 1978, Development of Regional Prehistoric Cultures. In Handbook of Native American Indians, Volume 8: California, pp. 37-57, edited by Robert F. Heizer. Smithsonian Institution, Washington, D.C.

gatherers in the coastal zone and near-shore islands depended on marine shellfish, fish, and mammals, supplemented with terrestrial game and a variety of terrestrial plants. Further inland, subsistence opportunities were limited to terrestrial plants and animals.

The prehistoric chronology of the region is traditionally divided into Milling Stone, Intermediate and Late Prehistoric periods, but more currently into Early, Middle, and Late Holocene periods.<sup>3</sup> In recent years, some conclusive evidence has emerged supporting human occupation during the late Pleistocene (126,000 BP to 12,000 BP) and earliest Holocene (i.e., 8,000 to 12,000 BP) periods.

Some of the oldest human skeletons found in the Americas were discovered at the Haverty Site, only about 9.3 miles south-southeast of the Project Site.<sup>4</sup> A more recent study of the Haverty skeletons concludes that at least some of the skeletons may be of “terminal Pleistocene age.”<sup>5</sup> Human bone collected from Santa Rosa Island in 1959 has recently been dated to 10,000-11,500 BP<sup>6</sup> and is contemporaneous with pygmy mammoth bone also found on the island.<sup>7</sup> Human and domestic dog bone, collected in 1994 from La Brea Tar Pits about 7.5 miles south-southeast of the Project Site, has been dated to the beginning of the Holocene, but radiocarbon dating complications make the date uncertain.<sup>8</sup> The Milling Stone Horizon<sup>9</sup> marks a shift from a subsistence strategy which emphasized big game hunting (of which large, fluted spear points, and the bones of butchered large mammals are hallmarks) to one which, for inland populations, emphasized plant seeds (as represented by the manos and metates used to mill them, and carbonized seeds). This presumably adaptive change occurred perhaps as early as 7,000 years BP and no later than about 4,000 or 3,000 BP.<sup>10</sup>

More elaborate material culture represents the subsequent Intermediate period, about 4,000 or 3,000 BP to about 1,500 BP: basket hopper mortars, bowl mortars, pestles, broad leaf-shaped blades, heavy side-notched and leaf-shaped spear points, stemmed atlatl dart points, implements and ornaments of bone, horn, shell, asphalt, and steatite, and inhumations with red ocher and stone cairns. This elaboration of material culture may reflect burgeoning and aggregating populations, and intensified social and political interaction.

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<sup>3</sup> Altschul, J. H., and D. R. Grenda (editors), 2002, *Islanders and Mainlanders: Prehistoric Context for the Southern California Coast and Channel Islands*. The University of Arizona Press, Tucson.

<sup>4</sup> Brooks, S., et al., 1990, *The Haverty Human Skeletons: Morphological, Depositional, and Geochronological Characteristics*. *Journal of California and Great Basin Anthropology* 12(1).

<sup>5</sup> Ibid.

<sup>6</sup> Johnson, J. R., 2002, *Arlington Springs Revisited*. In *Proceedings of the Fifth California Islands Symposium*, pp. 541-545. USDI Minerals Management Service and the Santa Barbara Museum of Natural History, Santa Barbara, California.

<sup>7</sup> Agenbroad, L. D., et al., 2005, *Mammoths and Humans as Late Pleistocene Contemporaries on Santa Rosa Island*. In *Proceedings of the Sixth California Islands Symposium* edited by D. Garcelon and C. Schwemm, pp. 3-7. National Park Service Technical Publication CHIS-05-01, Institute for Wildlife Studies, Arcata, California.

<sup>8</sup> Erlandson, J. M. 1994, *Early Hunter-Gatherers of the California Coast*. Plenum Press, New York.

<sup>9</sup> Wallace, W. J., 1955, *A Suggested Chronology for Southern California Coastal Archaeology*. *Southwestern Journal of Anthropology* 11(3):214-230.

<sup>10</sup> Elsasser, A. B., 1978, *Development of Regional Prehistoric Cultures*. In *Handbook of Native American Indians*, Volume 8: California, pp. 37-57, edited by Robert F. Heizer. Smithsonian Institution, Washington.

The Late Prehistoric period, circa 1,500 BP, marks the advent of the bow and arrow as evidenced by finely chipped, stemless, concave- and convex-based arrow points, and steatite arrow straighteners. Also added to the material culture were steatite containers and shell, bone, and stone ornaments. Inhumations included abundant and diverse grave goods. The bow and arrow may have been adopted or developed primarily as a weapon rather than as a hunting tool, suggesting the full realization of population pressure and territoriality. Laboriously manufactured and visually attractive containers and ornaments, and mortuary customs requiring the sacrifice of considerably valuable material possessions, suggest a fully developed concept of wealth. Warfare, territoriality, and wealth all point to incipient tribalism.

#### Protohistory, AD 1542-1769 (European Contact)

The Protohistoric period is the time between initial contact and subsequent, tenuous and peripheral contact with a literate culture to the full establishment of a local literate culture. In the Southern California Coast culture area, the advent of protohistory is marked by the maritime explorations of Juan Rodriguez Cabrillo in AD 1542. During the following 227 years, direct contact between local indigenous people and Europeans was limited to occasional European visits by sea. Spanish exploration and the establishment of Spanish colonies in Mexico, including along the Baja California Peninsula, afforded opportunities for brief episodes of direct contact and for peripheral contact such as “down-the-line” or “neighbor-to-neighbor” exchange of information and goods.<sup>11</sup>

European artifacts, although rare, are found in protohistoric archaeological deposits.<sup>12</sup> Glass trade beads are the most common. One example, albeit from farther north along the California coast, is that of China ceramic fragments from an AD 1595 Spanish shipwreck which were collected and reworked by the Coast Miwok for generations.<sup>13</sup> European diseases likely took a toll on indigenous populations during protohistory.<sup>14</sup> Historical documentation of local people and events began with the overland Portolá expedition in 1769 and the establishment of Spanish missions in the 1770s.

In 1542, when Cabrillo, leader of the first European exploration of the California coast, sailed his ships into the San Pedro and Santa Monica bays, a “great number of Indian villages” were observed:<sup>15</sup>

*Villages were situated all along the Pacific shore wherever fresh water was available from flowing springs or cañon streams. In this semi-arid land established villages were almost inevitable wherever there was a stretch of level land along the banks of the Los Angeles River and the few other streams within the county area. In the mountains, the cañons usually were too narrow to afford*

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<sup>11</sup> Lightfoot, K. G., and W. S. Simmons, 1998, Culture contact in Protohistoric California: Social Contexts of Native and European Encounters. *Journal of California and Great Basin Anthropology* 20(2): 138-170.

<sup>12</sup> King, C., 1978, Protohistoric and Historic Archaeology. In *Handbook of Native American Indians*, Volume 8: California, pp. 58-68, edited by Robert F. Heizer. Smithsonian Institution, Washington.

<sup>13</sup> Starr, K., 2005, *California: A History*. Modern Library, New York.

<sup>14</sup> Erlandson, J. M., and K. Bartoy, 1995, Cabrillo, the Chumash, and Old World Diseases. *Journal of California and Great Basin Anthropology* 17(2):153-173.

<sup>15</sup> Walker, E. F., 1951, *Five Prehistoric Archaeological Sites in Los Angeles County, California*. Southwest Museum, Los Angeles, California.

*sites for villages; but settlement sites are to be found where the cañons open out and the land levels off...*

It is notable that the courses of the rivers of the Los Angeles Basin, prior to modern, artificial channelization, fluctuated horizontally as sediments built up, or were transported and shifted due to storm waters and, at their estuaries, tidal and wave forces. Prehistoric village site locations, hence, may correlate with former, pluvial river channels rather than with current channels. Prior to floods in 1824-1825, for example, the Los Angeles River emptied into Santa Monica Bay, not San Pedro Bay.<sup>16</sup>

#### Ethnohistory, Early History, AD 1769-1847

The Project Site is located in the heart of Gabrielino<sup>17</sup> tribal territory which, at the start of the Spanish Period, included the Los Angeles Basin and adjacent areas, and San Clemente, Santa Catalina, and San Nicolas islands. Their mainland territory extended from the San Fernando Valley and the San Gabriel Mountains in the north to Aliso Creek and the Santa Ana Mountains in the south, and from Mount Rubidoux in the east to Topanga Canyon in the west. This territory included mountain, foothill, prairie, coastal zones, and the islands, which offered a variety of resources to Gabrielino foragers.

The Gabrielino relied on gathered wild plants and trapped or hunted animals<sup>18</sup> for food. Acorns and piñon nuts were food staples found only in the mountains and foothills. On the islands and coast, marine resources, especially shellfish, fish, and sea mammals, greatly supplemented terrestrial resources. Plants also provided building material and raw material for craft manufacturing such as basket making. Animal bone, skin, fur, and feathers were also used as raw material for craft manufacturing. Whale bones were sometimes used in building windbreaks and houses. Certain types of stone were quarried and asphaltum<sup>19</sup> was gathered for tool and container manufacturing, and for water-proofing boats. Santa Catalina Island provided abundant steatite<sup>20</sup> which was valued as a raw material for bowls and an array of other items, notably body ornaments.

The Gabrielino interaction sphere was considerably larger than their tribal territory *per se*:<sup>21</sup>

*With the possible exception of the Chumash [their westward neighbors], the Gabrielino were the wealthiest, most populous, and most powerful ethnic nationality in aboriginal southern California, their influence spreading as far*

<sup>16</sup> Johnston, B. E., 1962, California's Gabrielino Indians. Southwest Museum, Los Angeles.

<sup>17</sup> The Gabrielino (alternatively spelled Gabrieleño) are so called for their aggregation at the Mission San Gabriel Arcángel during the early Spanish Period. Currently, many Gabrielinos prefer the term Gabrielino-Tongva, or simply Tongva, or Kizh.

<sup>18</sup> Plants were not domesticated and domesticated animals were limited to dogs. Archaeological data collected to date does not suggest that dogs were used for food.

<sup>19</sup> Asphaltum is a tar-like substance that washes ashore from natural, undersea oil seepages.

<sup>20</sup> A soft rock consisting largely of talc and also known as steatite.

<sup>21</sup> Bean, L. J., and C. R. Smith, 1978, Gabrielino. In: Handbook of North American Indians, Vol. 8, California. Robert F. Heizer, ed., pp. 538-549. Smithsonian Institution, Washington.

*north as the San Joaquin Valley Yokuts, as far east as the Colorado River, and south into Baja California.*

The Gabrielino spoke several dialects of a Cupan language in the Takic family, and neighboring tribes to the north, east, and south also spoke languages in the Takic family.<sup>22</sup>

Spain established two Franciscan missions in Gabrielino tribal territory: Mission San Gabriel Arcángel, founded in 1771 in the north-central Los Angeles Basin, and Mission San Fernando Rey de España, founded 1797 in the north-central San Fernando Valley. Prior to aggregation at the missions, the Gabrielino settlement pattern included primary villages and secondary camps; both villages and camps were situated alongside fresh waterways or springs.

For the Gabrielino and other Native Americans, Euro-American exploration and settlement, and the Spanish mission system, meant disease, strife, capture, displacement, and population decline from first contact until the 20<sup>th</sup> century.<sup>23</sup>

During the Spanish and Mexican periods, from the time of the overland Portolá expedition until the culmination of the Mexican-American War, the Project Site was not far from the centers of population and commerce. El Pueblo de La Reina de Los Angeles, established in 1781, was about nine miles to the northeast, Mission San Fernando was about 18 miles to the northwest, and Mission San Gabriel was about 17 miles to the northeast of the Project Site.<sup>24</sup>

Later history is discussed in Section 4.3.1, Historical Resources, of this Draft EIR.

### ***Resources Identified within the Project Site and Vicinity***

#### **Archaeological Resources**

Results of the cultural resources records search through the South Central Coastal Information Center (SCCIC) indicate that a total of 21 cultural resource studies have been conducted within a one-mile radius of the Project Site. None of these studies have been conducted within the Project Site for archaeological resources and therefore it doesn't appear that the Project Site had been surveyed for archaeological resources prior to the Phase 1 Archaeological/Paleontological Resources Report. No known archaeological resources (historic or prehistoric) have been recorded within or immediately adjacent to the Project Site. However, a total of five prehistoric archaeological resources and one historic archaeological resource have been recorded within a one-half mile radius of the Project Site. These resources are described in **Table 4.3.2-2, *Known Archaeological Resources within a One-Half Mile Radius of the Project Site***, below. The prehistoric resources are described as seasonal villages or campsites located within close proximity to the Ballona Creek that include metates, manos, chipped stone tools, projectile points,

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<sup>22</sup> Shipley, W. F., 1978, Native Languages of California. In Handbook of North American Indians, Vol. 8, California. Robert F. Heizer, ed., pp. 80-90. Smithsonian Institution, Washington.

<sup>23</sup> Castillo, E. D., 1978, The Impact of Euro-American Exploration and Settlement. In Handbook of Native American Indians, Volume 8: California, pp. 99-127, edited by Robert F. Heizer. Smithsonian Institution, Washington. Costo, R., and J. H. Costo, (editors), 1987, The Missions of California: A Legacy of Genocide. Indian Historian Press, San Francisco. McCawley, W., 1996, The First Angelinos: The Gabrielino Indians of Los Angeles. Malki Museum Press, Banning, California.

<sup>24</sup> Beck, W. A., and Y. D. Haase, 1974, Historical Atlas of California. University of Oklahoma Press, Norman.

scrapers, shell, animal bone fragments, and human remains. The historic archaeological resource is described as a refuse scatter containing various glass bottle containers intermixed with modern refuse.

**TABLE 4.3.2-2  
KNOWN ARCHAEOLOGICAL RESOURCES WITHIN A ONE-HALF MILE RADIUS OF THE PROJECT SITE**

Designation	Description (Size in feet)	Year Recorded*	Distance**
P-19-000055	Prehistoric campsite with human remains, bone awl, metate, projectile points, and shell fragments (300 ft by 200 ft)	1950	0.5 mi. S
P-19-000056	Prehistoric campsite with shell fragments, scraper, mano, and "thin smoothed oval pebble" (150 ft x 100 ft)	1950	0.5 mi. S
P-19-000068	Prehistoric seasonal village site with 3 manos, 2 mano fragments, metate fragment, knife, bone fragments, and chipped stone debitage (300 ft x 200 ft)	1950	0.5 mi. E
P-19-002967	Historic refuse scatter with soda bottles, sanitary seam cans, liquor bottles, jars, and other glass bottle containers intermixed with modern refuse. Artifacts date from the 1920s to modern period (100 ft x 100 ft)	2000	0.5 mi. SE
P-19-002968	Prehistoric site with stone tools, fire-affected rock, and shell fragments intermixed with modern refuse (75 ft x 45 ft)	2000	0.5 mi. SE
P-19-100249	Prehistoric isolate: whole chert biface recovered during construction monitoring at unknown depth	1998	0.35 mi. S

\* = Year of initial recordation; \*\* = Distance from Project Site

SOURCE: SCCIC, April 2015

Although the current content and condition of these resources is currently unknown, these findings confirm the presence of past prehistoric and historic period occupation in the vicinity of the Project Site.

The Project Site appears to be undeveloped prior to circa 1919.<sup>25</sup> Review of the 1919 Sanborn map depicts three main structures on the northwestern portion of the Project Site which included an administration building and two large stages (Stage 1 and 2) as well as several smaller support structures (pool, laboratory, dressing rooms, paint shop, carpenter shop, cutting rooms, pool, electric sub-station, electric shop, wardrobe building). The southeastern portion of the Project Site is depicted as undeveloped by this time. Review of the 1929 Sanborn map shows that the two original stages (once depicted in the 1919 Sanborn map) had remained within the Project Site; however, these were relocated to make room for Stages 2/3/4 on the northwestern side of the Project Site. The 1929 Sanborn map also shows two additional stages (Stage 6 and 7), several storage buildings, a machine shop and a plumbing shop on the eastern portion of the Project Site by this time. All of these buildings depicted on the Sanborn maps are associated with studio uses. In 2015, PCR Services Corporation (now ESA PCR) conducted an evaluation of the Culver Movie Studios property and determined that it is not eligible as a historic district under federal,

<sup>25</sup> NETR Online, 2017, Topographic maps from 1896 and 1910, accessed online at <https://www.historicaerials.com/>, February 2017

state, and local criteria; however, several buildings were identified as appearing to be individually eligible at the federal, state, and local level.<sup>26</sup> More detailed information on the history and evaluation of Culver Studios is provided in Section 4.3.1, Historical Resources, of this Draft EIR.

Results of a records search through the NAHC did not indicate any known Native American cultural resources from the SLF database in the Project Site or vicinity.<sup>27</sup>

The field survey revealed that the Project Site “is landscaped and highly modified” and no archaeological resources were observed.<sup>28</sup>

### **Tribal Cultural Resources**

On December 5, 2016, the City received a letter from Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians-Kizh Nation as part of the AB 52 consultations. In the letter, Mr. Salas indicated that he had concerns for cultural resources as the “project lies in an area where the Ancestral territories of the Kizh (Kite) Gabrieleños villages adjoined and overlapped with each other.” Mr. Salas also mentioned that due to the Project’s location and the “high sensitivity of the area location”, that they request Native American monitoring during ground disturbing activities at the Project. To date, no other response letters 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. The AB 52 Native American consultation documentation is provided in Appendix D-3 of this Draft EIR.

### **4.3.2.3 Regulatory Framework**

This section provides a summary of pertinent archaeological and tribal cultural resources regulations affecting the Project at the State and local levels

#### **State**

#### **Archaeological Resources**

##### **California Register of Historical Resources**

Created by Assembly Bill 2881, which was signed into law on September 27, 1992, the California Register of Historical Resources (California Register) is “an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.” The criteria for eligibility for the California Register are based upon National Register criteria. Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

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<sup>26</sup> Jerabek, Margarita, et al., 2015, Historical Resources Assessment and Environmental Impact Analysis Report, The Culver Studios, 9336 West Washington Boulevard, Culver City, California.

<sup>27</sup> Totton, Gayle, 2017, Request for Sacred Lands File Search and Native American Contact List for the Proposed Culver Studios Innovation Plan Project, Culver City, Los Angeles County, California.

<sup>28</sup> Boxt, Matthew A., 2015, A Phase-1 Archaeological/Paleontological Resource Survey and Impact Assessment of the Culver Studios Project, 9336 W. Washington Boulevard, Culver City, California, 90232.

To be eligible for the California Register, a pre-historic or historic property must be significant at the local, state, and/or federal level under one or more of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register of Historic Places, but it may still be eligible for listing in the California Register.

Archaeological resources, in contrast to built environment historic period resources, are most often eligible under Criterion 4 for their “information potential.” For properties eligible under Criterion 4, less attention is given to their overall condition, than if they were being considered under Criteria 1, 2, or 3. Archeological sites, in particular, do not exist today exactly as they were formed as there are always cultural and natural processes that alter the deposited materials and their spatial relationships. For properties eligible under Criterion 4, integrity is based upon the property's potential to yield specific data that addresses important research questions.<sup>29</sup>

Additionally, the California Register includes resources that are listed automatically and those that are nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register of Historic Places and those formally Determined Eligible for the National Register of Historic Places.
- California Registered Historical Landmarks from No. 770 onward.
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

Resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5.<sup>30</sup>
- Individual historical resources.
- Historical resources contributing to historic districts.

<sup>29</sup> National Register Bulletin 15, page 46.

<sup>30</sup> Those properties identified as eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and/or a local jurisdiction register.

Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

#### California Environmental Quality Act

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the State. CEQA requires lead agencies to determine if a proposed project would have a significant effect on archaeological resources (Public Resources Code Sections 21000 et seq.). As defined in Section 21083.2 of the Public Resources Code, a “unique” archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

In addition, State CEQA Guidelines §15064.5 broadens the approach of classifying archaeological resources by using the term “historical resource” instead of “unique archaeological resource.” The Guidelines recognize that certain archaeological resources may also have significance. The Guidelines recognize that a historical resource includes: (1) a resource in the California Register of Historical Resources; (2) a resource included in a local register of historical resources, as defined in Public Resources Code §5020.1 (k) or identified as significant in a historical resource survey meeting the requirements of Public Resources Code §5024.1 (g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency’s determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of §21084.1 of the Public Resources Code and §15064.5 of the Guidelines apply. If an archaeological site does not meet the criteria for a historical resource contained in the Guidelines, then the site is to be treated in accordance with the provisions of Public Resources Code §21083.2, which refer to a unique archaeological resource. The Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. (§15064.5(c)(4)).

#### California Health and Safety Code

California Health and Safety Code sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable sections of the Public Resource Code), and the disposition of Native American burials in archaeological sites. These

regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

### **Tribal Cultural Resources**

Assembly Bill 52 (AB 52) is recent legislation that amends CEQA and requires lead agencies to consult with California Native American tribes to identify, evaluate, and mitigate impacts to a new type of cultural resource called “tribal cultural resources”, if the tribes formally request consultation. A tribal cultural resource is any of the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
  - Included or determined to be eligible for inclusion in the California Register.
  - Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- 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 California Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.

### **Local**

#### **Archaeological and Tribal Cultural Resources**

City of Culver City

The City’s General Plan does not include any policies, goals, or actions regarding the treatment of archaeological or tribal cultural resources.

### **4.3.2.4 Environmental Impacts**

#### **Methodology**

#### **Archaeological Resources**

The analysis of archaeological resources is based in part on the Phase 1 Archaeological/Paleontological Resources Report, which included a cultural resources records search through the SCCIC, review of relevant literature and historic maps, and a field survey of the Project Site.

In addition, ESA PCR conducted additional land use history research (by reviewing additional Sanborn maps) and requested a SLF search through the NAHC. The letter sent to the NAHC included the Project location and a brief description of the Project. The results of the SLF search are used to identify the location of additional prehistoric or Native American archaeological resources for which records may not be available at the SCCIC.

The potential for the Project Site to contain buried archaeological resources was assessed based on the findings of the cultural resources records search (i.e., presence and proximity of known resources) and SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the Project.

### **Tribal Cultural Resources**

The analysis of tribal cultural resources is based on Project notification and request to consult letters that the City submitted to seven (7) Native American individuals and three (3) organizations on the City's AB 52 Notification List on September 16, 2016 and follow-up consultation with individual tribes.

### ***Thresholds of Significance***

The significance thresholds below are derived from Appendix G of the State CEQA Guidelines. Accordingly, a significant impact to archaeological resources and tribal cultural resources would occur if the Project were to:

**ARCH-1:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

**ARCH-2:** Disturb any human remains, including those interred outside of dedicated cemeteries.

**TCR-1:** Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074.

### ***Project Characteristics and Project Design Features***

#### **Project Characteristics**

As relates to the evaluation of potential impacts on subsurface archaeological resources, the Project would require excavation and grading for building foundations, below grade parking, and other improvements. Excavation associated with the two new parking structures would reach minimum depths of ten feet to as deep as approximately 33 feet below the surface.

#### **Project Design Features**

There are no Project Design Features associated with archaeological and tribal cultural resources.

## ***Analysis of Project Impacts***

### **Archaeological Resources**

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**Threshold ARCH-1:** The Project would result in a significant archaeological resources impact if it causes a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

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**Impact Statement ARCH-1: The Project Site has been previously disturbed through grading and development for the existing Studio Campus, however, Project grading and excavation may encounter buried archaeological resources. As a result, construction may cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Impacts to archaeological resources are considered potentially significant.**

No known archaeological resources (historic or prehistoric) have been recorded within or immediately adjacent to the Project Site and no resources were identified during the field survey, conducted as a component of the Phase I Archaeological/Paleontological Resources Report. However, five prehistoric archaeological resources and one historic archaeological resource have been recorded within a one-half mile radius of the Project Site. Although the current contents and condition of these resources is currently unknown, these findings confirm the presence of past prehistoric and historic period occupation in the vicinity of the Project Site. Moreover, the Ballona Creek (located less than one-quarter mile southeast of the Project Site) would have attracted prehistoric inhabitants to the project area. The Project would require excavation and grading for building foundations, below grade parking, and other improvements. Based on the archaeological findings near the Project Site and the proximity to Ballona Creek (less than one-quarter mile), the potential to encounter archaeological resources during construction excavations is considered moderate to high. Therefore, impacts on archaeological resources are considered potentially significant.

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**Threshold ARCH-2:** The Project would result in a significant archaeological resources impact if it disturbs any human remains, including those interred outside of dedicated cemeteries.

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**Impact Statement ARCH-2: The Project Site has been previously disturbed through grading and development for the existing Studio Campus, however, Project grading and excavation may encounter buried human remains. As a result, construction may disturb human remains, including those interred outside of dedicated cemeteries. Impacts to human remains resources are considered potentially significant.**

Based on the results of the SLF search, SCCIC records search, and field survey, no known human remains have been recorded within or immediately adjacent to the Project Site and no human remains were identified during the field survey. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface that may be encountered during construction excavations associated with the Project. Moreover, two resources with human remains (P-19-000055 and -000172<sup>31</sup>) have been recorded within one-half

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<sup>31</sup> Pilling, 1950, DPR Site Record for Resource P-19-000172. Record on file at SCCIC.

mile south and one-mile east of the Project Site, respectively. Moreover, as mentioned above, the Ballona Creek (located less than one-quarter mile southeast of the Project Site) would have attracted prehistoric inhabitants to the project area. The Project would require excavation and grading for building foundations, below grade parking, and other improvements. Based on the archaeological findings (some of which include human remains) in the vicinity the Project Site and the proximity to Ballona Creek (less than one-quarter mile), the potential to encounter human remains during construction excavations is considered moderate to high. Therefore, impacts on human remains are considered potentially significant.

### **Tribal Cultural Resources**

**Threshold TCR-1:** The Project would result in a significant tribal cultural resources impact if it causes a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074.

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**Impact Statement TCR-1: The Project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074, since no tribal cultural resources were identified as located within the Project Site or immediately adjacent. No impacts to tribal cultural resources would occur.**

As discussed earlier, on December 5, 2016, the City received a letter from Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians-Kizh Nation as part of the AB 52 consultations. In the letter, Mr. Salas indicated that he had concerns for cultural resources as the “project lies in an area where the Ancestral territories of the Kizh (Kite) Gabrieleños villages adjoined and overlapped with each other.” Mr. Salas also mentioned that due to the Project’s location and the “high sensitivity of the area location”, that they request Native American monitoring during ground disturbing activities at the Project. The City subsequently drafted mitigation measure MM-ARCH-2 which includes provisions for the Applicant to retain a Native American representative to monitor construction excavations associated with implementing the Project. On September 5, 2017, Mr. Salas approved MM-ARCH-2 and this measure has been included below. To date, no other response letters 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. Therefore, the Project would not cause an impact to tribal cultural resources.

### ***Cumulative Impacts***

#### **Archaeological Resources**

Many of the related projects identified in Chapter 3, Environmental Setting, would require excavation that could potentially expose or damage potential archaeological resources or human remains. However, these related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures would be required for related projects that have the potential to cause significant impacts to undiscovered resources. Implementation of such mitigation measures would avoid significant impacts. State requirements regarding impacts on archaeological resources and CEQA compliance require monitoring of

excavation activities and treatment and/or curation of discovered resources where appropriate (Public Resources Code Section 21083.2, Section 15064.5, and State Health and Safety Code Section 7050.5). Such standard construction practices, particularly over a range of project sites, provide for protection, recovery and curation of discovered resources and preserve their contributions to the knowledge base of past population activity in the area. For those projects not subject to CEQA review, there would be some potential for impacts on archaeological resources and human remains in the event there are excavations that extend into soils conducive to retaining resources, however, regulations contained in the California Health and Safety Code and Penal Code would apply in some instances, and circumstances involving a loss of such resources are expected to be limited. Therefore, the cumulative effects from cumulative projects are considered less than significant.

The Project is required to comply with the mitigation measures MM-ARCH-1 and MM-ARCH-4 and regulations cited above in the event resources are found, thus ensuring proper identification, treatment and preservation of any resources, and reducing significant impacts on archaeological resources and human remains to less than significant levels. These regulations require excavation monitoring, and treatment and curation of discoveries. Therefore, to the extent impacts on archaeological resources and human remains from cumulative projects may occur, further contribution from the Project would not be cumulatively considerable, and the cumulative impacts of the Project would be less than significant.

### **Tribal Cultural Resources**

No tribal cultural resources have been identified in the Project Site or vicinity. Further, in association with CEQA review, future AB 52 consultations with Native American tribes in order to identify tribal cultural resources would be required for projects that have the potential to cause significant impacts to tribal cultural resources. Therefore, to the extent impacts on tribal cultural resources from cumulative projects may occur, contribution from the Project would not be cumulatively considerable and there would be no cumulative impact.

## **4.3.2.5 Mitigation Measures**

### ***Archaeological Resources***

**MM-ARCH-1:** Prior to issuance of demolition permit, the Applicant shall retain a Qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the Qualified Archaeologist and Gabrielino Tribe and shall focus on how to identify

archaeological and cultural resources that may be encountered during earthmoving activities, and the procedures to be followed in such an event.

**MM-ARCH-2:** Prior to issuance of demolition permit, the Applicant shall retain a Native American tribal monitor from a Gabrielino Tribe who shall be present during construction excavations such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall take into account the rate of excavation and grading activities, proximity to known 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-ARCH-3:** In the event that historic (e.g., bottles, foundations, refuse dumps/privies, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist and the Gabrielino Tribe. If the resources are prehistoric or Native American in origin, the Gabrielino Tribe shall consult with the City Planning Division and Qualified Archaeologist regarding the treatment and curation of those resources. If a resource is determined by the Qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City Planning Division to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan shall incorporate the Gabrielino Tribe’s treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Fowler Museum, if such an institution agrees to accept the material, and/or the Gabrielino Tribe. If no institution accepts the archaeological material and the Gabrielino Tribe does not accept the material, it may be donated to a local school or historical society in the area for educational purposes.

**MM-ARCH-4:** Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City Planning Division, 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.

**MM-ARCH-5:** If human remains are encountered unexpectedly during construction of the project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the location 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 land owner 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 land owner 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 land owner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

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

### ***Tribal Cultural Resources***

Although the Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074, and no impacts on such resources are expected to occur, Mitigation Measures MM-ARCH-1 through MM-ARCH-5 would help address any such resources if they were encountered.

## **4.3.2.6 Level of Significance after Mitigation**

### ***Archaeological Resources***

With implementation of the mitigation measures above, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 or disturb any human remains, including those interred outside of dedicated cemeteries. The implementation of the above mitigation measures provide for appropriate treatment and/or preservation of resources if encountered. Potentially significant impacts to archaeological resources and human remains would be reduced to a less than significant level.

***Tribal Cultural Resources***

Not applicable. Impacts on tribal cultural resources are not significant.

## 4.3.3 Paleontological Resources

### 4.3.3.1 Introduction

This section evaluates potential impacts on paleontological resources. The analysis provided in this section is based in part on a Phase 1 Archaeological/Paleontological Resource Survey and Impact Assessment (Phase 1 Archaeological/Paleontological Resources Report)<sup>1</sup>, which consisted of a paleontological resources records search acquired through the Natural History Museum of Los Angeles County. Since the Project Site is entirely developed or paved and lacks any visible native ground surface or potential for surface exposure of resources, no paleontological field survey was undertaken. The Report is included as Appendix D-2 of this Draft EIR.

Paleontology is a branch of geology that studies the life forms of the past, especially prehistoric life forms, through the study of plant and animal fossils. Paleontological resources represent a limited, non-renewable, and impact-sensitive scientific and educational resource. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities.

### 4.3.3.2 Environmental Setting

#### *Existing Conditions*

#### **Geological/Paleontological Setting**

The Project Site contains surface deposits of younger Quaternary alluvium<sup>2</sup> derived as fluvial deposits from Ballona Creek that flows less than a quarter-mile southeast of the Project Site. Older Quaternary sediments underlie the younger deposits and have yielded several paleontological resources in the vicinity of the Project Site.<sup>3</sup> These resources are described in more detail below.

#### **Resources Identified within the Project Site and Vicinity**

The results of a paleontological resources records search conducted as part of the Phase 1 Archaeological/Paleontological Resources Report (see Appendix D-2) through the Natural History Museum of Los Angeles County (NHMLAC) indicated that several known paleontological resources have been encountered at depth within older Quaternary alluvial deposits that currently underlie the Project Site. LACM 3368, located approximately one-mile northeast of the Project Site, yielded a specimen of fossil horse at an unknown depth while LACM 4250, located approximately one-mile northeast of the Project Site, yielded fossil mammoth remains at an unknown depth. LACM 4232 yielded fossil human remains (*Homo sapiens*) approximately 1.15 miles east of the Project Site. Additional fossil localities<sup>4</sup> (LACM

<sup>1</sup> Boxt, Matthew, A Phase-1 Archaeological/ Paleontological Resource Survey and Impact Assessment of the Culver Studios Project, 9336 W. Washington Boulevard, Culver City, California, 90232, April 27, 2015.

<sup>2</sup> Quaternary alluvium is unconsolidated soil or sediment that has been eroded and reshaped by water and redeposited in recent history in a non-marine setting

<sup>3</sup> McLeod, Samuel, 2015, Paleontological Resources for the Proposed Culver Studios Project, in Culver City, Los Angeles County, Project Area.

<sup>4</sup> Fossil localities refer to the location where one or more fossil specimens were encountered.

1159, LACM 3366, LACM 3367, LACM 3369 and LACM 3370) also exist east of the Project Site between Crenshaw Boulevard and Ballona Creek (approximately 1 to 3.5 miles from the Project). LACM 1159 yielded fossil human remains at a depth of 19-23 feet below surface, LACM 3366 produced a fossil camel and LACM 3367 a fossil mastodon at an unknown depth, LACM 3369 yielded a fossil horse at a depth of six feet below the surface, and LACM 3370 produced a fossil sabretooth cat at an unknown depth. Lastly, 78 fossil specimens were encountered less than a half-mile northeast of the Project Site during construction monitoring for the Ivy Station mixed use development project. These specimens included plant, mammal, and mollusks that were encountered between 28 and 29 feet below the street grade.<sup>5</sup>

### **4.3.3.3 Regulatory Framework**

This section provides a summary of pertinent paleontological resources regulations affecting the Project at the State and local levels.

#### **State**

##### **California Environmental Quality Act**

Paleontological resources are afforded protection by environmental legislation set forth under CEQA. Appendix G (part V) of the State CEQA Guidelines provides guidance relative to significant impacts on paleontological resources, stating that “a project will normally result in a significant impact on the environment if it will . . . disrupt or adversely affect a paleontological resource or site or unique geologic feature.” The CEQA Guidelines do not define “directly or indirectly destroy,” but it can be reasonably interpreted as the physical damage, alteration, disturbance, or destruction of a paleontological resource. The CEQA Guidelines also do not define the criteria or process to determine whether a paleontological resource is significant or “unique” or whether a geologic feature is “unique.”

##### **Other State Regulations**

California Code of Regulations, Title 14, Division 3, Chapter 1, Section 4307 states, part that “no person shall destroy, disturb, mutilate or remove . . . paleontological features.” California Public Resources Code Section 5097.5 protects cultural resources on public lands and specifies that any unauthorized removal of paleontological remains is a misdemeanor. California Penal Code Section 622½ states that damage or removal of archaeological or historical resources (which may be interpreted to include paleontological resources) on public or private land constitutes a misdemeanor.

#### **Local**

##### **City of Culver City**

The City’s General Plan does not contain specific policies or goals that address paleontological resources.

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<sup>5</sup> SWCA Environmental Consultants, 2016, Final Paleontological Resources Monitoring and Mitigation Report for the Washington National Project, Culver City, Los Angeles County, California.

### **Society for Vertebrate Paleontology Guidelines**

The Society of Vertebrate Paleontology (SVP) has established guidelines for the identification, assessment, and mitigation of adverse impacts on nonrenewable paleontological resources (SVP 1995)<sup>6</sup>. Most practicing paleontologists in the nation adhere closely to the SVP's assessment, mitigation, and monitoring requirements outlined in these guidelines, which were approved through a consensus of professional paleontologists and are the standard. The SVP outlined criteria for screening the paleontological potential of rock units (High, Undetermined, Low) and established assessment and mitigation procedures tailored to such potential. These guidelines were updated in 2010 by the SVP.

#### **4.3.3.4 Environmental Impacts**

##### ***Methodology***

The analysis of paleontological resources is based on a review of fossil, soil and rock inventories compiled, synthesized, and evaluated by the staff of the Vertebrate Paleontology Section of the NHMLAC. Because the Project Site is entirely developed or paved and lacks any visible native ground surface or potential for surface exposure of resources, no paleontological field survey was undertaken.

The objective of the record search through the NHMLAC was to determine the geological formations underlying the Project Site, whether any paleontological localities have previously been identified within the Project Site or in the same or similar formations near the Project Site, and the potential for excavations associated with the Project Site to encounter paleontological resources. These methods are consistent with the SVP guidelines for assessing the importance of paleontological resources in areas of potential environmental effect.

As with archaeological resources, since no known resources were identified within the Project Site from the NHMLAC search, this did not preclude the existence of previously unknown buried paleontological resources within the Project Site that may be impacted during construction of the Project. The potential to encounter paleontological resources during construction at the Project Site was determined by reviewing the results of the records search, the depth of native versus fill soils, land use history, past disturbances, and the proposed excavation parameters for the Project.

##### ***Thresholds of Significance***

The significance threshold below is derived from the Environmental Checklist question in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact to paleontological resources would occur if the Project were to:

**PALEO-1:** Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature.

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<sup>6</sup> Society of Vertebrate Paleontology, 2010, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources.

## ***Project Characteristics and Project Design Features***

### **Project Characteristics**

As relates to the evaluation of potential impacts on subsurface paleontological resources, the Project would require excavation and grading for building foundations, below grade parking, and other improvements. Excavation associated with the two new parking structures would reach minimum depths of ten feet to as deep as approximately 33 feet below the surface.

### **Project Design Features**

There are no Project Design Features associated with paleontological resources.

### ***Analysis of Project Impacts***

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**Threshold PALEO-1:** The Project would result in a significant impact to paleontological resources if it directly or indirectly destroys a unique paleontological resource or site, or unique geologic feature.

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**Impact Statement PALEO-1:** **The Project Site has been previously disturbed through grading and development for the existing Studio Campus, however, Project grading and excavation may encounter native soil/sediment associated with older Quaternary Alluvium, which has high potential for containing buried paleontological resources. As a result, construction may directly or indirectly destroy unique paleontological resources or sites or unique geologic features. Impacts to paleontological resources are therefore considered potentially significant.**

As discussed earlier, the Project Site contains surface deposits of younger Quaternary alluvium derived as fluvial deposits from Ballona Creek that flows less than a quarter-mile southeast of the Project Site. Older Quaternary sediments underlie the younger deposits and have yielded several paleontological resources in the vicinity of the Project Site. Specifically, these fossils include specimens of fossil mammoths, horses, sabretooth cats, camels, mastodons, and humans<sup>7</sup> that were recovered as shallow as six feet below the surface to as deep as 23 feet below the surface (including unknown depths) within one- to three-miles of the Project Site. The Project would require excavation and grading for building foundations, below grade parking, and other improvements. Excavations associated with the parking structures would reach minimum depths of ten feet to as deep as approximately 33 feet below the surface. Based on the rich paleontological findings near the Project Site and given that the proposed excavations for the subterranean parking will likely extend into fossiliferous native soils (i.e., older Quaternary sediments), the potential to encounter paleontological resources during construction excavations extending past artificial fill is considered high. Therefore, impacts on buried paleontological resources are considered potentially significant.

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<sup>7</sup> Although these are fossilized human remains and not fossils of extinct flora or fauna, they indicate that the older alluvial deposits are conducive to retaining fossils at depth and inform the paleontological sensitivity of the area

### **Cumulative Impacts**

Many of the related projects identified in Chapter 3, Environmental Setting, would require excavation that could potentially expose or damage paleontological resources. However, these related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, for related projects that do have the potential to encounter buried or subsurface paleontological resources during construction, these would be expected to implement standard mitigation measures to reduce or mitigate impacts on paleontological resources. These measures would include a construction monitoring program and treatment/curation requirements for discovered fossils. Further, those projects' mitigation measures would ensure that their incremental impacts are less than significant and not cumulatively considerable.

The Project is required to comply with the mitigation measures MM-PALEO-1 through MM-PALEO-3, thus ensuring proper identification, treatment and preservation of any resources, and reducing significant impacts on paleontological resources to less than significant levels. These measures require construction monitoring of excavation activities, and treatment and curation of discoveries, if encountered. Therefore, to the extent impacts on paleontological resources from cumulative projects may occur, further contribution from the Project would not be cumulatively considerable, and the cumulative impacts of the Project would be less than significant.

#### **4.3.3.5 Mitigation Measures**

**MM-PALEO-1:** A qualified Paleontologist shall be retained to monitor construction excavations that would encounter older Quaternary sediments (generally associated with sediments below six feet in the area). The Paleontologist shall attend a pre-grading/excavation meeting to discuss the paleontological monitoring requirements. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older Quaternary sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated (older vs. younger alluvium), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Paleontologist.

**MM-PALEO-2:** If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the Paleontologist shall implement a paleontological salvage program to remove the resources from the project

site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

**MM-PALEO-3:** The Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected (if any) and their significance. The report shall be submitted by the project Applicant to the City Planning Division and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project monitoring and required mitigation measures.

#### **4.3.3.6 Level of Significance after Mitigation**

With implementation of the mitigation measures above, the Project would not directly or indirectly destroys a unique paleontological resource or site, or unique geologic feature. The implementation of the above mitigation measures provides for appropriate treatment and/or preservation of resources, if encountered. Potentially significant impacts to paleontological resources would be reduced to a less than significant level.

## 4.4 Geology and Soils

### 4.4.1 Introduction

This section evaluates potential geologic and soils hazards associated with the Project including fault rupture, seismic ground shaking, liquefaction, lateral spreading, subsidence, soils (expansive, collapsible/compressible, and corrosive), landform/landslides, erosion, and methane. This section is based largely on a Preliminary Geotechnical Evaluation (Geotechnical Report) prepared for the proposed Project by Ninyo & Moore.<sup>1</sup> The Geotechnical Report is included as Appendix E of this Draft EIR.

### 4.4.2 Environmental Setting

#### Existing Conditions

##### *Regional Geology*

The Project Site is located within the central block of the Los Angeles Basin region of the Transverse Ranges geomorphic province. This geomorphic province is characterized by an east-west trending structure of mountain ranges separated by broad, alluviated valleys and is bounded by the San Andreas fault system to the northeast, the Coast Ranges to the northwest, and the Peninsular Ranges to the southeast. Principal fault structures of the province comprise both east-west and southeast-northwest trends. Principal east-west trending faults in the region of the site include the San Cayetano, Oak Ridge, Santa Susana, Malibu Coast, Hollywood, and Santa Monica-Raymond. Principal northwest-trending faults in the region of the site include the San Andreas, San Gabriel, Sierra Madre, Verdugo, Whittier, Newport-Inglewood, and Palos Verdes.<sup>2</sup>

The geology of the region consists of older, pre-Tertiary age basement rocks comprised of granitic rocks, metamorphic rocks including gneiss and schist, and older marine sedimentary rocks. Younger Tertiary age volcanic and sedimentary formations of marine and non-marine origin overlie the basement rocks. Thick deposits of younger Quaternary-age alluvial sediments overlie the bedrock in the Los Angeles basin area, deposited as a result of uplift and erosion of the surrounding San Gabriel and Santa Monica mountains.<sup>3</sup>

##### *Site Geology*

The Project Site includes approximately 14 acres of relatively level terrain lying at elevations ranging from approximately 85 feet above mean sea level (msl) in the southwest to approximately 100 feet msl in the northeast. The Project Site is situated in the Ballona Creek drainage between Cheviot Hills to the northeast and Baldwin Hills to the southwest. The Ballona Creek flood control channel is located approximately 500 feet southeast of the Project Site and roughly trends

<sup>1</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>2</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>3</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

from northeast to southwest. Published geologic maps and literature indicate that the Project Site is underlain by Quaternary-age alluvium consisting of gravel, sand, and silty clay derived from the Santa Monica Mountains (see Figure 4 of the Geotechnical Report).<sup>4</sup>

### ***Groundwater***

Historic high groundwater in the Project Site vicinity is approximately 15 feet below the existing ground surface (bgs). However, fluctuations in groundwater levels may occur due to variations in precipitation, ground surface topography, subsurface stratification, irrigation, groundwater pumping and other factors. Shallow perched conditions may also be present in places. During previous (2005-2006, 2009 and 2015) subsurface investigations (e.g., 11 borings), groundwater was encountered in the borings at depths ranging from 35 to 50 feet bgs. Groundwater was encountered at depths ranging from approximately 35 to 41 feet in northern part of the Project Site (front lawn area), approximately 38 to 47 feet in the western part of the Project Site (near the Van Buren Parking Structure), and approximately 50 feet in eastern part of the Project Site (near Building O). More recent (March 2017) groundwater monitoring encountered groundwater a depth of approximately 45 feet. However, groundwater was not encountered at the maximum exploratory depth of 75 in any of the borings. The above results are indicative of shallow perched groundwater rather than a shallow groundwater table. See Figure 3 of the Geotechnical Report for the boring locations.<sup>5</sup>

On-site dewatering currently occurs associated with the existing Rear Lawn subterranean parking structure. This groundwater pumping may be affecting, and potentially lowering, the groundwater levels observed during the previous borings.<sup>6</sup>

### ***Faulting and Seismicity***

Surface fault rupture is the offset or rupturing of the ground surface by relative displacement across a fault during an earthquake. Based on a literature review conducted as part of the Geotechnical Report, the Project Site is not transected by known active faults, nor is the Project Site located within a State of California Alquist-Priolo Earthquake Fault Zone (EFZ). Therefore, the probability of damage from surface fault rupture is considered low, although lurching or cracking of the ground surface as a result of nearby seismic events is possible.<sup>7</sup>

The Project Site is located in the seismically active southern California region and is subject to potentially strong seismic ground shaking. The numerous faults in southern California include active, potentially active, and inactive faults. As defined by the California Geological Survey (CGS), active faults are faults that have ruptured within Holocene time (e.g., within the last 11,000 years), potentially active faults are those that show evidence of movement during

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<sup>4</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>5</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>6</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>7</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

Quaternary time (e.g., within the last 1.6 million years but for which evidence of Holocene movement has not been established, and inactive faults have not ruptured in the last 1.6 million years. Furthermore, there are two types of faults in the region: standard faults that express surface rupture; and blind thrust faults that do not break the surface but are still capable of generating damaging earthquakes.<sup>8</sup>

**Figure 4.4-1, *Fault Locations***, shows the approximate site location relative to the major active faults in the region, while **Table 4.4-1, *Principal Regional Active Faults***, lists the principal known active faults within approximately 40 miles of the Project Site, the distance of each of these faults to the Project Site, and the maximum moment magnitude ( $M_{max}$ ) associated with each of these faults. As indicated therein, the nearest active fault to the Project Site include the Newport-Inglewood fault located approximately 0.6 mile to the southeast, the Santa Monica Fault located approximately 3.0 miles to the north, and the Puente Hills Blind Thrust Fault located approximately 3.2 miles to the east. As further indicated therein, the  $M_{max}$  that can be anticipated from faults in the region ranges up to magnitude 8.2 from the San Andreas Fault located approximately 8.2 miles to the northeast.<sup>9</sup>

The City of Los Angeles NavigateLA website mapping tool shows a fault bisecting the Project Site. Based on review of the CGS Fault Activity Map of California, the fault shown on the NavigateLA website is an older branch of the Newport-Inglewood Fault Zone that is not considered active by CGS and would not require further subsurface evaluation in accordance with the Alquist-Priolo Fault Zoning Act.<sup>10</sup>

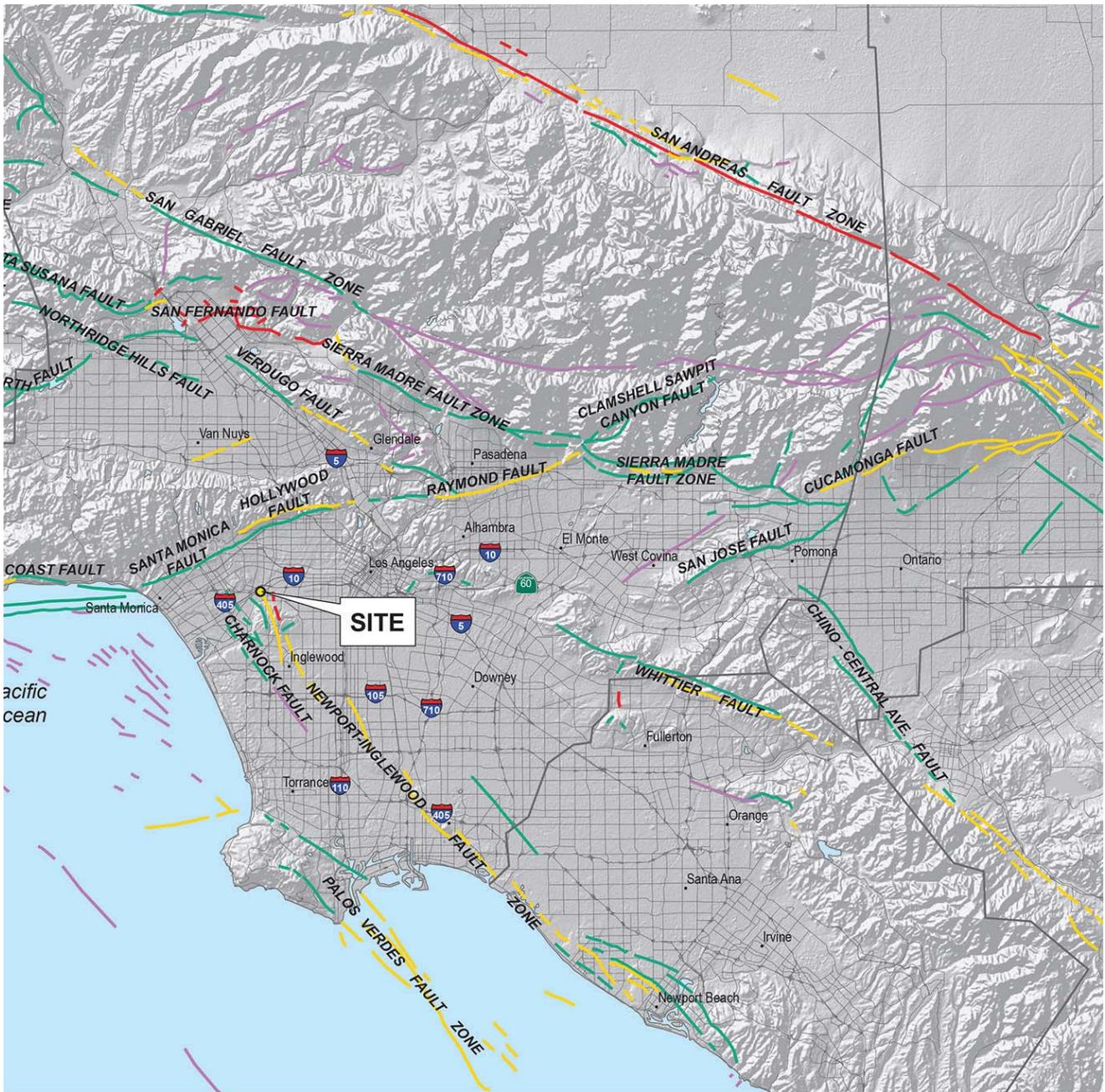
The 2016 California Building Code (CBC), which the City of Culver City (City) has adopted by reference, specifies that the Risk-Targeted, Maximum Considered Earthquake ( $MCE_R$ ) be used to evaluate seismic loads for design of buildings and other structures.  $MCE_R$  ground motion response accelerations are based on the spectral response accelerations for five percent damping in the direction of maximum horizontal response, and incorporate a target risk for structural collapse equivalent to 1 percent in 50 years with deterministic limits for near-source effects. The horizontal peak ground acceleration (PGA) that corresponds to the  $MCE_R$  for the Project Site is calculated at 0.80g using the United States Geological Survey (USGS) web-based seismic design tool.<sup>11</sup>

<sup>8</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>9</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>10</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

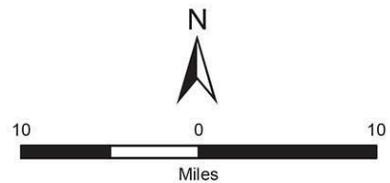
<sup>11</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.



GIS DATA SOURCE: CALIFORNIA GEOLOGICAL SURVEY (CGS), ENVIRONMENTAL SYSTEMS RESEARCH INSTITUTE (ESRI)  
 REFERENCE: JENNINGS, 1994, FAULT ACTIVITY MAP OF CALIFORNIA AND ADJACENT AREAS

LEGEND	
<b>FAULT ACTIVITY:</b>	
<span style="color: red;">—</span> HISTORICALLY ACTIVE	<span style="color: green;">—</span> LATE QUATERNARY
<span style="color: yellow;">—</span> HOLOCENE ACTIVE	<span style="color: purple;">—</span> QUATERNARY
<span style="color: black;">—</span> COUNTY BOUNDARIES	

NOTE: ALL DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE



SOURCE: Ninyo & Moore Geotechnical and Environmental Sciences Consultants,  
 Preliminary Geotechnical Evaluation for The Culver Studios Comprehensive Plan  
 Amendment 7, April 4, 2017.

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**Figure 4.4-1**  
 Fault Locations

**TABLE 4.4-1  
PRINCIPAL REGIONAL ACTIVE FAULTS**

<b>Fault</b>	<b>Approximate Distance to Project Site (miles)</b>	<b>Maximum Moment Magnitude (<math>M_{MAX}</math>)</b>
Newport-Inglewood	0.6	7.5
Santa Monica	3.0	7.4
Puente Hills	3.2	7.0
Hollywood	4.4	6.7
Malibu Coast	7.8	7.0
Elysian Park (Upper)	8.2	6.7
Anacapa-Dume	9.3	7.2
Palos Verdes	9.9	7.7
Raymond	11.8	6.8
Verdugo	12.9	6.9
Sierra Madre	17.3	7.3
Elsinore	19.7	7.8
Whittier	19.7	7.8
Northridge	19.8	6.9
Santa Susana	20.9	6.9
San Gabriel	21.3	7.3
Clamshell-Sawpit	24.8	6.7
Simi-Santa Rosa	26.1	6.9
Holser	28.7	6.8
San Jose	29.3	6.7
Oak Ridge (Onshore)	32.2	7.4
San Joaquin Hills Blind Thrust	34.6	7.1
San Cayetano	35.6	7.2
Chino-Central Ave.	37.0	6.8
Cucamonga	38.6	6.7
San Andreas	39.7	8.2

SOURCE: Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

The 2016 CBC specifies that the potential for seismic ground shaking be evaluated for the mapped Maximum Considered Earthquake Geometric Mean (MCEG) PGA, with adjustment for site class effects in accordance with the American Society of Civil Engineers (ASCE) 7-10 Standard. The MCEG PGA is based on the geometric mean PGA with a 2 percent probability of exceedance in 50 years. The mapped MCEG PGA at the Project Site, with adjustment for site class effects ( $PGA_M$ ), is calculated as 0.73g using the USGS seismic design tool. This potential level of ground shaking could have high impacts on buildings and structures without appropriate design.

### **Liquefaction**

Liquefaction is a phenomenon in which soil loses its shear strength for short periods of time during an earthquake. Ground shaking of sufficient duration results in the loss of grain-to-grain contact due to a rapid increase in pore water pressure, causing the soil to behave as a fluid for short periods of time. The effects of liquefaction may include excessive total and/or differential settlement of structures founded on the liquefying soils. To be susceptible to liquefaction, a soil is typically cohesionless, with a grain-size distribution of a specified range (generally sand and silt), loose to medium dense, below the groundwater table, and subjected to a sufficient magnitude and duration of ground shaking. As indicated previously, the Project Site is underlain by fill and alluvial soils which are typically cohesionless in their natural state, and groundwater underlying the Project Site is relatively close to the surface (35-40 feet bgs).

According to Seismic Hazards Zones Maps published by the State of California, the Project Site is located within an area considered susceptible to liquefaction as indicated in **Figure 4.4-2, Seismic Hazard Zones**. The results of the previous 2005-2006, 2009 and 2015 geotechnical evaluations at the Project Site indicate that potentially liquefiable soil layers in the soils that underlie the Project Site.<sup>12</sup>

The phenomenon of soil liquefaction may result in several hazards including liquefaction-induced settlement. The amount of dynamic soil settlement during a strong seismic event depends on the thickness of the liquefiable layers and the density and/or consistency of the soils. In order to estimate the amount of potential post-earthquake settlement, the method proposed by Tokimatsu and Seed (1987) is generally used in which the seismically induced cyclic stress ratios and corrected blow counts (N-values) are correlated to the volumetric strain of the soil. The results of evaluations for the above-ground parking structure, Building J, and other previously proposed structures indicate the potential for liquefaction-induced dynamic settlement at the Project Site.<sup>13</sup>

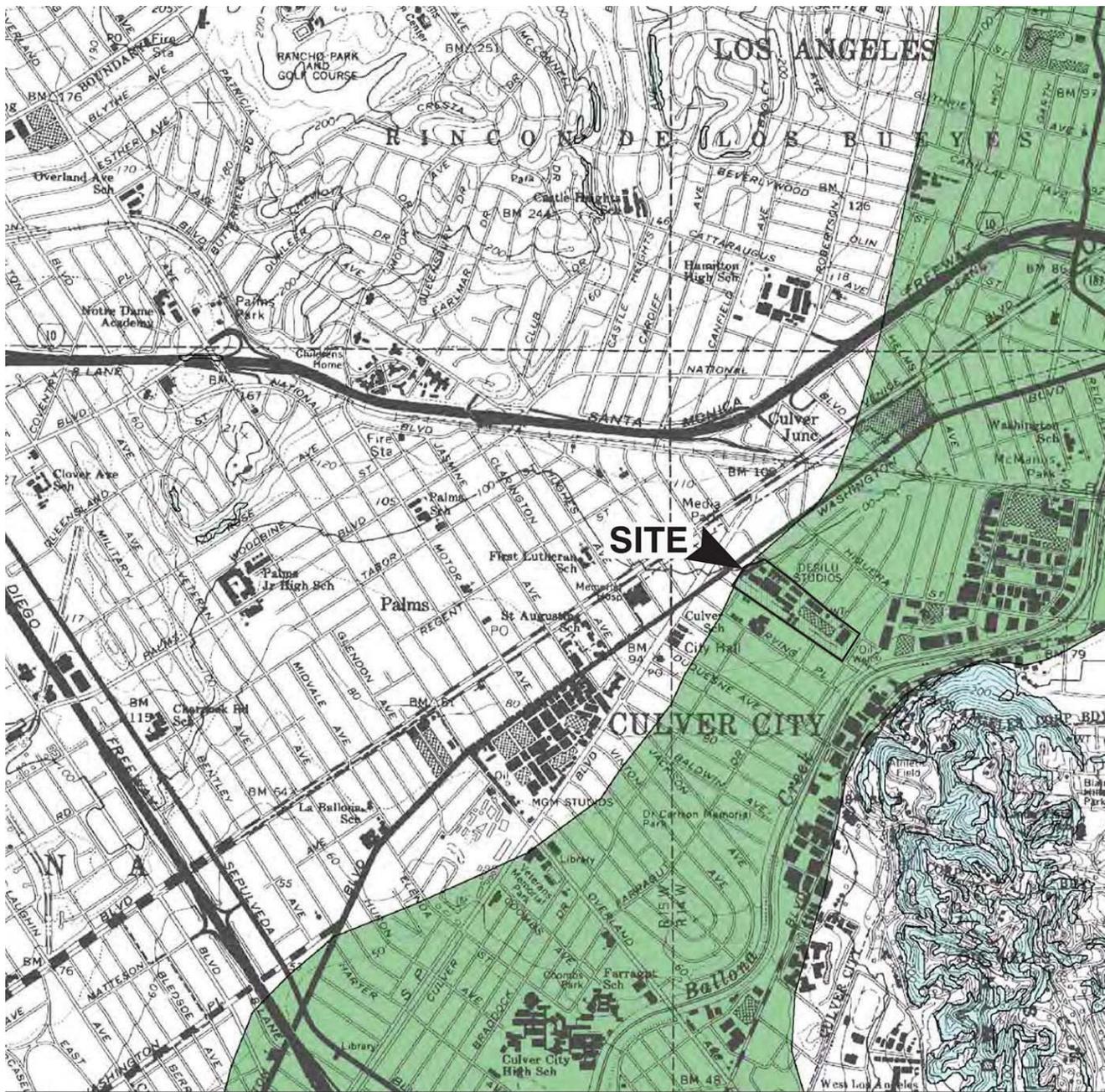
### **Landslides**

Landslides generally occur where slopes are steep and/or the earth materials are too weak to support themselves. Earthquake-induced landslides may also occur due to seismic ground shaking. As indicated previously, the Project Site is located in the Los Angeles Basin on relatively flat terrain. As there are no significant slopes on or within the vicinity of the Project Site, and as indicated in the City's Seismic Hazards

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<sup>12</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

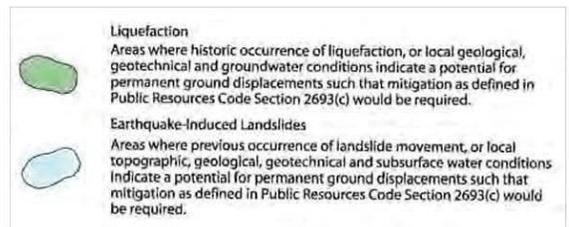
<sup>13</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.



REFERENCE: CALIFORNIA DEPARTMENT OF CONSERVATION DIVISION OF MINES AND GEOLOGY, 1999, SEISMIC HAZARD ZONES OFFICIAL MAP, BEVERLY HILLS QUADRANGLE, DATED MARCH 25.



NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE



SOURCE: Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Preliminary Geotechnical Evaluation for The Culver Studios Comprehensive Plan Amendment 7, April 4, 2017.

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**Figure 4.4-2**  
Seismic Hazard Zones

Map, the Project Site is not located within a City-designated Landslide Hazard Zone, the Project Site is not subject to landslides.<sup>14</sup>

### ***Lateral Spreading***

Lateral spreading of the ground surface during a seismic event 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 very gentle slopes. Despite the potential for liquefaction on the Project Site, due to the absence of any channel, slope, or river on or adjacent to the Project Site, the potential for lateral spreading on the Project Site is currently considered to be low.<sup>15</sup>

### ***Subsidence***

Subsidence is characterized as a sinking of ground surface relative to surrounding areas, and can generally occur where deep soil deposits are present. Subsidence in areas of deep soil deposits is typically associated with regional groundwater withdrawal or other fluid withdrawal from the ground such as oil and natural gas. Subsidence can result in the development of ground cracks and damage to subsurface vaults, pipelines and other improvements.

The Culver City General Plan, Seismic Safety Element indicates that some subsidence has historically occurred in the Los Angeles Basin associated with groundwater withdrawal, oil and gas withdrawal, and hydrocompaction.<sup>16</sup> However, historic subsidence is not known to have occurred or been reported in the Project Site vicinity.<sup>17</sup> Furthermore, while Culver City does not map areas of subsidence within its borders: (1) the City of Los Angeles and County of Los Angeles references do not indicate mapped areas of subsidence; and (2) subsurface extraction activities within the State are regulated by the Oil Drilling District procedures which contain provisions for monitoring and imposing measures to preclude subsidence related to oil and gas extraction. In addition, some groundwater withdrawal currently occurs at the Project Site associated with dewatering for the existing subterranean structures, and additional dewatering may be required under the Project. However, the quantities of dewatered groundwater are expected to continue to be small, and groundwater underlying the Project Site is likely perched rather than part of the groundwater basin, which minimize the potential for subsidence. Lastly, the California Building Code (CBC), which Culver City has adopted by reference, outlines foundation, footing and other design requirements to withstand the effects of normal levels of subsidence, and requires that detailed geotechnical studies be prepared for proposed development projects prior to building

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<sup>14</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Preliminary Updated Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017. Also, City of Culver City, GIS Mapping Program, Seismic Hazards Map, February 2007. <http://www.culvercity.org/home/showdocument?id=124>. Accessed February 21, 2017.

<sup>15</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017].

<sup>16</sup> City of Culver City, Culver City General Plan – Public Safety Element, July 1975. <http://www.culvercity.org/home/showdocument?id=776>. Accessed February 21, 2017.

<sup>17</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

permit approval that outline design requirements specific to the proposed development site. Therefore, the potential for subsidence in the Project area is relatively low.<sup>18</sup>

### ***Soils (Expansive, Collapsible/Compressible, and Corrosive)***

Fill materials and alluvial deposits were encountered during previous 2005-2006, 2009 and 2015 subsurface explorations at the Project Site at depths ranging from approximately 3 feet to 15 feet below the ground surface. This fill material generally consisted of: soft to stiff, silty clay and sandy clay with gravel; and loose to dense, silty sand and clayey sand with gravel. Alluvial deposits were encountered beneath the fill to the explored depths of approximately 101 feet. The alluvial deposits generally consisted of interlayered clay, silt, and sand, and some gravel. The fine-grained alluvial materials encountered generally ranged from soft to hard, clay, silty clay, and sandy clay and clayey silt. The coarse-grained alluvial deposits generally range from very loose to very dense, clayey sand, silty sand, silt, sandy silt, and poorly graded sand, with some gravel. Clayey soil deposits containing shells, which are indicative of estuarine (lagoonal) deposits, were encountered in the 2015 borings below a depth of approximately 55 feet<sup>19</sup>

Expansive soils include clay minerals that are characterized by their ability to undergo significant volume change (shrink or swell) due to variations in moisture content. Sandy soils are generally not expansive. Changes in soil moisture content can result from rainfall,

irrigation, pipeline leakage, surface drainage, perched groundwater, drought, or other factors. Volumetric change of expansive soil may cause excessive cracking and heaving of structures with shallow foundations, concrete slabs-on-grade, or pavements supported on these materials. Based on site explorations and laboratory testing, the near-surface soils at the Project Site contain clayey soils that may be potentially expansive and could affect future surface flatwork and hardscape improvements.<sup>20</sup>

Compressible soils are generally comprised of soils that undergo decrease in volume when exposed to new loading, such as fill or foundation loads. Soil collapse is a phenomenon where the soils undergo a significant decrease in volume upon increase in moisture content, with or without an increase in external loads. Buildings, structures and other improvements may be subject to excessive settlement-related distress when compressible soils or collapsible soils are present. The Project Site is underlain by older fill and unconsolidated alluvial material. . The alluvial deposits underlying the site are generally unconsolidated to weakly consolidated, based on the young nature of the deposits, reflecting a depositional history without substantial loading, and may be subject to collapse. Older, undocumented fill soils related to previous site development were observed in the previous exploratory excavations to depths ranging from approximately 3 to 15 feet bgs, and are considered potentially compressible/collapsible. Due to the presence of

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<sup>18</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>19</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>20</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

potentially compressible/collapsible soils at the site, there is a potential for differential settlement to cause damage to project improvements.<sup>21</sup>

Laboratory testing performed on soil samples from the 11 previous 2005-2006, 2009 and 2015 subsurface borings at the Project Site indicates that soil pH is relatively neutral to slightly basic. The electrical resistivity measured in the laboratory was considered to have a low corrosion potential to ferrous metals, while the chloride content of the soil sample were found to have a low corrosion potential to ferrous metals. The soil samples indicate a low water-soluble sulfate content, indicating that the on-soils may be considered to have a negligible potential for sulfate attack to concrete.<sup>22</sup>

### ***Erosion***

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 at the Project Site where soil or rock 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. Based on the Project Site reconnaissance conducted for the Geotechnical Report, there are no surface exposures of bare ground at the Project Site, other than in landscaped planter areas where planter soil is present. Furthermore, the Project Site is relatively flat. Therefore, the erosion potential of the Project Site is relatively low, although leaving site soils unprotected could lead to some soil erosion.<sup>23</sup>

### ***Methane***

The Project Site is not located within a designated methane zone. Therefore, no constraints associated with methane or other subsurface gases are expected encountered at the Project Site.<sup>24</sup>

## 4.4.3 Regulatory Framework

This section provides a summary of State and local geology and soils regulations and policies applicable to the Project Site.

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<sup>21</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>22</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>23</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>24</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

## State

### ***Alquist-Priolo Earthquake Fault Zoning Act***

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code Section 2621) was enacted by the State of California in 1972 to address the hazard of surface faulting to structures for human occupancy.<sup>25</sup> The purposes of the Alquist-Priolo Earthquake Fault Zoning Act are to prevent the construction of buildings intended for human occupancy on the surface traces of active faults, to provide the citizens with increased safety and to minimize the loss of life during and immediately following earthquakes by facilitating seismic retrofitting to strengthen buildings against ground shaking. The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish regulatory zones, known as “earthquake fault zones.” These are zones that lie within 500 feet on either side of the surface traces of active faults. The State Geologist is also required to issue appropriate maps to assist cities and counties in planning, zoning, and building regulation functions. Local agencies enforce the Alquist-Priolo Earthquake Fault Zoning Act in the development permit process, where applicable, and may be more restrictive than State law requires. According to the Alquist-Priolo Earthquake Fault Zoning Act, before a project that is within an Alquist-Priolo Earthquake Fault Zone can be permitted, cities and counties shall require a geologic investigation, prepared by a licensed geologist, to demonstrate that buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back. Although setback distances may vary, a minimum 50-foot setback is required.

### ***Seismic Hazards Mapping Act***

To address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990 (Public Resources Code Section 2690-2699). Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate “seismic hazard zones.” Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of the Project Site are investigated and appropriate mitigation measures, if any, are incorporated into development plans.

The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plan and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. Under the Seismic Hazards Mapping Act, cities and counties are required, prior to the approval of a project located in a seismic hazard zone, to prepare a geotechnical report defining and delineating any seismic hazard and recommendations. Each city is required to submit one copy of each geotechnical report to the State Geologist within 30 days of its approval. The geotechnical report required under the Seismic Hazards Mapping act discussed above is the same as the detailed geotechnical investigation required by California Building Code Section 1803 (discussed further below) rather than the planning level geotechnical report (Ninyo & Moore, July 15, 2015) upon which this Draft EIR section is based.

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<sup>25</sup> The Act was originally entitled the Alquist-Priolo Geologic Hazards Zone Act.

State publications supporting the requirements of the Seismic Hazards Mapping Act include the California Geological Survey SP 117A, *Guidelines for Evaluating and Mitigating Seismic Hazards in California* and SP 118, *Recommended Criteria for Delineating Seismic Hazard Zones in California*. The objectives of SP 117A are to assist in the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations and to promote uniform and effective statewide implementation of the evaluation and mitigation elements of the Seismic Hazards Mapping Act. SP 118 implements the Seismic Hazards Mapping Act in the production of Probabilistic Seismic Hazard Maps for the State.

### **California Building Code**

The CBC, Title 24 of the California Code of Regulations, is a compilation of building standards, including seismic safety standards for new buildings. CBC standards are based on building standards that are adopted without change from the most recently adopted International Building Code; building standards based on the national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code, such as certain American Society of Civil Engineers (ASCE) standards. The CBC applies to all occupancies in California, except where stricter standards have been adopted by local agencies. Chapter 16 of the CBC contains provisions for structural design which includes, among others, soil lateral loads (Section 1610) and earthquake loads (Section 1613). Specifically, Section 1613 states: “[e]very structure, and portion thereof, including nonstructural components that are permanently attached to structures and their supports and attachments, shall be designed and construction to resist the effects of earthquake motions in accordance with ASCE 7.”<sup>26</sup> Chapter 18 identifies provisions for soils and foundations including geotechnical explorations (Section 1803), excavation, grading and fill (Section 1804), and foundations (Sections 1808-1810).

CBC Section 1803 also requires the preparation of a detailed geotechnical investigation, prepared to ASTM standards by a State licensed Geotechnical Engineer and using ASTM procedures, prior to design and construction. As required therein, the detailed geotechnical investigation must: (1) address fault rupture, seismic ground shaking, liquefaction, lateral spreading, settlement, subsidence, slope stability, and expansive and collapsible soils; and (2) include a literature review, subsurface testing (e.g., borings), laboratory testing of collected soils, analysis, and geotechnical engineering recommendations for project foundations, footings, and other construction and design elements. Per City requirements, the detailed geotechnical investigation must be submitted with the Site Improvement/Grading Plan. Compliance with the geotechnical engineering recommendations in a detailed geotechnical investigation would ensure that the site-specific geotechnical and soils hazards at a project site are taken into account during design and construction and properly mitigated.

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<sup>26</sup> ASCE 7 is a document published by the American Society of Civil Engineers (ASCE) that specifies minimum design loads for buildings and other structures.

## Local

### ***Culver City General Plan - Public Safety Element***

The 1975 Public Safety Element of the City's General Plan identifies and defines programs to protect the community from fire, and geologic hazards.<sup>27</sup> Relevant policies in the Public Safety Element include the following:

Policy 1: Establish and enforce standards and criteria to reduce unacceptable levels of fire and geologic risk.

Policy 5: Develop stringent site criteria for construction in areas with fire and/or geologic problems and prohibit construction if these criteria are not met.

Policy 9: Require all new development and selected existing development to comply with established fire and geologic safety standards.

### ***Culver City General Plan – Seismic Safety Element***

The 1974 Seismic Safety Element of the City's General Plan identifies and appraises the seismic hazards in the City, such as susceptibility to fault rupture, seismic ground shaking, and seismically-induced ground failure.<sup>28</sup> While primarily a geologic hazards appraisal rather than a policy document, the Seismic Safety Element does include a limited number of policies, including the relevant policies below:

Liquefaction: Areas of shallow groundwater (less than 50 feet in depth) should be considered potentially problematic in terms of liquefaction and, therefore, should be evaluated in terms of seismic design.

Landslides and Slope Stability: Evaluation of slope stability for natural, man-made or proposed slopes must include geologic-soils evaluation of these factors (e.g., nature of bedrock underlying the site, proximity to faulting, structural dip of bedding plans, slope angle, presence of ancestral slope failures, groundwater levels) which, in turn, must be based on detailed field and laboratory observations by the geologist and soils engineer.

Soils Investigations: Soils investigations should be required for all development within the City. Problems of expansive and boggy soils conditions will be particularly important considerations by the soils engineer. Potentially high groundwater conditions could result in the future and should receive the attention of the soils engineer.

### ***Culver City Building Code***

Per City of Culver City Municipal Code Chapter 15.02, the City has adopted the 2016 edition of the CBC by reference with amendments.

<sup>27</sup> City of Culver City, Culver City General Plan – Public Safety Element, July 1975.  
<http://www.culvercity.org/home/showdocument?id=776>. Accessed February 21, 2017.

<sup>28</sup> City of Culver City, Culver City General Plan – Seismic Safety Element, May 1974, updated January 1977.  
<http://www.culvercity.org/home/showdocument?id=780>. Accessed February 21, 2017.

## 4.4.4 Environmental Impacts

### Methodology

The technical analyses supporting the impact conclusions in the following subsections are based on the analysis contained in the April 2017 Geotechnical Report prepared by Ninyo & Moore for the proposed Project and included in Appendix E of this Draft EIR. The Geotechnical Report presents preliminary geotechnical information regarding the geologic and soils conditions at the Project Site, conclusions regarding the potential geologic and soils impacts of the Project, and recommendations to mitigate potential geologic and soils hazards. The Geotechnical Report was prepared in accordance with current engineering practice and the standard of care exercised by reputable geotechnical consultants performing similar tasks in the City. The conclusions in the Geotechnical Report were primarily derived from the following:<sup>29</sup>

- Review of background data, including topographic and geologic maps, published geotechnical and geologic reports, seismic data, groundwater data, aerial photographs, and available preliminary plans regarding the proposed construction.
- Review of the findings and subsurface data from previous geotechnical evaluations prepared for the Project Site, including the 2005 and 2006 geotechnical evaluations prepared for Building J and for the above-grade parking structure in the southern portion of the Project Site, and the 2009 and 2015 geotechnical evaluations prepared for CPAs No. 5 and 6, respectively. Included as part of the review was a review of the findings of laboratory analysis of soil samples taken from nine exploratory borings and five previous cone penetration tests (CPTs) conducted as part of the 2005, 2006, 2009 and 2015 geotechnical evaluations.
- Site reconnaissance on March 30, 2017, to observe current site conditions and measure the groundwater level in the monitoring well at the Project Site (Figure 3 of the Geotechnical Report)
- Data compilation and engineering analysis of the information obtained from the background review and the previous site explorations.
- Assessment of the general geologic conditions and seismic hazards affecting the area and evaluation of their potential impacts on the Project

Data and conclusions from the analyses in the Geotechnical Report were used to determine potential impacts from the Project to and from the site geology and soils parameters. These impacts were compared against the Thresholds of Significance set forth below to determine the level of significance of potential impacts.

### Thresholds of Significance

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact associated with geology and soils would occur if the Project were to:

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<sup>29</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

- **GEO-1:** Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving earthquake fault rupture, seismic shaking, or ground failure.
- **GEO-2:** 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 an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
- **GEO-3:** Be located on expansive soils, as defined in Table 18-1-B of the UBC (1994), or corrosive soils, creating substantial risk to life or property.
- **GEO-4:** Result in substantial soil erosion or the loss of topsoil.

As discussed in the Initial Study, provided in Appendix A of this Draft EIR, and in Chapter 6, Other CEQA Considerations, the Project Site is generally flat, with the closest area of slope approximately 0.2 miles to the south, and according to the City of Culver City's GIS Hazards Map, is located outside the areas identified as susceptible to earthquake-induced landslides.<sup>30</sup> Therefore, no further analysis of this topic in the Draft EIR is necessary.

## Project Characteristics and Project Design Features

### *Project Characteristics*

The Project would include the demolition of the majority of the existing on-site buildings, and the construction and operation of new studio buildings (with up to four levels above-grade), above - and below-grade parking structures (with up to two levels below-grade), and a subterranean vehicular connection between Culver Boulevard and the Project Site. Project subterranean structures would extend to a maximum depth of approximately 33 feet bgs, the maximum depth of excavation would be approximately 45 feet bgs, and grading would include approximately 432,912 cubic yards (cy) of , all of which would be exported from the Project Site for off-site reuse or disposal.<sup>31</sup>

All proposed structures would be designed and constructed in accordance with the 2016 edition of the CBC, as amended by the City, and with other applicable laws and regulations. Specific relevant CBC requirements, in addition to designing and constructing buildings to code, include but are not limited to, the following:

- **CBC Section 1803 (Detailed Geotechnical Investigations):** CBC Section 1803 requires the preparation of a detailed geotechnical investigation, prepared to ASTM standards by a State licensed Geotechnical Engineer and using ASTM procedures, prior to design and construction. As required therein, the detailed geotechnical investigation must: (1) address fault rupture, seismic ground shaking, liquefaction, lateral spreading, settlement, subsidence, slope stability, and expansive and collapsible soils; and (2) include a literature review, subsurface testing (e.g., borings), laboratory testing of collected soils, analysis, and

<sup>30</sup> City of Culver City, Seismic Hazards, dated February 1, 2007. Available at: <http://www.culvercity.org/home/shadowdocument?id=124>. Accessed June 2016.

<sup>31</sup> The Central Parking Structure would include two levels of subterranean parking extending to a depth of 25 feet below the ground surface (bgs). The Van Buren Parking Structure would include six above grade and two subterranean levels extending to a depth of 33 feet bgs.

geotechnical engineering recommendations for project foundations, footings, and other construction and design elements. Per City requirements, the detailed geotechnical investigation must be submitted with the Site Improvement/Grading Plan. Compliance with the geotechnical engineering recommendations in a detailed geotechnical investigation would ensure that the site-specific geotechnical and soils hazards at a project site are taken into account during design and construction and properly mitigated.<sup>32,33</sup>

The detailed geotechnical investigation discussed above is required during the building permit stage, and is separate from the planning level geotechnical report (Ninyo & Moore, September, 2017) upon which this Draft EIR section is based.

- **CBC Section 1805.1.3 (Groundwater Control)**: Where dewatering is required, CBC Section 1805.1.3 requires that the design of the system to lower the groundwater table shall be based on accepted principles of engineering that consider issues that include, but are not necessarily limited to, permeability of the soil, rate at which water enters the drainage system, rated capacity of pumps, head against which pumps are to operate, and the rated capacity of the disposal area for the system. Consideration of these issues would ensure that any required dewatering systems are properly sized and designed to accommodate the dewatering required.
- **CBC Section 1304 (Excavation, Grading and Fill)**: CBC Section 1304 identifies specific slope limitations, compaction requirements, placement of fill requirements, and other grading requirements for excavation, grading and fill. These requirements have been formulated to ensure the safe and proper support of new buildings/structures.
- **CBC Section J104.3 (Grading Permit Requirements – Geotechnical/Soils Report)**: Per CBC Section J104.3, a geotechnical report prepared by a registered design professional shall be required for a grading permit. The report shall contain at least: (1) the nature and distribution of existing soils; (2) conclusions and recommendations for grading procedures; (3) soil design criteria for any structures or embankments required to accomplish the proposed grading; and (4) where necessary, slope stability studies, and recommendations and conclusions regarding site geology. Per City requirements, a final compaction report is also required. Compliance with these requirements would ensure that grading occurs in a safe manner and would provide for the safe and proper support of new buildings/structures.
- **CBC Section J104.4 (Grading Permit Requirements – Liquefaction Study)**: For sites with mapped maximum considered earthquake spectral response accelerations at short periods greater than 0.5g, a study of the liquefaction potential of the site shall be provided and the recommendations incorporated into the grading plan. Compliance with this requirement would ensure that any grading and other earthwork takes into account the potential for liquefaction at site and, along with the design of foundations, footings, and other design elements, would mitigate potential liquefaction hazard.

### ***Project Design Features***

The following Project Design Feature (PDF) is proposed to reduce or avoid the potential geology and soils impacts of the proposed Project

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<sup>32</sup> The geotechnical and soils issues listed are those required by CBC Section 1803.5.12 be addressed in detailed geotechnical reports for projects in USGS Seismic Design Categories D through F (e.g., areas subject to potentially strong seismic ground shaking).

<sup>33</sup> It was determined that the Project Site is in Seismic Design Category D by using the USGS's Seismic Design Category web tool at: <https://earthquake.usgs.gov/designmaps/us/application.php>. Accessed on February 23, 2017.

**PDF-GEO-1: Groundwater Dewatering.** Unless determined not to be required in the detailed geotechnical report for the Project dewatering systems shall be installed in the lowest levels of the proposed Central and Van Buren Parking Structures and along the underground vehicular connection between the existing on-site subterranean parking structure and Culver Boulevard. The design of the systems shall be reviewed and approved by the City, and shall be based on accepted principles of engineering that consider but are not necessarily limited to, permeability of the soil, rate at which water enters the drainage system, rated capacity of pumps, head against which pumps are to operate, and the rated capacity of the disposal area for the system. Consideration of these issues would ensure that dewatering systems are properly sized and designed to accommodate the required dewatering in accordance with CBC Section 1805.1.3. A modified discharge permit shall be obtained from the RWQCB, LADPW, or other appropriate permitting agency for the additional discharge.<sup>34</sup>

## Analysis of Project Impacts

**Threshold GEO-1:** The Project would result in a significant impact if it would expose people or structures to potential substantial adverse effects, including the risk or loss, injury, or death, involving earthquake fault rupture, seismic shaking, or ground failure.

**Impact Statement GEO-1: The Project Site is not subject to fault rupture, and compliance with existing regulations would avoid substantial hazards related to seismic ground shaking and reduce hazards associated with liquefaction. However, potential hazards associated with liquefaction are considered potentially significant impacts and mitigation measures are recommended.**

### ***Fault Rupture***

No known active or potentially active faults bisect the Project Site, nor is the Project Site located within a State of California Alquist-Priolo Earthquake Fault Zone.<sup>35</sup> The closest known active fault to the Project Site is the Newport-Inglewood Fault located approximately 0.60 miles to the south.<sup>36</sup> Therefore, the Project Site is not subject to fault rupture. No impact would occur with respect to fault rupture.

Lurching or cracking of the ground surface is possible at the Project Site associated with nearby seismic events.<sup>37</sup> However, as required by CBC Section 1803, a detailed geotechnical report would be prepared, and any applicable recommendations in the report would be implemented, to ensure adequate seismic safety and soils stability of all proposed Project improvements. In addition, the Project's grading plan and building plans would conform to the recommendations in the detailed geotechnical report in a manner meeting CBC requirements as amended by the City.

<sup>34</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>35</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>36</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>37</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

Through compliance with the recommendations in a detailed geotechnical report and with other standard building code requirements, impacts related to lurching or cracking of the ground surface would be less than significant.

### ***Seismic Ground Shaking***

The Project Site is located in the seismically active southern California region and is subject to potentially strong seismic ground shaking. As indicated previously, the closest active fault to the Project Site is the Newport-Inglewood fault located approximately 0.6 mile to the south, the highest  $M_{max}$  that can be expected at the Project Site from faults in the region is magnitude 7.8, the horizontal PGA that corresponds to the  $MCE_R$  for the Project Site is calculated at 0.80g, and the  $PGA_M$  at the Project Site is calculated as 0.73g. This data supports the proximity-based conclusion in the first sentence above that the Project Site would be subject to the potentially strong seismic ground shaking. However, Project foundation/structural design and construction would be subject to the requirements of the seismic safety provisions of the CBC (Title 14, California Code of Regulations, Part 2) which have been formulated to prevent building collapse during a design earthquake so that building occupants can evacuate buildings after an earthquake.<sup>38</sup> Furthermore, Project foundation/structural design and construction would be subject to the site-specific geotechnical engineering recommendations of the detailed geotechnical investigation required for the Project by CBC Section 1803, with these recommendations specifically formulated to avoid substantial adverse effects to people and structures associated with soil conditions, the highest seismically-induced  $M_{max}$ , and the  $MCE_R$  and  $PGA_M$  at the Project Site. Therefore, through adherence to applicable regulations and the recommendations in a detailed geotechnical investigation, impacts related to seismic ground shaking would be less than significant.

### ***Liquefaction***

As indicated previously, the Project Site is located within an area considered susceptible to liquefaction according to Seismic Hazards Zones Maps published by the State of California. is underlain by potentially liquefiable soils, and has relatively shallow (35-50 feet bgs) perched groundwater, which together indicate that the Project Site is potentially subject to liquefaction.<sup>39</sup>

Compliance with existing regulations would substantially reduce the potential liquefaction hazard at the Project Site. These regulations include, but are not necessarily limited to: CBC Section 1803 which requiring a detailed geotechnical investigation that evaluates and provides geotechnical engineering recommendations for liquefaction; CBC Section 1805.1.3 which requires that dewatering systems be adequately sized, and be designed and operated in accordance with specified engineering requirements; CBC Sections 1304 and J104.3 which identify specific slope limitations, compaction requirements, placement for fill requirements, and other grading requirements to provide the proper support of buildings; and CBC Section J104.4 which requires

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<sup>38</sup> A “design earthquake” is one with a two percent chance of exceedance in 50 years, or an average return period of 2,475 years.

<sup>39</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017. Also, City of Culver City, GIS Mapping Program, Seismic Hazards Map, February 2007. <http://www.culvercity.org/home/showdocument?id=124>. Accessed February 21, 2017.

a liquefaction study and the implementation of the recommendations in the study for a grading permit. It is likely that compliance with these regulations would fully mitigate the potential liquefaction hazard. Still, without assurance that Project structures would incorporate foundations specifically designed to mitigate the liquefaction hazard (including the associated dynamic settlement hazard), the potential impact is considered significant, and mitigation measures are provided below.

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**Threshold GEO-2:** The Project would result in a significant impact if it would be located on a geologic unit or soil that is unstable or that would become unstable, potentially resulting in an on-site or off-site lateral spreading, subsidence, liquefaction, or collapse.

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**Impact Statement GEO-2: Compliance with existing regulations would avoid substantial hazards related to subsidence and collapse and would substantially reduce hazards associated with lateral spreading and liquefaction. However, potential lateral spreading and liquefaction hazards are considered potentially significant impacts and mitigation measures are recommended.**

### ***Lateral Spreading***

As indicated previously, lateral spreading of the ground surface during a seismic event 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 less extent on ground surface with a very gentle slope. Despite the potential for liquefaction on the Project Site, due to the absence of any channel, slope, or river within or near the Project Site, the potential for on-site lateral spreading is currently negligible.<sup>40</sup> The Geotechnical Report also concludes that the site soils would be capable of supporting proposed structures with the recommended foundation design measures.<sup>41</sup>

However, the Project would include excavations of up to 45 feet bgs and new above-grade and subterranean structures, and could potentially include some slopes and/or retaining walls. Given the presence of liquefiable soil levels at the Project Site, these excavations and features could potentially lead to lateral spreading. Compliance with CBC Sections 1803 (Detailed Geotechnical Investigations), 1304 (Excavations, Grading and Fill), and J104.3 (Grading Permit Requirements – Geotechnical/Soils Report) would substantially reduce the potential for lateral spreading, and could potentially mitigate any such potential, by requiring construction, grading compaction, shoring design, slope design, structure foundations and footings, etc., specifically designed to address on-site geotechnical and soils conditions including lateral spreading. Nonetheless, the potential for impacts associated with liquefaction induced lateral spreading is considered significant, and mitigation measures are provided below.

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<sup>40</sup> City of Culver City, Initial Study for Culver Studios Comprehensive Plan Amendment No. 6, November 18, 2015.

<sup>41</sup> City of Culver City, Initial Study for Culver Studios Comprehensive Plan Amendment No. 6, November 18, 2015.

### ***Subsidence***

As indicated previously, the potential for subsidence at the Project Site is considered low.<sup>42</sup> Furthermore, Project buildings and associated footings would be designed and constructed in accordance with standard CBC requirements which have formulated to provide the required amount of structural stability. Therefore, potential subsidence impacts would be less than significant.

### ***Liquefaction, Groundwater, and Saturated Soils***

Impacts related to liquefaction are discussed above under Impact GEO-1. As indicated therein, impacts would be significant prior to implementation of mitigation measures.

With respect to groundwater, during the previous (2005-2006, 2009, and 2015) subsurface explorations at the Project Site, groundwater was observed in the borings at depths ranging from approximately 35 feet to more than 50 feet bgs. Historic high groundwater is approximately 15 feet bgs). The proposed structures associated with the Project, including the Central Parking Structure and Van Buren Parking Structure, would be constructed in excavations performed below the existing ground surface of the Project Site. Based on review of preliminary project plans, the subterranean levels of the proposed Central and Van Buren Parking Structures would extend to approximately 25 and 32 feet bgs, respectively. Based on the previous subsurface explorations and groundwater monitoring, groundwater levels in the central and western portions of the Project Site (where the proposed parking structures would be constructed) have been recorded in the range of approximately 38 to 50 feet, and groundwater was measured at a depth of approximately 45 feet in the monitoring well (2015 Boring B-9) in the western part of the Project Site on March 30, 2017.

Based on the current and previous groundwater levels observed at the Project Site, and the anticipated depth of construction activities, groundwater may not be required for the subterranean parking garages during operation. Nevertheless, this analysis assumes that permanent dewatering would be undertaken under proposed PDF-GEO-1 unless determined not to be required in the final geotechnical report. During excavations, shallow perched groundwater could potentially be encountered, and, if encountered, could have an impact on associated construction activities. Additionally, it is anticipated that shaft excavations for drilled CIDH piles, if utilized for structure foundations, would also encounter groundwater during excavations. Furthermore, groundwater levels could rise where influenced by seasonal variations, precipitation, irrigation, soil/rock types, groundwater pumping, and other factors and are subject to fluctuations. On-site infiltration of storm water related to low impact development guidelines could also have an impact on existing and planned site improvements. As permanent dewatering is proposed under PDF-GEO-1, if required, operational groundwater impacts would be less than significant. Without dewatering during construction, if required, construction-related groundwater impacts would be significant.

Wet or saturated soil conditions encountered in excavations during construction for the Project could cause instability of the excavations, and present a constraint to construction activities.

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<sup>42</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

Excavations in areas with groundwater may need to be cased/shored and/or dewatered to maintain stability of the excavations and adjacent improvements and provide access for construction. Mitigation techniques should be developed, as appropriate, to reduce the impacts related to groundwater. The potential impacts due to groundwater would be reduced with incorporation of techniques such as casing, shoring and/or construction dewatering.

### ***Collapse***

As indicated previously, soil collapse is a phenomenon where unconsolidated soils undergo a significant decrease in volume upon an increase in moisture content. Soil collapse can cause excessive settlement-related distress to buildings and other improvements. The Project Site is underlain by unconsolidated fill and alluvial material with relatively high groundwater levels (approximately 35-44 feet bgs).<sup>43</sup> Therefore, while the soils underlying the Project Site have been compacted by previous grading activities and the presence of on-site buildings, they could become collapsible if disturbed without proper re-grading and compaction.

However, Project grading activities would occur in accordance with the requirements of the CBC, including with: (1) CBC Section 1304 which identifies general compaction, placement of fill, and other grading requirements; and (2) CBC Section J104.3 which requires the preparation of a geotechnical/soils report as a condition for obtaining a grading permit which requires analysis of on-site soils and identification of site-specific soil design criteria for structure given these soils (including, potentially, removal of the collapsible soil layers and replacement with compacted fill and/or the use of deep foundations). Compliance with these requirements would ensure the proper re-grading and compaction is conducted, and would avoid the potential for collapse. Therefore, the impact would be less than significant.

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**Threshold GEO-3:** The Project would result in a significant impact if it would be located on expansive soil, as defined in Table 18-1-B of the UBC (1994), or corrosive soils, creating substantial risk to life or property.

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**Impact Statement GEO-3: The Project Site does not have corrosive soils, and compliance with existing regulations would substantially reduce hazards associated with expansive soils. However, hazards associated with expansive soils are considered a potentially significant impact and mitigation measures are recommended.**

### ***Expansive Soils***

Expansive soils shrink and swell in response to moisture due to high percentages of clay. The Geotechnical Report indicates that soils underlying the Project Site consist of fill and alluvium that contain clay.<sup>44</sup> Therefore, the potential for expansive soils at the Project Site is considered moderate. However, the Geotechnical Report concludes that the Project Site soils would be capable of supporting the proposed structures with the recommended foundation and footing

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<sup>43</sup> Ibid.

<sup>44</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

design measure.<sup>45</sup> Furthermore, compliance with CBC Sections 1803 (Detailed Geotechnical Investigations), 1304 (Excavations, Grading and Fill), and J104.3 (Grading Permit Requirements – Geotechnical/Soils Report) would substantially reduce the potential for expansive soils, and would mitigate any such potential, by requiring construction, over-excavation and compaction of problematic soils, moisture management, shoring design, slope design, structure foundations and footings, etc., specifically designed to address on-site geotechnical and soils conditions including expansive soils. Nonetheless, the potential for impacts associated with expansive soils is considered potentially significant, and mitigation measures are provided below.

### **Corrosive Soils**

As indicated previously, laboratory testing performed on soil samples at the Building J site indicates that soil pH is relatively neutral to slightly basic. The electrical resistivity measured in the laboratory is considered to have a low corrosion potential to ferrous metals, while the chloride content of the soil sample was found to have a low corrosion potential to ferrous metals. The soil samples indicate a low water-soluble sulfate content, indicating that the on-soils may be considered to have a negligible potential for sulfate attack to concrete.<sup>46</sup> Therefore, the existing on-site soils would not be expected to result in damage to Project building foundations, footings and subterranean levels, and no impact would occur.

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**Threshold GEO-4:** The Project would result in a significant impact if it would result in substantial soil erosion or the loss of topsoil.

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**Impact Statement GEO-4: Compliance with existing grading and water quality regulations would avoid substantial soil erosion or the loss of topsoil during Project construction and operation. Therefore, the impact would be less than significant.**

As indicated previously, the soil underlying the Project Site soils consist of approximately three feet to 15 feet of fill below the ground surface and/or disturbed alluvium deposits beneath the fill. The alluvial deposits consist of interlayered clay, silt, sand, and some gravel.<sup>47</sup> Little if any native topsoil is likely to occur at the Project Site since the site is already covered with paving and structures and would be mostly covered with paving and impervious surfaces under the proposed Project.<sup>48</sup> Therefore, the Project would not result in the loss of topsoil.

Future construction at the Project Site would result in ground surface disruption during excavation, grading, and trenching that would create the potential for wind-born and water-born soil erosion during the construction period. However, substantial wind-born erosion during construction would be avoided through the implementation of soil stabilization measures (daily watering, covering of haul truck loads, etc.) required by the South Coast Air Quality Management District (SCAQMD) under Rule 403 (Fugitive Dust). At the same time, substantial water-born

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<sup>45</sup> City of Culver City, Initial Study for Culver Studios Comprehensive Plan Amendment No. 6, November 18, 2015.

<sup>46</sup> City of Culver City, Initial Study for Culver Studios Comprehensive Plan Amendment No. 6, November 18, 2015.

<sup>47</sup> Ninyo & Moore Geotechnical and Environmental Sciences Consultants, Updated Preliminary Geotechnical Evaluation for The Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>48</sup> City of Culver City, Initial Study for Culver Studios Comprehensive Plan Amendment No. 6, November 18, 2015.

erosion during construction would be avoided through implementation of the City's standard erosion control practices (e.g., sandbagging, use of soil-covering geofabrics, etc.) required pursuant to the CBC, and of a Storm Water Pollution Prevention Plan (SWPPP) and associated erosion control Best Management Practices (BMPs) required by the National Pollution Discharge Elimination System (NPDES). Following construction, erosion would be minimized through the proposed covering of most of the Project Site with impervious surfaces, and by long-term erosion management practices and drainage provisions incorporated into the design and maintenance of the Project.<sup>49</sup>

Based on the above, no impact would occur with respect to topsoil, and a less than significant impact would occur with respect to soil erosion.

## Cumulative Impacts

The study area considered for cumulative geology and soils impacts is the central block of the Los Angeles Basin region of the Transverse Ranges geomorphic province as this is the smallest discrete geologic area in which the Project Site and each of the related projects listed in Chapter 3, General Description of Environmental Setting, of this Draft EIR are located.

All of the related projects would be built in the same seismically active region and could experience ground shaking and other seismically related hazards, similar to the Project. Those projects would also be subject to applicable seismic standards, safety requirements and, standard design specification to keep potential risk of damage from seismic and other geologic hazards to an acceptable level. Geologic and soil impacts are generally site-specific and there is little, if any, cumulative relationship between development projects. Adherence to all relevant plans, codes, and regulations with respect to project design and construction, together with the mitigation measures identified in this section, would reduce Project geologic and seismic impacts to less than significant levels as indicated above under Impacts GEO-1 through GEO-3, and adherence of the related projects to these regulations and CEQA requirements for mitigation should do the same with respect to the related projects. Therefore, the proposed Project would not contribute considerably to cumulative geologic and seismicity impacts, nor would the related projects be likely to result in significant geologic and seismic impacts. As such, cumulative geologic and seismic impacts would be less than significant.

During construction of the proposed Project and related projects, grading and excavation have the potential to expose soils in the area to wind and water erosion, resulting in a loss of soils. As discussed above under Impact GEO-4, any project involving grading of an area greater than one acre is required to apply for a NPDES permit, which requires the use of BMPs for erosion control. Compliance with NPDES requirements, and with the grading requirements of the applicable City (Culver City, City of Los Angeles), would minimize potential soil erosion impacts for the proposed Project and related projects, with the erosion impacts of the proposed Project less than significant as indicated above under Impact GEO-4. Therefore, the proposed Project would not contribute considerably to cumulative erosion impacts, nor would the related

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<sup>49</sup> City of Culver City, Initial Study for Culver Studios Comprehensive Plan Amendment No. 6, November 18, 2015.

projects be likely to result in significant erosion impacts. As such, cumulative erosion impacts would be less than significant.

#### 4.4.5 Mitigation Measures

The following mitigation measures are required to mitigate the potential liquefaction (including associated dynamic settlement), lateral spreading, expansive soils, and shallow groundwater constraints identified under Impacts GEO-1, GEO-2 and GEO-3, respectively:

**MM-GEO-1:** During the building permit stage, the detailed geotechnical evaluation required by CBC Section 1803 shall be prepared to further investigate and address potential constraints associated with liquefaction, lateral spreading and expansive soils hazards, as required by CBC Section 1803. Any such constraints shall be addressed to the satisfaction of a qualified geotechnical engineer and the City through such techniques as over-excavation and replacement of problematic soils with compacted soil; constructing buildings on deep foundations (drilled, not driven) mat foundations, or spread footings, and using braced shoring systems and/or tiebacks, depending on the results of the evaluation. Typical deep foundation systems include the use of cast-in-drilled hole (CIDH) piles.<sup>50</sup> In addition, it shall be confirmed whether or not permanent dewatering is required during Project operation. Compliance with the geotechnical engineering recommendations in the detailed geotechnical investigation shall be monitored and shall ensure that the site-specific geotechnical and soils hazards at a Project Site are taken into account during design and construction, and are properly mitigated in accordance with ASTM standards and practices.

**MM-GEO-2:** Additional subsurface exploration shall be performed, as part of the detailed geotechnical evaluation required by CBC Section 1803, in areas of the Project Site not previously explored to address the site-specific conditions at the locations of the planned improvements and to provide detailed recommendations for design and construction.

**MM-GEO-3:** Construction dewatering shall be implemented if determined to be required either by the City or the construction engineer in accordance with applicable permit requirements.

#### 4.4.6 Level of Significance after Mitigation

With implementation of Mitigation Measure MM-GEO-1 through MM-GEO-3, potential impacts of the Project associated with geology and soils would be reduced to less than significant levels.

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<sup>50</sup> City of Culver City, Initial Study for Culver Studios Comprehensive Plan Amendment No. 6, November 18, 2015.

## 4.5 Greenhouse Gas Emissions

### 4.5.1 Introduction

This section addresses greenhouse gas (GHG) emissions generated by the construction and operation of the Project inclusive of mandatory and voluntary energy and resource conservation measures that have been incorporated into the Project to reduce its GHG emissions. The analysis also addresses the consistency of the Project with applicable regulations, plans, and policies set forth by the State of California and the City to reduce GHG emissions. Details regarding the GHG analysis are provided in the Greenhouse Gas Technical Report, which is attached as Appendix F of the Draft EIR.

### 4.5.2 Environmental Setting

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however, data indicates that the current global conditions differ from past climate changes in rate and magnitude. The current increased changes in global climate have been attributed to anthropogenic activities by the Intergovernmental Panel on Climate Change (IPCC).<sup>1</sup> GHGs trap long-wave radiation or heat in the atmosphere, which heats the surface of the Earth. Without human intervention, the Earth maintains an approximate balance between the GHG emissions in the atmosphere and the storage of GHGs in the oceans and terrestrial ecosystems. GHGs are the result of both natural and anthropogenic activities. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking, are the primary sources of GHG emissions.

The federal government and State of California recognized that anthropogenic (i.e., human-caused) GHG emissions are contributing to changes in the global climate, and such changes are having and will have adverse effects on the environment, the economy, and public health. While worldwide contributions of GHG emissions are expected to have widespread consequences, it is not possible to link particular changes to the environment of California or elsewhere to GHGs emitted from a particular source or location. In other words, emissions of GHGs have the potential to cause global impacts rather than local impacts. Increased concentrations of GHGs in the Earth's atmosphere have been linked to global climate change and such conditions as, rising surface temperatures, melting icebergs and snowpack, rising sea levels, and the increased frequency and magnitude of severe weather conditions. Existing climate change models also show that climate warming portends a variety of impacts on agriculture, including loss of microclimates that support specific crops, increased pressure from invasive weeds and diseases, and loss of productivity due to changes in water reliability and availability. In addition, rising temperatures and shifts in microclimates associated with global climate change are expected to increase the frequency and intensity of wildfires. California law defines GHGs to include the

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<sup>1</sup> Intergovernmental Panel on Climate Change, Fifth Assessment Report: The Physical Science Basis, Summary for Policy Makers, (2013).

following compounds: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>).<sup>2</sup>

The most common GHG that results from human activity is CO<sub>2</sub>, which represents 76 percent of total anthropogenic GHG emissions in the atmosphere (as of 2010 data),<sup>3</sup> followed by CH<sub>4</sub> and N<sub>2</sub>O. Scientists have established a Global Warming Potential (GWP) to gauge the potency of each GHG's ability to absorb and re-emit long-wave radiation. The GWP of a gas is determined using CO<sub>2</sub> as the reference gas with a GWP of 1 over 100 years. For example, a gas with a GWP of 10 is 10 times more potent than CO<sub>2</sub> over 100 years. The sum of each GHG multiplied by its associated GWP is referred to as carbon dioxide equivalents (CO<sub>2</sub>e). The measurement unit of CO<sub>2</sub>e is used to report the combined potency of GHG emissions. The IPCC updated the GWP values based on the latest science in its Fifth Assessment Report (AR5). Although GWPs have been updated in IPCC AR5, CARB uses GWPs from IPCC AR4 for its most recent GHG emissions inventory.<sup>4</sup> Compounds that are regulated as GHGs are discussed below.<sup>5,6</sup>

- **Carbon Dioxide (CO<sub>2</sub>):** the most abundant GHG in the atmosphere primarily generated from fossil fuel combustion from stationary and mobile sources. CO<sub>2</sub> has a GWP of 1, and therefore, is the reference gas for determining the GWPs of all other GHGs.
- **Methane (CH<sub>4</sub>):** emitted from biogenic sources (i.e., resulting from the activity of living organisms), incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. CH<sub>4</sub> has a GWP of 25.
- **Nitrous Oxide (N<sub>2</sub>O):** produced by human-related sources including agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. N<sub>2</sub>O has a GWP of 298.
- **Hydrofluorocarbons (HFCs):** fluorinated compounds consisting of hydrogen, carbon, and fluorine, typically used as refrigerants in both stationary refrigeration and mobile air conditioning systems. HFCs have GWPs ranging from 124 to 14,800.
- **Perfluorocarbons (PFCs):** fluorinated compounds consisting of carbon and fluorine, primarily created as a byproduct of aluminum production and semiconductor manufacturing. PFCs have GWPs ranging from 7,390 to 127,200.
- **Sulfur Hexafluoride (SF<sub>6</sub>):** fluorinated compound consisting of sulfur and fluoride, a colorless, odorless, nontoxic, nonflammable gas most commonly used as an electrical insulator in high voltage equipment that transmits and distributes electricity. SF<sub>6</sub> has a GWP of 22,800.

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<sup>2</sup> State CEQA Guidelines Section 15364.5; Health and Safety Code, section 38505(g).

<sup>3</sup> Intergovernmental Panel on Climate Change, Fifth Assessment Report: Synthesis Report, (2013).

<sup>4</sup> GWPs and associated CO<sub>2</sub>e values were developed by the Intergovernmental Panel on Climate Change (IPCC), and published in its Second Assessment Report (SAR) in, 1996. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values based on the science in its Fourth Assessment Report (AR4). CARB reports GHG emission inventories for California using the GWP values from the IPCC AR4.

<sup>5</sup> Intergovernmental Panel on Climate Change, Second Assessment Report, Working Group I: The Science of Climate Change, (1995).

<sup>6</sup> Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, (2007).

## Existing Conditions

### ***Greenhouse Gas Emissions Inventory***

Worldwide, man-made emissions of GHGs were approximately 49,000 million metric tons (MMT) CO<sub>2</sub>e in 2010 including ongoing emissions from industrial and agricultural sources and emissions from land use changes (e.g., deforestation).<sup>7</sup> Emissions of CO<sub>2</sub> from fossil fuel use and industrial processes account for 65 percent of the total while CO<sub>2</sub> emissions from all sources accounts for 76 percent of the total GHG emissions. Methane emissions account for 16 percent and N<sub>2</sub>O emissions for 6.2 percent. In 2015, the United States was the world's second largest emitter of CO<sub>2</sub> at 5,150 MMT; China was the largest emitter of CO<sub>2</sub> at 10,700 MMT.<sup>8</sup>

The California Air Resources Board (CARB) compiles GHG inventories for the State of California. Based on the 2015 GHG inventory data (i.e., the latest year for which data are available from CARB, California emitted 440.4 million metric tons of CO<sub>2</sub>e (MMTCO<sub>2</sub>e) including emissions resulting from imported electrical power, and 405 MMTCO<sub>2</sub>e excluding emissions related to imported power. Since 2007, statewide GHG emissions have followed a declining trend and 2015 emissions were 1.5 MMTCO<sub>2</sub>e lower than 2014.<sup>9</sup> Between 1990 and 2015, the population of California grew by approximately 9.1 million (from 29.8 to 38.9 million), which represents an increase of approximately 30 percent from 1990 population levels.<sup>10</sup> In addition, the California economy, measured as gross state product, grew from \$773 billion in 1990 to \$2.49 trillion in 2015 representing an increase of approximately three times the 1990 gross state product.<sup>11</sup> Despite the population and economic growth, California's net GHG emissions only grew by approximately 2 percent between 1990 and 2015. According to CARB, the declining trend coupled with the state's GHG reduction programs (such as the Renewables Portfolio Standard, LCFS, vehicle efficiency standards, and declining caps under the Cap and Trade Program) demonstrate that California is on track to meet the 2020 GHG reduction target codified in California Health and Safety Code (HSC), Division 25.5, also known as The Global Warming Solutions Act of 2006 (AB 32).<sup>12</sup> **Table 4.5-1, *State of California Greenhouse Gas Emissions***, identifies and quantifies statewide anthropogenic GHG emissions and sinks (e.g., areas of carbon sequestration due to forest growth) in 1990 and 2015 (i.e., the most recent year

<sup>7</sup> Intergovernmental Panel on Climate Change, Fifth Assessment Report Synthesis Report, (2014).

<sup>8</sup> PBL Netherlands Environmental Assessment Agency and the European Commission Joint Research Center, Trends in Global CO<sub>2</sub> Emissions 2016 Report, (2016) 20, 23. Available: <http://www.pbl.nl/en/publications/trends-in-global-co2-emissions-2016-report>. Accessed August 2017.

<sup>9</sup> California Air Resources Board, California Greenhouse Gas Emission Inventory-2017 Edition. Available at <https://www.arb.ca.gov/cc/inventory/data/data.htm>. Accessed June 2017.

<sup>10</sup> United States Census Bureau, 1990 Census Apportionment Results, <https://www.census.gov/data/tables/1990/dec/1990-apportionment-data.html>. Accessed June 2017; California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State, January 1, 2011-2017, with 2010 Benchmark, <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>. Accessed June 2017.

<sup>11</sup> California Department of Finance, Gross State Product. Available at: [http://dof.ca.gov/Forecasting/Economics/Indicators/Gross\\_State\\_Product/](http://dof.ca.gov/Forecasting/Economics/Indicators/Gross_State_Product/). Accessed June 2017. Amounts are based on current dollars as of the date of the report (May 2017).

<sup>12</sup> California Air Resources Board, Frequently Asked Questions for the 2016 Edition California Greenhouse Gas Emission Inventory, (2016). Available: [https://www.arb.ca.gov/cc/inventory/pubs/reports/2000\\_2014/ghg\\_inventory\\_faq\\_20160617.pdf](https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2014/ghg_inventory_faq_20160617.pdf). Accessed May 2017.

for which data are available from CARB). As shown in the table, the transportation sector is the largest contributor to statewide GHG emissions at 37 percent in 2015.

### **Effects of Global Climate Change**

The scientific community’s understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth’s climate system and inability to accurately model it, the uncertainty surrounding climate change may never be eliminated. Nonetheless, the IPCC, in its Fifth Assessment Report, Summary for Policy Makers, stated that, “it is extremely likely that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forcings together.”<sup>13</sup> A report from the National

**TABLE 4.5-1  
 STATE OF CALIFORNIA GREENHOUSE GAS EMISSIONS <sup>A</sup>**

<b>Category</b>	<b>Total 1990 Emissions using IPCC SAR (MMTCO<sub>2</sub>e)</b>	<b>Percent of Total 1990 Emissions</b>	<b>Total 2015 Emissions using IPCC AR4 (MMTCO<sub>2</sub>e)</b>	<b>Percent of Total 2015 Emissions</b>
Transportation	150.7	35%	162.9	37%
Electric Power	110.6	26%	83.7	19%
Commercial	14.4	3%	13.2	3%
Residential	29.7	7%	26.4	6%
Industrial	103.0	24%	92.5	21%
Recycling and Waste <sup>b</sup>	—	—	8.8	2%
High GWP/Non-Specified <sup>c</sup>	1.3	<1%	17.6	4%
Agriculture/Forestry	23.6	6%	35.2	8%
Forestry Sinks	-6.7	-2%	— <sup>d</sup>	— <sup>d</sup>
<b>Net Total (IPCC SAR)</b>	<b>426.6</b>	<b>100%</b>	—	—
<b>Net Total (IPCC AR4) <sup>e</sup></b>	<b>431</b>	<b>100%</b>	<b>440.4</b>	<b>100%</b>

<sup>a</sup> Totals may not add up exactly due to rounding.  
<sup>b</sup> Included in other categories for the 1990 emissions inventory.  
<sup>c</sup> High GWP gases are not specifically called out in the 1990 emissions inventory.  
<sup>d</sup> Revised methodology under development (not reported for 2014).  
<sup>e</sup> CARB revised the State’s 1990 level GHG emissions using GWPs from the IPCC AR4.

SOURCES: California Air Resources Board, Staff Report – California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit, (2015). Available: <https://www.arb.ca.gov/cc/inventory/1990level/1990level.htm>. Accessed October 2016; California Air Resources Board, California Greenhouse Gas Emission Inventory – 2017 Edition, Scoping Plan Categorization, (2017). Available: <http://www.arb.ca.gov/cc/inventory/data/data.htm>. Accessed June 2017.

<sup>13</sup> Intergovernmental Panel on Climate Change, Fifth Assessment Report, Summary for Policy Makers, (2013) page 15.

Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.<sup>14</sup>

According to California Environmental Protection Agency (CalEPA), the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation.<sup>15</sup> Data regarding potential future climate change impacts are available from the California Natural Resources Agency (CNRA), which in 2009 published the *California Climate Adaptation Strategy*<sup>16</sup> as a response to the Governor's Executive Order S-13-2008. The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the *California Climate Adaptation Strategy*, the California Energy Commission (CEC) was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers.<sup>17</sup> The website, known as Cal-Adapt, became operational in 2011.<sup>18</sup> The information provided by the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values from a variety of scenarios and models, and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. Below is a summary of some of the potential climate change effects and relevant Cal-Adapt data, reported by an array of studies that could be experienced in California as a result of global warming and climate change.

### **Air Quality**

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state.<sup>19</sup>

<sup>14</sup> Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America. 2010;107:12107-12109.

<sup>15</sup> California Environmental Protection Agency, Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, (2006).

<sup>16</sup> California Natural Resources Agency, Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, (2009).

<sup>17</sup> California Natural Resources Agency, Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, (2009).

<sup>18</sup> The Cal-Adapt website address is: <http://cal-adapt.org>.

<sup>19</sup> California Energy Commission, Scenarios of Climate Change in California: An Overview, February 2006. <http://www.energy.ca.gov/2005publications/CEC-500-2005-186/CEC-500-2005-186-SF.PDF>. Accessed April 2016.

According to the Cal-Adapt website, the portion of the City of Culver City in which the Project Site is located could result in an average increase in temperature of approximately 3.0 to 5.0°F by 2070-2090, compared to the baseline 1961-1990 period. The data suggests that the predicted future increase in temperatures as a result of climate change could potentially interfere with efforts to control and reduce ground-level ozone in the region.

### **Water Supply**

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, “Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change.”<sup>20</sup> For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation.<sup>21</sup> Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full.<sup>22</sup> Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.<sup>23</sup>

The California Department of Water Resources report on climate change and effects on the State Water Project, the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that “climate change will likely have a significant effect on California’s future water resources...[and] future water demand.” It also reports that “much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain.” It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but “[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future.” Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows.<sup>24</sup> In its Fifth Assessment Report, the IPCC states “Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions.”<sup>25</sup>

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<sup>20</sup> Pacific Institute for Studies in Development, Environment and Security, *Climate Change and California Water Resources: A Survey and Summary of the Literature*, July 2003.  
[http://www.esf.edu/glrc/library/documents/CaliforniaClimateChangeWaterResourcesLitReview\\_2003.pdf](http://www.esf.edu/glrc/library/documents/CaliforniaClimateChangeWaterResourcesLitReview_2003.pdf). Accessed June 2017.

<sup>21</sup> Ibid.

<sup>22</sup> Ibid.

<sup>23</sup> Ibid.

<sup>24</sup> California Department of Water Resources *Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California’s Water Resources*, July 2006.  
[http://baydeltaoffice.water.ca.gov/climatechange/DWRClimateChangeJuly06\\_update8-2-07.pdf](http://baydeltaoffice.water.ca.gov/climatechange/DWRClimateChangeJuly06_update8-2-07.pdf). Accessed June 2017.

<sup>25</sup> Intergovernmental Panel on Climate Change, *Fifth Assessment Report, Summary for Policy Makers*, (2013) 20.

## Hydrology and Sea Level Rise

As discussed above, climate changes could potentially affect: the amount of snowfall, rainfall and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm, and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply, and increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

## Agriculture

California has a \$30 billion agricultural industry that produces half the country's fruits and vegetables. Higher CO<sub>2</sub> levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.<sup>26</sup>

## Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Scientists expect that the average global surface temperature could rise by 2-11.5°F (1.1-6.4°C) by 2100, with significant regional variation.<sup>27</sup> Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as two feet along most of the U.S. coast. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage.<sup>28, 29</sup>

## Existing Site Greenhouse Gas Emissions

The Project Site is currently developed as a fully operational movie and television production studio on an approximately 14-acre site. GHG emissions are currently associated with vehicle trips to and from the existing Project Site and daily studio operations which include on-site combustion of natural gas for heating (in an on-site central plant), on-site combustion emissions from landscaping equipment, off-site combustion of fossil fuels for electricity, and off-site emissions from solid waste decomposition and wastewater treatment.

**Table 4.5-2, *Existing Site GHG Emissions***, identifies the GHG emissions of the existing Project Site. As shown, the primary source of emissions is from mobile sources.

<sup>26</sup> California Climate Change Center, *Our Changing Climate: Assessing the Risks to California*, (2006).

<sup>27</sup> National Research Council, *Advancing the Science of Climate Change*, (2010).

<sup>28</sup> Parmesan, C., 2004. *Ecological and Evolutionary Response to Recent Climate Change*.

<sup>29</sup> Parmesan, C and Galbraith, H, 2004. *Observed Ecological Impacts of Climate Change in North America*. Arlington, VA: Pew. Cent. Glob. Clim. Change.

**TABLE 4.5-2  
EXISTING SITE GHG EMISSIONS**

<b>Emissions Sources</b>	<b>CO<sub>2</sub>e (Metric Tons per Year) <sup>a</sup></b>
Area (Landscaping Equipment)	<1
Electricity	1740
Natural Gas	79
Mobile Sources	3622
Waste	85
Water	149
<b>Total</b>	<b>5,675</b>

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix F.

<sup>b</sup> CO<sub>2</sub>e emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change Fourth Assessment Report.

SOURCE: ESA PCR, 2017

### 4.5.3 Regulatory Framework

This section provides a summary of pertinent GHG regulations affecting the Project at the federal, State, and local levels.

#### **Federal**

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, methane and other non-CO<sub>2</sub> gases, agricultural practices, and implementation of technologies to achieve GHG reductions. The USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the Energy Star labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

On May 19, 2009, the President announced a national policy for fuel efficiency and emissions standards in the United States auto industry.<sup>30</sup> The adopted federal standard applies to passenger cars and light-duty trucks for model years 2012 through 2016. The rule surpasses the prior Corporate Average Fuel Economy standards and requires an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO<sub>2</sub> per mile by model year 2016, based on USEPA calculation methods. These standards were formally adopted on April 1, 2010. In August

<sup>30</sup> On March 15, 2017, the Trump Administration announced its intention to direct the USEPA to reconsider the model year 2017-2025 cars and light truck emissions standards, but did not rescind California's waiver. Therefore, the standards remain in effect. See: The White House, Remarks by President Trump at American Center for Mobility | Detroit, MI, March 15, 2017. Available at: <https://www.whitehouse.gov/the-press-office/2017/03/15/remarks-president-trump-american-center-mobility-detroit-mi>. Accessed May 2017.

2012, standards were adopted for model year 2017 through 2025 passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO<sub>2</sub> per mile. According to the USEPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle.<sup>31</sup>

On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the federal Clean Air Act. The USEPA adopted a Final Endangerment Finding for the six defined GHGs (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>) on December 7, 2009. The Endangerment Finding is required before USEPA can regulate GHG emissions under Section 202(a)(1) of the Clean Air Act consistently with the United States Supreme Court decision. The USEPA also adopted a Cause or Contribute Finding in which the USEPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. These findings do not themselves impose any requirements on industry or other entities. However, these actions were a prerequisite for implementing GHG emissions standards for vehicles.

Standards for GHG emissions and fuel efficiency for medium- and heavy-duty trucks have been jointly developed by the USEPA and the National Highway Traffic Safety Administration (NHTSA). The Phase 1 standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.<sup>32</sup> The USEPA and NHTSA are in the process of considering adoption of the Phase 2 standards, which would cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.<sup>33</sup>

## State

California has promulgated a series of executive orders, laws, and regulations aimed at reducing both the level of GHGs in the atmosphere and emissions of GHGs from commercial and private activities within the State.

### ***California's Involvement in International Climate Change Efforts***

California is a member of the Under2 Coalition, which is an international coalition representing 39 percent of the global economy, and has signed a memorandum of understanding to limit greenhouse gas emissions to below 80 to 95 percent below 1990 levels and limit global warming

<sup>31</sup> United States Environmental Protection Agency, "EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks," <http://www.epa.gov/oms/climate/documents/420f12051.pdf>. 2012.

<sup>32</sup> United States Environmental Protection Agency, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, August 2011, <https://nepis.epa.gov/Exec/zyPDF.cgi/P100BOT1.PDF?Dockey=P100BOT1.PDF>. Accessed August 2017.

<sup>33</sup> United States Environmental Protection Agency, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, October 25, 2016, <https://www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf>. Accessed August 2017.

to 2 degrees Celsius. In July 2017, California Governor Jerry Brown announced an international climate summit, scheduled for 2018 in San Francisco, California. The intent of this international climate summit is to position the state as an active partner in international climate change efforts. Between 2016 and 2017, the Paris Agreement was adopted by 196 countries within the United Nations Framework Convention on Climate Change, and sets a goal to limit temperature increases to below 2 degrees Celsius above pre-industrial levels. The Paris Agreement came into force for the United States on November 4, 2016, and agreed to reduce GHG emissions by 26 percent to 28 percent of 2005 levels by 2025.<sup>34</sup> However, on August 4, 2017, under President Donald Trump, the United States officially announced their intention to withdraw from the treaty. However, under the agreement's rules, parties may only begin withdrawal after three years of participation, with one additional year required to fully withdraw. California Air Resources Board

CARB, a part of the CalEPA, is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan, for which it works closely with the federal government and the local air districts. The State Implementation Plan is required for the State to take over implementation of the federal Clean Air Act.

### ***Executive Order S-3-05 and Executive Order B-30-15***

California Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels;
- By 2020, California shall reduce GHG emissions to 1990 levels; and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

In accordance with Executive Order S-3-05, the Secretary of CalEPA is required to coordinate efforts of various agencies in order to collectively and efficiently reduce GHGs. Some of the agency representatives involved in the GHG reduction plan include the Secretary of the Business, Transportation and Housing Agency, the Secretary of the Department of Food and Agriculture, the Secretary of the Resources Agency, the Chairperson of CARB, the Chairperson of the California Energy Commission, and the President of the Public Utilities Commission. Representatives from these agencies comprise the California Climate Action Team (CAT).

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<sup>34</sup> United Nations, Framework Convention on Climate Change, Paris Agreement – Status of Ratification, [http://unfccc.int/paris\\_agreement/items/9444.php](http://unfccc.int/paris_agreement/items/9444.php). Accessed August 2017.

The CAT provides biennial reports to the Governor and Legislature on the state of GHG reductions in the state as well as strategies for mitigating and adapting to climate change. The first CAT Report to the Governor and the Legislature in 2006 contained recommendations and strategies to help meet the targets in Executive Order S-3-05.<sup>35</sup> The 2010 CAT Report, finalized in December 2010, expanded on the policy-oriented 2006 assessment.<sup>36</sup> The new information detailed in the CAT Report included development of revised climate and sea-level projections using new information and tools that had become available in the previous two years; and an evaluation of climate change within the context of broader social changes, such as land-use changes and demographic shifts.

On April 29, 2015, California Governor Brown issued Executive Order B-30-15. Therein, Governor Brown:

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

In response to the 2030 GHG reduction target, CARB released the 2017 Climate Change Scoping Plan Update in January 2017.<sup>37</sup> The Scoping Plan Update outlines the strategies the State will implement to achieve the 2030 GHG reduction target, which build on the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, improved vehicle, truck and freight movement emissions standards, increasing renewable energy, and strategies to reduce methane emissions from agricultural and other wastes by using it to meet our energy needs. The Scoping Plan Update also comprehensively addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The Scoping Plan Update considers the following scenarios:

- Proposed Scenario: Continuing the Cap-and-Trade Program combined with an additional 20 percent reduction of greenhouse gases in the refinery sector.
- Alternative 1: Direct regulations on a wide variety of sectors, such as specific required reductions for all large GHG sources, more renewables, etc.
- Alternative 2: A carbon tax to put a price on carbon, instead of the Cap-and-Trade Program.
- Alternative 3: All Cap-and-Trade. This would remove the refinery measure and keep the LCFS at 10 percent.

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<sup>35</sup> California Environmental Protection Agency, California Climate Action Team Report to the Governor and the Legislature, (2006).

<sup>36</sup> California Environmental Protection Agency, California Climate Action Team Report to the Governor and the Legislature, (2010).

<sup>37</sup> California Air Resources Board, The 2017 Climate Change Scoping Plan Update, (January 2017). Available: [https://www.arb.ca.gov/cc/scopingplan/2030sp\\_pp\\_final.pdf](https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf). Accessed March 2017.

- Alternative 4: Cap-and-Tax. This would place a declining cap on industry, and natural gas and fuel suppliers, while also requiring them to pay a tax on each ton of GHG emitted.

CARB was scheduled to consider the proposed scenario and alternatives and potential adoption of the 2017 Climate Change Scoping Plan Update in late June 2017; however, CARB has postponed this to an undetermined future date.<sup>38</sup>

### **California Health and Safety Code, Division 25.5 – California Global Warming Solutions Act of 2006**

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California HSC, Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines regulated GHGs as CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub> and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries, with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

As required by HSC Division 25.5, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions reduction target for 2020. The 2020 emissions reduction target was originally set at 427 MMTCO<sub>2</sub>e using the GWP values from the IPCC SAR. CARB has determined the updated target, based on GWP values from the IPCC AR4, for the 1990 GHG emissions inventory and 2020 GHG emissions target is now 431 MMTCO<sub>2</sub>e. CARB also projected the state's 2020 GHG emissions under business-as-usual (BAU) conditions, also known as no action taken (NAT) conditions – that is, emissions that would occur without any plans, policies, or regulations to reduce GHG emissions. CARB originally used an average of the state's GHG emissions from 2002 through 2004 and projected the 2020 levels at approximately 596 MMTCO<sub>2</sub>e (using GWP values from the IPCC SAR). CARB also updated the State's projected 2020 emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that were recently adopted for motor vehicles and renewable energy. CARB's projected statewide 2020 emissions estimate using the GWP values from the IPCC AR4 is 509.4 MMTCO<sub>2</sub>e.<sup>39</sup> In the 2017 Climate Change Scoping Plan Update, CARB provides the estimated projected statewide 2030 emissions and the level of reductions necessary to achieve the 2030 target of 40 percent below 1990 levels, taking into account 2020 GHG reduction policies and programs. A summary of the GHG emissions reductions required under HSC Division 25.5 is provided in **Table 4.5-3, Estimated Greenhouse Gas Emissions Reductions Required by HSC Division 25.5.**

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<sup>38</sup> California Air Resources Board, Notice of Postponement - Public Meeting for the 2017 Climate Change Scoping Plan Update, June 13, 2017. Available: <https://www.arb.ca.gov/lispub/rss/displaypost.php?pno=10383>. Accessed July 2017.

<sup>39</sup> California Air Resources Board, 2020 Business-as-Usual (BAU) Emissions Projection, 2014 Edition. Available at: <http://www.arb.ca.gov/cc/inventory/data/bau.htm>. Accessed May 2017.

**TABLE 4.5-3  
ESTIMATED GREENHOUSE GAS EMISSIONS REDUCTIONS REQUIRED BY HSC DIVISION 25.5**

Emissions Scenario	GHG Emissions (MMTCO <sub>2e</sub> )
<b>2008 Scoping Plan (IPCC SAR)</b>	
2020 BAU Forecast (CARB 2008 Scoping Plan Estimate)	596
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	427
<b>Reduction below Business-As-Usual necessary to achieve 1990 levels by 2020</b>	<b>169 (28.4%)<sup>a</sup></b>
<b>2011 Scoping Plan (IPCC AR4)</b>	
2020 BAU Forecast (CARB 2011 Scoping Plan Estimate)	509.4
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	431
<b>Reduction below Business-As-Usual necessary to achieve 1990 levels by 2020</b>	<b>78.4 (15.4%)<sup>b</sup></b>
<b>2017 Scoping Plan Update (Note: CARB will consider adoption of the Plan at a future undetermined date)</b>	
2030 BAU Forecast ("Reference Scenario" which includes 2020 GHG reduction policies and programs)	392
2030 Emissions Target Set by HSC Division 25.5 (i.e., 40% below 1990 Level)	260
<b>Reduction below Business-As-Usual Necessary to Achieve 40% below 1990 Level by 2030</b>	<b>132 (33.7%)<sup>c</sup></b>

MMTCO<sub>2e</sub> = million metric tons of carbon dioxide equivalents

<sup>a</sup> 596 – 427 = 169 / 596 = 28.4%

<sup>b</sup> 509.4 – 431 = 78.4 / 509.4 = 15.4%

<sup>c</sup> 392 – 260 = 132 / 392 = 33.7%

SOURCE: California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011; California Air Resources Board, 2020 Business-as-Usual (BAU) Emissions Projection, 2014 Edition. Available: <http://www.arb.ca.gov/cc/inventory/data/bau.htm>. Accessed May 2017; California Air Resources Board, The 2017 Climate Change Scoping Plan Update, (January 2017). Available: [https://www.arb.ca.gov/cc/scopingplan/2030sp\\_pp\\_final.pdf](https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf). Accessed May 2017.

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197; both were signed by Governor Brown. SB 32 and AB 197 amends HSC Division 25.5 and establishes a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and includes provisions to ensure that the benefits of state climate policies reach into disadvantaged communities. CARB is in the process of preparing the second update to the Scoping Plan to reflect the 2030 target established in Executive Order B-30-15 and SB 32. The 2017 Scoping Plan Update discusses a Proposed Scenario and four alternatives. CARB states that the Proposed Scenario “is the clear choice to achieve the State’s climate and clean air goals.”<sup>40</sup> Under the Proposed Scenario, the majority of the reductions would result from continuation of the Cap-and-Trade regulation. Additional reductions are achieved from requiring 20 percent reduction of GHG emissions from the refinery sector, electricity sector standards (i.e., utility providers to supply 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the Low Carbon Fuel Standard (LCFS), implementing the short-lived GHG strategy (e.g., hydrofluorocarbons), and implementing the mobile source strategy and sustainable freight action plan. The alternatives are designed to

<sup>40</sup> California Air Resources Board, The 2017 Climate Change Scoping Plan Update, (January 2017). Available: [https://www.arb.ca.gov/cc/scopingplan/2030sp\\_pp\\_final.pdf](https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf). Accessed May 2017.

consider various combinations of these programs as well as consideration of a carbon tax in the event the Cap-and-Trade regulation is not continued.

Continuation of the Cap-and-Trade regulation (or carbon tax) is expected to cover approximately 34 to 76 percent of the 2030 reduction obligation.<sup>41</sup> Under the Proposed Scenario, the short-lived GHG strategy is expected to cover approximately 13 to 26 percent. The Renewables Portfolio Standard with 50 percent renewable electricity by 2030 is expected to cover approximately 10 to 11 percent. The mobile source strategy and sustainable freight action plan includes maintaining the existing vehicle GHG emissions standards, increasing the number of zero emission vehicles and improving the freight system efficiency, and is expected to cover approximately 9 to 11 percent. 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, requires the CEC in collaboration with the California Public Utilities Commission (CPUC) to establish the framework for the energy savings target setting. The CEC has proposed a schedule for establishing this framework and target setting by November 2017, which will outline the necessary actions that will need to occur in future years.<sup>42</sup> The CEC states that workforce education and training institutions will be required to engage the building industry, map industry priorities for efficiency to major occupations that will provide services, identify workforce competency gaps, and quantify the work needed to build a workforce to implement high-quality efficiency projects at scale.<sup>43</sup> Under the Proposed Scenario, CARB expects that the doubling of the energy efficiency savings by 2030 would cover approximately 7 to 8 percent of the 2030 reduction obligation. The other strategies would be expected to cover the remaining percentage of the 2030 reduction obligation.

### ***California Assembly Bill No. 1493 (AB 1493, Pavley), (Chapter 200, Statutes of 2002)***

In response to the transportation sector accounting for the largest portion of California's GHG emissions at approximately 37 percent in 2015 (see Table 4.5-1, above), AB 1493 (Chapter 200, Statutes of 2002), enacted on July 22, 2002, required CARB to set GHG emission standards for passenger vehicles, light duty trucks, and other vehicles whose primary use is non-commercial personal transportation manufactured in and after 2009. In setting these standards, CARB must consider cost effectiveness, technological feasibility, economic impacts, and provide maximum flexibility to manufacturers.<sup>44</sup>

As discussed previously, the USEPA and USDOT have adopted federal standards for model year 2012 through 2016 light-duty vehicles. In light of the USEPA and USDOT standards, California - and states adopting California emissions standards - have agreed to defer to the proposed national

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<sup>41</sup> California Air Resources Board, The 2017 Climate Change Scoping Plan Update, (January 2017). Available: [https://www.arb.ca.gov/cc/scopingplan/2030sp\\_pp\\_final.pdf](https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf). Accessed May 2017.

<sup>42</sup> California Energy Commission, 2016 Existing Buildings Energy Efficiency Plan Update, December 2016. Available at: [http://docketpublic.energy.ca.gov/PublicDocuments/16-EBP-01/TN214801\\_20161214T155117\\_Existing\\_Building\\_Energy\\_Efficiency\\_Plan\\_Update\\_Deceber\\_2016\\_Thi.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-EBP-01/TN214801_20161214T155117_Existing_Building_Energy_Efficiency_Plan_Update_Deceber_2016_Thi.pdf). Accessed May 2017.

<sup>43</sup> Ibid.

<sup>44</sup> California Air Resources Board, Regulations to Control Greenhouse Gas Emissions from Motor Vehicles, Final Statement of Reasons, (2005). Available at: <https://www.arb.ca.gov/regact/grnhsgas/fsor.pdf>. Accessed June 2017.

standard through model year 2016. The 2016 endpoint of the federal and state standards is similar, although the federal standard ramps up slightly more slowly than required under the state standard. The state standards (called the Pavley standards) require additional reductions in CO<sub>2</sub> emissions beyond model year 2016 (referred to as Pavley Phase II standards).<sup>45</sup> As noted above, the USEPA and USDOT have adopted GHG emission standards for model year 2017 through 2025 vehicles.<sup>46</sup> These standards are slightly different from the Pavley Phase II standards, but the State of California has agreed not to contest these standards, in part due to the fact that while the national standard would achieve slightly lower reductions in California, it would achieve greater reductions nationally and is stringent enough to meet state GHG emission reduction goals.<sup>47</sup> On November 15, 2012, CARB approved an amendment that allows manufacturers to comply with the 2017-2025 national standards to meet state law.

### ***Executive Order S-01-07***

Executive Order S-01-07 was enacted by the Governor on January 18, 2007. The order mandates the following: (1) that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established in California. In September 2015, CARB approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In the proposed 2017 Climate Change Scoping Plan Update, CARB's preferred recommendation includes increasing the stringency of the LCFS by reducing the carbon intensity of transportation fuels by 18 percent by 2030, up from the current target of 10 percent by 2020.<sup>48</sup> In April 2017, the LCFS was brought before the Court of Appeal challenging the analysis of potential nitrogen dioxide impacts from biodiesel fuels. The Court directed CARB to conduct an analysis of nitrogen dioxide impacts from biodiesel fuels and froze the carbon intensity targets for diesel and biodiesel fuel provisions at 2017 levels until CARB has completed this analysis, which CARB has indicated is expected to occur in 2018.<sup>49</sup>

### ***Senate Bill 375 (SB 375, Steinberg) (Chapter 728, Statutes of 2008)***

SB 375 (Chapter 728, Statutes of 2008), which establishes mechanisms for the development of regional targets for reducing passenger vehicle greenhouse gas emissions, was adopted by the State on September 30, 2008. Under SB 375, CARB is required, in consultation with the Metropolitan Planning Organization, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. On September 23, 2010, CARB adopted

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<sup>45</sup> On March 24, 2017, CARB voted unanimously to uphold the State's model year 2017-2025 cars and light truck emissions standards. See: California Air Resources Board, CARB finds vehicle standards are achievable and cost-effective, March 24, 2017. Available at: <https://www.arb.ca.gov/newsrel/newsrelease.php?id=908>. Accessed May 2017.

<sup>46</sup> United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, (2012). Available at: <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100EZ7C.PDF?Dockey=P100EZ7C.PDF>. Accessed May 2017.

<sup>47</sup> California Air Resources Board, Advanced Clean Cars Summary. Available at: [http://www.arb.ca.gov/msprog/clean\\_cars/acc%20summary-final.pdf](http://www.arb.ca.gov/msprog/clean_cars/acc%20summary-final.pdf). Accessed May 2017.

<sup>48</sup> California Air Resources Board, AB 32 Scoping Plan, (2017). Available at: <https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>. Accessed May 2017.

<sup>49</sup> Biodiesel Magazine, Court rules against CARB on LCFS, preserves 2017 status quo, April 17, 2017.

the vehicular GHG emissions reduction targets for the Southern California Association of Governments (SCAG), which is the Metropolitan Planning Organization for the region in which the City of Culver City is located.

Under SB 375, the target must be incorporated within that region's Regional Transportation Plan (RTP), which is used for long-term transportation planning, in a Sustainable Communities Strategy (SCS). Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plan) are not required to be consistent with either the RTP or SCS. On April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is an update to the previous 2012-2035 RTP/SCS. Using growth forecasts and economic trends, the RTP/SCS provides a vision for transportation throughout the region for the next 25 years. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The RTP/SCS successfully achieves and exceeds the GHG emission-reduction targets set by CARB by demonstrating an 8 percent reduction by 2020 and 18 percent reduction by 2035 compared to the 2005 level on a per capita basis. Compliance with and implementation of 2016-2040 RTP/SCS policies and strategies would have co-benefits of reducing per capita criteria air pollutant emissions associated with reduced per capita VMT. Strategies for successful implementation of SCAG's 2016 RTP/SCS objectives are discussed under the Regional subheading below.

### ***Title 24, Building Standards Code and CALGreen Code***

The California Energy Commission first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality."<sup>50</sup> The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. When the CALGreen Code went into effect in 2009, compliance through 2010 was voluntary. As of January 1, 2011,

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<sup>50</sup> California Building Standards Commission, 2010 California Green Building Standards Code, (2010).

the CALGreen Code is mandatory for all new buildings constructed in the state. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality.<sup>51</sup> The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2017.<sup>52</sup>

### **Renewables Portfolio Standard**

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. In November 2008, Governor Schwarzenegger signed Executive Order S-14-08, which expands the State's Renewables Portfolio Standard to 33 percent renewable power by 2020. Pursuant to Executive Order S-21-09, CARB was also preparing regulations to supplement the Renewables Portfolio Standard with a Renewable Energy Standard that will result in a total renewable energy requirement for utilities of 33 percent by 2020. But on April 12, 2011, Governor Jerry Brown signed SB X1-2 to increase California's Renewables Portfolio Standard to 33 percent by 2020. SB 350 (Chapter 547, Statutes of 2015) further increased the Renewables Portfolio Standard to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. SB 350 was signed into law on October 7, 2015.

### **Cap-and-Trade Program**

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. CARB asserts that this program would help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established and facilities subject to the cap would be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program<sup>53</sup> pursuant to its authority under AB 32. The development of this Program included a multi-year stakeholder process and consideration of potential impacts on disproportionately impacted communities. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors<sup>54</sup> (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and would decline over time, achieving GHG emission reductions throughout the Program's duration.

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<sup>51</sup> California Building Standards Commission, 2010 California Green Building Standards Code, (2010).

<sup>52</sup> California Building Standards Commission, CALGreen (Part 11 of Title 24), <http://www.bsc.ca.gov/Home/CALGreen.aspx>. Accessed June 2017.

<sup>53</sup> 17 CCR §§ 95800 to 96023.

<sup>54</sup> See generally 17 CCR §§ 95811, 95812.

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 MTCO<sub>2</sub>e per year must comply with the Cap-and-Trade Program.<sup>55</sup> Triggering of the 25,000 MTCO<sub>2</sub>e per year “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or “MRR”).<sup>56</sup>

Each covered entity with a compliance obligation is required to surrender “compliance instruments”<sup>57</sup> for each MTCO<sub>2</sub>e of GHG they emit. Covered entities are allocated free allowances in whole or part (if eligible), buy allowances at auction, purchase allowances from others, or purchase offset credits. A “compliance period” is the time frame during which the compliance obligation is calculated. The years 2013 and 2014 are the first compliance period, the years 2015–2017 are the second compliance period, and the third compliance period is from 2018–2020. At the end of each compliance period, each facility will be required to surrender compliance instruments to CARB equivalent to their total GHG emissions throughout the compliance period. There also are requirements to surrender compliance instruments covering 30 percent of the prior year’s compliance obligation by November of each year. For example, in November 2014, a covered entity was required to submit compliance instruments to cover 30 percent of its 2013 GHG emissions.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in its First Update to the Climate Change Scoping Plan:

*The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. **But as the cap declines, aggregate emissions must be reduced** (emphasis added).*<sup>58</sup>

In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program. However, as climate change is a global phenomenon and the effects of GHG emissions are considered cumulative in nature, a focus on aggregate GHG emissions reductions is warranted.

Further, the reductions in GHG emissions that would be achieved by the Cap-and-Trade Program inherently are variable and, therefore, impossible to quantify with precision:

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<sup>55</sup> 17 CCR § 95812.

<sup>56</sup> 17 CCR §§ 95100-95158.

<sup>57</sup> Compliance instruments are permits to emit, the majority of which will be “allowances,” but entities also are allowed to use CARB-approved offset credits to meet up to 8% of their compliance obligations.

<sup>58</sup> CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 86 (May 2014) (emphasis added).

*The Cap-and-Trade Regulation is different from most of the other measures in the Scoping Plan. The [R]egulation sets a hard cap, instead of an emission limit, so the emission reductions from the program vary as our estimates of “business as usual” emissions in the future are updated. In addition, the Cap-and-Trade Program works in concert with many of the direct regulatory measures—providing an additional economic incentive to reduce emissions. Actions taken to comply with direct regulations reduce an entity’s compliance obligation under the Cap-and-Trade Regulation. So, for example, increased deployment of renewable electricity sources reduces a utility’s compliance obligation under the Cap-and-Trade Regulation.<sup>59</sup>*

If California’s direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California’s direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. In other words, the Cap-and-Trade Program functions similarly to an insurance policy for meeting California 2020’s GHG emissions reduction mandate:

*The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the “capped sectors.” Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap.<sup>60</sup>*

*[T]he Cap-and-Trade Regulation provides assurance that California’s 2020 limit will be met because the regulation sets a firm limit on 85 percent of California’s GHG emissions.<sup>61</sup>*

In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory architecture adopted by CARB under AB 32, the reductions attributed to the Cap-and-Trade Program can change over time, depending on the State’s emissions forecasts and the effectiveness of direct regulatory measures.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.<sup>62</sup> Accordingly, GHG emissions associated with CEQA projects’ electricity usage are covered by the Cap-and-Trade Program.

<sup>59</sup> California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, at 86 (May 2014) (emphasis added).

<sup>60</sup> CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 88 (May 2014)

<sup>61</sup> Id. at 86-87.

<sup>62</sup> 17 CCR § 95811(b).

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program’s first compliance period.<sup>63</sup> While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015:

*Suppliers of natural gas, suppliers of RBOB [Reformulated Gasoline Blendstock for Oxygenate Blending] and distillate fuel oils, suppliers of liquefied petroleum gas, and suppliers of liquefied natural gas specified in sections 95811(c), (d), (e), (f), and (g) that meet or exceed the annual threshold in section 95812(d) will have a compliance obligation beginning with the second compliance period.<sup>64</sup>*

As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California’s GHG emissions.

The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are “supplied” (i.e., delivered into commerce). However, transportation fuels that are “supplied” in California, but can be demonstrated to have a final destination outside California, do not generate a compliance obligation. The underlying concept here is that CARB is seeking to capture tailpipe GHG emissions from the combustion of transportation fuels supplied to California end-users. Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle combustion of transportation fuels are covered by the Cap-and-Trade Program.

## **Regional**

### ***South Coast Air Quality Management District***

The Project is located in the South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside Counties, in addition to the San Geronio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

The SCAQMD adopted a “Policy on Global Warming and Stratospheric Ozone Depletion” on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan. In March 1992, the SCAQMD Governing

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<sup>63</sup> 17 CCR §§ 95811, 95812(d).

<sup>64</sup> Id. at § 95851(b)(emphasis added).

Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrofluorocarbons (e.g., SCAQMD Rules 1141 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support adoption of a California GHG emission reduction goal.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.<sup>65</sup> Within its October 2008 document, the SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of for stationary source/industrial projects where the SCAQMD is lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., mixed-use/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.<sup>66</sup> The aforementioned Working Group has been inactive since 2011 and the SCAQMD has not formally adopted any GHG significance threshold for land use development projects.

### ***Southern California Association of Governments***

In February 2011, CARB adopted the GHG emissions reduction targets under SB 375 for the SCAG region. The target is a per capita reduction of 8 percent for 2020 and 13 percent for 2035 compared to the 2005 baseline. On April 7, 2016, SCAG adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is an update to the previous 2012 RTP/SCS.<sup>67</sup> Using growth forecasts and economic trends, the 2016 RTP/SCS provides a vision for transportation throughout the region for the next 25 years. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The 2016 RTP/SCS successfully achieves and exceeds the GHG emission-reduction targets set by CARB by demonstrating an 8 percent reduction by 2020, 18 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level on a per capita basis.<sup>68</sup> Compliance with and implementation of 2016 RTP/SCS policies and strategies would have co-benefits of reducing per

<sup>65</sup> South Coast Air Quality Management District, Board Meeting, Date: December 5, 2008, Agenda No. 31, <http://www3.aqmd.gov/hb/2008/December/0812ag.html>. Accessed January 2016.

<sup>66</sup> South Coast Air Quality Management District, Greenhouse Gases CEQA Significance Thresholds, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed January 2016.

<sup>67</sup> Southern California Association of Governments, 2016 RTP/SCS. Available: <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS>. Accessed September 2016.

<sup>68</sup> Ibid.

capita criteria air pollutant emissions associated with reduced per capita vehicle miles traveled (VMT).

SCAG's 2016 RTP/SCS provides specific strategies for successful implementation. These strategies include supporting projects that encourage diverse job opportunities for a variety of skills and education, recreation and cultures and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles. In addition, the 2016 RTP/SCS includes new strategies to promote active transportation, supports local planning and projects that serve short trips, expand understanding and consideration of public health in the development of local plans and projects, and supports improvements in sidewalk quality, local bike networks, and neighborhood mobility areas. It also proposes increasing access to the California Coast Trail, light rail and bus stations, and promoting corridors that support biking and walking, such as through a regional greenway network and local bike networks. The 2016 RTP/SCS proposes to better align active transportation investments with land use and transportation strategies, increase competitiveness of local agencies for federal and state funding, and to expand the potential for all people to use active transportation. CARB has accepted the SCAG GHG quantification determination in the 2016 RTP/SCS.<sup>69</sup>

## **Local**

### ***City of Culver City***

Culver City has not adopted a GHG significance threshold, however, the City participates in an environmental recognition program, California Green Communities. The program helps cities develop strategies to reduce carbon emissions and increase energy efficiency in their community. In addition, the City has adopted green building ordinances to reduce GHG emissions for new development. The City has adopted a Photovoltaic Requirement which requires 1 kilowatt (kw) of photovoltaic power installed per 10,000 square feet of new development.<sup>70</sup>

In 2009, the City adopted the Green Building program which contains a number of GHG reducing features such as enhanced building insulation, low-flow water fixtures, and efficient lighting and HVAC systems.<sup>71</sup> For new construction totaling more than 50,000 square feet, the Green Building Program requires these developments to achieve Leadership in Energy and Environmental Design (LEED) certification.<sup>72</sup> An example of the City's Green Building Program

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<sup>69</sup> California Air Resources Board, Southern California Association of Governments' (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 2016. Available at: [https://www.arb.ca.gov/cc/sb375/scag\\_executive\\_order\\_g\\_16\\_066.pdf](https://www.arb.ca.gov/cc/sb375/scag_executive_order_g_16_066.pdf). Accessed May 2017.

<sup>70</sup> Culver City Municipal Code 2017. Solar Photovoltaic Systems, Chapter 15.02.1005. Accessed July 2017.

<sup>71</sup> Culver City Municipal Code 2017. Green Building Program and Requirements, Chapter 15.02.1100. Accessed July 2017

<sup>72</sup> Culver City Municipal Code 2017. Green Building Program and Requirements, Chapter 15.02.1100. Accessed July 2017

requirements would be all lighting has to be either fluorescent, LED or other type of high-efficiency lighting. As well, specific feature for parking garages requires all new lighting to be motion sensor controlled and the minimum base level lighting would use high efficiency lighting.

As discussed in Section 4.8, Land Use, the Project Site is located within the Eastern Sub-Area of the City. Issues specific to the Eastern Sub-Area pertain to improving the existing residential neighborhoods through the provision of neighborhood-supporting retail, pedestrian improvements, and parks and creating a distinct neighborhood identity.

As discussed in Section 4.8, Land Use, the Circulation Element provides objectives and policies to encourage the use of public transit and provide safe and attractive pedestrian facilities. A detailed description of the existing regional and local roadway system, bikeway system, and public transit that serve the Project Site is provided in Section 4.11, Transportation and Traffic. The City has also adopted the concept of “Complete Streets”, which emphasizes a balanced transportation system that considers all users of the road (cyclists, pedestrians, transit riders, and vehicles) while planning development and transportation projects.<sup>73</sup> The goal of this concept is to transform the City into a place with an extensive bicycle and pedestrian network that allows travelers of all levels and abilities to feel comfortable walking and biking to their destinations.<sup>74</sup>

The Culver City Bicycle & Pedestrian Master Plan (BPMP) is a comprehensive plan for bicycling and walking in Culver City that considers all users of the road (cyclists, pedestrians, transit riders, and vehicles) while planning development and transportation projects. The BPMP includes a stated goal of transforming the City into a place with an extensive bicycle and pedestrian network for travelers of all levels and abilities, thereby reducing car trip and encouraging the use of alternative transportation.

As presented in the BPMP, the closest existing bicycle facility to the Project Site is the Ballona Creek Class I Bike Path/Multi-Use Path, with access off of Duquesne Avenue.<sup>75</sup> Other bicycle facilities near the Project Site include a Class III<sup>76</sup> Bike Route/Shared Lane Markings (sharrows) on Van Buren Place, Higuera Street, and Lucerne Avenue to provide a connection between East Culver City to Downtown Culver City; and Class II Bike Lanes<sup>77</sup> on Duquesne Avenue from Washington Place to Jefferson Boulevard.<sup>78</sup> In the vicinity of the Project Site Washington Boulevard and Culver Boulevard are proposed Class III Bike Routes and Van Buren Place is

<sup>73</sup> Alta Planning + Design, Culver City Bicycle & Pedestrian Master Plan, adopted by City Council, November 8, 2010, page 8.

<sup>74</sup> Alta Planning + Design, Culver City Bicycle & Pedestrian Master Plan, adopted by City Council, November 8, 2010, page 136.

<sup>75</sup> Culver City Bicycle & Pedestrian Master Plan, op. cit., Table 3-1, Figure 3-1, and Map 3-1. A Class I Bike Path provides completely separated right-of-way for exclusive use by bicycles and pedestrians with cross-flow minimized.

<sup>76</sup> A Class III Bike Route provides for shared use on major roadway segments and are designated by Shared Roadway Bicycle Marking (sharrow) or signage only.

<sup>77</sup> A Class II Bike Lane provides a striped lane (minimum width of 5 feet) for one-way bike travel on a street or highway.

<sup>78</sup> Biking in Culver City, <http://www.culvercity.org/enjoy/getting-around/biking-in-culver-city>. Accessed February 28, 2017.

designated as a Bicycle Friendly Street.<sup>79</sup> As also shown in the BPMP, a proposed pedestrian corridor is identified along Irving Place/Van Buren Place, Washington Boulevard, and Culver Boulevard.<sup>80</sup>

## 4.5.4 Environmental Impacts

### Methodology

The analysis of the Project's construction and operation GHG emissions has been conducted as follows. Additional details are provided in the Greenhouse Gas Technical Report in Appendix F of this Draft EIR.

### **Greenhouse Gas Emissions**

The total GHG emissions from the Project were quantified to determine the level of the Project's estimated annual GHG emissions. GHG emissions are typically separated into three categories that reflect different aspects of ownership or control over emissions. They include:

- Scope 1: Direct, on-site and off-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, diesel, and transportation fuels).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy.<sup>81</sup>

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 calculated on an annual basis. The Project would remove existing structures and associated GHG emissions. Emissions removed are applied as a credit toward the new emissions under the Project such that the GHG emissions evaluated are the net (Project-Existing) increase in emissions.

GHG emissions are estimated using the California Emissions Estimator Model (CalEEMod) (Version 2016.3.1), 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.,

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<sup>79</sup> Culver City Bicycle & Pedestrian Master Plan, op. cit., Map 5-1. A Bicycle Friendly Street designation is for predominately residential streets with relatively low traffic volumes and includes Class III Bike Route signage or sharrows, and may include custom signage and traffic calming features.

<sup>80</sup> Culver City Bicycle & Pedestrian Master Plan, op. cit., Map 5-2.

<sup>81</sup> Embodied energy includes energy required for water pumping and treatment for end-uses.

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.<sup>82</sup>

### **Construction Emissions**

Consistent with calculations in Section 4.2, Air Quality, of this Draft EIR, in summary, construction emissions were forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. The emissions were estimated using the CalEEMod software as recommended by the SCAQMD. The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the criteria pollutant analysis in Section 4.2 to generate GHG emissions values for each construction year. The SCAQMD guidance, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, recognizes that construction-related GHG emissions from projects “occur over a relatively short-term period of time” and that “they contribute a relatively small portion of the overall lifetime project GHG emissions.”<sup>83</sup> The guidance recommends that construction project GHG emissions should be “amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.”<sup>84</sup> In accordance with that SCAQMD guidance, GHG emissions from construction have been amortized over the 30-year lifetime of the Project.

### **Operational Emissions**

CalEEMod was also used to estimate operational GHG emissions from electricity, natural gas, solid waste, water and wastewater, and landscaping equipment. Building electricity and natural gas usage rates were adjusted to account for current Title 24 Building Energy Efficiency Standards. Mobile source emissions were estimated using CalEEMod and are based on CARB’s updated version of the on-road vehicle emissions factor (EMFAC) model. The most recent version is EMFAC2014, which “represents [C]ARB’s current understanding of motor vehicle travel activities and their associated emission levels.”<sup>85</sup>

For mobile sources, CalEEMod was used to generate the vehicle miles traveled (VMT) from the existing and Project uses based on the trip rates in the Traffic Study.<sup>86</sup> The Traffic Study applied a 15 percent reduction to existing and proposed daily trip rates due to the Project’s location to the

<sup>82</sup> See: <http://www.caleemod.com>.

<sup>83</sup> South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, October 2008. Available at: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2). Accessed May 2017.

<sup>84</sup> South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, October 2008. Available at: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-6/ghg-meeting-6-guidance-document-discussion.pdf?sfvrsn=2). Accessed June 2017.

<sup>85</sup> California Air Resources Board, *Mobile Source Emissions Inventory*. Available at: <http://www.arb.ca.gov/msei/categories.htm#emfac2014>. Accessed June 2017.

<sup>86</sup> Fehr & Peers, *Traffic Study for The Culver Studios Modified Comprehensive Plan Update #7*, May 30, 2017.

Metro Culver City Expo Line Light Rail Station (Culver City Station) and other regional transit lines, and being within a reasonable walking distance to a wide variety of land uses. Also, as stated in Section 4.11, Transportation and Traffic, the implementation of a Traffic Demand Management (TDM) Program would reduce net new Project trips by 10 percent. The TDM is incorporated as Mitigation Measure MM-TRAF-6. This reduction was included in Project operational emissions.

With regard to energy demand, GHG emissions are generated from the consumption of fossil fuels for electricity generation, building heating, and hot water. Energy demand rates were estimated based on specific square footage of the Project's development, as well as predicted water supply needs for these uses. Energy demand (off-site electricity generation and on-site natural gas consumption) for the Project was calculated within CalEEMod using the CEC's *California Commercial End Use Survey* (CEUS) data set, which provides energy demand by building type and climate zone.<sup>87</sup> However, since the data from the CEUS is from 2002, correction factors were incorporated into CalEEMod to account for the current version of the Title 24 Building Energy Efficiency Standards in effect. CalEEMod provides default intensity factors for CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O for SCE and calculates an overall CO<sub>2</sub>e intensity factor. The default CO<sub>2</sub> intensity factor is based on year 2012 and was adjusted to reflect an intensity factor that represents a 2020 scenario. By 2020, 41.4 percent of the energy SCE provide its customers is contracted to be generated by sources of renewable energy. Since the Project's first operational year is anticipated to be 2020, the default CO<sub>2</sub> intensity factor in CalEEMod for SCE, which is based on SCE's energy and renewable energy mix in year 2012 (approximately 20.6 percent renewable), was adjusted to account for 41.4 percent renewable energy.

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 CH<sub>4</sub>, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery), which are statewide averages, were used in this assessment.

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

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<sup>87</sup> California Energy Commission, California Commercial End-Use Survey. Available at: <http://capabilities.itron.com/CeusWeb/Chart.aspx>. Accessed December 2013.

*Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003).*<sup>88</sup>

Emissions calculations include credits or reductions for the Project Design Features and GHG reducing measures, some of which are required by regulation, such as compliance with SCAQMD rules and regulations and reductions in energy and water demand. The Project is subject to the City's Green Building Code and Project Design Features will be incorporated consistent with the minimum requirements. In addition, the Project will be designed to meet criteria for the United States Green Building Council (USGBC) LEED Certification level.

Operational GHG impacts are assessed based on the Project-related incremental increase in GHG emissions compared to baseline conditions. Under CEQA, the baseline environmental setting is established as the time the Notice of Preparation for this EIR circulated (November 17, 2016).

### **Comparison to Project without GHG Reduction Characteristics, Features, and Measures**

In order to evaluate the efficacy of the GHG reduction characteristics, features, and measures that would be implemented as part of the Project, this analysis compares the Project's GHG emissions to the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures. This approach mirrors the concepts used in CARB's Climate Change Scoping Plan, which demonstrates GHG reductions compared to a BAU scenario. This comparison is provided only to evaluate the Project's efficiency with respect to GHG emissions but is not a threshold of significance. As detailed in the CARB Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), the updated projected 2020 emissions estimate in the absence of GHG reduction measures in the Climate Change Scoping Plan is based on statewide data from the 2006 to 2008 period and accounts for the effect of the 2007–2009 economic recession on future growth, updated estimates for future fuel and energy demand, and the reductions required by regulation that were adopted for motor vehicles and renewable energy.<sup>89</sup> The Project's GHG emissions in comparison to the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures is consistent with CARB's approach in the Scoping Plan FED. Furthermore, the specific Project Site characteristics and Project Design Features are not included as they encompass GHG reduction strategies and features that would be consistent with state, regional, and local GHG reduction plans and policies or would go above and beyond regulatory requirements. These Project Site characteristics and Project Design Features include Project GHG reductions from energy efficiency measures that would exceed the Title 24 Building Standards Code, such as LEED Certification level measures, and trip reductions from co-location of uses and availability of public transportation within a quarter-mile. The emissions are estimated using the CalEEMod software, and the model inputs are adjusted to account for the specific and defined circumstances and described above. The analysis assumes the Project without implementation of

<sup>88</sup> California Air Resources Board, OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, (6/13/2003). Available at: [http://www.arb.ca.gov/msei/2001\\_residential\\_lawn\\_and\\_garden\\_changes\\_in\\_eqpt\\_pop\\_and\\_act.pdf](http://www.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_act.pdf). Accessed May 2017.

<sup>89</sup> California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011.

GHG reduction characteristics, features, and measures would incorporate the same land uses and building square footage as the proposed Project.

### ***Consistency with Greenhouse Gas Reduction Plan, Policies, and Actions***

The Project's GHG emissions are also evaluated by assessing the Project's consistency with applicable GHG reduction strategies and local actions adopted by the City of Culver City. As discussed previously, the City has established goals and actions to reduce the generation and emission of GHGs from new developments in its mandatory Green Building Program.

In the latest State CEQA Guidelines amendments, which went into effect on March 18, 2010, the Office and 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 State 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 AB 32 and Executive Order S-3-05. 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 reduction (AB 32).

### **Thresholds of Significance**

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact associated with GHGs would occur if the Project were to:

- **GHG-1:** Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- **GHG-2:** Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Amendments to Section 15064.4 of the State 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 State 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)).<sup>90</sup>

Although GHG emissions can be quantified as discussed under Methodology above, 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."<sup>91</sup> 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."<sup>92</sup>

Per State 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.<sup>93</sup> 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, interpret, or make specific the law enforced or administered by the public agency.<sup>94</sup> 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."<sup>95</sup> Thus, State 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.<sup>96</sup>

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<sup>90</sup> See generally California Natural Resources Agency, Final Statement of Reasons for Regulatory Action (December 2009), pp. 11-13, 14, 16; 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 [https://www.opr.ca.gov/docs/Transmittal\\_Letter.pdf](https://www.opr.ca.gov/docs/Transmittal_Letter.pdf). Accessed May 2017.

<sup>91</sup> Governor's Office of Planning and Research, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, (2008).

<sup>92</sup> Ibid.

<sup>93</sup> 14 CCR § 15064(h)(3).

<sup>94</sup> Ibid.

<sup>95</sup> Ibid.

<sup>96</sup> 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

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 2016 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.

## **Project Characteristics and Project Design Features**

### ***Project Characteristics***

The Project involves development of six new Digital Media buildings totaling approximately 649,420 square feet (sf), and the demolition of approximately 236,293 sf of existing studio uses, for a net increase in studio uses at the Project Site of 413,127 sf. Also, two parking structures would be constructed. Construction of the Project would last approximately 32 months and is projected to be operational in 2020. Demolition activities would include the removal of existing stages and support facilities totaling approximately 236,293 sf

The Project would represent an urban infill development, since it would be undertaken on a currently developed property, and would be located near existing public transit stops, which would result in reduced vehicle trips and VMT compared to model default assumptions. The Project Traffic Study includes transit credit from public transit stops in the form of 15 percent reduced trips compared to default trips rates in the Institute of Transportation Engineers, *Trip Generation, 9<sup>th</sup> Edition*.<sup>97</sup> An additional 10 percent reduction was applied to new net Project trips for the implementation of a TDM Program.<sup>98</sup> These transit credits and associated emissions reductions are accounted for in the operational emissions modeling. These transit credits and associated emissions reductions are accounted for in the operational emissions modeling.

### ***Project Design Features***

The Project would incorporate Project Design Features (PDFs) that would reduce construction emissions and target sustainable site development, water savings, energy efficiency, green-oriented materials selection, and improved indoor environmental quality. PDFs are part of the Project design, and are not mitigation measures. The PDFs relevant to GHG emissions are identified below:

**PDF-AIR-1 (Construction Features):** Construction equipment operating at the Project Site will be subject to a number of requirements. These requirements shall be included in

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one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO<sub>2</sub>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).

<sup>97</sup> Fehr & Peers, Traffic Study for The Culver Studios Modified Comprehensive Plan Update #7, May 30, 2017.

<sup>98</sup> The TDM Program is Mitigation Measure MM-TRAF-6 and further details can be found in Section 4.11 Transportation and Traffic.

applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. Construction measures include the following:

- The Project shall require all off-road diesel equipment greater than 50 horsepower (hp) used for this Project to meet USEPA Tier 4 off-road emission standards or equivalent. Welders will meet USEPA Tier 4 off-road emission standards or will be electric-powered. All equipment shall be outfitted with Best Available Control Technology (BACT) devices including a California Air Resources Board (CARB)-certified Level 3 Diesel Particulate Filter or equivalent. This PDF would reduce diesel particulate matter and NOx emissions during construction activities.
- Consistent with CPA No. 6, the Project shall utilize low-VOC coatings during construction activities to avoid excessive VOC emissions.
- Consistent with CPA No. 6 Condition of Approval #140, trucks and other vehicles in loading and unloading queues shall be parked with engines off to reduce vehicle 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 use water efficient landscaping and native drought tolerant plants.
- 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 meet the USEPA WaterSense specifications or equivalent.
- The parking structures shall be designed with occupancy-sensor controlled lighting that would place lighting fixtures in a low power state in unoccupied zones.<sup>99</sup>

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

- The Project design would meet criteria for the LEED Certification level.
- The Project shall install 100 bicycle parking spaces.
- The Project shall install infrastructure for future gray water uses.

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<sup>99</sup> A demonstration project by the United States Department of Energy indicated that the use of occupancy-sensor controlled lighting achieved a reduction of greater than 50 percent in lighting energy use compared to a similarly lighted parking structure without occupancy-sensor controls. For the purposes of this assessment, compliance with this feature is assumed to achieve a minimum 50 percent reduction in the energy required for the parking structures. United States Department of Energy, Building Technologies Office, SSL Demonstration: Parking Garage Lighting, Washington DC, June 2013. Available at [https://www1.eere.energy.gov/buildings/publications/pdfs/ssl/deptoflabor\\_brief.pdf](https://www1.eere.energy.gov/buildings/publications/pdfs/ssl/deptoflabor_brief.pdf). Accessed May 2017.

- 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 kW of solar photovoltaics per 10,000 sf of new development.

## Analysis of Project Impacts

**Threshold GHG-1:** A significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

**Threshold GHG-2:** A significant impact would occur if the Project would conflict with any applicable plan, policy, regulation, or recommendation of an agency adopted for the purpose of reducing the emissions of GHGs.

**Impact Statement GHG-1 and GHG-2:** The Project would generate GHG emissions due to construction and operational activities. The Project’s annual direct and indirect GHG emissions would be generated from development that is located and designed to be consistent with relevant goals and actions to reduce Project emissions as much as feasibly possible, as well as consistent with the HSC Division 25.5 goals and CARB guidelines for assessing GHG emissions. Therefore, the Project’s GHG emissions and associated impacts would be less than significant.

### Calculation of Construction Emissions

As explained above, the emissions of GHGs associated with construction of the Project were calculated for each year of construction activity, taking into account PDF-AIR-1. Detailed emissions calculations are provided in Appendix F. Results of the Project’s construction phase GHG emissions calculations are presented in **Table 4.5-4, Project 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. In accordance with this recommendation, the Project’s estimated construction GHG emissions have been amortized over a 30-year period.

**TABLE 4.5-4  
 PROJECT CONSTRUCTION GREENHOUSE GAS EMISSIONS**

<b>Emission Source</b>	<b>CO2e (Metric Tons) <sup>a</sup></b>
Construction Year 2017	415
Construction Year 2018	2,088
Construction Year 2019	1,421
Construction Year 2020	1,157
<b>Total Construction Emissions</b>	<b>5,080</b>
<b>Amortized Construction Emissions (30-years)</b>	<b>169</b>

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix F.

SOURCE: ESA PCR, 2017

### Calculation of Operational Emissions

As previously stated, the Project would demolish a large portion of existing stages and production support facilities. **Table 4.5-5, Existing Site GHG Emission to be Removed**, summarizes the emissions to be applied as a credit to evaluate the Project’s net increase in GHG emissions.

**TABLE 4.5-5  
 EXISTING SITE GHG EMISSIONS TO BE REMOVED**

<b>Emissions Sources</b>	<b>CO2e (Metric Tons per Year) <sup>a</sup></b>
Area (Landscaping Equipment)	<1
Electricity	1174
Natural Gas	58
Mobile Sources	2159
Waste	58
Water	106
<b>Total</b>	<b>3,555</b>

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix F.

<sup>b</sup> CO2e emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change Fourth Assessment Report.

SOURCE: ESA PCR, 2017

As explained above, the emissions of GHGs associated with operation of the Project were calculated using CalEEMod, taking into account the Project’s compliance with the portions of the City’s Green Building Code and mandatory Green Building Program applicable to new developments. 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: installation of 1 kW of solar photovoltaics per 10,000 sf of new development, using water conserving fixtures, and water efficient irrigation techniques. Recycling facilities would be installed dedicated for stage set and production waste, and reduced building energy usage consistent with 2016 Title 24 Building Energy Efficiency Standards. In addition, energy calculations from the parking structure also take into account the City’s Green Building Program requirement of using motion sensing lighting for new parking structures. Use of motion sensing lights in the proposed parking structure, which would be implemented as a Project Design Feature and is consistent with Title 24 requirements, would reduce energy usage of the parking structures by approximately 50 percent and resulting GHG emissions. In accordance with the City’s Green Building Program, the Project would be designed to meet criteria for the LEED Certification level.

Maximum annual net GHG emissions resulting from motor vehicles, energy (i.e., electricity, natural gas), water conveyance, and waste sources were calculated for the expected first operating year, 2020. The maximum first operating year GHG emissions from operation of the Project are shown in **Table 4.5-6, *Estimated Annualized Unmitigated Project Greenhouse Gas Emissions and Comparison to BAU Scenario***. The Project’s emissions were then compared to CARB’s BAU scenario emissions and the percent reduction represented by the Project’s emissions was calculated. As Table 4.5-5 reports, the Project’s GHG emissions represent a minimum of a 25.7 percent reduction in emissions as compared to a scenario without GHG reduction features and measures.

**TABLE 4.5-6  
 ESTIMATED ANNUALIZED UNMITIGATED PROJECT GREENHOUSE GAS EMISSIONS AND COMPARISON TO  
 BAU SCENARIO**

Emissions Sources	Operational Emissions CO <sub>2</sub> e (Metric Tons per Year) <sup>a</sup>	
	Proposed Project	Project Without GHG Reduction Characteristics, Features, and Measures
Opening Operational Year (2020)		
Electricity	2,506	2,677
Natural Gas	328	344
Mobile Sources	7,713	9,843
Solid Waste	94	189
Water	222	399
Area (Landscaping Equipment)	<1	<1
Amortized Construction Emissions	169	169
Existing Studio Emissions	3,555	3,555
<b>Total Net Project Emissions</b>	<b>7,478</b>	<b>10,065</b>
Emissions Reduction	2,587	—
Percent Reduction	25.7	—

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix F.

SOURCE: ESA PCR, 2017

With the implementation of the Project’s green building measures and additional PDFs, the Project would achieve GHG reductions for energy as compared to a scenario without GHG reducing features and measures. For comparison, under HSC Division 25.5, CARB’s updated 2020 BAU emissions estimate, which accounts for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulations that were adopted for motor vehicles and renewable energy, is 509.4 MMTCO<sub>2</sub>e. The

emission reductions necessary to achieve the 2020 emissions target of 431 MMTCO<sub>2</sub>e would be 78.4 MMTCO<sub>2</sub>e, or a reduction of GHG emissions by 15.4 percent.

As shown in Table 4.5-6, the Project's GHG reductions, when compared to a project without GHG reduction characteristics, features, and measures, would be approximately 25.7 percent.

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 50 percent of their electricity from renewable electricity sources by 2030 consistent with SB 350, 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 CO<sub>2</sub> 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. Therefore, the Project would not generate GHG emissions that may have, either directly or indirectly, a significant impact on the environment, and the impact would be less than significant.

### ***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 that reduces trips and VMTs. Transportation-related GHG emissions are the largest sector of emissions from the Project. This finding is consistent with the findings in many regional plans, such as the SCAG 2016 RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. The purpose of the SCAG 2016 RTP/SCS is to achieve its assigned regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2016 RTP/SCS, released in December 2015, states that "[e]ach [Metropolitan Planning Organization] is required to prepare an SCS in conjunction to [sic] with the RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375."<sup>100</sup> SCAG's 2016 RTP/SCS plans for regional population growth using smart land use strategies. As part of the 2016 RTP/SCS, "transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to

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<sup>100</sup> Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, (2015), page 3.8-37. Available at: <http://scagrtpsc.net/Pages/DRAFT2016PEIR.aspx>. Accessed May 2017.

accommodate increases in population, households, employment, and travel demand.”<sup>101</sup> Moreover, the 2016 RTP/SCS states that while “[p]opulation and job growth would induce land use change (development projects) and increase VMT, and would result in direct and indirect GHG emissions,” the 2016 RTP/SCS “supports sustainable growth through a more compact, infill, and walkable development pattern.”<sup>102</sup>

Consistent with SCAG’s 2016 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 Site is a movie and television production studio operating 24 hours and 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 Downtown Culver City. The Project’s enhanced Studio Campus would further the pedestrian-friendly environment with direct access to downtown Culver City and clear linkages to regional and local transportation systems. Within walking distance of the Culver City Station, the Project would promote alternate modes of transit, as well as implement TDM measures,<sup>103</sup> promote the use of bicycles, and participate in visioning and development of the Culver City Transit Oriented Development District. According to the Project Traffic Study, the Project Site’s proximity to the Culver City Station and other regional transit lines and close proximity (within walking distance) to a wide variety of land uses in the area would result in a 15 percent reduction trip rates. Also, according to the Traffic Study, the implementation of a TDM Program would reduce net new Project trips by 10 percent.

SCAG’s 2016 RTP/SCS states that 38 percent of all trips in the region are less than 3 miles.<sup>104</sup> 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 100 bicycle parking spaces and further encouraging the use of bicycles as a mode of transportation to the Project Site by providing onsite amenities such as showers and locker rooms, as well as a bike share program outlined in the TDM. In addition, according to the Traffic Study, the Project would support improvements proposed as part of the Downtown Bicycle Connector that would provide safe, two-way bike lanes that would extend from the Culver City Expo line to Downtown Culver City. Therefore, the Project would be consistent with the SCAG 2016 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 4.5-7, *Consistency with Applicable Culver City Green Building Program Requirements*** contains mandatory items the Project would implement that would increase energy

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<sup>101</sup> Ibid., page 3.8-35.

<sup>102</sup> Ibid., page 3.8-36.

<sup>103</sup> The TDM Program is required by mitigation measure TRAF-6 for Project operations in Section 4.11, Transportation and Traffic of this EIR.

<sup>104</sup> The 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy, April 2016. <http://scagrtpsc.net/Documents/2016/final/f2016RTPSCS.pdf> Accessed June 2017.

efficiency and reduce energy consumption, thus reducing Project GHG emissions. As discussed in Table 4.5-6, the Project is consistent with the applicable requirements. Therefore, as 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, and the impact would result be less than significant impacts.

**TABLE 4.5-7  
 CONSISTENCY WITH APPLICABLE CULVER CITY GREEN BUILDING PROGRAM REQUIREMENTS**

Source	Category / Description	Consistency Analysis
Culver City Green Building Program	Requires developments 50,000 square feet or more to meet criteria for LEED “Certified” performance level or higher	<b>Consistent:</b> The Project would be designed to meet criteria for the LEED Certified level. The Project would be designed to reduce water use by 40% with installation of low-flow water fixtures, reduce the use of potable water for irrigation by 50%, use high efficacy lighting throughout the Project, utilize refrigerants that minimize or eliminate compounds that lead to ozone depletion, and would develop a measurement and verification plan.
	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	<b>Consistent:</b> The Project would consist of approximately 650,000 sf of new construction and would install a solar photovoltaic system that meets criteria for the LEED Certification level and the City.

SOURCE: ESA PCR, 2017

**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.”<sup>105</sup> 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 are 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

<sup>105</sup> California Air Pollution Control Officers Association, CEQA & Climate change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, (2008).

incorporates physical and operational Project characteristics and Project Design Features 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 2016 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 above, the Project's daily trips were reduced by 15 percent based on the Project's location to existing modes of public transit, safe bicycle routes, and within reasonable walking distances of a variety of land uses. According to the Traffic Study<sup>106</sup>, the implementation of the TDM Program (MM-TRAF-6) would reduce net new trips by 10 by percent. 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 2016 RTP/SCS, which seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them."<sup>107</sup> According to SCAG, giving people more transportation choices and providing greater opportunities for biking and walking reduces the number of people who drive alone and encourages people to use alternative modes of travel.<sup>108</sup>

**Table 4.5-8, *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 half of the State's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting rail and other alternative transportation options, and use of high efficiency appliances, water heaters, and HVAC systems.<sup>109</sup> 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 onsite bicycle parking facilities, being located in close proximity to the Culver City Station, and being located in an area with other commercial and retail land uses within walking distance.. The Project would utilize energy-efficient lighting and equipment and

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<sup>106</sup> Fehr & Peers, Traffic Study for The Culver Studios Modified Comprehensive Plan Update #7, May 30, 2017.

<sup>107</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, (2016) 16, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed May 2017.

<sup>108</sup> Ibid., page 14.

<sup>109</sup> Energy + Environmental Economics, Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios, April 6, 2015. Available at: [https://www.arb.ca.gov/html/fact\\_sheets/e3\\_2030scenarios.pdf](https://www.arb.ca.gov/html/fact_sheets/e3_2030scenarios.pdf). Accessed May 2017.

would reduce its building energy consumption via compliance with City Green Building Program and the CALGreen Code.

**TABLE 4.5-8  
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.	<b>Consistent.</b> 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.	<b>Consistent.</b> 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.	<b>Consistent.</b> 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.	<b>Consistent.</b> 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.	<b>Consistent.</b> 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.	<b>Consistent.</b> 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.	<b>Consistent.</b> 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.	<b>Consistent.</b> 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.	<b>Consistent.</b> 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.	<b>Consistent.</b> The Project would meet this requirement as part of its compliance with the CALGreen Code by using low-flow water fixtures.
	All irrigation controllers must be installed with weather sensing or soil moisture sensors.	<b>Consistent.</b> 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.	<b>Consistent.</b> 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.	<b>Consistent.</b> 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.	<b>Consistent.</b> The Project would meet this requirement as part of its compliance with the CALGreen Code.	

Source	Category / Description	Consistency Analysis
	Requires use of low VOC coatings consistent with AQMD Rule 1168.	<b>Consistent.</b> 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.	<b>Consistent.</b> 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.	<b>Consistent.</b> The Project would meet this requirement as part of its compliance with the CALGreen Code.

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. Therefore, impacts would be less than significant.

### **Cumulative Impacts**

Worldwide man-made emissions of GHGs were approximately 49,000 MMTCO<sub>2</sub>e in 2010 including ongoing emissions from industrial and agricultural sources and emissions from land use changes (e.g., deforestation).<sup>110</sup> Emissions of CO<sub>2</sub> from fossil fuel use and industrial processes account for 65 percent of the total while CO<sub>2</sub> emissions from all sources accounts for 76 percent of the total. Methane emissions account for 16 percent and N<sub>2</sub>O emissions for 6.2 percent. In 2013, the United States was the world’s second largest emitter of carbon dioxide at 5,300 MMT (China was the largest emitter of carbon dioxide at 10,300 MMT).<sup>111</sup>

CEQA requires that lead agencies consider the cumulative impacts of GHG emissions from even relatively small (on a global basis) increases in GHG emissions. Small contributions to this cumulative impact (from which significant effects are occurring and are expected to worsen over time) may be potentially considerable and therefore significant. In the case of global climate change, the proximity of the Project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. As stated above, GHG emission impacts are, by their very nature cumulative, as both the California Natural Resources Agency and CAPCOA have recognized.<sup>112</sup> Therefore, an analysis of a project’s GHG emission impacts also serves as a cumulative impact assessment.

Although HSC Division 25.5 sets a statewide target for statewide 2020 and 2030 GHG emission levels, its implementing tools (e.g., CARB’s *Climate Change Scoping Plan*) make clear that the reductions are not expected to occur uniformly from all sources or sectors. CARB has set targets specific to the transportation sector (land use-related transportation emissions), for example, and under SB 375, SCAG must incorporate these GHG-reduction goals into its Regional

<sup>110</sup> Intergovernmental Panel on Climate Change, Fifth Assessment Report Synthesis Report, 2014.

<sup>111</sup> PBL Netherlands Environmental Assessment Agency and the European Commission Joint Research Center, Trends in Global CO<sub>2</sub> Emissions 2014 Report, 2014.

<sup>112</sup> California Air Pollution Control Officers Association, CEQA & Climate change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, (2008).

Transportation Plan and demonstrate that its Sustainable Communities Strategy is consistent with the Regional Housing Needs Assessment. One of the goals of this process is to ensure that the efforts of State, regional and local planning agencies accommodate the contemporaneous increase in population and employment with a decrease in overall GHG emissions. For example, adopting zoning designations that reduce density in areas which are expected to experience growth in population and housing needs, is seen as inconsistent with anti-sprawl goals of sustainable planning. Although development under a reduced density scenario would result in lower GHG emissions from the use of that individual parcel of land compared to what is currently or hypothetically allowed (by creating fewer units and fewer attributable vehicle trips), total regional GHG emissions would likely fail to decrease at the desired rate or, worse, would increase if regional housing and employment needs of an area were then met with a larger number of less-intensive development projects. Therefore, it is not simply a cumulative increase in regional development or the resultant GHG emissions that potentially threatens GHG reduction goals, but the configuration and design of that development.

With implementation of good planning policies, the land use sector can accommodate growth and still be consistent with statewide plans to reduce GHG emissions. To that end, various agencies are required to develop programs to guide future building and transportation development toward minimizing resource consumption and reducing resultant pollution. As discussed above, the City has adopted the CAL Green Code and a Green Building Program that include mandatory measures to minimize and reduce GHG emissions from energy consumption.

As discussed in the tables above, the Project's design and location would be consistent with applicable GHG reduction strategies recommended by the City, region, and State. In addition, implementation of PDF-AIR-2 and 3 would exceed minimum regulatory requirements, and the Project would support and be consistent with relevant and applicable GHG emission reduction strategies in SCAG's 2016 RTP/SCS. The Project would concentrate employment growth in an area served by the Culver City Metro Station and Expo Line, regional and local bus lines, and bicycle facilities. As such, the Project would be consistent with SCAG's 2016 RTP/SCS policies for the concentration of growth in proximity to transit.

Furthermore, the overwhelming majority of the Project-related GHG emissions are from two highly regulated source sectors, including electricity generation and transportation fuels. These sectors are already covered entities under the Renewables Portfolio Standard and the Cap-and-Trade Program and as such would be reduced sector-wide in accordance with the GHG reduction targets of HSC Division 25.5, in addition to the previously discussed GHG emissions reductions from the Project-specific energy efficiency design features, and substantial VMT-reducing land use characteristics of the Project. As indicated above, the State CEQA Guidelines were amended in response to SB 97. In particular, the State CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction program renders a cumulative impact insignificant. Per State 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 would avoid or

substantially lessen the cumulative problem within the geographic area of the project.<sup>113</sup> 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, interpret, or make specific the law enforced or administered by the public agency.<sup>114</sup> 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**” (emphasis added).<sup>115</sup> Put another way, State 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 the California Cap-and-Trade Program or other regulatory schemes to reduce GHG emissions.

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

#### 4.5.5 Mitigation Measures

The Project would not result in significant impacts associated with GHG emissions. Therefore, no mitigation measures would be required.

#### 4.5.6 Level of Significance After Mitigation

Not applicable. Impacts related to Project GHG emissions would be less than significant.

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<sup>113</sup> 14 CCR § 15064(h)(3).

<sup>114</sup> 14 CCR § 15064(h)(3).

<sup>115</sup> Ibid.

## 4.6 Hazards and Hazardous Materials

### 4.6.1 Introduction

This section analyzes potential impacts associated with hazards and hazardous materials that could occur during construction and operation of the Project. Hazards and hazardous materials are generally defined as any material that is flammable, combustible, corrosive, caustic, explosive, toxic, poison, or an irritant that has the potential to cause harm to humans, animals, or the environment, either by itself or through interaction with other factors. Hazardous materials are defined, strictly regulated, and closely monitored under a series of regulations administered by an array of government agencies as described in this section. The analysis is based largely on a December 2013 Phase I Environmental Site Assessment (Phase I ESA) prepared by Global Realty Services Group (GRS Group) for the last Comprehensive Plan Amendment (CPA No. 6) approved for the Project Site in 2015.<sup>1</sup> The GRS Phase I ESA is provided as Appendix G of this Draft EIR. The analysis is also based on an April 2013 Phase I ESA prepared by EMG, the findings of which are referenced in the GRS Phase I ESA. The EMG Phase I ESA is included as Appendix L of the GRS Phase I ESA.

### 4.6.2 Environmental Setting

#### Historical Site Conditions

As described in the GRS Phase I ESA, the Project Site was first developed from as early as 1896 to as late as 1902. From 1917 to the present, the Project Site has been developed for commercial use and occupied by: Thomas H. Ince Studios, Pathe Studios Inc., RKO Radio Pictures Inc., Desilu Productions Inc., Seiznikc Company Inc., Beverly Hills Studios, Laird International Studios, Sony Pictures Entertainment, and The Culver Studios (the present owner). According to the Sanborn fire insurance maps for the property, the specific uses developed at the property by the early studios are listed below. Most of the existing on-site studio structures were built around 1928.<sup>2</sup>

- Thomas H. Ince Studios Inc. (at least 1917 through 1924): Administrative building, laboratory building, carpentry shop, dressing rooms, cutting room, pool, electric sub-station, water tank, green house, wardrobe building, offices, lumber storage, molding storage, pain shop, supplies storage, drapery department, at title department, plaster shop, stages, auto parking garage, and auto repair shop.
- Pathe Studios Inc. (1924-1949): Stages, machine shop, auto repair, plumbing shop, arsenal, storage, electric power house, lumber shed, offices, dressing rooms, carpentry shop & mill, pool, office buildings, camera vaults, casting office, and administrative building.
- RKO Radio Picture and Beverly Hills Studios Inc. (1949-1970): Additional office buildings & stages, garage, auto repair, and printing building.

<sup>1</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>2</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

The general vicinity of the Project Site was also developed from as early as 1896 and as late as 1902, first with primarily residential uses and then, starting around 1919, with studio uses and more commercial uses. A gas station occupied the northeast-adjointing property from 1928 to 1994. Other early surrounding commercial uses included a car dealership, paper manufacturing company, and ice cream company. Later surrounding uses included, in addition to the residential uses, a liquor store, restaurant, billiards hall, barber shop, cigar shop, auto sales facilities, auto repair facilities, electronics parts manufacturing, and Paramount Laundry.<sup>3</sup>

Multiple historical information sources were reviewed for the GRS Phase I ESA, including aerial photographs, Sanborn fire insurance maps, property tax files USGS topographic maps, local street directories, City Building Department records, zoning/land use records, prior environmental assessments, the State of California Department of Conservation's Division of Oil, Gas and Geothermal Resources (DOGGR) online mapping system, and other historical resources. None of these sources identified hazards and hazardous materials concerns at the Project Site, none indicate the historical placement of fill materials (such as gravel, sand, or soils), on the Project Site, and none indicate that heating oil tanks have ever been present at the Project Site. These sources do, however, indicate the presence of several capped and abandoned oil wells southeast of the Project Site. The records also identify the presence of a 550-gallon gasoline underground storage tank (UST) at the Project Site that was removed in 1987 with initial soil testing that indicated the presence of elevated levels of some contaminants in the soils around the UST, but subsequent testing revealing the lack of elevated levels of these contaminants (discussed further below under Hazardous Materials Database Site Listings). Furthermore, the records identify the ongoing treatment of groundwater pumped from the Rear Lawn Parking Structure, and the disposal of this treated groundwater into first the local streets, then the local storm drain system, and currently into the local sewer system under a permit from the Los Angeles County Department of Public Works (LACDPW) (also discussed further below under Hazardous Materials Database Site Listings).<sup>4</sup>

## **Current Site Conditions**

### ***Existing Development***

As indicated in Figure 2-1, Regional and Project Vicinity Map, in Chapter 2, Project Description, of this Draft EIR, the Project Site is bordered by Washington Boulevard to the north, residential uses to the south, Ince Boulevard to the east, and Van Buren Place along with residential and commercial uses to the west.

The Project Site is relatively flat, is located at elevations of between 90 and 100 feet (ft) above mean sea level (msl), and is located approximately 500 ft northwest of Ballona Creek. The Project Site is underlain by the West Coast Groundwater Basin, with the estimated depth to the

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<sup>3</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>4</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

nearest groundwater estimated at between 32 and 41 feet below the ground surface (bgs). The prevailing groundwater gradient in the area flows towards the south.<sup>5</sup>

The Project Site is currently developed with The Culver Studios, a fully operational movie and television studio that is leased for use on a short-term basis to a range of tenants.<sup>6</sup> The Project Site is developed with 24 buildings, including 14 sound stages, production support and/or offices totaling approximately 347,549 square feet (sf) of floor area. The Project Site also contains one above-grade parking structures, a subterranean parking structure (up to four levels), surface parking lots, loading docks, and landscaped open space. The buildings range from single-story to 64 feet (4 stories). Most of the on-site buildings date from around 1928, with several dating as far back as 1917 and additions taking place in 1932, 1935 and 2007.

### ***Hazardous Materials Database Site Listings***

As part of the GRS Phase I ESA, environmental agency databases that log known hazardous site conditions were reviewed to ascertain whether the Project Site and other area properties are listed on such Federal, State, local, or other databases. These databases list properties by location and provide information regarding past use and presence of hazardous conditions. The databases and relevant listings for the Project Site and nearby properties are summarized below. The complete results of the database search are included as Appendix I of GRS Phase I ESA.

### **Project Site**

According to the hazardous materials database search conducted for the GRS Phase I ESA, the Project Site is listed on 10 hazardous materials databases (in certain cases multiple times). These listings and the associated details are identified in **Table 4.6-1, On-Site Hazardous Materials Database Listings**. As indicated therein, none of these listings represent Recognized Environmental Conditions (RECs) which represent the presence or likely presence of a hazardous substance or petroleum product on a property under conditions that indicate an existing release, past release, or material threat of a release of such substances into structures, the ground, the groundwater, or the surface water of a property.<sup>7</sup>

Two of the listings (ENF and CHMIRS) represent Controlled RECs (CRECs) which are RECs that, through the implementation of ongoing engineering controls, are in the process of being addressed to the satisfaction of the applicable regulatory agency. These listings, both of which involve the same case, involve ongoing dewatering activities at the Project Site where groundwater contaminated with solvents (dichloroethane and trichloroethane) is first treated and then: (1) was discharged to the local sewer system under permit from LACDPW between 2003 and 2014; and (2) since 2014 is used as irrigation water for on-site landscaping.<sup>8</sup>

<sup>5</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>6</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>7</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>8</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013. Also, Jim Suhr, James Suhr and Associates, phone communication, September 7, 2017.

**TABLE 4.6-1  
 ON-SITE HAZARDOUS MATERIALS DATABASE LISTINGS**

Database	Description	Listing Date	REC/CREC
RCRA-LQG <sup>a</sup>	Same case as second ENF below	1987	HREC
ERNS <sup>b</sup>	Release of ethylene glycol from failed cooling line. Release reported and cleaned up, and no additional regulatory action appears to have been documented.	1994	No
FINDS <sup>a</sup>	Generation by Culver Studios of hazardous waste (off-specification, aged or surplus organics, ACM waste, aqueous solution with organic residues, other inorganic solids, solvents recovery, and unknown wastes), all of which was manifested and transported off-site to licensed recycling/disposal facilities	2004, 2012	No
RCRA <sup>a</sup> NonGen/NL R	Same case as FINDs listing above. According to the RCRA LQG listing, this facility is registered with the USEPA as a large quantity hazardous waste generator with no reported violations.	2004, 2012	No
ENF <sup>c</sup>	Multiple listings: Collection and discharge of estimated 3,000 gpd of groundwater containing solvents (e.g., dichloroethane @7 micrograms per liter and trichloroethane @9 micrograms per liter) above the action level (5 micrograms per liter), first into the street starting in 1989 when the subterranean parking structure was built, and later into the local storm drain system. Tenant (Sony Pictures) issued violation and enforcement action in 2003 for discharging without permit – installed two carbon filter tanks in lowest subterranean level of parking structure to filter, and started discharging the treated groundwater to local sewer system under LACDPW permit. Same case as the CHMIRS listing below.	1989 – present	CREC
	Initial measurement of elevated levels of TRPH, Benzene and Toluene detected in soil samples taken from around a 550-gallon UST removed from the Project Site in 1987. Follow-up soil testing did not detect these contaminants, leading LACDPW to issue No Further Action Letter. Same case as one of ENF listings above and one of L.A. CO. HMS listings below.	1987	HREC
CHMIRS <sup>d</sup>	Collection and discharge of estimated 3,000 gpd of groundwater containing solvents (dichloroethane and trichloroethane) above the action level of 5 micrograms per liter, first into the street and later into the local storm drain system, and then into the local sewer system under permit. Same case as one of the ENF listings above.	1989 - present	CREC (same as ENF CREC above)
SWEEPS UST <sup>e</sup>	Same as the second of the ENF cases above.	1987	No
L.A. CO. HMS <sup>e</sup>	Multiple listings: Permit to discharge treated groundwater from subterranean parking garage due to rising water table into County sewer system; permit to treat/store/dispose of hazardous waste (water based paint, paint sludge solvents); permit to discharge wastewater from on-site restaurant into County sewer system; quarterly Self-Monitoring Reports for on-site waste disposal (waste paint related materials, rags containing solvents, latex paint, glycol, acetone) submitted to LACDPW between 1993 and 2004.	1989, 1993, 1994, 2002, 2003, 2004	No
	Same case as second ENF above.	1987	HREC (same as ENF HREC above)
EMI <sup>f</sup>	Permit to emit total organic hydrocarbon gases, ROG, CO, NOX, SOX, and particulate matter. No compliance citations issued.	2002-2004	No

Database	Description	Listing Date	REC/CREC
HAZNET <sup>9</sup>	Multiple listings: Generation by tenants of hazardous waste (halogenated organic compounds, latex, organic solids, hydrocarbons solvents, paint, sludge, aqueous solution, ACM), all of which was manifested and transported off-site to licensed recycling/disposal facilities.	1996, 1998, 1999, 2005, 2009, 2010	No
	Same case as FINDs listing above.	2004, 2012	No

- <sup>a</sup> U.S. Environmental Protection Agency database  
<sup>b</sup> National Response Center, U.S. Coast Guard database  
<sup>c</sup> State Water Resources Control Board database  
<sup>d</sup> California Office of Emergency Services database  
<sup>e</sup> Los Angeles County Department of Public Works database  
<sup>f</sup> California Air Resources Board database  
<sup>g</sup> California Environmental Protection Agency database

Acronyms: ACM = Asbestos Containing Materials; CHMIRS = California Hazardous Material Incident Report System; CO = Carbon Monoxide; CREC = Controlled Recognized Environmental Condition; EMI = Emissions Inventory Data; ENF = Enforcement Action Listing; ERNS = Emergency Response Notification System; FINDS = Facility Index System/Facility Registry System; HAZNET = Facility and Manifest Data; HREC = Historical Recognized Environmental Condition; LA. CO. HMS = Los Angeles County Hazardous Material System; NOX = Nitrogen Dioxide; RCRA-LQG = Resource Conservation and Recovery Act - Large Quantity Generator; RCRA NonGen/NLR= Resource Conservation and Recovery Act – Non-generator of hazardous waste, No Longer Regulated; REC = Recognized Environmental Condition; ROG = Reactive Organic Gases; SOX= Sulphur Dioxide; SWEEPS UST = Statewide Environmental Evaluation and Planning System Underground Storage Tank

SOURCE: ESA PCR, May 2017. Based on information from Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

According to the EMG Phase I ESA, historical uses at the Project Site likely did not contribute to the levels of solvents in the underlying groundwater, and no violations are currently on file regarding the treatment system.

Also, three of the listings (RCRA-LQG, ENF and LA CO. HMS) represent Historical RECs (HRECs) which are RECs that are no longer of concern (for example, a past release or potential release of a hazardous material that, through testing, turned out not to be of a concern or that has corrected to the satisfaction of the applicable regulatory agency). These listings, all three of which focus on the same case, involved initial soils testing around a previously removed on-site UST which initially showed elevated levels of Total Recoverable Petroleum Hydrocarbons (TRPH), benzene and toluene, with later sampling indicating no elevated levels of these contaminants, followed by the LACDPW issuing a No Further Action Letter.<sup>9</sup>

According to the GRS Phase I ESA, none of the identified on-site database listings represent a significant ongoing hazards and hazardous materials conditions at the Project Site.<sup>10</sup>

### Adjacent & Nearby Properties

According to the hazardous materials database search conducted for the GRS Phase I ESA, there is one environmental hazardous materials/waste listing within a 1/8-mile radius of the Project Site and 93 within a one-mile radius. The one listing within a 1/8-mile radius is on the RCRA-SQG database. The 93 listings within a one-mile radius are on the CERCLIS-NFRAP, RCRA-LQG, RCRA-SQG, ERNS, FINDS, RCRA NonGen/NLR, LUST, UST, HIST UST, VCP, ENF,

<sup>9</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>10</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

CHMIRS, SWEEPS UST, SWF/LF, ENVIROSTOR, WMUDS/SWAT, NOTIFY 65, L.A. CO. HMS, CA FID UST, HIST CORTESE, EMI, HAZNET, AND SLIC databases.<sup>11</sup> Identified below are the nearest listed hazardous materials/waste sites as identified in the GRS Phase I ESA, and the conclusions in the GRS Phase I ESA concluding the potential for these sites to adversely affect the Project Site.

The following database records identify the closest off-site listings to the Project Site:<sup>12</sup>

- Fox Hills Buick GMC Pontiac (9099 W. Washington Blvd.): This property is identified as a RCRA SQG, FINDS and HAZNET site, and is located to the north, across Washington Boulevard, approximately 930 ft from the Project Site. This site is not listed non any release database that would impact the subject property. Based on the lack of a documented release, this site is not expected to represent a REC that adversely affects the Project Site.
- Harold Auto Supply (9076 W. Washington Blvd.): This property is identified as a SWEEPS UST site located one-half block east of the Project Site along the east side of Washington Boulevard. This site is not listed on any release database that would impact the Project Site. Based on the lack of a documented release, this site is not expected to represent a REC that adversely affects the Project Site.
- Chevron Station (9094 W. Washington Blvd.): This site is identified as a RCRA SQG, FINDS, LUST, HIST CORTESE, HIST UST and SWEEPS UST site located to the east, across Ince Boulevard, approximately 890 ft from the Project Site. This facility is reported to have experienced an unauthorized waste oil release impacting the soil. The status of this site is listed as Case Closed and No Further Action is being required. Based on the current regulatory status, this site is not expected to represent a REC that adversely affects the Project Site.
- Culver City Fire Station (9600 Culver Blvd.): This property is identified as a LUST, UST site located 1,200 ft west of the Project Site. This site is considered unlikely to impact the Project Site because of its distance from the Project Site and cross-gradient location with respect to the direction of groundwater flow.
- Mile Miller Toyota Chevrolet (9055 and 9077 W. Washington Blvd.): This property is identified as a RCRA SQG, FINDS, and SWEEPS UST site located 300 ft northeast of the Project Site. This site is considered unlikely to impact the Project Site because of its cross-gradient location with respect to the direction of groundwater flow.
- City of Culver City (9037 Washington Blvd.): This property is identified SWEEPS UST site located 600 ft northeast of the Project Site. This site is considered unlikely to impact the Project Site because of its cross-gradient location with respect to the direction of groundwater flow.
- Rising Sun Automotive (9005 W. Washington Blvd.): This property identified as a LUST and HIST CORTESE site located 1,000 ft north and up-gradient of the Project Site. Regulatory “closure” has been granted for this property; closure is normally granted only after off-site

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<sup>11</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013., Map Findings Summary, page 14.

<sup>12</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

impacts have been investigated and controlled or corrected. As a result, no related impact is expected, and this property is not considered to represent a REC that adversely affects the Project Site.

- Merit Manufacturing Company (4222 Van Buren Place): This property is identified as a CERC-NFRAP, LA CO. Site Mitigation, and EnvirStor site located 1,200 ft southeast and cross-gradient from the Project Site. Regulatory “closure” has been granted for this property, and this property is not considered to represent a REC that adversely affects the Project Site.

All remaining sites identified during the records search are located more than ¼-mile from the Project Site and either do not involve a release or involve a release that is down-gradient or cross-gradient from the Project Site and, therefore, are not RECs that adversely affect the Project Site.<sup>13</sup>

As concluded in the GRS Phase I ESA, based on the nature and extent of these properties, and the nature and distance of any reported releases, the position of reported releases with respect to the regional groundwater flow direction, current regulatory status, and/or the absence of reported releases, none of these 93 listings represent a REC that adversely affects the Project Site.<sup>14</sup> Furthermore, no regional contamination has been identified within the target search area.<sup>15</sup>

### ***Hazardous Materials on the Project Site***

#### **Hazardous Materials/Waste Associated with Existing Operations**

Based on a field reconnaissance of the Project Site conducted for the GRS Phase I ESA, existing studio and on-site maintenance operations utilize small quantities of hazardous materials including ethylene glycol, hydraulic oil, acetone, kerosene, paints, janitorial/maintenance supplies, diesel, gasoline, propane and lead-acid batteries, and generate small amounts of hazardous waste in the form of waste paint, solvents, waste oil, slop (water mixed with oil and paint), ballasts, and waste oil filters. The hazardous materials are kept in 1-gallon and 5-gallon containers in flammable-proof liquefy cabinets, mostly in the maintenance shop, and appeared to be properly stored. Hazardous wastes are kept in similar containers and storage lockers adjacent to Stages 3 and 5, State 10 and State 16. Five 55-gallon drums containing waste were observed in the maintenance shop, and one 55-gallon drum containing cooling tower water treatment chemical, six 55-gallon drums containing ethylene glycol, and eight 5-gallon containers containing biocide, were observed in the Ice Plant and Building Y. No evidence of any spillage or significant staining was observed in the areas of hazardous material and waste storage during the field reconnaissance.<sup>16</sup>

A field reconnaissance conducted for the EMG Phase I ESA in 2013 before the GRS Phase I ESA was prepared indicated that standing oil was observed in the secondary containment area in the hazardous waste storage locker adjacent to Stage 16. This storage locker was being used to store gasoline in individual containers, but was previously used to store oil and wastes. The oil appeared to be contained in the secondary containment area, and had not impacted the asphalt

<sup>13</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>14</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>15</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>16</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

surface adjacent to the storage locker. The EMG Phase I ESA recommended that the accumulated oil be removed from the secondary containment area. This condition was fully remediated in May, 2014, with the waste oil conveyed to a licensed recycling and treatment facility.<sup>17</sup>

Based on interviews with the Project Applicant (The Culver Studios), none of the following apply to the Project Site: environmental cleanup liens which affect the property; activity and use limitations which affect the property; commonly known or reasonably ascertainable information which indicates a potential release at the property; discount to property values resulting from a current or past release at the property; or obvious evidence of a potential release at the property.<sup>18</sup>

### **Hazardous Materials Facilities/Features**

Potential hazardous materials facilities and features observed on the Project Site during the field reconnaissance are described below:<sup>19</sup>

- Above-Ground Storage Tanks (ASTs): Two 200-gallon diesel ASTs for the fire pumps, one 25-gallon gasoline AST for the emergency generator, and one 200-gallon ethylene glycol AST for the Ice Plant, were observed. No staining or other concerns were notated in the vicinity of these storage facilities, and they were not anticipated to have an adverse impact on the property.
- Discharge Features: One below ground grease interceptor was observed outside the cafeteria building (Building L), and one below ground clarifier was observed abandoned in place next to Building T. The wastewater generated from restaurant operations is discharged into the City's sewer system via the grease interceptor, with the greasy material captured by the interceptor periodically pumped out by a certified pumping company. No concerns were observed in the vicinity of the clarifier.
- Transformers: One vaulted and two pad-mounted SCE transformers were observed on the property. The transformers were observed to be in good condition with no sign of leaking or release, and since the transformers are owned by SCE, any potential cleanup of spills or releases from them is the responsibility of SCE. However, based on the dates of construction of the current improvements, the transformers are unlikely to contain polychlorinated biphenyls (PCB)-contaminated dielectric fluid.
- Hydraulic Equipment: Five hydraulic elevators for the buildings and two hydraulic elevators for the parking garage were observed. The elevators are serviced on a monthly basis by Otis and Schindler Elevator Companies. A review of service records in the elevator rooms did not reveal any major incidents with the elevator equipment, and the equipment is not anticipated to have an adverse impact on the property.
- Other: A cooling tower, two chillers, and 18 thermal storage tanks were observed in the Ice Plant for HVAC system. In addition, an abandoned paint spray booth was observed outside along the southeastern side of State 16. Lastly, a sump and dewatered groundwater treatment system is operated under an LACDPW permit in the lowest level of the subterranean parking structure adjacent to Building C. It is anticipated that, if the operation of this equipment

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<sup>17</sup> Patrick Dempsey, General Management, The Culver Studios, closing Uniform Hazardous Waste Manifest dated May 16, 2014 e-mailed to ESA PCR on September 14, 2017.

<sup>18</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>19</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

continues to occur in accordance with applicable regulations, this equipment is not anticipated to have an adverse impact on the property.

Other facilities and features often associated with hazardous materials, including dry wells, floor drains, ponds/pits/lagoons, dumps, stockpiled soils, septic systems, settlement tanks, underground pipelines, and wells, were not observed on the Project Site during the field reconnaissance.<sup>20</sup>

### **Asbestos-Containing Materials**

Asbestos-containing materials (ACMs) have historically been present in a wide variety of building materials, although the use of ACMs as building materials was substantially curtailed in 1981 with the adoption of regulatory controls on their use. Given that the majority of the existing on-site buildings were constructed prior to 1981, ACMs may be present in some on-site buildings. During the field reconnaissance conducted for the GRS Phase I ESA, materials which may contain asbestos were observed, including acoustical ceiling tiles, vinyl floor tile, drywall, joint compound, pipe insulation, and fire-proofing materials, as well as roofing felt and coatings. All of these materials were observed to be in good condition. Additional materials that may contain ACMs may also be present. The EMG Phase I ESA recommended the development and implementation of an Asbestos O&M Program for the property.<sup>21</sup>

### **Lead-Based Paints**

The EMG Phase I ESA identified the potential for lead-based paints (LBPs) in some of the buildings on the Project Site, and recommended the development and implementation of a LBP O&M Program for the property.<sup>22</sup>

### **Polychlorinated Biphenyls**

See the discussion concerning the on-site transformers above. As indicated therein, based on the dates of construction of the current improvements, the transformers are unlikely to contain PCB-contaminated dielectric fluid.<sup>23</sup>

### **Mold**

No visual or olfactory evidence of mold was identified in the on-site buildings during the field reconnaissance conducted for the GRS Phase I ESA. Furthermore, The Culver Studios Building Engineer interviewed for the GRS Phase I ESA had no knowledge of past or present areas of mold growth or moisture intrusion at the Project Site or of related tenant complaints of mold.<sup>24</sup>

### ***Hazardous Materials on Adjacent Properties***

Several properties adjacent to the Project Site were briefly inspected during the field reconnaissance conducted for the GRS Phase I ESA to see if there were any conditions which could potentially affect the Project Site. Specifically, adjacent properties inspected included: the parking lot and Culver Hotel (9400 Culver Blvd.) to the northwest; Sony Digital Pictures (9050

<sup>20</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>21</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>22</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>23</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>24</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

W. Washington Blvd.), the office buildings (3958-4060 Ince Blvd.), and the parking lot and single family residences to the northeast; the single family residences to the southeast; Linwood W. How Elementary School (4100 Irving Place), commercial buildings (9426 Washington Blvd. and 3928 Van Buren Place), and the single family residences to the southwest; and the parking structure (9099 W. Washington Blvd.) to the north. No activities or features were observed on these properties that would be expected to have potentially hazards and hazardous materials impacts at the Project Site.<sup>25</sup>

### 4.6.3 Regulatory Framework

The use, storage, and disposal of hazardous materials are subject to federal, State, and local regulations that are applicable to the Project Site as further discussed below.

#### **Federal**

##### ***Hazardous Materials Management***

The Federal Resource Conservation and Recovery Act (RCRA) (42 U.S.C. secs. 6901-6992k) regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. Under RCRA regulations, generators of hazardous waste must register and obtain a hazardous waste activity identification number. RCRA allows individual states to develop their own program for the regulation of hazardous waste as long as it is at least as stringent as RCRA. The State of California has developed the California Hazardous Waste Control Law (HWCL) (Health and Safety Code sec. 25100 et seq. and 22 California Code of Regulations [CCR] sec. 66260.1 et seq.) and the U.S. Environmental Protection Agency (USEPA) has authorized RCRA enforcement to the State of California. Primary authority for the statewide administration and enforcement of HWCL rests with California EPA's (CalEPA) Department of Toxic Substances Control (DTSC).

The Federal Occupational Safety and Health Act of 1970, which is implemented by the Federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. Federal OSHA requirements, as set forth in 29 Code of Federal Regulations (CFR) Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right-to-know. The U.S. Department of Labor has delegated the authority to administer OSHA regulations to the State of California. The California OSHA program (Cal/OSHA) (codified in the CCR, Title 8, or 8 CCR generally and in the Labor Code secs. 6300-6719) is administered and enforced by the Division of Occupational Safety and Health (DOSH). Cal/OSHA is very similar to the Federal OSHA program. Among other provisions, Cal/OSHA requires employers to implement a comprehensive written Injury and Illness Prevention Program (IIPP) for potential workplace hazards, including those associated with hazardous materials.

The Safe Drinking Water and Toxic Enforcement Act (22 CCR sec. 12000 et seq.), Proposition 65, lists chemicals and substances believed to have the potential to cause cancer or deleterious reproductive effects in humans, restricts the discharges of listed chemicals into known drinking water sources at levels above the regulatory levels of concern, requires public notification of any

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<sup>25</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

unauthorized discharge of hazardous waste, and requires that a clear and understandable warning be given prior to a known and intentional exposure to a listed substance.

At the local level, the County of Los Angeles Fire Department Health Hazardous Materials Division administrates hazardous waste inspections for generators and monitors their activities, including handling, storage, transportation, and disposal. Specifically, business and facilities that handles hazardous waste and/or materials at any one time during a year equal to, or greater than a total volume of 55 gallons, a total weight of 500 pounds, or 200 cubic feet of a compressed gas will be constituted as a hazardous materials handler and must report hazardous waste information to the California Environmental Reporting System (CERS). The Health Hazardous Materials Division's Hazardous Waste Program provides a detailed Generator Requirements Summary Chart to give inspectors a list of requirements as they apply to Large Quantity Generators (LQGs), Small Quantity Generators (SQGs), and more. Different documentation required include manifests, biennial reports, personnel training plans, and contingency plans.

### ***Polychlorinated Biphenyls***

PCBs are regulated under the Toxic Substances Control Act (TSCA). These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. TSCA also contains provisions controlling the continued use and disposal of existing PCB-containing equipment. The disposal of PCB wastes is also regulated by TSCA (40 CFR 761), which contains life cycle provisions similar to those in RCRA. Provisions relating to PCBs are contained in the HWCL, which lists PCBs as hazardous waste. In California, CalEPA is the primary administration and enforcement agency.

## **State**

### ***Underground Storage Tanks***

USTs are regulated under Subtitle I of RCRA and its regulations which establish construction standards for new UST installations (those installed after December 22, 1988), as well as standards for upgrading existing USTs and associated piping. Since 1998, all non-conforming tanks were required to be either upgraded or closed.

The State regulates USTs pursuant to Health and Safety Code, Division 20, Chapter 6.7, and CCR Title 23, Division 3, Chapter 16 and Chapter 18. The State's UST program regulations include among others, permitting USTs, installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. Oversight of the statewide UST program is assigned to the State Water Resources Control Board (SWRCB) which has delegated authority to the Regional Water Quality Control Board (RWQCB) and typically on the local level, to the fire department. The Culver City Fire Department (CCFD) administers and enforces Federal and State laws and local ordinances for USTs at the Project Site. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by CCFD inspectors. If a release is documented that affects groundwater, the project file is transferred to the RWQCB for oversight.

### ***Asbestos-Containing Materials***

In California, any facility known to contain ACMs is required to have a written Asbestos Operations and Maintenance (O&M) Program. Removal of ACM must be conducted in accordance with the requirements of South Coast Air Quality Management District (SCAQMD) Rule 1403. Rule 1403 regulations require that the following actions be taken: (1) a survey of the facility prior to issuance of a permit by SCAQMD; (2) notification of SCAQMD prior to construction activity; (3) asbestos removal in accordance with prescribed procedures; (4) placement of collected asbestos in leak-tight containers or wrapping; and (5) proper disposal.

### ***Lead-Based Paint***

Cal/OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 establishes the rules and procedures for conducting demolition and construction activities and establishes exposure limits, exposure monitoring, and respiratory protection for workers exposed to lead.

## **Local**

### ***Hazardous Materials Disclosure Reporting Program***

California Senate Bill 1082, passed in 1993, created the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) which requires the administrative consolidation of six hazardous materials and waste programs under one agency, a Certified Unified Program Agency (CUPA). The City of Culver City is a member of the LA Co CUPA which requires that every business that handles more than 55 gallons, 5-pounds, or 200 cubic feet or more of a hazardous material (as defined by the California Health & Safety Code) at any one time report their inventories of hazardous materials to the Los Angeles County Fire Department and the local city fire department (if applicable). This requirement is also applicable to quantities as low as one pound of materials classified as “extremely hazardous” (as defined by the California Health & Safety Code). Per the City of Culver City’s CUPA/Hazardous Materials Disclosure Reporting Program, business that meet the above hazardous materials thresholds must submit Reporting Forms manifesting the hazardous materials used, and an Emergency Plan for responding to any potential spills of these materials, to the Los Angeles County Fire Department and CCFD to be kept on file by these departments.<sup>26</sup>

## 4.6.4 Environmental Impacts

### **Methodology**

The evaluation of hazardous conditions and materials associated with construction and/or operation of the Project is based on the GRS Phase I ESA prepared for the Project and included as Appendix G of this Draft EIR. The GRS Phase I ESA was prepared in accordance with American Society for Testing and Materials (ASTM) E1527-13, Standard Practice for Environmental Site Assessments. The GRS Phase I ESA includes the results of: a field reconnaissance of the Project Site and adjacent properties conducted on December 3-4, 2013 (limited to accessible areas);

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<sup>26</sup> City of Culver City Fire Department, CUPA/Hazardous Materials Disclosure Reporting Program, Business Reporting Forms and Emergency Plan Packet, July 2005, <https://www.culvercity.org/home/showdocument?id=648>. Accessed February 13, 2017.

interviews regarding current property usage and conditions; a review of the EMG Phase I ESA; a review of historical information (e.g., aerial photographs, Sanborn fire insurance maps, property tax files USGS topographic maps, local street directories, Building Department records, zoning/land use records, prior assessments, DOGGR online mapping system, etc.); and a review of regulatory agency databases and files pertaining to the Project Site and properties within a one-mile radius of the Project Site. The Phase I ESA also includes findings and conclusions regarding the risks posed by existing hazardous materials conditions at the Project Site (e.g., RECs, CRECs, and HRECs), and the hazards and hazardous materials impacts of the Project given these risks and the proposed use of hazardous materials in Project construction and operation.

Additional services conducted by GRS Group for the GRS Phase I ESA, in addition to the standard ASTM E1527-13 GRS Phase I ESA content requirements, include: (1) for existing on-site buildings constructed prior to 1981, GRS Group looked for and observed the condition of building materials commonly found to contain asbestos (e.g., a limited screening survey); and (2) for all existing on-site buildings, GRS Group recorded any instances of mold that was readily observable during the field reconnaissance.

The GRS Phase I ESA indicates that the following two data failures were encountered during completion of the GRS Phase I ESA, neither of which constitutes significant data gaps.<sup>27</sup>

- The property was not undeveloped at the earliest research date. Because no environmentally sensitive operations were identified at the subject or nearby properties at the earliest research date, this data failure was not expected to significantly impact the ability to identify RECs in connection with the Project Site. As a result, this data failure does not constitute a significant data gap.
- Research intervals of more than five years were encountered during the review of historical resources. Because this data failure was not expected to significantly impact the ability to identify RECs in connection with the property, this data failure does not constitute a significant data gap.

See the GRS Phase I ESA for additional discussion of the analysis methodology.

## Thresholds of Significance

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact associated with hazards and hazardous materials would occur if the Project were to:

**HAZ-1:** Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

**HAZ-2:** Create a significant hazard to the public or the environment reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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<sup>27</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

**HAZ-3:** Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

**HAZ-4:** Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.

**HAZ-5:** Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

As discussed in the Initial Study, provided in Appendix A of this Draft EIR, and in Chapter 6, Other CEQA Considerations, the Project Site would have no impact with respect to being located within an airport land use plan area or in the vicinity of a private airstrip; or exposure of people or structures to a significant risk involving wildland fires. Therefore, no further analysis of these topics in this Draft EIR is necessary.

## **Project Characteristics and Project Design Features**

### ***Project Characteristics***

Construction of the Project would involve the temporary use of hazardous substances in the form of fuels, oils, lubricants, solvents, paint, adhesives, surface coatings and other finishing materials, and cleaning agencies. Hazardous materials used during construction would be transported, used, stored and disposed of in accordance with applicable laws, regulations and manufacturer instructions.

Operation of the Project would involve the long-term use of many of the same types of small quantities hazardous materials that are currently used on the Project Site (e.g., ethylene glycol, hydraulic oil, acetone, paints kerosene, diesel, gasoline, propane, janitorial/maintenance supplies, pesticides, etc.) and generate similar hazardous wastes (e.g., off-specification aged organics, ACM waste, aqueous solution with organic residues, inorganic solids, hydrocarbon solvents, latex, paint sludge, slop, aqueous solution, lead-acid batteries, ballasts, etc.). However, it is anticipated that the use of these materials would occur in smaller quantities given modernized facilities, such as the central plant, and the transition to more use of digital media.

Permanent dewatering would likely be required for subterranean levels of the proposed Central and Van Buren Parking Structures and along the underground vehicular connection between the existing on-site subterranean parking structure and Culver Boulevard. Project Design Features (PDFs) are proposed below to address the potential for the subject groundwater to be contaminated.

The use of any hazardous materials during Project construction and operation would comply with applicable regulatory requirements and manufacturer instructions regarding the transport, use, storage and disposal of hazardous materials. Examples are provided below:

- Hazardous Materials Management (Hazardous Materials Handling): Cal/OSHA has requirements, as set forth under CFR Section 1910 and CCR Title 8, for hazardous materials

handling and the implementation by on-site employers of comprehensive written IIPPs for potential hazardous materials workplace hazards. Compliance with these requirements would ensure that hazardous materials are used and handled on the Project Site in compliance with applicable regulations which have been formulated to provide for the safe handling of hazardous materials and to minimize the potential for hazardous materials spills/releases.

- Hazardous Materials Management (Responding to Accidental Releases/Spills): The City of Culver City has a CUPA/Hazardous Materials Disclosure Reporting Program. This program requires projects that use hazardous materials over certain quantity thresholds to submit Reporting Forms manifesting the hazardous materials used to the Los Angeles County Fire Department and CCFD, and to implement an Emergency Plan for responding to any potential releases/spills of these materials. Compliance with the requirements of this program would ensure that any accidental releases/spills of hazardous materials are contained and cleaned up quickly, under certain cases under the auspices of the County Fire Department and CCFD, and that these departments have knowledge of the types and quantities of hazardous materials used and stored on-site so as to be able to properly respond to an emergency on the Project Site.
- ACMs and LBPs: The renovation or demolition of buildings that contain ACMs and/or LBPs is subject to abatement regulations, including SCAQMD Rule 1403, Cal/OSHA, California Department of Public Health, DTSC, and City of Culver City Building Code requirements for the proper identification, remediation, removal and disposal of ACM and LBP, and for worker and public safety during these activities. For example, removal of ACM must be conducted in accordance with the requirements of SCAQMD Rule 1403 which requires that the following measures be taken when ACM is found in buildings to be renovated or demolished: (1) a survey of the facility prior to issuance of a permit by SCAQMD; (2) notification of SCAQMD prior to construction activity; (3) asbestos removal in accordance with prescribed procedures; (4) placement of collected asbestos in leak-tight containers or wrapping; and (5) proper disposal. Furthermore, for the ongoing occupancy of on-site buildings to be retained unaltered under the Project, regulations requiring the implementation of Asbestos and PCB O&M Programs to ensure that any ACM and/or LBP does not become airborne over time and represent a potential health hazard, to include: worker training, occupant notification of the presence of ACMs and/or LBPs, monitoring changes in the conditions of these materials over time, job site controls for maintenance work in the area of these materials, safe work practices, recordkeeping, and worker protection. Compliance with the above would ensure that ACM and LBP of any buildings containing such materials is controlled on-site and does not become airborne and migrate to off-site uses, and that on-site workers who continue to work in buildings to be retained that may contain ACM or LBP are protected.
- Contaminated Dewatered Groundwater: LACDPW requires a discharge permit for any dewatered groundwater that is discharged to the local sewer system. The permit requirements set forth criteria for treatment, sampling/monitoring of water quality of the discharges, the water quality standards to be applied, maintenance requirements for the treatment system, and ongoing annual inspections of the treatment system by the LACDPW. Compliance with these permit requirements would ensure that dewatered groundwater discharges from the Project Site do not exceed applicable water quality standards.

### **Project Design Features**

There are certain practices and features of the Project that would serve to reduce or avoid environmental impacts. The following PDFs would serve to reduce or avoid potential impacts associated with hazards and hazardous materials and have been accounted for in the impact analysis.

**PDF-TRAF-1 (Construction Management Plan):** A Final Construction Management Plan (FCMP) shall be prepared by the Project contractor in consultation with the Project's traffic and/or civil engineer. The FCMP will define the scope and scheduling of construction activities as well as the Applicant's proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, and alternative transportation modes and public transit are minimized to the extent feasible. The FCMP shall be subject to review and approval by Culver City's Building Official, City Engineer and/or Planning Manager, as applicable, prior to issuance of any Project demolition, grading or excavation permit. The FCMP shall also be reviewed and approved by Culver City's Fire and Police Departments. The Culver City 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 FCMP be prepared by a different engineer.

Prior to commencement of construction, the contractor shall advise the Public Works Inspector and Building Inspector (Inspectors) of the construction schedule and shall meet with the Inspectors. Also, biweekly construction management meetings with City Staff and other representatives of surrounding developments if under construction at around the same time as the Project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another. The FCMP shall assess project construction impacts and provide effective strategies to limit the use of the public right of way (streets and sidewalks) during peak traffic periods, and shall be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.

Prior to approval of the FCMP, the applicant shall conduct one (1) Community Meeting pursuant to the notification requirements of the City's Community Meeting guidelines, to discuss and provide the following information to the surrounding community:

- Construction schedule and hours.
- Framework for construction phases.
- Identify traffic diversion plan by phase and activity. (The Traffic Control Plan will be submitted for review and approval by the City for each phase).
- Potential location of construction parking and office trailers.
- Truck hauling routes and material deliveries (i.e. identify the potential routes and restrictions. Discuss the types and number of trucks anticipated and for what construction activity).
- Emergency access plan.
- Demolition plan.
- Staging plan for the concrete pours, material loading and removal.

- Crane location(s).
- Accessible applicant and contractor contacts during construction activity and during off hours (relevant email address and phone numbers).
- Community notification procedures.
- The FCMP shall at a minimum include the following:
  1. The name and telephone number of a contact person who can be reached 24 hours a day regarding construction or construction traffic complaints or emergency situations.
  2. An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the site, and maps showing access to and within the site and to adjacent properties.
  3. Construction plans and procedures to address: community and City notification of key construction activities; temporary construction fencing and maintenance of construction areas within public view; noise and vibration controls; dust management and control; and worker education on required mitigation measures and best practices to reduce disturbances to adjacent and nearby land uses.
  4. Procedures for the training and certification of flag persons.
  5. To the extent known identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and, plans for use of protective devices, warning signs, and staging or queuing areas.
  6. The location of temporary power, portable toilet and trash and materials storage locations.
  7. The timing and duration of all street and/or lane closures 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.
  8. Provisions that staging of construction equipment and materials will be accommodated within the Studio Campus and that construction worker parking will be accommodated on the Studio Campus and at off-site locations to be determined and disclosed, potentially with shuttles to and from the Studio Campus.

**PDF-HAZ-1 (Vector/Pest Control Plan):** A vector/pest control abatement plan prepared by a pest control specialist licensed or certified by the State of California shall be submitted for review and approval by the Planning Manager and the Building Official. Said plan shall outline all steps to be taken prior to the commencement of demolition or construction activity in order to ensure that any and all pests (including, but not limited to, rodents, bees, ants and mosquitoes) that may populate the Property do not relocate to or impact adjoining properties.

**PDF-HAZ-2 (Groundwater Filtration System):** For the permanent dewatering required at the subterranean levels of the proposed Central and Van Buren Parking Structures, and along the proposed underground vehicular connection between the existing on-site subterranean parking structure and Culver Boulevard, carbon filter tank treatment systems will be installed by the Applicant in these structures to treat the dewatered groundwater prior to discharge.

**PDF-WW-1 (Dewatering):** Similar to the existing dewatering operation at the Project Site since 2014, any additional permanent dewatering required under the Project will be treated and used for on-site landscape irrigation rather than being treated and discharged to the local sewer system.

## **Analysis of Project Impacts**

### ***Hazardous Materials Management***

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**Threshold HAZ-1:** The Project would result in a significant impact if it would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

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**Impact Statement HAZ-1: The transport, use, storage and disposal of hazardous materials during Project construction and operation would occur in accordance with applicable regulations and manufacturer instructions which have been formulated to provide for safe use of these materials. Accordingly, impacts would be less than significant.**

Construction of the Project would involve the temporary use of hazardous substances in the form of fuels, oils, lubricants, solvents, paint, adhesives, surface coatings and other finishing materials, and cleaning agencies. All hazardous materials would be transported, used, stored and disposed of in accordance with applicable laws, regulations and manufacturer instructions (e.g., Cal-OSHA CFR Section 1910 and CCR Title 8 requirements, CUPA/Hazardous Materials Disclosure Reporting Program requirements, etc.) which have been formulated to provide for the same transport, use, storage and disposal of these materials, and would not be of a type of quantity that is atypical of similar types of construction in the City. Also, routine construction control measures and best management practices for hazardous materials storage, application, waste disposal, accident prevention, clean-up, etc. would be implemented.<sup>28</sup> Furthermore, emissions from the on-site use of hazardous materials during Project construction would not exceed regulatory thresholds and would be localized to the Project Site. Therefore, construction of the Project would not create a significant hazard to the public or the environment through the routine transport, use, storage or disposal of hazardous materials, and the impact would be less than significant.

Operation of the Project would be expected to involve the long-term on-site use of many of the same types of small quantities hazardous materials that are currently used on the Project Site (e.g., ethylene glycol, hydraulic oil, acetone, paints kerosene, diesel, gasoline, propane,

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<sup>28</sup> City of Culver City, Initial Study and Mitigated Negative Declaration for Culver Studios Comprehensive Plan Amendment 6, November 18, 2015.

janitorial/maintenance supplies, pesticides, etc.) and generate the same types of hazardous wastes (e.g., off-specification aged organics, ACM waste, aqueous solution with organic residues, inorganic solids, hydrocarbon solvents, latex, paint sludge, slop, aqueous solution, lead-acid batteries, ballasts, etc.). However, it is anticipated that the use of these materials would occur in smaller quantities than are currently used at the Studio Campus given the modern digital age and advent of CGI where many sets are increasingly created electronically rather than through physical manufacturing, and the intent of the Project to update the existing Studio Campus and embrace these technologies. Also, with the proposed elimination of the aging central plant/Ice Plant/cooling tower, which currently utilizes the largest number and quantities of hazardous materials at the Project in favor of decentralized state-of-the-art utilities and HVAC systems powered by electricity from the central grid and alternative energy sources, less hazardous materials would be expected to be utilized on-site to power studio uses.

Furthermore: (1) all hazardous materials would be transported, used, stored and disposed of in accordance with applicable laws, regulations and manufacturer instructions (e.g., Cal/OSHA CFR Section 1910 and CCR Title 8 requirements, etc.) which have been formulated to provide for the same transport, use, storage and disposal of these materials; and (2) Project construction and operational haul routes would not utilize neighborhood streets, thereby reducing the potential for the exposure of area residents to any potential accidental hazardous materials releases or spills.

Lastly, in accordance with the City of Culver City CUPA/Hazardous Materials Disclosure Reporting Program, on-site uses under the Project that utilize hazardous materials in quantities above the thresholds set forth by the LA Co CUPA would if applicable continue to be required to both provide manifests describing these hazardous materials to the County of Los Angeles Fire Department and CCFD and to prepare or update emergency response plans for the emergency response/cleanup of any potential future releases of hazardous materials at the Project Site. Furthermore, the Project Site would continue to be subject to annual inspections by the City of Culver City Fire Department to ensure compliance with Federal, State, County and City requirements with regard to hazardous materials transport, use, storage and disposal.<sup>29</sup>

Therefore, based on the above, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, storage or disposal of hazardous materials, and the impact would be less than significant.

### ***Upset and Accident Conditions***

**Threshold HAZ-2:** The Project would result in a significant impact if it would 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.

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<sup>29</sup> City of Culver City, Initial Study and Mitigated Negative Declaration for Culver Studios Comprehensive Plan Amendment 6, November 18, 2015.

**Impact Statement HAZ-2: The Project would not create a significant hazard to the public or environment through conditions involving the release of hazardous materials with compliance with applicable regulations and Project Design Features PDF-HAZ-1, PDF-HAZ-2, and PDF-WW-1. Accordingly, impacts would be less than significant.**

Regarding reasonably foreseeable upset and accident conditions involving the routine transport, use, storage and disposal of hazardous materials during Project construction and operation, see the impact analysis under Impact HAZ-1 above. As indicated therein, the routine transport, use, storage and disposal of hazardous materials during Project construction and operation would not create a significant hazard to the public or the environment (including through reasonably upset and accident conditions) with compliance with existing regulations, manufacturer instructions, and the impact would be less than significant.

As indicated previously, the GRS Phase I ESA determined that, as that the majority of the existing on-site buildings were constructed prior to asbestos being substantially curtailed as a building material in 1981, these building could potentially contain ACM and/or LBPs.<sup>30</sup> Given this, and given that the Project proposes to renovate and/or demolish the majority of the existing on-site buildings, there is the potential that renovation or demolition of buildings containing ACM and/or LBPs could occur under the Project. However, Project renovation and demolition activities would be required to comply with standard applicable ACM and LBP abatement regulations, including: SCAQMD Rule 1403, Cal/OSHA, California Department of Public Health, DTSC, and City of Culver City Building Code requirements for the proper identification, remediation, removal, and disposal of ACM and LBP, and for worker and public safety during these activities. For example, removal of ACM must be conducted in accordance with the requirements of SCAQMD Rule 1403 which requires that the following measures be taken when ACM is found in buildings to be removed or demolished: (1) a survey of the facility prior to issuance of a permit by SCAQMD; (2) notification of SCAQMD prior to construction activity; (3) asbestos removal in accordance with the procedures prescribed under Rule 1403 (e.g., covering construction/removal areas with plastic, tenting of the building if required, use of masks by construction personal, daily vacuuming/cleaning of the construction area, proper cleaning of construction equipment, etc.); (4) placement of collected asbestos in asbestos in leak-tight containers or wrapping; and (5) proper disposal at facilities licensed to accept ACM waste. Furthermore, for the ongoing occupancy of on-site buildings to be retained unaltered under the Project, regulations require the implementation of Asbestos and PCB O&M Programs to ensure that any ACM and/or LBP does not become airborne over time and represent a potential health hazard. Any required O&M Programs would include the following elements: worker training, occupant notification of the presence of ACMs and/or LBPs, monitoring changes in the conditions of these materials over time, job site controls for maintenance work in the area of these materials, safe work practices, recordkeeping, and worker protection. Furthermore, as required by existing regulations, required permits would be obtained for the regulated disposal of hazardous materials, including ACM waste, and such permits have been formulated to avoid potential exposure hazards. Therefore, Project renovation and demolition activities during construction, and the ongoing occupancy of on-site buildings to be retained unaltered under the Project, would

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<sup>30</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

not result in reasonably foreseeable upset and accident conditions involving ACM and/or LBPs, and the impact would be less than significant.

See Impact HAZ-4 below regarding the reasonably foreseeable upset and accident conditions involving the regulatory hazardous materials database listings on the Project Site. As indicated therein, the regulatory hazardous materials database listings on the Project Site would not result in foreseeable upset and accident conditions under the Project.

Concern was expressed by certain members of the community during the approval process for CPA No. 6 regarding vector impacts, specifically the potential for an influx of rodents from the Project Site to the surrounding land uses during the proposed demolition of on-site buildings. Because like CPA No. 6 the Project would include the demolition of some on-site buildings, and to address this community concern, Project Design Feature HAZ-1 would be implemented requiring the implementation of a vector/pest control abatement plan reviewed and approved by the City.

Lastly, as indicated previously, the Project would include the below-grade Central Parking Structure and mixed-grade Van Buren Parking Structure), along with an underground vehicular connection between the existing on-site subterranean parking structure and Culver Boulevard. These proposed subterranean structures would likely require permanent ongoing dewatering of groundwater underlying the Project Site which has been previously documented with concentrations of dichloroethane and trichloroethane above applicable action levels. However, PDF-HAZ-2 requires the installation and operation of a dewatered groundwater treatment system for these improvements similar to the system currently operating in the existing on-site subterranean parking structure, while PDF-WW-1 requires that the treated dewatered groundwater be used as landscape irrigation at the Project Site. This would avoid discharges of groundwater with concentrations of contaminants above applicable action levels.

Based on the above, the Project would not create a significant hazard to the public or environment through conditions involving the release of hazardous materials given compliance with existing regulations and PDF-HAZ-1, PDF-HAZ-2, and PDF-WW-1. Therefore, the impact would be less than significant.

### ***Emit Hazardous Materials Within One-Quarter Mile of a School***

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**Threshold HAZ-3:** The Project would result in a significant impact if it would emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

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**Impact Statement HAZ-3:** While the Project would include the handling of hazardous materials typical of studio operations within one-quarter mile of a school, the handling of such materials already occurs on the Project Site, would be reduced under the Project, and would continue to occur in accordance with applicable regulations, and manufacturer instructions formulated for safe use of these materials. Accordingly, impacts would be less than significant.

There are two schools located within a one-quarter mile radius of the Project Site: Lynwood Howe Elementary School, at 4100 Irving Place, approximately 60 feet west (across Van Buren Place); and Park Century School, at 3939 Landmark Street, approximately 0.25 miles to the northeast. Construction of the proposed Project would occur in accordance with standard regulations addressing potential off-site construction-related hazards associated with demolition of buildings, including those discussed under Impact HAZ-2 above for ACM and/or LCBs (e.g., SCAQMD Rule 1403, etc.), and would obtain all required permits for any hazardous materials emissions as required by existing regulations, which have been formulated to avoid exposure hazards. Also, emissions associated with construction equipment and chemicals used during construction (e.g., fuels, oils, solvents, paints, etc.) would be temporary, limited, and largely confined to the Project Site. Furthermore, according to the refined Health Risk Assessment (HRA) performed in support of the toxic air contaminants (TACs) analysis in Section 4.2, Air Quality, of this Draft EIR, Project construction activities would not generate diesel particulate matter (DPM) or other TAC emissions that would result in significant health effects to nearby sensitive receptors (including to the students at the two schools). Therefore, Project construction activities would not emit hazardous emissions within one-quarter mile of an existing or proposed school.

Operation of the proposed Project would not generate air emissions that are not already generated by the existing studio uses at the Project Site; in fact, it is expected that operational stationary source emissions at the Studio Campus could decrease under the Project with the proposed removal of the central plant/Ice Plant. Also, the Project would include studio, studio support, office and parking uses rather than the types of uses (e.g., industrial, manufacturing, power generation, etc.) most often associated with the emission of hazardous emission during operation. Furthermore, the emission of any hazardous materials covered by existing regulations (e.g., total organic hydrocarbon gases, ROG, CO, NOX, SOX, particulate matter, etc.) above specified thresholds set forth in existing regulations would occur under permit, as required by existing regulations, with the permit requirements formulated to avoid significant impacts on nearby sensitive receptors (such as the schools). Therefore, Project operation would not emit hazardous emissions, or non-hazardous emissions above applicable regulatory thresholds, within one-quarter mile of an existing or proposed school.

### ***Hazardous Materials Database Listings***

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**Threshold HAZ-4:** The Project would result in a significant impact if it would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment.

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**Impact Statement HAZ-4:** The Government Code Section 65962.5 database listings on the Project Site do not represent RECs (only one CREC and one HREC), and thus would not create a significant hazard to the public or the environment. Accordingly, impacts would be less than significant.

As indicated previously, and as indicated in Table 4.6-1, On-Site Hazardous Materials Database Listings, the regulatory agency hazardous materials database search conducted for the GRS Phase I ESA found that the Project Site is listed on 10 hazardous materials databases (in certain cases multiple times).<sup>31</sup> As indicated therein, none of these listings represent a REC which is the presence or likely presence of a hazardous substance or petroleum product on a property under conditions that indicate an existing release, past release, or material threat of a release of such substances into structures, the ground, the groundwater, or the surface water of a property.<sup>32</sup>

Also as indicated in the GRS Phase I ESA and Table 4.6-1, two of the listings (ENF and CHMIRS) represent Controlled RECs (CRECs) which are RECs that, through the implementation of ongoing engineering controls, are in the process of being addressed to the satisfaction of the applicable regulatory agency. These listings, both of which involve the same case, involve ongoing dewatering activities at the Project Site where groundwater contaminated with solvents (dichloroethane and trichloroethane) is first treated and then used for on-site landscape irrigation.<sup>33</sup> According to the EMG Phase I ESA prepared for the Project Site by EMG, historical uses at the Project Site likely did not contribute to the levels of solvents in the underlying groundwater, and no violations are currently on file regarding the treatment system. Furthermore, as required by existing regulations and the existing LACDPW discharge permit, the existing carbon filter tank dewatered groundwater treatment system currently installed in the existing on-site subterranean parking structure shall continue to be maintained to the satisfaction of the regulatory authorities until such authorities say that the treatment system is no longer required. Also, the existing LACDPW discharge permit for the treated dewatered water sets forth specific requirements that ensure that the discharges do not create an exposure hazard.

As further indicated in the GRS Phase I ESA and Table 4.6-1, three of the listings (RCRA-LQG, ENF and LA CO. HMS) represent Historical RECs (HRECs) which are RECs that are no longer of concern (for example, a past release or potential release of a hazardous material that, through testing, turned out not to be of a concern or that has corrected to the satisfaction of the applicable regulatory agency). These listings, all three of which involve the same case, involve initial soils testing around a previously removed on-site UST which showed elevated levels of TRPH, benzene and toluene, only to have later sampling indicating no elevated levels of these contaminants and the LACDPW accordingly issuing a No Further Action Letter.<sup>34</sup>

According to the GRS Phase I ESA, the CREC and HREC identified above have or are in the process of being addressed to the satisfaction of the applicable regulatory agency, and none of the identified on-site database listings (including the CREC and HREC) represent a significant ongoing hazard and hazardous materials impact at the Project Site.<sup>35</sup>

<sup>31</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>32</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>33</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013. Also, Jim Suhr, James Suhr and Associates, phone communication, September 7, 2017.

<sup>34</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>35</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

### ***Impair Implementation of Adopted Emergency Response Plan***

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**Threshold HAZ-5:** The Project would result in a significant impact if it would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

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**Impact Statement HAZ-5: The Project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. Accordingly, impacts would be less than significant.**

The proposed Project would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemicals plant), nor would it close any existing streets or otherwise represent a significant impediment to emergency response and evacuation of the local area. Therefore, the Project's proposed land uses would not require a new or interfere with an adopted emergency response or evacuation plan.

As indicated previously, Ince, Washington and Culver Boulevards are all of secondary arterial status or higher and thus may act as evacuation routes during an emergency. The Project would include temporary construction activities (e.g., temporary lane closures, etc.) and traffic, which could potentially affect these routes. However, the construction activities would not require full street closures and most Project construction activities would be confined to the Project Site. Furthermore, as indicated in Sections 4.11.1, Fire Protection, 4.11.2, Police Protection, and 4.12, Transportation and Traffic in this Draft EIR, Project construction activities would result in less than significant impacts to emergency access, response times and traffic with implementation of PDF-TRAF-1, Construction Management Plan. Because of the short-term nature of the construction activities and with implementation of a Construction Management Plan, the Project's construction activities would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan.

As discussed in Section 4.11, Transportation and Traffic, the Project would result in less than significant operational traffic impacts at the study intersections along Ince Boulevard, but would result in significant unavoidable operational traffic impacts at two study intersections along Washington and two study intersections along Culver Boulevard. Nonetheless, the Project Site is located in an established urban area that is well served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. As discussed in Sections 4.10.2, Fire Protection, and 4.10.2, Police Protection, impacts associated with emergency response times from Project implementation would be less than significant. Under the Project, Washington and Culver Boulevards in the Project Site vicinity would still be available for use as disaster routes in an emergency, even with the addition of Project traffic. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to Project implementation. Furthermore, during an unanticipated disaster event, the City would implement operational plans, programs and protocols to facilitate emergency response and/or evacuation, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate, by the applicable responding City agencies to maximize effectiveness.

For these reasons, the Project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan.

## Cumulative Impacts

As indicated in Chapter 3, Environmental Setting, of this Draft EIR, 56 cumulative projects (e.g., related projects that are anticipated to be developed or have recently been completed) within an approximately one-mile radius of the Project Site, including two (Project Nos. 22 and 24) within a one block or less of the Project Site and six more (Project Nos. 13, 26, 30, 34, 44, and 48) within a three block radius. These projects include residential or standard mixed use development which, like the proposed Project, would not be of a type (e.g., industrial, manufacturing, power generation facilities, etc.) typically associated with the use or emission of large quantities of hazardous materials/waste.

With regard to cumulative impacts related to hazardous materials management, development located within the vicinity of the Project Site would be subject to similar local, regional, State, and Federal regulations and manufacturer instructions pertaining to hazardous materials as the Project (e.g., Cal/OSHA CFR Section 1910 and CCR Title 8, CUPA Hazardous Materials Disclosure Reporting Program, etc.), and like the proposed Project, would not pose a significant hazard to the Project or other existing and planned development in the area with adherence to these regulations and instructions. Furthermore, while hazardous materials would continue to be used at the Project Site under the Project, it is expected that this use could fall with the proposed removal of the central plant/Ice Plant. Therefore, cumulative impacts related to hazardous materials management would be less than significant.

With regard to cumulative impacts related to upset and accident conditions, listed hazardous materials/waste sites, and the emission of hazardous materials (including within one-quarter mile of a school, as indicated previously, the GRS Phase I ESA included a hazardous materials database search that identified one environmental hazardous materials/waste listing within a 1/8-mile radius of the Project Site and 93 such listings within a one-mile radius. However, as concluded in the GRS Phase I ESA, based on distance, topography, assumed groundwater gradient, current regulatory status, and/or the absence of reported releases, none of these listings represent a REC that adversely affects the Project Site, and no regional contamination has been identified within the target search area.<sup>36</sup> Also as indicated previously, a field reconnaissance of the adjacent properties (including but not limited to Fox Hills Buick GMC Pontiac, Harold Auto Supply, and the Chevron Station at 9094 W. Washington Blvd.) conducted for the GRS Phase I ESA resulted in the conclusion that these properties do not contain RECs that adversely affect the Project Site.<sup>37</sup> Similarly, as indicated in the analysis of the hazardous and hazardous materials impacts of the Project above, the Project Site does not contain any RECs (it only contains one CREC and one HREC which the GRS Phase I ESA concludes do not represent release/exposure hazards), and the Project would not emit hazardous materials (e.g., TACs, ACMs, LBP, PCBs, etc.) that would result in significant health effects to sensitive receptors in the Project vicinity,

<sup>36</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

<sup>37</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

with compliance with applicable regulations (e.g., Cal-OSHA CFR Section 1910 and CCR Title 8, CUPA/Hazardous Materials Disclosure Reporting Program, SCAQMD Rule 1403, etc.).<sup>38</sup> Therefore, cumulative impacts related to upset and accident conditions, listed hazardous materials/waste sites, and the emission of hazardous materials (including within one-quarter mile of a school) would be less than significant.

With regards to cumulative impacts related to the impairment of an emergency response or evacuation plan, like the proposed Project, the cumulative projects would be evaluated on a project-by-project basis to determine consistency with applicable plans. For example, the cumulative projects would be required to provide the minimum number of required emergency access roads per applicable regulatory requirements, design traffic improvements to accommodate emergency vehicles, and maintain traffic flow and emergency access during construction. Also, as indicated in the impact analysis for the Project above, the Project would not conflict with an adopted emergency response or evacuation plan. As such, the Project would not contribute considerably to any cumulative impairment of such plans. Therefore, cumulative impacts related to the impairment of an emergency response or evacuation plan would be less than significant.

#### 4.6.5 Mitigation Measures

No mitigation measures are required with adherence to applicable hazards and hazardous materials regulations and implementation of the Project Design Features identified in this section, since impacts would be less than significant.

#### 4.6.6 Level of Significance after Mitigation

Not applicable. Impacts regarding hazards and hazardous materials would be less than significant.

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<sup>38</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

## 4.7 Hydrology and Water Quality

### 4.7.1 Introduction

This section analyzes the Project's potential impacts on hydrology (drainage) and surface water quality. The analysis is based on a Hydrology Report and Preliminary Low Impact Development (LID) Study prepared for the Project by KPFF Consulting Engineers.<sup>1</sup> The Hydrology Report and LID Study are included as Appendices G-1 and G-2, respectively, of this Draft EIR.

### 4.7.2 Environmental Setting

#### Existing Conditions

The Project Site encompasses approximately 14 acres of relatively flat land in downtown Culver City (City). The Project Site is generally bounded by vacated portions of Washington Boulevard to the north, Ince Boulevard to the east, Van Buren Place to the west, and Lucerne Avenue to the south, and is surrounded on all sides by urban development. The Project Site is currently developed with The Culver Studios, a fully operational movie and television studio with office, sound stages, and support uses totaling approximately 347,549 square feet (sf), along with surface and both above- and below-grade structured parking.

Approximately 84 percent of the Project Site is currently covered with impervious surfaces, with most of the balance in landscaping (Front Lawn, etc.) around the Mansion in the northern portion of the Project Site. No streams or rivers are located on or adjacent to the Project Site – the closest such feature is Ballona Creek located approximately 625 feet to the southeast.

#### Hydrology (Drainage)

The Project Site gradually slopes from north to south at elevations ranging from approximately 85 to 101.5 feet above mean sea level (msl). Most of the Project Site drains via sheet flow to a series of localized concrete swales, trench drains, area drains and catch basins. For the majority of the connector pipes servicing the shallow area drains/catch basins, discharge is directed through the curb faces along Ince Boulevard and Van Buren Place. Based on the record drawings<sup>2</sup>, the Project Site contains two main privately-owned storm drain pipes; one starts with 4-inch pipe in the back of Stage 2, 3, and 4 and changes to 6-inch pipe running west to east between these stages and Stage 5, and then again increases to 8-inch pipe as it passes between Building L and the Commissary. The other storm drain starts with a 12-inch pipe at the northwest corner of Stage 15 and 16, wraps around the building and runs with an increased 15-inch pipe toward east on the north side of Building Y. Both storm drain pipes connect to the back of existing catch basins on Ince Boulevard for discharge. The existing storm drains, catch basins, and other drainage infrastructure, are shown in **Figure 4.7-1, Existing Storm Drainage Infrastructure**.

<sup>1</sup> KPFF Consulting Engineers, Hydrology Report - Culver Studios Innovation Plan (CPA No. 7), September, 2017. Also, KPFF Consulting Engineers, Preliminary Low Impact Development (LID) Study – Culver Studios Innovation Plan (CPA No. 7), September, 2017.

<sup>2</sup> Architectural Survey Showing Tract No. 2530, M.B. 35/10, Portions of the Nolan Park Tract, M.B. 32/45 & Lot 2 of Tract No. 1775, M.B. 21-190/191", dated July 14, 2016 by Mollenhauer Group. This is included as Exhibit 1 of the Hydrology Report.

The off-site stormwater conveyance system serving the Project Site, which is owned and operated by the Los Angeles County Flood Control District (LACFCD), includes a 36-inch off-site reinforced concrete pipe (RCP) storm drain in Ince Boulevard which starts at the intersection of Ince Boulevard and Poinsettia Court, 6.5 feet east of center line of Ince Boulevard. The pipe flows towards the south, increasing in size to a 39-inch pipe as it passes Carson Street after which it connects with a 78” Culver City main line that discharges to Ballona Creek.

As indicated in **Table 4.7-1, Existing On-Site Drainage Conditions**, the Project Site is subdivided into seven drainage areas, with impervious surfaces making up between 40 and 100 percent of each drainage area (see the Proposed LID Plan figure later in this section for the boundaries of these drainage areas), with the total impervious area approximately 84 percent of the Project Site. As further indicated in Table 4.7-1, stormwater runoff generated at the Project Site during the design (e.g., 50-year or Q50) storm event is an estimated 5.18 acre feet (AF) over a 24-hour period, or a maximum of 35.53 cubic feet per second (cfs). The Project Site does not receive off-site runoff.

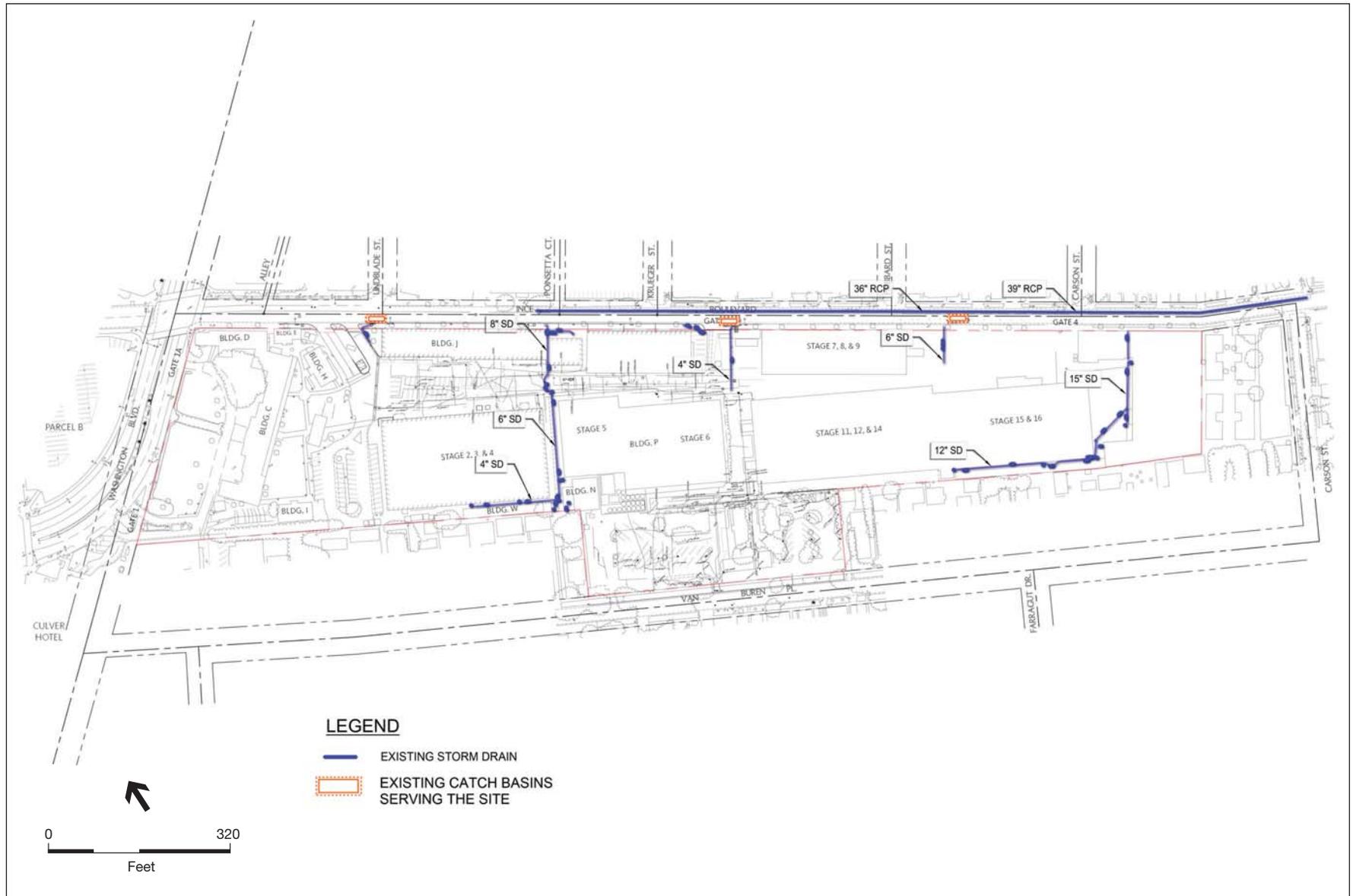
**TABLE 4.7-1  
 EXISTING ON-SITE DRAINAGE CONDITIONS**

<b>Drainage Area (#)</b>	<b>Drainage Area (ac)</b>	<b>Impervious Area (%)</b>	<b>Q50 24-hour Runoff Volume (AF)</b>	<b>Q50 Peak Flow (cfs)</b>
DA1	1.44	40	0.32	3.29
DA2	1.50	60	0.42	3.68
DA3	2.45	100	0.99	6.13
DA4	2.10	100	0.87	5.77
DA5	2.77	100	1.14	6.59
DA6	2.01	100	0.83	6.02
DA7	1.59	90	0.61	4.04
<b>Total</b>	<b>13.86</b>	<b>84</b>	<b>5.18</b>	<b>35.53</b>

ac = acres, Q50 = 50 year runoff, AF = acre feet, cfs = cubic feet per second

SOURCE: KPFF Consulting Engineers, Hydrology Report - Culver Studios Innovation Plan (CPA No. 7), September, 2017.

In addition to the above, a dewatering operation currently exists at the Project Site where contaminated dewatered groundwater collected from the lowest level of the subterranean parking structure adjacent to Building C is treated and then used for on-site landscape irrigation. As this dewatering operation does not discharge to the stormwater drainage system, and as any future such operations would similarly not discharge to the stormwater drainage system, this issue is not addressed further in this section. See Sections 4.6, Hazards and Hazardous Materials, of this Draft EIR for further discussion and analysis of this issue.



SOURCE: KPFF Consulting Engineers, Hydrology Report – The Culver Studios, August 23, 2017

The Culver Studios Innovation Plan

**Figure 4.7-1**  
Existing Storm Drainage Infrastructure

### **Surface Water Quality**

In general, urban stormwater runoff occurs following precipitation events, especially during the early phases of a precipitation event called first-flush, with the volume of runoff flowing into the drainage system depending on the intensity and duration of the rain event. Contaminants that may be found in stormwater from developed areas include sediments, trash, bacteria, metals, nutrients, organics and pesticides. The source of contaminants includes surface areas where precipitation falls, as well as the air through which it falls. Contaminants on surfaces such as roads, maintenance areas, parking lots, and buildings, which are usually contained in dry weather conditions, may be carried by rainfall runoff into drainage systems. Culver City typically installs catch basins with screens to capture debris before entering the storm drain system. In addition, the City conducts routine street cleaning operations, as well as periodic cleaning and maintenance of catch basins, to reduce stormwater pollution within the City.

The Project Site drains indirectly to Ballona Creek and then Santa Monica Bay near the boat-channel entrance to Marina del Rey at Dockweiler Beach. Since this part of Ballona Creek is within the reach of the tidal waters, it is considered the Ballona Creek Estuary even though it is concrete-lined. Constituents of concern listed for the Ballona Creek Estuary under Section 303(d) of the California Clean Water Act include coliform bacteria, cadmium, chlordane, copper, lead, zinc, silver, DDT, bacteria, PAHs, PCBs, and toxicity, with Total Maximum Daily Loads (TMDLs) identified for trash, metals, toxic pollutants, and bacteria.<sup>3</sup> Dockweiler Beach is 303(d)-listed for coliform bacteria and resulting beach closures, while Santa Monica Bay (offshore/nearshore) is 303(d)-listed for chlordane, DDT and debris.<sup>4</sup> Furthermore, the Ballona Creek Estuary has existing designated beneficial uses to both protect aquatic life (e.g., EST, MAR, WLD, RARE, MIGR, SWWM, and SHELL) and human use (NAV, COMM), while Dockweiler Beach and Santa Monica Bay have their own designated beneficial uses.<sup>5</sup>

As indicated previously, the majority of stormwater runoff from the Project Site currently sheet flows to shallow area drains and catch basins which discharge to curb drains in the surrounding streets, with the balance conveyed by the on-site storm drains and laterals to the Ince Boulevard storm drain. Based on a site investigation conducted as part of the LID Study, it appears that non-structural surface water quality Best Management Practices (BMPs) are not currently implemented and structural surface water quality BMPs do not currently exist at the Project Site.<sup>6</sup>

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<sup>3</sup> Los Angeles Regional Water Quality Control Board, 2016 Clean Water Act Sections 305(b) and 303(d) Integrated Report for the Los Angeles Region, February 2017, [http://www.swrcb.ca.gov/losangeles/water\\_issues/programs/303d/2016/2016\\_303d.shtml](http://www.swrcb.ca.gov/losangeles/water_issues/programs/303d/2016/2016_303d.shtml). Accessed August 23, 2017.

<sup>4</sup> Ibid.

<sup>5</sup> Los Angeles Regional Water Quality Control Board, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, September 11, 2014, [http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/basin\\_plan/basin\\_plan\\_documentation.shtml](http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.shtml). Accessed August 23, 2017.

<sup>6</sup> Judith Keith, KPFF, e-mailed correspondence, August 23, 2017.

### 4.7.3 Regulatory Framework

This section provides a summary of the federal, State, regional, and local hydrology (drainage) and water quality policies and requirements applicable to the Project Site.

#### ***Federal***

##### **Federal Clean Water Act (33 USC §1251, et seq.)**

The primary goals of the Clean Water Act (CWA) are to restore and maintain the chemical, physical, and biological integrity of the nation's waters and to make all surface waters fishable and swimmable. The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the National Pollutant Discharge Elimination System (NPDES), effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint-source discharge programs, and wetlands protection. The United States Environmental Protection Agency (USEPA) has delegated the responsibility for administration of portions of the CWA to state and regional agencies.

NPDES permitting is broken up into two Phases: I and II. Phase I requires medium and large cities, or certain counties with populations of 100,000 or more to obtain NPDES permit coverage for their storm water discharges. Phase II requires regulated small Municipal Separate Storm Sewer Systems (MS4s) in urbanized areas, as well as small MS4s outside the urbanized areas that are designated by the permitting authority, to obtain NPDES permit coverage for their storm water discharges. Polluted storm water run-off is commonly transported through MS4s. This run-off is often untreated and discharged into local water bodies.

#### ***State***

##### **California Porter-Cologne Act**

The CWA places the primary responsibility for the control of surface water pollution and for planning the development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs and allows the EPA to withdraw control from states with inadequate implementation mechanisms.

California's primary statute governing water quality and water pollution issues is the Porter-Cologne Water Quality Control Act (Water Code §§ 13000, et seq.). This act grants the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) authority and responsibility to adopt plans and policies, to regulate discharges, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product. Each RWQCB must formulate and adopt a water quality control plan for its region that conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its state water policy. The Porter-Cologne Act also provides that a RWQCB may include within its regional plan water discharge prohibitions applicable to particular conditions, areas, or types of waste.

NPDES requirements are divided into two parts: construction and post-construction or operational. Construction permitting is administered by the SWRCB, while operational permitting is administered by the RWQCB.

### **Construction NPDES Permit**

Development projects typically result in the disturbance of soil that requires compliance with the NPDES General Permit, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction Activities (Order No. 2009-0009-DWQ, NPDES Permit No. CAS000002). This Statewide General Construction permit regulates discharges from construction sites that disturb one or more acres of soil. By law, all storm water discharges associated with construction activity where clearing, grading, and excavation results in soil disturbance of at least one acre of total land area must comply with the provisions of this NPDES Permit, and develop and implement an effective Storm Water Pollution Prevention Plan (SWPPP).

SWPPPs are required to contain a site map(s) which show the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. SWPPPs are also required to identify Best Management Practices (BMPs) the discharger will use to protect storm water runoff and the placement of those BMPs. Additionally, SWPPPs must contain a visual monitoring program; a chemical monitoring program for “non-visible” pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment.

A project applicant must submit a Notice of Intent (NOI) to the SWRCB to be covered by the NPDES General Permit, and prepare a SWPPP before beginning construction. Implementation of the plan starts with the commencement of construction and continues through the completion of project construction. Upon completion of construction, the applicant must submit a Notice of Termination (NOT) to the SWRCB to indicate that construction has been completed.

### ***Regional***

#### **Operations NPDES Permit**

The SWRCB oversees the nine RWQCBs in the state of California. Culver City is within the jurisdiction of the Los Angeles RWQCB (LARWQCB).

The Municipal Storm Water Permitting Program regulates storm water discharges from municipal separate storm sewer (drain) systems (MS4s). Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The MS4 permits require the discharger to develop and implement a Storm Water Management Plan/Program with the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP). The management programs specify what BMPs will be used to address certain program areas. The program areas include public education and outreach; illicit discharge detection and elimination; construction and post-construction; and good housekeeping for municipal operations.

In order to address the requirements of the Clean Water Act, the LARWQCB issued Order No. R4-2012-0175 (NPDES Permit No. CAS004001, Waste Discharge Requirements for Municipal

Separate Storm Sewer System [MS4] Discharges Within the Coastal Watersheds of Los Angeles County [MS4]) to the LACFCD, the County of Los Angeles, and the 84 incorporated cities (including Culver City) within the coastal watersheds of Los Angeles County (excluding Long Beach). The MS4 Permit Order requires development and implementation of a Planning and Land Development Program for all “New Development” and “Redevelopment” projects subject to the Order. The Program is intended to accomplish the following objectives:

- Lessen the water quality impacts of development by using smart growth practices such as compact development, directing development towards existing communities via infill or redevelopment, and safeguarding of environmentally sensitive areas;
- Minimize the adverse impacts from storm water runoff on the biological integrity of Natural Drainage Systems and the beneficial uses of water bodies in accordance with requirements under CEQA;
- Minimize impervious surfaces in development by minimizing soil compaction during construction, designing projects to minimize the impervious area footprint, and employing LID<sup>7</sup> design principles to mimic predevelopment water balance hydrology through infiltration, evapotranspiration and rainfall harvest and use;
- Maintain existing riparian buffers and enhance riparian buffers when possible;
- Minimize pollutant loadings from impervious surfaces through the use of properly designed, technically appropriate BMPs (including Source Control BMPs such as good housekeeping practices), LID Strategies, and Treatment Control BMPs;
- Properly select, design and maintain LID and Hydromodification Control BMPs to address pollutants that are likely to be generated, reduce changes to pre-development hydrology, assure long-term function, and avoid the breeding of vectors; and
- Prioritize the selection of BMPs to remove storm water pollutants, reduce storm water runoff volume, and beneficially use storm water to support an integrated approach to protecting water quality and managing water resources.

The MS4 Permit Order identifies the types of development subject to Permittee conditioning and approval for the design and implementation of post-construction controls to mitigate storm water pollution before completion of a project. These include, but are not limited to:

- Land-disturbing activity that results in the creation, addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site.
- Where Redevelopment results in an alteration to more than 50 percent of impervious surfaces of a previously existing development, and the existing development was not subject to post-construction storm water quality control requirements, the entire project must be mitigated.

The Project would meet the above size criteria, and is thus subject to Permittee conditioning under the MS4 Permit.

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<sup>7</sup> Low impact development (LID) is an approach to stormwater management that emphasizes the use of small-scale, natural drainage features integrated throughout the City to slow, clean, infiltrate and capture urban runoff and precipitation, thus reducing water pollution, replenishing local aquifers and increasing water reuse.

The NPDES Permit requires that proposed projects include a Standard Urban Storm Water Mitigation Plan (SUSMP), or functional equivalent document, to address potential water quality impacts on-site using LID and that its potential impact on downstream waterbodies (i.e., Hydromodification) is evaluated. BMPs are required in all drainage areas to be developed. Additionally, the NPDES Permit requires BMPs to retain the 0.75-inch, 24-hour rain event, or the 85th percentile, 24-hour storm event, whichever is greater, and achieve applicable water quality-based effluent limitations and/or receiving water limitations established pursuant to TMDLs. The use of bioretention and biofiltration systems are required to meet design specifications and the maximum potential for evapotranspiration from green roofs, and rainfall harvest and use shall be considered when evaluating the potential for onsite detention.

### **Local**

#### **Culver City Municipal Code**

Culver City Municipal Code (CCMC) refers to the LACDPW 2006 Hydrology Manual for storm drain planning and design calculations. The LACDPW requires a storm drain conveyance system to be designed for a 25-year storm event, but that hydrology reports evaluate the 50-year (capital) storm.<sup>8</sup> All drainage improvements in the vicinity of the Proposed Project are subject to review and approval by LACDPW and the Public Works Department of Culver City, as appropriate.

CCMC Section 5.05.035 requires construction activities subject to NPDES requirements to; implement non-structural and/or structural BMPs to reduce sediment, construction waste, trash, and other pollutants from construction activities be reduced to the MEP; covering soil piles between October 1 and April 15 to avoid sedimentation; avoid washing construction vehicles where the runoff can enter the storm drain system; and the implementation of a City-approved SWPPP and Wet Weather Erosion Control Plan for construction activities.

CCMC Section 5.05.010 identifies Culver City as a permittee under the County of Los Angeles' NPDES Permit (Permit Nos. R4-2012-0175 and CAS004001, MS4 Permit) and subject to the discharge requirements of this permit. This section also authorizes the City to adopt BMP requirements for new development and redevelopment (such as those below) to help the City comply with the discharge requirements.

CCMC Section 5.05.030 requires owners and occupants of property in the City to implement non-structural and/or structural BMPs to prevent or reduce the discharge of operational pollutants to the municipal storm drain system to the maximum extent practicable, such as: minimizing washing down of paved areas and runoff from irrigation to the extent practicable; sweeping and collecting debris from paved areas; conducting vehicle maintenance in protected areas that avoid the discharge of associated pollutions to the storm drain system; periodic sweeping of parking lots with more than 25 parking spaces that are subject to stormwater runoff; and application of measures in areas where fuels, chemicals, animal waste, garbage, batteries, or other materials are used, stored or disposed of to avoid adverse impacts on water quality.

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<sup>8</sup> KPFF Consulting Engineers, Hydrology Report - Culver Studios Innovation Plan (CPA No. 7), September, 2017. Also, KPFF Consulting Engineers, Preliminary Low Impact Development (LID) Study – Culver Studios Innovation Plan (CPA No. 7), September, 2017. Also, Judith Keith, KPFF, e-mailed correspondence, August 23, 2017.

CCMC Section 5.05.040 requires the implementation of LID strategies and SUSMP outlining pollution prevention control requirements during operation for projects meeting specified size and/or redevelopment criteria to mimic predevelopment hydrology. LID strategies include infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use to retain stormwater runoff on-site for the Stormwater Quality Design Volume (SWQDV) defined as the 85 percentile 24-hour runoff event from the Los Angeles County 85<sup>th</sup> percentile precipitation isohyetal map. SUSMP stormwater pollution control strategies include but may not be limited to: minimizing impervious surface area; conserving natural areas, providing storm drain system stenciling and signage, periodic street and parking lot sweeping, minimizing runoff during irrigation, avoiding motor vehicle washing where the runoff can enter the storm drain system, and installation of grease/oil clarifiers.

## 4.7.4 Environmental Impacts

### **Methodology**

The analysis in this section addresses potential Project impacts on hydrology (drainage) and surface water quality. The analysis is based on the Hydrology Report and LID Study prepared for the Project by KPFF and included as Appendices G-1 and G-2, respectively, of this Draft EIR.

### ***Hydrology (Drainage)***

The analysis of hydrology (drainage) impacts is based on the information and calculations in the Hydrology Report, and includes a calculation of pre-project and post-project runoff rates during the design (e.g., 50-year or Q50) storm event. The procedures, criteria, and standards set forth in LACDPW's 2006 Hydrology Manual were utilized to calculate the runoff rates. The Los Angeles County HydroCalc software was used to compute the peak runoff at pre-determined design points based on the existing and proposed land uses, topographic features, proposed grading, and average slopes and runoff coefficients. In the process of calculating proposed conditions, the lengths of each drainage flow distance was set to theoretical values; therefore, the time of concentration was calculated to be maximum value of 30 minutes, in which the peak flow rate of every subdivided drainage area was reduced. As the Project Site does not receive off-site runoff, off-site runoff was not included in the runoff calculations.

### ***Surface Water Quality***

The analysis of surface water quality impacts is based on the information and calculations in the LID Study. The analysis: (1) characterizing the types of pollutants and/or effects on water quality likely to be associated with construction and operation of the Project; (2) identifies the Project Design Features (PDFs) proposed to address the quality of stormwater runoff from the Project Site under the Project; and (3) determines whether the proposed PDFs would comply with existing regulations which have been formulated to avoid significant surface water quality impacts associated with new development. The sizing of the proposed on-site treatment areas (described further below) was determined in the LID Study by estimating the SWQDV associated with the Project, and sizing the proposed treatment areas to accommodate this SWQDV.

## Thresholds of Significance

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact associated with hydrology would occur if the Project were to:

### ***Hydrology (Drainage)***

**H/WQ-1:** Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff, in a manner that would result in flooding on- or off-site.

**H/WQ-2:** Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems.

### ***Surface Water Quality***

**H/WQ-3:** Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.

**H/WQ-4:** Violate any water quality standards or waste discharge requirements.

**H/WQ-5:** Create or contribute runoff water which would provide substantial additional sources of polluted runoff.

**H/WQ-6:** Otherwise substantially degrade water quality.

As discussed in the Initial Study, provided in Appendix A of this Draft EIR, and in Chapter 6, Other CEQA Considerations, the Project would have no impact or less than significant impacts with respect to the depletion of groundwater or interference with groundwater recharge, the placement of housing within an area delineated as a flood hazard, the placement of structures within a flood hazard area, the exposure to people or structure to flood hazards resulting from levee or dam failure, and placement of people or structures in areas subject to inundation by seiche, tsunami, or mudflow. Therefore, these issues are not evaluated further in this section.

## Project Characteristics and Project Design Features

### ***Project Characteristics***

The Project would include the demolition of the majority of the existing on-site buildings, a net increase in studio (e.g., office, stage, and support) uses of approximately 413,127 sf, and new above- and below-grade parking structures. To accommodate the subterranean levels, the Project would excavate the Project Site to a depth of approximately 45 feet below the ground surface (bgs), resulting in the excavation of approximately 432,912 cubic yards (CY) of soil material, all of which would be exported off-site. Approximately two-thirds of the approximately 14-acre Project Site would be disturbed during construction.

Proposed drainage infrastructure improvements would be restricted to the Project Site, except for the development of several new laterals connecting the on-site stormwater collection system to the off-site stormwater conveyance system (e.g., the 36 to 39-inch RCP storm drain in Ince Boulevard). On-site drainage infrastructure improvements would include the development of a network of new on-site storm drains constructed to City standards, and possibly the abandonment of one or more existing on-site storm drains in accordance with City requirements.

### ***Project Design Features***

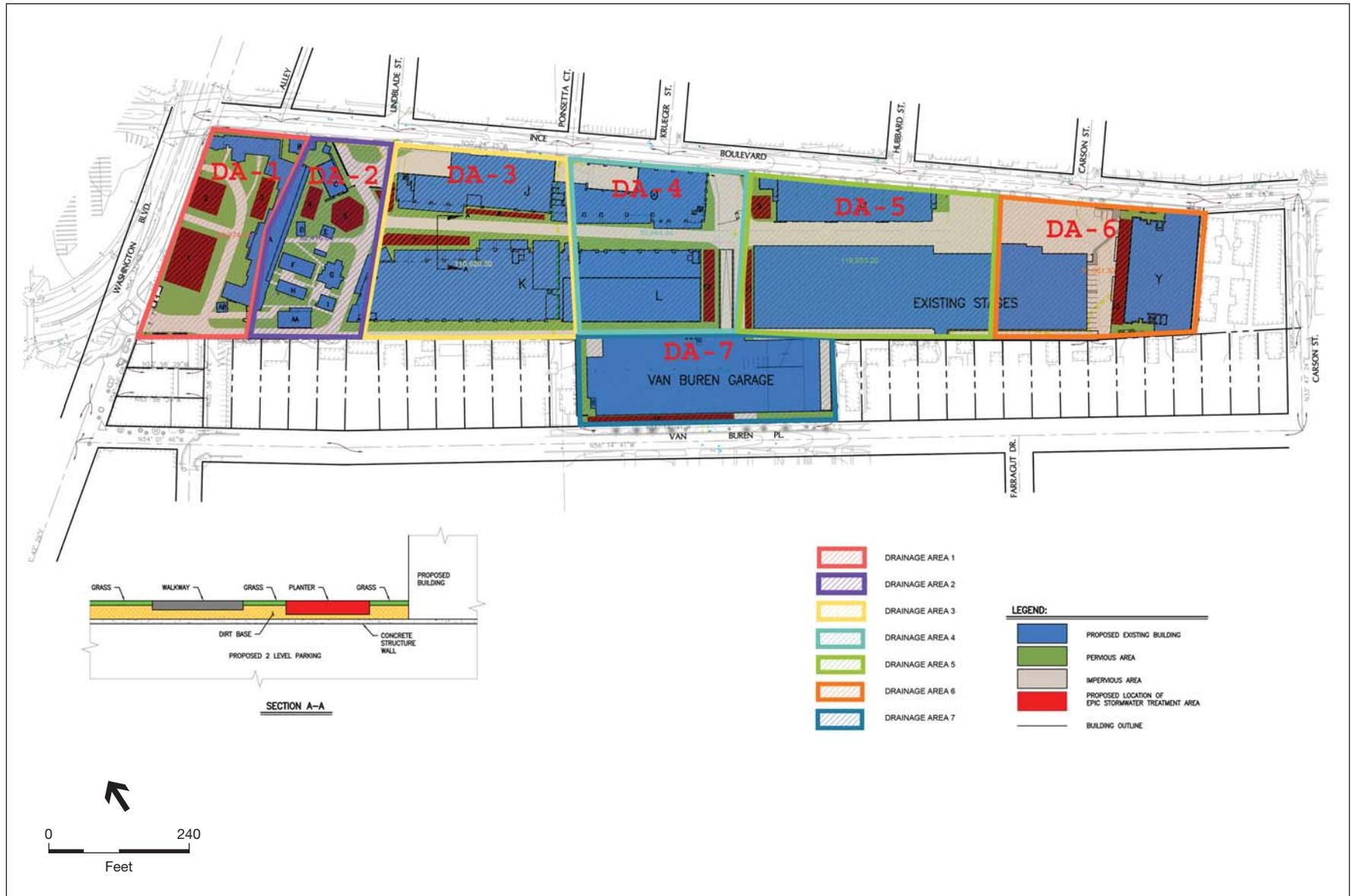
There are certain practices and features of the Project that would serve to reduce or avoid environmental impacts. The following PDFs would serve to reduce or avoid potential impacts associated with hydrology (drainage) and surface water quality, and have been accounted for in the impact analysis:

**PDF-H/WQ-1 (Structural BMPs):** The following structural BMPs would be implemented during Project operation:

- 13 Environmental Passive Integrated Chamber (EPIC) stormwater treatment areas of 18-inches in depth will be developed on the Project Site totaling 24,200 sf (approximately 0.56 acres) to retain the SWQDv (37,600 cf) through capture and reuse.<sup>9</sup> Pipes will channel rainwater collected from roof and area drains to the treatment areas, which will be planted with native vegetation to remove the collected rainwater over time through uptake and transpiration. Flow entering the treatment areas in excess of the SWQDv will be discharged directly to the off-site storm drain system via overflow valves. The sizes and locations of the proposed treatment areas are identified in **Figure 4.7-2, Preliminary LID Plan**.
- Trash enclosure areas will have floor drains that connect to the sewer system rather than the storm drain system.
- On-site drains, catch basins and stormwater treatment areas will be stenciled to indicate that no substance other than stormwater is to be collected by the storm drain system.

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<sup>9</sup> Infiltration was deemed to be infeasible given both the relatively high groundwater and the existing and proposed on-site subterranean parking structures which would substantially hinder (e.g., act as a barrier to) infiltration.



SOURCE: KPFF Consulting Engineers, Hydrology Report – The Culver Studios, August 23, 2017

The Culver Studios Innovation Plan

**Figure 4.7-2**  
Preliminary LID Plan

**PDF-H/WQ-2 (Non-Structural BMPs):** The following non-structural BMPs will be implemented during Project operation:

Open Paved Areas and Planter Areas:

- Maintenance records will be kept of, regular visual inspections/sweeping/removal of debris will be conducted for, and regulator disposal and replacement of the absorbent materials will be conducted in, the stormwater treatment areas.
- Regular sweeping of all open hardscape areas, at a minimum, on a weekly basis in order to prevent dispersal of pollutants that may collect on those surfaces.
- Regular pruning of the trees and shrubs in the planter areas to avoid formation of dried leaves and twigs, which are normally blown by the wind during windy days. These dried leaves are likely to clog the surface inlets of the drainage system when rain comes, which would result to flooding of the surrounding area due to reduced flow capacities of the inlets.
- Trash and recycling containers will be used such that, if they are to be located outside or apart from the principal structure, are fully enclosed and watertight in order to prevent contact of stormwater with waste matter, which can be a potential source of bacteria and other pollutants in runoff. These containers will be emptied and the wastes disposed of properly on a regular basis.

Education and Training:

- The Operation and Management Manual will include education/training standards to ensure training of studio staff as to proper maintenance of on-site BMPs. Training will include information on proper methods of handling and disposal of wastes.
- Monitoring and Maintenance:
- All BMPs will be operated, monitored, and maintained for the life of the Project. At a minimum, all structural BMPs will be inspected, cleaned-out, and where necessary, repaired, at the following minimum frequencies: 1) prior to October 15th each year; 2) during each month between October 15th and April 15th of each year and, 3) at least twice during the dry season (between April 16 and October 14 of every year).
- Debris and other water pollutants removed from structural BMPs during cleanout will be contained and disposed of in a proper manner.
- The drainage system and BMPs will be maintained according to manufacturer's specification to ensure maximum pollutant removal efficiencies.

## Analysis of Project Impacts

### *Hydrology (Drainage)*

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**Threshold H/WQ-1:** The Project would result in a significant impact if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff, in a manner that would result in flooding on- or off-site.

**Threshold H/WQ-2:** The Project would result in a significant impact if it would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems.

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### **Construction**

**Impact Statement H/WQ-1: Project construction activities would not change the course of a stream or river, or increase the rate or amount of surface runoff from the Project Site, in a manner that could lead to flooding. Furthermore, while Project construction activities could temporarily alter the existing drainage pattern of the Project Site, grading activities would be subject to NPDES, SWPPP and City grading permit requirements which require that stormwater runoff be controlled and routed to avoid flooding. Therefore, Project construction-related hydrology (drainage) impacts would be less than significant.**

No streams or rivers bisect the Project Site. Therefore, Project construction activities would not substantially alter the course of a stream or river that could result in flooding.

Project construction activities would involve Project Site preparation activities, including excavation and grading, the installation of subsurface utility lines, and the development of footings, foundations, and other hardscape. These activities could temporarily affect the amount of existing pervious and impervious surfaces at the Project Site and the amount of stormwater being discharged from the Project Site. However, given that Project construction activities would temporarily decrease rather than increase impervious surfaces at the Project Site due to the removal of buildings and other pervious surfaces before new such uses are constructed, it is anticipated that on-site infiltration of rainwater would temporarily increase during construction, thereby temporarily reducing the amount of stormwater runoff currently being discharged from the Project Site. Therefore, Project construction activities would not be expected to result in exceedance of the capacity of the on- or off-site storm drain system or associated on- or off-site flooding.

Project construction activities could temporarily alter the existing drainage pattern at the Project Site. However, these Project activities would be subject to the NPDES General Construction Activity Permit, including the required implementation of a City-approved SWPPP in accordance with CCMC Section 5.05.035 specifying BMPs (e.g., routing of stormwater drainage, sand bag barriers, storm drain inlet protection, etc.) to address both runoff conditions and potential pollution from the construction site. In addition, the Project would be required to comply with the City's Grading Ordinance (Ordinance No. CS-296) requiring the implementation of measures necessary to prevent on- and off-site flooding during construction.

Based on the above, Project construction-related hydrology (drainage) impacts would be less than significant.

## Operation

**Impact Statement H/WQ-2: Project operation would not change the course of a stream or river, or increase the rate or amount of surface runoff from the Project Site in a manner that could lead to flooding. Furthermore, the Project would decrease peak stormwater runoff flows and on-site stormwater infrastructure meeting City standards would be constructed to safely convey stormwater runoff to the off-site storm drain system. Therefore, Project operations-related hydrology (drainage) impacts would be less than significant.**

No streams or rivers bisect the Project Site. Therefore, Project operation would not substantially alter the course of a stream or river in a manner that could result in flooding. The closest stream or river is Ballona Creek located approximately 625 feet to the southeast.

As indicated previously, the Project would include: 1) the demolition of the majority of the existing on-site buildings; 2) a net increase in studio, stage, and support uses of 413,127 sf; 3) new above- and below-grade parking structures; 4) the development of new on-site storm drains and laterals connecting these drains to the 36- to 39-inch RCP storm drain in Ince Boulevard, and possible abandonment of one or more existing on-site storm drains, and 5) under Project Design Feature PDF-H/WQ-1, 13 on-site EPIC stormwater treatment areas totaling approximately 0.56 acres to retain the SWQDv (37,600 cf) through capture (via ground and roof drains) and re-use (via plant transpiration).

**Table 4.7-2, *Pre- and Post-Project 50-Year Frequency Peak Stormwater Runoff Flows***, provides a comparison of the 50-year peak runoff volumes and flows from the Project Site under existing conditions and the proposed Project. As indicated therein, the peak stormwater runoff volume from the Project Site under the Project would increase slightly from 5.18 to 5.32 AF (a 0.14 AF increase) owing to the small increase in on-site impervious surfaces (e.g., from 84 to 90 percent) under the Project. At the same time, the peak flow during the criteria storm event, which is the relevant metric for determining impacts to the local off-site storm drain system, would decrease from an estimated 35.53 to an estimated 17.44cfs (a 18.09 cfs decrease) owing to the proposed on-site stormwater treatment areas which would retain the SWQDv through capture and reuse.

Furthermore, Project improvements to the on-site storm drain system would be sized in accordance with City requirements, and would be reviewed and approved by the City's Public Works Department. Therefore, the Project would not result in exceedance of the capacity of the local storm drain system. This is a conservative analysis because it assumes that the stormwater treatment areas would represent impervious area, due to the existing and proposed underlying subterranean parking structures), even though it is likely that some infiltration and holding capacity (in the soils to line the treatment areas) would be afforded by the treatment areas.

**TABLE 4.7-2  
 PRE- AND POST-PROJECT 50-YEAR FREQUENCY PEAK STORMWATER RUNOFF FLOWS**

Drainage Area (#)	Drainage Area (ac)	Existing Conditions			Project Conditions			Net Increase	
		Impervious Area (%)	Q50 Runoff Volume (AF)	Q50 Peak Flow (cfs)	Impervious Area (%)	Q50 Runoff Volume (AF)	Q50 Peak Flow (cfs)	Q50 Runoff Volume (AF)	Q50 Peak Flow (cfs)
DA1	1.44	40	0.32	3.29	80	0.50	1.76	0.18	(1.53)
DA2	1.50	60	0.42	3.68	80	0.52	1.81	0.10	(1.87)
DA3	2.45	100	0.99	6.13	100	0.99	3.09	0.00	(3.04)
DA4	2.10	100	0.87	5.77	100	0.87	2.71	0.00	(3.06)
DA5	2.77	100	1.14	6.59	90	1.06	3.50	(0.08)	(3.09)
DA6	2.01	100	0.83	6.02	90	0.77	2.56	(0.06)	(3.46)
DA7	1.59	90	0.61	4.04	90	0.61	2.01	0.00	(2.03)
<b>Total</b>	<b>13.86</b>	<b>84</b>	<b>5.18</b>	<b>35.53</b>	<b>90</b>	<b>5.32</b>	<b>17.44</b>	<b>0.14</b>	<b>(18.09)</b>

Acronyms: ac = acres, Q50 = 50 year runoff, AF = acre feet, cfs = cubic feet per second

Source: KPFF Consulting Engineers, Hydrology Report - Culver Studios Innovation Plan (CPA No. 7), September, 2017.

Based on the above, the Project would not substantially alter the existing drainage pattern of the Site or area, or substantially alter the course of a stream or river, in a manner that would result in flooding, and would not substantially increase the rate or amount of surface runoff that would result in flooding or exceedance of existing or planned stormwater drainage infrastructure. Therefore, Project operational hydrology (drainage) impacts would be less than significant.

### **Surface Water Quality**

**Threshold H/WQ-3:** The Project would result in a significant impact if it would substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.

**Threshold H/WQ-4:** The Project would result in a significant impact if it would violate any water quality standards or waste discharge requirements.

**Threshold H/WQ-5:** The Project would result in a significant impact if it would create or contribute runoff water which would provide substantial additional sources of polluted runoff.

**Threshold H/WQ-6:** The Project would result in a significant impact if it would otherwise substantially degrade water quality.

### **Construction**

**Impact Statement H/WQ-3:** The Project would implement a SWPPP outlining BMPs to be implemented during construction to protect the quality of stormwater runoff in accordance with the NPDES General Construction Activity Permit. The Project would also implement a Wet Weather Erosion Control Plan outlining BMPs to be implemented during any grading and/or earthwork during the rainy season to avoid substantial water-born erosion or siltation. Therefore, Project construction-related surface water quality impacts would be less than significant.

Project construction activities would include activities including, but not limited to, clearing, excavation, grading, stockpiling of soils, and the export of soils off-site, with excavation depths

up to approximately 40 feet bgs and the grading and export of approximately 432,912 CY of soil. These activities could potentially result in short-term impacts to stormwater quality during the approximately three-year construction period.

Dischargers whose projects disturb one or more acres of soil are required to obtain coverage under the NPDES General Construction Permit. Because the Project would disturb more than one acre of soil, it would be subject to the requirements of the General Construction Permit. As part of the development's compliance, the Applicant would be required to submit a NOI to the SWRCB providing notification and intent to comply with the General Construction Permit. Before the City issues grading permits, the Applicant would be required to submit a SWPPP to the SWRCB and the City in accordance with CCMC Section 5.05.035 outlining BMPs to be implemented to control common pollutants in stormwater runoff from the construction site (e.g., measures to control spills of fuels and chemicals, limiting construction vehicle washing to areas where the runoff cannot enter the storm drain system, debris remove from drains and curb inlets, periodic street sweeping, etc.), and an Erosion Control Plan with BMPs to control erosion and siltation from the construction site (e.g., routing of stormwater drainage, sand bag barriers, storm drain inlet protection, etc.). The SWPPP would be implemented under the responsibility of a qualified SWPPP practitioner and an Annual Report would be submitted to the SWRCB each year the Project Site, or portions thereof, is not fully stabilized. As required by the General Construction Permit, the Applicant would be required to submit a NOT to the SWRCB at the end of construction indicating that construction has been completed.

Furthermore, if grading and other earthwork were to occur during the raining season (between October 1 and April 15), the Applicant would be required to implement a Wet Weather Erosion Control Plan in accordance with CCMC Section 5.05.035 that outlines BMPs to be implemented to control water-born erosion, siltation and sedimentation (e.g., covering stockpiled soils, additional sandbagging, etc.).

Lastly, the Project would be required to comply with the City's Grading Ordinance (Ordinance No. CS-296) requiring the implementation of common industry-accepted measures to control contaminants and sediment in stormwater runoff from the construction site during grading.

With compliance with the above-specified requirements, which have been formulated to avoid construction-related surface water quality impacts associated with new development, Project construction-related impacts on surface water quality of the applicable receiving waters (e.g., the Ballona Creek Estuary, Dockweiler Beach and Santa Monica Bay) would be less than significant.

## Operation

**Impact Statement H/WQ-4: The Project includes a LID Report which outlines non-structural and structural BMPs to be implemented during Project operation, based on LID and SUSMP (or functional equivalent) design principles, as required by the applicable NPDES MS4 Permit. These BMPs would ensure Project operational stormwater runoff discharges are protective of the TMDLs and beneficial uses of the receiving waters. Therefore, Project operations-related surface water quality impacts would be less than significant.**

Long-term impacts to surface water quality occur when impacts related to urban runoff increase due to Project operations. Increases in urban activity and/or impermeable surfaces can increase pollutants in stormwater runoff discharges and increase impacts to surface water quality. However, such impacts can be avoided with the implementation of non-structural and/or structural BMPs, such as the on-site retention, filtering, and/or reuse of stormwater runoff and implementation of good housekeeping measures to reduce the concentration of contaminants in the runoff.

As indicated previously, the Project would include: demolition of the majority of existing on-site buildings; a net increase in studio, stage, and support uses of 413,127 sf; and new above- and below-grade parking structures. This would slightly increase (by approximately 3 percent) the Q50 24-hour stormwater runoff volume from the Project. This would also incrementally increase human activity and motor vehicle use at the Project Site, and could potentially increase standard urban pollutants (e.g., organics, fuels, oils, rubber, nutrients, metals, pesticides, trash, and debris) in stormwater runoff from the Project Site that would be discharged indirectly to protected receiving waters including the Ballona Creek Estuary, Dockweiler Beach and Santa Monica Bay. This, in turn, could potentially adversely affect the quality of, and potentially interfere with the TMDLs and designated beneficial uses of, these receiving waters.

New development and redevelopment projects subject to MS4 Permittee conditioning (e.g., the implementation of post-construction BMPs to mitigate storm water pollution) include land-disturbing activity that results in the addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site.<sup>10,11</sup> The Project would meet this criteria, and is thus subject to MS4 Permittee conditioning which requires: (1) on-site retention of the SWQDv (e.g., the 0.75-inch, 24-hour rain event, or the 85<sup>th</sup> percentile, 24-hour storm event, whichever is greater), through infiltration and/or bioretention/biofiltration; and (2) minimizing pollutant loadings from impervious surfaces through the use of properly designed, technically appropriate BMPs (including source control BMPs such as good housekeeping practices, LID strategies and treatment control BMPs).

In accordance with MS4 Permit conditioning requirements, 13 on-site EPIC stormwater treatment areas totaling approximately 24,200 sf (0.56 acres) are proposed under PDF-H/WQ-1 to retain the SWQDv (37,600) through capture (via ground and roof drains) and re-use (via plant transpiration). These stormwater treatment areas would retain the SWQDv on-site where no such retention currently occurs, retain the first-flush which typically contains the highest concentration of urban pollutants, and decrease the Q50 peak runoff flows from the Project Site by approximately 49 percent. A summary of relevant information concerning these treatment areas, including their sizes, capacities, and Q50 volumes to be retained/treated, is provided in **Table 4.7-3, Summary of 50-Year Treatment Calculations for Proposed EPIC Stormwater Treatment Areas.**

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<sup>10</sup> As discussed in the previous Regulatory Setting section under Los Angeles Regional Water Quality Control Board, the MS4 Permit Order specifies criteria or thresholds for determining “New Development” and “Redevelopment Project.”

<sup>11</sup> As discussed in the previous Regulatory Setting section under Operational NPDES Permits, MS4 permits are issued to a group of co-permittees encompassing an entire metropolitan area. NPDES Permit No. CAS004001, which covers the Project Site, was issued to the Los Angeles County Flood Control District, County of Los Angeles, and 84 incorporated cities (including the City of El Segundo).

**TABLE 4.7-3**  
**SUMMARY OF 50-YEAR TREATMENT CALCULATIONS FOR PROPOSED EPIC STORMWATER TREATMENT AREAS**

<b>Drainage Area</b>	<b>Impervious Area (ac)</b>	<b>Q50 Volume to be Treated/Retained On-Site</b>	<b>Treatment Area Size (SF)</b>	<b>Treatment Area Volume (CF)</b>
DA1	1.44	2,990	1,500	2,500
DA2	1.50	33,345	1,700	2,800
DA3	2.45	9,152	5,000	7,500
DA4	2.10	7,298	4,000	6,000
DA5	2.77	10,053	5,000	8,400
DA6	2.01	6,948	4,000	5,600
DA7	1.59	5,807	3,000	4,800
<b>Total</b>	<b>13.86</b>	<b>45,593</b>	<b>24,200</b>	<b>37,600</b>

Acronyms: Q50 = 50 year runoff, SF = square feet, CF = acre feet, cfs = cubic feet per second

Source: KPFF Consulting Engineers, LID Study - Culver Studios Innovation Plan (CPA No. 7), September, 2017.

Also in accordance with MS4 Permit conditioning requirements, non-structural BMPs would be implemented during Project operation as outlined in PDF-H/WQ-2. These BMPs include, but are not limited to: regular sweeping of hardscape areas; regular removal of debris from the proposed stormwater treatment areas; use of fully enclosed and watertight trash and recycling containers; education and training of Project Site facilities staff as to the proper maintenance of on-site BMPs; and regular maintenance of structural BMPs. In addition, per PDF-H/WQ-1, trash enclosure areas would have floor drains connecting to the sewer rather than the storm drain system, and on-site drains, catch basins and stormwater treatment areas would be stenciled to indicate that no substance other than stormwater is to be collected by the storm drain system.

Furthermore, in accordance with CCMC Section 5.05.040, a SUSMP and LID Plan would be submitted to the City’s Engineering Division for review and approval prior to approval of Site Improvement Plans, and the non-structural and structural stormwater quality BMPs required by the MS4 Permittee conditioning and CCMC Sections 5.05.030 and 5.05.040 would be enumerated in these plans and implemented during the operational life of the Project.

With compliance with the above-specified requirements and BMPs, which have been formulated to avoid operations-related surface water quality impacts associated with new development, there would be an improvement in the quality of the stormwater runoff from the Project Site being discharged to the applicable receiving water (e.g., Ballona Creek Estuary, Dockweiler Beach, and Santa Monica Bay). Therefore, Project operations-related impacts on surface water quality would be less than significant.

**Cumulative Impacts**

For purposes of hydrology (drainage), cumulative impacts are considered for those related projects that would utilize the same local off-site storm drain (e.g., the Ince Boulevard storm drain) as the Project, while for purposes of surface water quality, cumulative impacts are considered for those related projects that would discharge to the same local receiving water (e.g.,

Ballona Creek Estuary) as the proposed Project. Of the 56 related projects identified in Chapter 3, General Description of Environmental Setting, of this Draft EIR, only Related Projects 22, 24, and 24 appear to meet the hydrology (drainage) criterion, while the majority of the related projects appear to meet the surface water quality criterion.

### ***Hydrology (Drainage)***

Implementation of Related Projects 22, 24, and 54 could result in changes to drainage patterns and the amount of impervious surfaces at the respective development sites of these related projects. Any higher stormwater runoff flows resulting from this cumulative development would contribute stormwater flows to the Ince Boulevard storm drain which could result in hydrology (drainage) impacts such as exceedance of storm drain capacity and downstream flooding. However, as concluded in the Project analysis above, the Project would not result in either substantial changes to existing drainage patterns or a net increase in peak stormwater runoff flows to the local off-site storm drainage system.<sup>12</sup> Therefore, the Project would not contribute to cumulative hydrology (drainage) impacts.

### ***Surface Water Quality***

The related projects would have the potential to affect water quality at their respective sites during the construction phase and/or long-term operation. However, like the Project, the related projects would be subject to NPDES requirements and implement a SWPPP with specific BMPs design to reduce erosion, siltation, and the conveyance of pollutants in urban runoff from their respective development sites during construction. Additionally, the Project and the related projects would be required to adhere to NPDES MS4 Permit requirements and implement a SUSMP and LID Plan with specific pollutant-reducing BMPs during operations. Each related project would also be required to comply with existing water quality standards at the time of development review and include BMPs, as necessary. As these requirements have been formulated to avoid significant surface water quality impacts during construction and operation, and as the Project and the related projects would be required to comply with these requirements, the combined cumulative short- and long-term impacts on surface water quality associated with the Project and the related projects would be less than significant. Furthermore, because the Project would retain the SWQDv on the Project Site, it would not contribute considerably to long-term cumulative surface water quality impacts.

## 4.7.5 Mitigation Measures

The Project would result in less than significant impacts related to hydrology (drainage) and water quality with compliance with applicable regulations and implementation of the proposed project design features. Therefore, no mitigation measures are required

## 4.7.6 Level of Significance After Mitigation

Not applicable. The Project would result in less than significant impacts related to hydrology (drainage) and water quality.

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<sup>12</sup> As indicated previously, the Project would result in a slight include in 24-hour peak runoff volumes, but peak runoff flows (cfs) rather than 24-hour peak runoff volumes (AF) is the relevant metric in determining impacts to the local storm drain system.

## 4.8 Land Use and Planning

### 4.8.1 Introduction

Development on the Project Site is guided by land use policies and regulations set forth in local and regional plans and local zoning regulations. This section provides an analysis of the potential impacts of the Project with regard to consistency with applicable land use plans and regulations. Other topical sections in Chapter 4 (e.g., Sections 4.1, Aesthetics, 4.2, Air Quality, 4.5, Greenhouse Gas Emissions, and 4.11, Transportation and Traffic) also include evaluation of relevant plans and policies.

### 4.8.2 Environmental Setting

#### Existing Conditions

##### ***Project Site***

The Project Site encompasses approximately 14 acres at 9336 Washington Boulevard in downtown Culver City. The Studio is generally bounded by the vacated portion of Washington Boulevard to the north, Ince Boulevard to the east, Van Buren Place to the west, and Lucerne Avenue to the south. Vehicular access is provided in five locations from surrounding streets. Gate 1 (staffed) on Washington Boulevard, Gates 2 and 3 on Ince Boulevard, Gate 4 at the southernmost gate on Ince Boulevard is used for emergency egress, and the Van Buren Emergency Gate fronting Van Buren Place is used only for emergency access. The Project Site is approximately 0.35 miles east of the Metro Culver City Expo Station (Culver City Station).

The Culver Studios is currently a fully operational movie and television studio that produces feature-length films, television shows, short-term shoots, commercials, green screen/motion capture, video games, and music videos. The Studio Campus houses the headquarters of The Culver Studios as well as 14 sound stages, and 19 buildings and a commissary that provides office and support facilities. A plan identifying the existing uses by gate number, building letter, and stage number is provided in **Figure 2-3, Existing Site Conditions**, in Chapter 2, Project Description. **Table 4.8-1, Existing Site Conditions Summary**, presents the existing uses associated with the corresponding building. As indicated, existing facilities total approximately 347,549 gross square feet (GSF).

The Studio Campus is a narrow, wedge-shaped, relatively flat parcel and is generally divided into three distinct subareas: the Mansion Area, which is set back from Washington Boulevard and contains the public face of the studio; the Central Area, which occupies the majority of the Campus and contains the sound stages, offices, and support services/facilities; and the peripheral Western Area, where the property extends to Van Buren Place and is primarily occupied by parking. The existing uses are depicted in **Figure 2-3, Existing Site Conditions**, in Chapter 2, Project Description. Office and support buildings on the Studio Campus range in height from single-story to approximately 56 feet, exclusive of rooftop mechanical and stairway housings and architectural projections, while sound stages are up to 64 feet in height, all with varying setbacks from the property boundaries.

**TABLE 4.8-1  
EXISTING SITE CONDITIONS SUMMARY**

<b>Building/Stage</b>	<b>Building Height<sup>a</sup></b>	<b>Building Setback from Property Line<sup>b</sup></b>	<b>Use</b>	<b>Area (GSF)</b>	<b>Total (GSF)</b>
Building C – Mansion	35'	31'	Office	15,140	15,140
Building D	20'	4'	Office	5,387	5,387
Building E	14'	2'	Office	881	881
Building H	19'	33'	Office	1,806	1,806
Building I	14'	20'	Office	1,641	1,641
Building J	56' <sup>c</sup>	8"	Office	49,500	49,500
Building L	26' <sup>d</sup>	8"	Office	3,343	3,343
Building N <sup>e</sup>	19'	0"	--	--	--
Building O	41'	3'	Office	22,264	
			Support	4,700	26,964
Building S – Bungalow	18'	58'	Office	1,914	1,914
Building T – Bungalow	14'	20'	Office	1,066	1,066
Building U – Bungalow	14'	20'	Office	644	644
Building V – Bungalow	13'	77'	Office	1,605	1,605
Building W	14'	0"	Support	875	875
Building X	11'	1'	Support	541	541
Building Y	29'	0"	Support	26,624	26,624
Building Z	24'	1'	Support	1,943	1,943
Commissary	18' <sup>f</sup>	16'	Support	3,566	3,566
Breezeway/Building P	40'	129'	Office	12,681	
			Support	9,334	22,015
Stages 2/3/4	59'	24'	Stage	32,400	32,400
Stages 5/6	47'	58'	Stage	27,400	
			Support	20,600	48,000
Stages 7/8/9	46'	1'	Stage	16,800	16,800
Stage 10	34'	1'	Stage	3,280	
			Support	442	3,722
Stages 11/12/14	64'	22'	Stage	40,500	40,500
Stages 15/16	57'	21'	Stage	35,100	
			Support	5,572	40,672
<b>Total</b>					<b>347,549</b>

<sup>a</sup> Approximate height to highest point of roofline without parapets. architectural projections/mechanical screening.

<sup>b</sup> Building setback to closest property line adjacent to residential uses.

<sup>c</sup> Highest point of Building J is approximately 64 feet with mechanical screening.

<sup>d</sup> Highest point of Building L is approximately 31 feet with mechanical screening.

<sup>e</sup> Building N is a utility shed/central plant and not included in building area total.

<sup>f</sup> Highest point of Commissary is approximately 22 feet with skylight.

GSF = Gross Square Feet of floor area.

SOURCE: Gensler and ESA PCR, 2017

Currently Buildings J and L have an 8-inch setback, Building O has a 3-foot setback, Buildings N and Y have zero setbacks; Stages 7, 8, 9, and 10 have a 1-foot setback; and the Van Buren Parking Structure has zero setbacks from the property line closest to adjacent residential uses. The Campus contains below-grade, at-grade, and above-grade structured parking, including the below-grade Rear Lawn Parking Structure and the three-level above-grade Van Buren Parking Structure.

### **Surrounding Uses**

As shown on **Figure 4.8-1, *Project Site and Surrounding Land Uses***, adjacent and surrounding land uses to the north include commercial retail uses – such as restaurants and a movie theater, the Culver Hotel and Town Plaza, and surface parking (Parcel B), fronting on vacated Washington Boulevard and Culver Boulevard. Parcel B and a portion of vacated Washington Boulevard have been approved for the Downtown Parcel B and Town Plaza Expansion project.<sup>1</sup> To the east across Ince Boulevard are studio and studio-related facilities, including some affiliated with The Culver Studios, and single-family and low-density multi-family residential uses. To the west, primarily low-density multi-family and single-family residential uses abut the Studio Campus on Van Buren Place, with Linwood E. Howe Elementary School and low-density multi-family and single-family residential uses located across Van Buren Place. To the south, low-density multi-family residential uses abut the Studio Campus and primarily front on Lucerne Avenue.

## 4.8.3 Regulatory Framework

Following is a summary of the applicable local and regional regulatory plans, policies, and ordinances that apply to development at the Project Site. Specific provisions of the documents that pertain to the Project are listed under Project Impacts and evaluated for consistency with the Project.

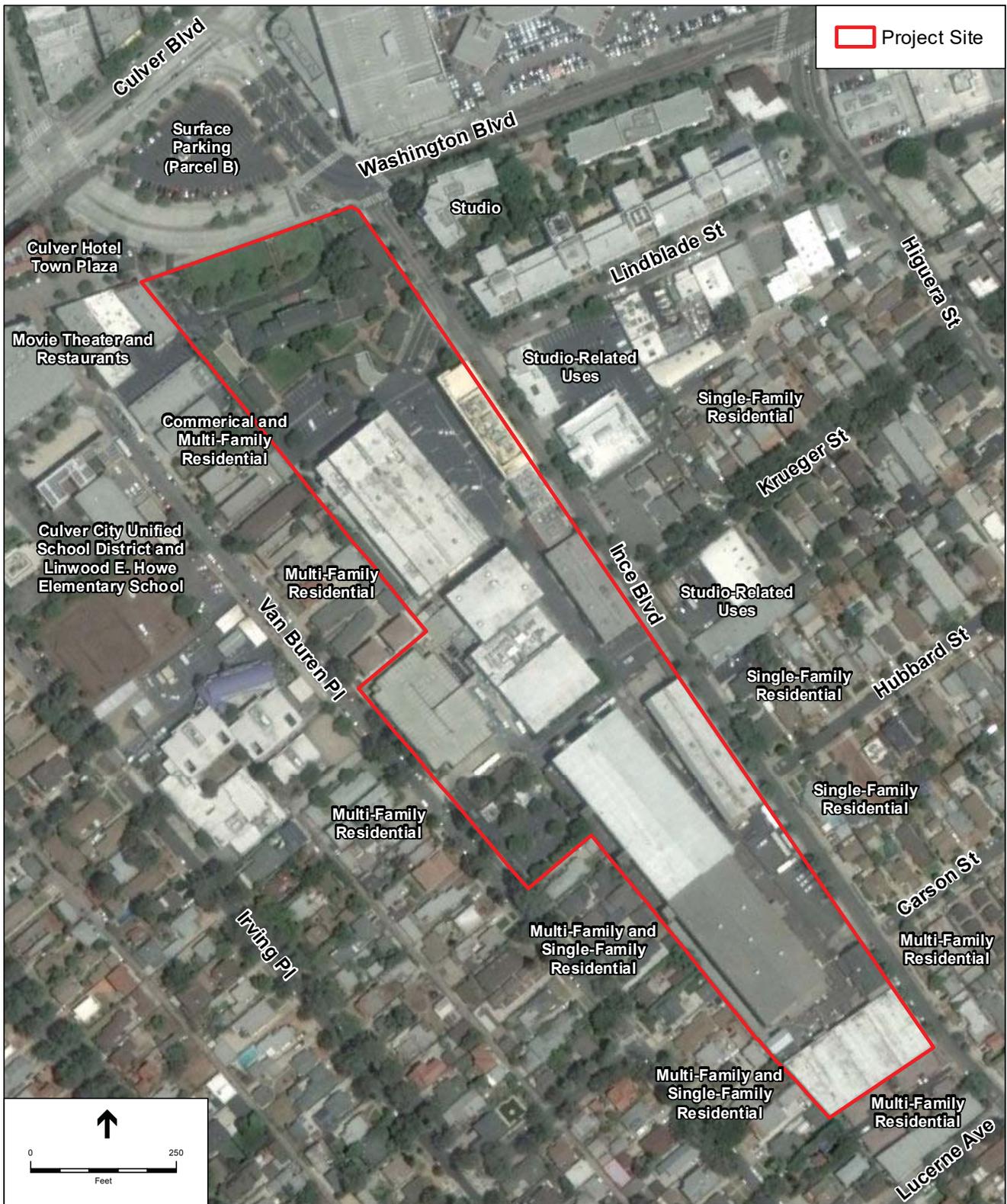
### **Local**

#### ***City of Culver City General Plan***

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. The City's General Plan, adopted in 1996, includes the Land Use Element (amended through 2004), the Circulation Element (amended through 2004), the Housing Element, the Open Space Element (amended through 2004), the Noise Element, Conservation Element, Seismic Safety Element, Public Safety Element, and Recreation Element. The City's General Plan elements and policies relevant to the topic of land use are discussed below. The General Plan elements and policies related to Aesthetics, Noise, Seismic Safety, and Public Safety are addressed in Sections 4.1, Aesthetics, 4.9, Noise, 4.4, Geology and Soils, and 4.10.1, Fire Protection.

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<sup>1</sup> The Downtown Parcel B and Town Plaza Expansion is a mixed-use project that includes 74,600 square feet of office, 21,700 square feet of retail, and 21,700 square feet of restaurant uses with subterranean parking



SOURCE: Google Earth, 7/8/2016 (Aerial)

The Culver Studios Innovation Plan

**Figure 4.8-1**  
Project Site and Surrounding Land Uses

## Land Use Element

As shown on **Figure 4.8-2, General Plan Land Use Element Map**, the General Plan Land Use designation of the Project Site is Studio. Adjacent designations to the north include Downtown and Studio, to the east and south primarily Low Density Two Family, and to the west primarily Low Density Three Family and Downtown. The Studio designation acknowledges the long-standing existence of studio uses within Culver City and is intended to encourage and support studio and media businesses, while ensuring that their future expansion has minimal impacts on adjacent land uses. It recognizes the unique densities, uses and relationships of activities on a studio lot, which are governed through a comprehensive plan.<sup>2</sup>

As presented in Table LU-5 of the Land Use Element, the Land Use designation of Studio has a corresponding Zone of S-1 for office/storage/stage development. As represented in the Land Use Element and shown on **Figure 4.8-3, Neighborhood Zone Map**, the Project Site is located within the Lucerne – Higuera Neighborhood in the eastern portion of the City. As indicated in the Land Use Element, Figure LU-12, the Project Site is located within the Eastern Sub-Area of the City. Issues specific to the Eastern Sub-Area pertain to improving the existing residential neighborhoods through the provision of neighborhood-supporting retail, pedestrian improvements, and parks and creating a distinct neighborhood identity. No specific objectives or policies were identified for or are directly applicable to The Culver Studios.

## Circulation Element

The Circulation Element provides an overview of regulatory policies, transportation agencies, and local conditions; presents a vision for mobility in the Culver City area; presents a Street System Classification; discusses the Culver CityBus system; presents Bikeway Classifications; and provides goals, objectives, and policies to improve the local and regional transportation system. As shown on Figure 3 of the Circulation Element, Washington Boulevard and Culver Boulevard are identified as Primary Arterials.<sup>3</sup> A detailed description of the existing regional and local roadway system, bikeway system, and public transit that serve the Project Site is provided in Section 4.11, Transportation and Traffic. The Bicycle & Pedestrian Master Plan (adopted November 8, 2010), including existing and proposed bicycle and pedestrian facilities, is discussed below.

## Open Space Element

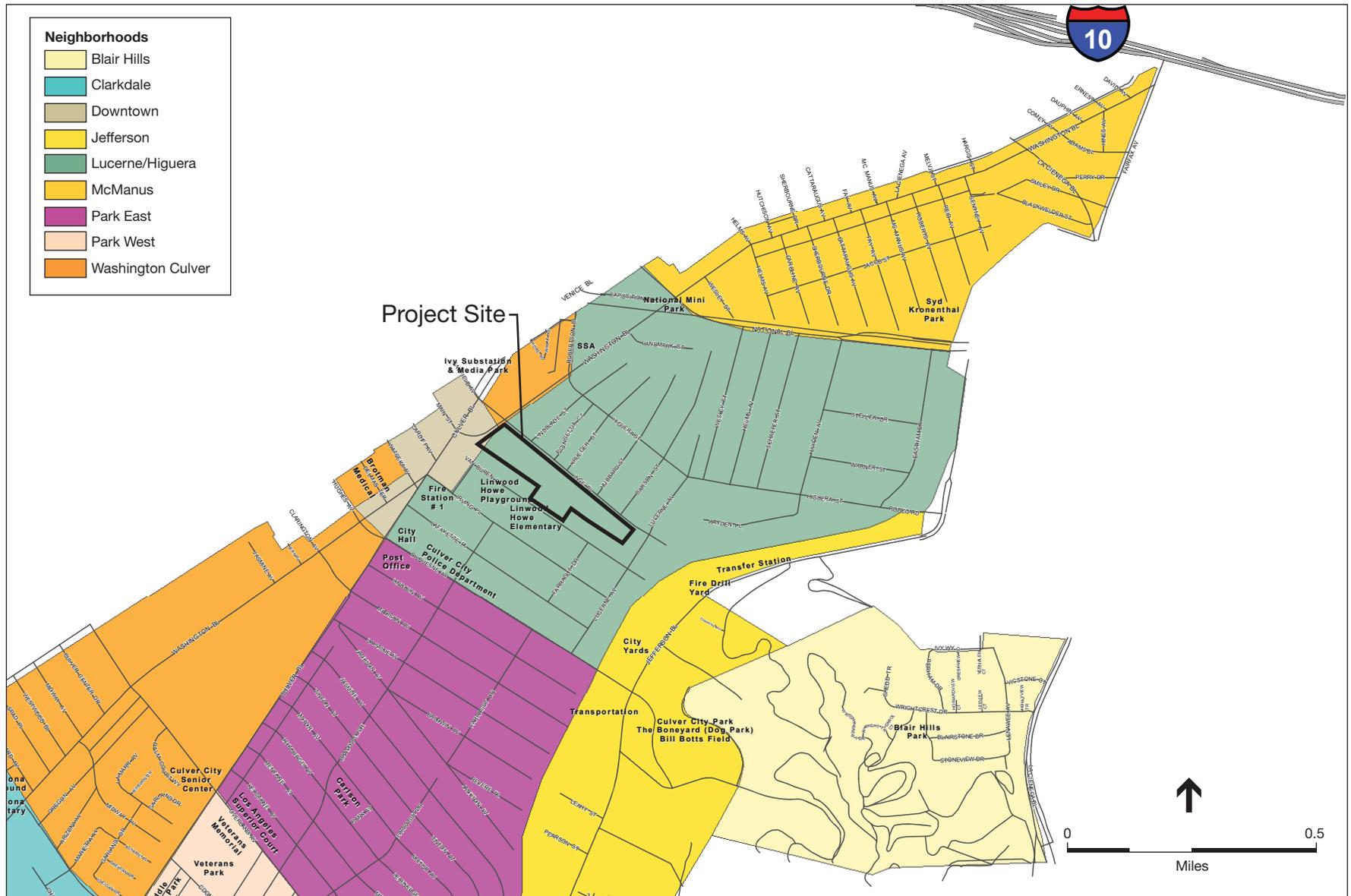
The intent of the Open Space Element is to protect, expand, and enhance, visible and usable open space resources. The Open Space Element identifies existing City resources; provides open space definitions and standards; and presents goals, objectives and open space policies.<sup>4</sup>

<sup>2</sup> City of Culver City General Plan, Land Use Element, adopted 1996, amended through 2004, page LU-22.

<sup>3</sup> City of Culver City General Plan, Circulation Element, adopted 1996, amended through 2004.

<sup>4</sup> City of Culver City General Plan, Open Space Element, adopted 1996, amended through 2004.





SOURCE: Culver City Planning Division, 2007

The Culver Studios Innovation Plan  
**Figure 4.8-3**  
 Neighborhood Zone Map

### ***Culver City Bicycle & Pedestrian Master Plan***

The Culver City Bicycle & Pedestrian Master Plan (BPMP) is a comprehensive plan for bicycling and walking in Culver City that considers all users of the road (cyclists, pedestrians, transit riders, and vehicles) while planning development and transportation projects. The BPMP provides an inventory and evaluation of the City's existing bicycle and pedestrian facilities, identifies opportunities and constraints associated with these facilities, and provides recommendations for the future development of bicycle and pedestrian facilities.<sup>5</sup> The BPMP also includes a stated goal of transforming the City into a place with an extensive bicycle and pedestrian network for travelers of all levels and abilities, and in so doing encourage more people to forgo car trips in favor of alternative forms of transportation. The BPMP identifies specific objectives, policies, and actions directed towards the City in order to achieve this goal.

As presented in the BPMP, the closest existing bicycle facility to the Project Site is the Ballona Creek Class I Bike Path/Multi-Use Path, with access off of Duquesne Avenue.<sup>6</sup> As updated on the City's website, other bicycle facilities near the Project Site include a Class III<sup>7</sup> Bike Route/Shared Lane Markings (sharrows) on Van Buren Place, Higuera Street, and Lucerne Avenue to provide a connection between East Culver City to Downtown Culver City; and Class II Bike Lanes<sup>8</sup> on Duquesne Avenue from Washington Place to Jefferson Boulevard.<sup>9</sup> As identified in the BPMP, in the vicinity of the Project Site Washington Boulevard and Culver Boulevard are proposed Class III Bike Routes and Van Buren Place is designated as a Bicycle Friendly Street.<sup>10</sup> As also shown in the BPMP, a proposed pedestrian corridor is identified along Irving Place/Van Buren Place, Washington Boulevard, and Culver Boulevard.<sup>11</sup>

Appendix 1 includes a Bicycle & Pedestrian Master Plan Design Guide that addresses the design of bicycle and pedestrian facilities. While the majority of these guidelines are directed towards development within the public rights-of-way, the Design Guide does provide guidance for the provision of bicycle parking that is applicable to private development projects as discussed in Section 4.11, Transportation and Traffic.

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- <sup>5</sup> Alta Planning + Design, Culver City Bicycle & Pedestrian Master Plan, adopted by City Council, November 8, 2010, pages 1 and 2.
- <sup>6</sup> Culver City Bicycle & Pedestrian Master Plan, op. cit., Table 3-1, Figure 3-1, and Map 3-1. A Class I Bike Path provides completely separated right-of-way for exclusive use by bicycles and pedestrians with cross-flow minimized.
- <sup>7</sup> A Class III Bike Route provides for shared use on major roadway segments and are designated by Shared Roadway Bicycle Marking (sharrow) or signage only.
- <sup>8</sup> A Class II Bike Lane provides a striped lane (minimum width of 5 feet) for one-way bike travel on a street or highway.
- <sup>9</sup> Biking in Culver City, <http://www.culvercity.org/enjoy/getting-around/biking-in-culver-city>. Accessed February 28, 2017.
- <sup>10</sup> Culver City Bicycle & Pedestrian Master Plan, op. cit., Map 5-1. A Bicycle Friendly Street designation is for predominately residential streets with relatively low traffic volumes and includes Class III Bike Route signage or sharrows, and may include custom signage and traffic calming features.
- <sup>11</sup> Culver City Bicycle & Pedestrian Master Plan, op. cit., Map 5-2.

### ***Culver City Urban Forest Master Plan***

The Culver City Urban Forest Master Plan is a comprehensive long-term management plan that includes designations of tree species to be planted on each street segment when an existing tree must be removed, and best management practices for tree planning, preservation, and maintenance. In addition, the Urban Forest Master Plan includes recommendations for green connections throughout the City to encourage recreation, walking, biking and public transit use. Recommendations are also provided for plant palettes and planting structure, places of priority, designations of trees and plants to assist with wayfinding and placemaking, and action areas and strategies to be implemented by the City in public areas.<sup>12</sup> As indicated in the Urban Forest Master Plan, in the vicinity of the Project Site the areas between portions of Van Buren Place and Irving Place, and Washington Boulevard and Culver Boulevard are designated as proposed pedestrian areas and proposed pedestrian routes, where additional trees and landscaping are recommended to improve and enhance public connections to the Downtown area.<sup>13</sup>

### ***City of Culver City Zoning Code***

The Culver City Zoning Code (Title 17 of the Culver City Municipal Code) carries out the policies of the Culver City General Plan by classifying and regulating the uses of land and structures within the City. As shown on **Figure 4.8-4, Zoning Map**, the zoning designation of the Project Site is S (Studio), which is consistent with the Studio Land Use designation of the General Plan. Adjacent zoning designations include CD (Commercial Downtown) and S to the north, R2 (Residential Two Family) to the east and south, and RMD (Residential Medium Density) and CD to the west.

#### **Section 17.250.015, Studio (S) District Requirements**

As specified in Subsection 17.250.015.A (Uses Permitted) uses permitted within the S Zoning District are:

- Uses customary or incidental to the production or distribution of motion pictures and other forms of audiovisual products, including but not limited to, education and entertainment films, tapes and other reproduction media. Restaurants, support and related retail and sales of alcoholic beverages, pursuant to an “on sale” license issued by the State Department of Alcoholic Beverage Control, are permitted if not accessible to the general public. Telecommunications facilities may be permitted with an Administrative Use Permit or Conditional Use Permit, as provided for in §17.400.110 (Telecommunications Facilities).

As stated in Subsection 17.250.015.B (Comprehensive Plan to Establish Standards):

- All development standards for sites within the S Zoning District, except the height limits established by Subsection 17.250.015.D (Height Limit) below, shall be established by a Comprehensive Plan in compliance with Chapter 17.560 (Comprehensive Plans).

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<sup>12</sup> Culver City Urban Forest Master Plan, 2015.

<sup>13</sup> Culver City Urban Forest Master Plan, 2015, page 61.



As stated in Subsection 17.250.015.C (Temporary Structures)

- Temporary structures constructed as part of a production set shall not be subject to the requirements of this Title; provided that the structures comply with applicable building, fire, and other applicable life safety regulations, and do not interfere with required site improvements, including parking spaces and aisles, and setbacks.

Regarding height limits, Subsection 17.250.015.D states:

- No structure within the S Zoning District shall exceed a height of 56 feet. (This provision is as approved by Initiative Ordinance No. 90-0131½ adopted April 17, 1990, or as may be amended.)

### **Chapter 17.560, Comprehensive Plans**

Pursuant to Subsection 17.560.005 (Purpose), a Comprehensive Plan allows for flexibility in the application of zoning code standards to a proposed development, in order to consider innovation in site planning and other aspects of project design, and more effective design responses to site features, uses on adjoining properties, and other impacts.

As specified in Subsection 17.560.015.B (Comprehensive Plan Requirements), Comprehensive Plans shall include, but not be limited to the following:

1. A site plan, showing building(s), various functional use areas, parking and circulation.
2. A description of development standards, which may include, but not be limited to, building heights, setbacks and parking requirements.
3. Preliminary building plans, including floor plans and exterior elevations.
4. Landscape plans, including a plant palette.
5. Lighting and signage plans.
6. Civil engineering plans, including site grading, public rights-of-way improvements, drainage, trash/recycling areas, and public utility extensions, as necessary.
7. Proposed use and occupancy, construction type, building height and area of each building or structure, and proposed distances between buildings or structures, and setbacks to property lines.
8. Other information or applicable materials as may be deemed necessary by the Director.

As stated in Subsection 17.560.020 (Findings and Decision), a Comprehensive Plan may be approved, provided that the facts submitted and evaluated during the review process support the following findings:

- A. The proposed Comprehensive Plan can be substantially completed within 4 years.
- B. The proposed development is capable of creating an environment of sustained desirability and stability, or adequate assurance will be provided such objective will be attained.
- C. The proposed uses will not be substantially detrimental to present and potential surrounding uses, but will have a beneficial effect.

- D. The streets and thoroughfares serving the development are suitable and adequate to carry anticipated traffic, and the development will not generate traffic that will overload the adjacent street network.
- E. The proposed development is compatible with the surrounding area.
- F. The types and locations of any proposed commercial development can be economically justified.
- G. The Comprehensive Plan is in conformance with the General Plan, or a concurrent General Plan amendment is in process.
- H. Any exception from the standards and requirements of this Title is warranted by the design and amenities incorporated in the Comprehensive Plan, and is desired by the Council.
- I. Existing and proposed utility services are adequate for the proposed uses.
- J. The Comprehensive Plan has complied with all applicable City requirements.

Pursuant to Subsection 17.560.025.A, major changes or alterations to an approved Comprehensive Plan shall be considered by the Commission at a public hearing, which shall make recommendations to the Council. The Council may then approve, conditionally approve, or disapprove the proposed changes or alteration, after a public hearing.

As stated in Subsection 17.560.030 (Conditions of Approval), the Council may approve a Comprehensive Plan in compliance with Subsection 17.560.020 (Findings and Decision), and may impose conditions upon the project, including the City's "Comprehensive Standard Conditions of Approval for Site Plan Review and Other Discretionary Planning and Zoning Applications." Conditions may relate to both on- and off-site improvements that are necessary to mitigate project-related impacts, and to carry out the purpose and requirements of the Comprehensive Plan and all applicable development standards and design guidelines.

### ***Comprehensive Plan Amendment No. 6***

In December 2015, Comprehensive Plan Amendment No. 6 (CPA No. 6) was approved and a Mitigated Negative Declaration adopted by the City of Culver City.

As shown in **Table 4.8-2, *Existing Development and CPA No. 6 Approved Development Program***, CPA No. 6 proposed the demolition of seven buildings and structures encompassing 66,703 square feet of office, stage, and support area. These included existing Buildings L, O, X, Y, and Z; the Commissary Building; and Stage 10; as well as the existing parking structure near Van Buren Place. CPA No. 6 proposed the construction of three new production office buildings totaling 138,997 net new square feet, including a new and expanded Building O and new Buildings R and Y, as well as a new 1,408-space, multi-level parking structure and associated linear, park-like open space on Van Buren Place on the west side of the Studio Campus (the Van Buren Parking Structure).

**TABLE 4.8-2  
EXISTING DEVELOPMENT AND CPA NO. 6 APPROVED DEVELOPMENT PROGRAM**

<b>Building</b>	<b>Office (SF)</b>	<b>Stage (SF)</b>	<b>Support (SF)</b>	<b>Total (SF)</b>
<b>Existing Studio Campus</b>				
	117,872	155,480	74,197	347,549
<b>Existing to Remain</b>				
C – Mansion	15,140	-	-	15,140
D	5,387	-	-	5,387
E	881	-	-	881
H	1,806	-	-	1,806
I	1,641	-	-	1,641
J	49,500			49,500
S – Bungalow	1,914	-	-	1,914
T – Bungalow	1,066	-	-	1,066
U – Bungalow	644	-	-	644
V – Bungalow	1,605	-	-	1,605
W			875	875
Breezeway/Building P	12,681		9,334	22,015
Stages 2/3/4		32,400		32,400
Stages 5/6		27,400	20,600	48,000
Stages 7/8/9		16,800		16,800
Stages 11/12/14	-	40,500	-	40,500
Stages 15/16	-	35,100	5,572	40,672
Subtotal	92,265	152,200	36,381	280,846
<b>Proposed for Demolition</b>				
L	(3,343)	-	-	(3,343)
O	(22,264)	-	(4,700)	(26,964)
X	-	-	(541)	(541)
Y	-	-	(26,624)	(26,624)
Z	-	-	(1,943)	(1,943)
Commissary	-	-	(3,566)	(3,566)
Stage 10	-	(3,280)	(442)	(3,722)
Subtotal	(25,607)	(3,280)	(37,816)	(66,703)

<b>Building</b>	<b>Office (SF)</b>	<b>Stage (SF)</b>	<b>Support (SF)</b>	<b>Total (SF)</b>
<b>Proposed for Construction</b>				
O	90,000	-	-	90,000
Y	84,700	-	-	84,700
R	31,000			31,000
Van Buren Parking Structure	-	-	-	-
Subtotal	205,700	0	0	205,700
Gross SF Total	297,965	152,2000	36,381	486,546
Net New SF Total	180,093	(3,280)	(37,816)	138,997
<b>Parking Supply</b>				
<b>Existing Spaces</b>				
Below Grade – Rear Lawn Parking Structure				419
At Grade and Above Grade				337
Existing Spaces to be Demolished				(301)
<b>Proposed Spaces</b>				
Van Buren Parking Structure				1,408
Building Y				12
Total Spaces at Buildout				1,875
Net New Spaces				1,119

SOURCE: Gensler, November 2015; ESA PCR, March 2017

CPA No. 6 also proposed relocation to an area south of the Mansion of four historically significant bungalows, Buildings S, T, U and V. Relocation is subject to a Relocation and Rehabilitation Plan and approval of a Certificate of Appropriateness to ensure relocation and exterior alterations comply with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards).

Other proposed improvements under CPA No. 6 included relocation of the existing guard shack at Gate 1; realignment of existing Gate 4; upgrades to aging Studio Campus infrastructure including heating/ventilation/air conditioning, electrical, and domestic and fire water systems; and certain off-site improvements such as new curbs, gutters, driveways and access approaches, sidewalks, streetlights, parking meters, and street trees on Ince Boulevard and Van Buren Place. The bungalows were recently relocated under the observation of a qualified historian and are currently in the process of being rehabilitated in conformance with the Standards. None of the other improvements approved under CPA No. 6 have been completed.

CPA No.6 included the following Development Standards:

- All proposed development will adhere to the Culver City Zoning Code, Section 17.250.015 (Studio (S) District Requirements)
  - Office uses generally involve spaces to accommodate producers, writers, and production teams.
  - Stage uses include all types of active entertainment production.
  - Support uses range from utilities, to props/grips/wardrobe, to set construction
- All development shall occur within the property boundary.
- All new development within the Studio District zone shall not exceed a maximum height of 56 feet, except for parapets and mechanical screening.
  - The parapet shall not exceed 5 feet above the top of the roof
  - All mechanical screening shall not exceed 13 feet, 6 inches above the top of the roof

Resolution No. 2015-P008, adopted December 2015, included a number of Conditions of Approval that were imposed on CPA No. 6 for the construction of three new office buildings and a new multi-level parking structure; and a Historic Preservation Program Certificate of Appropriateness for the relocation of four historically designated bungalow buildings. The conditions addressed landscaping and setbacks/step backs, parking, signage, infrastructure, energy use, solid waste and recycling, grading and construction, access and traffic, fire protection, relocation of the historically designated bungalows, and noise. Some of the specific provisions include preparation of a Construction Management Plan, a Construction Traffic Management Plan, a Pedestrian Protection Plan and compliance with the City's Mandatory Green Building Program, Mandatory Solar Photovoltaic Program, and Transportation Demand and Trip Reduction Measures. A copy of Resolution No. 2015-P008 is on file with the City Planning Division. A Subsequent Conformance Review prepared in response to the appeal of the Planning Commission's previous Conformance Review approval on June 8, 2016 identified setback, architectural, lighting, and landscaping requirements for Building Y and the Van Buren Parking Structure, in order to provide additional visual enhancements and minimize potential impacts to adjacent residential uses. These requirements included a 5-foot setback along the southern and western property lines adjacent to Building Y; a 12-foot high perimeter wall at the property line adjacent to Y; a canted roofline on the western façade of Building Y; a stepback of 14 feet, 4 inches from the lower parking levels at the north elevation and 18 feet from the west elevation of the Van Buren Parking Structure; and a 15-foot setback of below-grade parking levels B1 and B2 of the Van Buren Parking Structure along the western property line.

Although the appeal was denied by City Council on July 25, 2017, further modification to Building Y and the Van Buren Parking Structure were incorporated as part of CPA No. 6.

### ***Visioning Study for the Culver City Transit Oriented Development District***

On September 19, 2016 the City released a Request for Proposals (RFP) to initiate the Visioning Study for the Culver City Transit Oriented Development (TOD) District, and on January 23, 2017 a consultant was selected. The Visioning Study for the TOD District will focus on local mobility

and area circulation within the TOD District and abutting residential neighborhoods that generally surround the convergence of Washington Boulevard, National Boulevard, and Robertson Boulevard and includes the Culver City Station. The Project Site is located near the intersections of Washington Boulevard, Robertson Boulevard, and Higuera Street. The purpose of the Study is to build on the strengths of the TOD District, examine area mobility and circulation, and plan for future transit oriented development by establishing a comprehensive and effective program of alternative transit and mobility improvements. However, formal preparation of this Study has not begun.

## **Regional**

### ***Southern California Association of Governments***

The Southern California Association of Governments (SCAG) is the designated regional planning agency for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. SCAG is a joint powers agency with responsibilities pertaining to regional issues. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, land use, sustainability, and economic development.

As part of its planning obligations, SCAG prepares the Regional Comprehensive Plans (RCP), the most recent of which was released on February 9, 2009. The 2008 RCP was prepared by SCAG for use as an advisory document that may be voluntarily used by local jurisdictions when developing local plans and addressing local issues of regional significance. The RCP addresses issues related to future growth and provides a means for assessing the potential impact of individual development projects within a regional context. SCAG recommends local governments consider the RCP's recommendations in the preparation of General Plan updates, municipal code amendments, design guidelines, incentive programs and other actions. The RCP is also closely linked to, and serves as a basis for the preparation of SCAG's Regional Transportation Plan.

On April 7, 2016, SCAG's Regional Council adopted the 2016 - 2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. Also, the 2016 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. The 2016 RTP/SCS includes nine goals that pertain to economic development, mobility, accessibility, travel safety, productivity of the transportation system, protection of the environment and health through improved air quality, energy efficiency, and land use and growth patterns that complement the state and region's transportation investments, and security of the regional transportation system. Exhibit 5.1 of the 2016 RTP/SCS identifies the Project Site as a High Quality Transit Area (HQTA), an area proposed for the focus of jobs and housing.

### ***Air Quality Management Plan***

The Air Quality Management Plan (AQMP) of the South Coast Air Quality Management District (SCAQMD) presents strategies for achieving the air quality planning goals set forth in the Federal

and California Clean Air Acts, including a comprehensive list of pollution control measures aimed at reducing emissions. The SCAQMD, which was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act, is responsible for bringing air quality in the South Coast Air Basin (Air Basin) into conformity with federal and State air pollution standards. The SCAQMD is also responsible for monitoring ambient air pollution levels throughout the Air Basin and for developing and implementing attainment strategies to ensure that future emissions will be within federal and State standards. Additional discussion of the AQMP, and Project consistency with the AQMP, is addressed in Section 4.2, Air Quality, of this EIR.

### **Los Angeles County Metropolitan Transportation Authority**

The Los Angeles County Metropolitan Transportation Authority (Metro) is the transportation planning agency for Los Angeles County. Metro develops and oversees transportation plans, policies, and funding programs to address mobility, accessibility, and related environmental issues. Metro directly operates bus, light rail, heavy rail, and bus rapid transit services. Relevant to the Project is the Congestion Management Program and Active Transportation Strategic Plan, discussed below.

#### **Congestion Management Program**

Metro administers the Congestion Management Program (CMP). The CMP is a State-mandated program designed to provide comprehensive long-range traffic planning on a regional basis. On October 28, 2010, the Metro Board adopted the 2010 CMP for Los Angeles County. The 2010 CMP summarizes the results of 18 years of CMP highway and transit monitoring and 15 years of monitoring local growth. CMP implementation guidelines for local jurisdictions are also contained in the 2010 CMP. The primary goal of the CMP is to reduce traffic congestion in order to enhance the economic vitality and quality of life for affected communities. CMP guidelines specify that freeway segments to which a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of designated CMP roadway intersections to which a project could add 50 or more trips during either the A.M. or P.M. peak hour. Furthermore, the guidelines require an evaluation of transit trips that could be generated by the Project. The Project's consistency with the requirements of the CMP is discussed in Section 4.11, Transportation and Traffic, of this EIR.

#### **Active Transportation Strategic Plan**

Metro's Active Transportation Strategic Plan (ATSP) identifies strategies to increase walking, biking, and transit use in Los Angeles County.<sup>14</sup> Specifically, the ATSP focuses on improving first and last mile access to transit stations to increase transit ridership, and proposes a regional network of active transportation facilities, such as shared use paths and on-street bikeways. As listed in Appendix B of the ATSP, Culver City Bicycle and Pedestrian Master Plan (described above) is identified as a related plan.<sup>15</sup> As shown on Map 5, Central Los Angeles Proposed Regional Active Transportation Network, of the ATSP, existing Class III Bicycle Facilities along Van Buren Place, Lucerne Avenue, and Irving Place would connect with a proposed Dedicated

<sup>14</sup> Metro, Active Transportation Strategic Plan, Volume I, April 2016, <https://www.metro.net/projects/active-transportation-strategic-plan/>. Accessed August 7, 2017.

<sup>15</sup> Metro, Active Transportation Strategic Plan, Volume II: Appendices, April 2016, <https://www.metro.net/projects/active-transportation-strategic-plan/>. Accessed August 7, 2017.

On-Street Regional Active Transportation Network to the northwest along Culver Boulevard and Metro's Culver City Expo Station (approximately 0.35 miles from the Project Site). To the southeast, Van Buren Place, Lucerne Avenue, and Irving Place would connect with a proposed Off-Street Regional Active Transportation Network along the Ballona Creek Channel.

The ATSP includes the following objectives:

- Identify improvements that increase first last mile access to transit by active modes.
- Work with partners to create a regional active transportation network.
- Develop supporting programs and policies related to education, enforcement, encouragement, and evaluation.
- Provide guidance for setting regional active transportation policies and guidelines to guide future investment.
- Develop a funding strategy and explore opportunities to expedite implementation.

The ATSP includes several recommendations to improve first last mile access to transit stations such as: bike share stations and bicycle services, sidewalk widening or addition, enhanced pedestrian crossings, enhanced bicycle facility, traffic calming measures, enhanced bus waiting areas, street furniture, landscaping and shade, lighting, and park-and-ride lots.

The ATSP provides the following regional active transportation network guiding principles:

- Connect cities and communities
- Serve desire lines
- Serve Main Street
- Harness continuous rights-of-way
- Link to transit
- Address existing safety problems
- Design for all ages and abilities

## 4.8.4 Environmental Impacts

### **Methodology**

The State CEQA Guidelines Section 15125(d) requires that an EIR discuss project inconsistencies with applicable general plans, specific plans, and regional plans. For purposes of this analysis, the Project is considered consistent with regulatory plans if it meets the intent of the plans and/or would not preclude the attainment of their primary goals. The criterion for determining significance with respect to a land use plan emphasizes conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that an inconsistency with a plan, policy, or regulation does not necessarily equate to a significant physical impact on the environment. The analysis of potential land use impacts of the Project therefore considers consistency with adopted plans, regulations, and development guidelines that regulate land use on

the Project Site and whether any such inconsistencies are tied to physical impacts on the environment associated with the Project.

## Thresholds of Significance

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines. Accordingly, a significant impact associated with land use consistency would occur if the Project:

- **LU-1:** Substantially conflicts with the applicable environmental policies in the General Plan or other regional and local plans adopted for the purpose of avoiding or mitigating an environmental effect.

As discussed in the Initial Study, which is provided in Appendix A of this Draft EIR, and in Chapter 6, Other CEQA Considerations, the Project would have a less than significant impact with respect to dividing an established community, since the Project would involve improvements within the existing Studio Campus. The only off-site components proposed are off-site roadway improvements to improve local circulation (gate and access improvements), streetscape improvements (street trees, curbs, gutters, sidewalks, and streetlights), and utility improvements, including a sewer line upgrade on Ince Boulevard, as needed. The Project would have no impact with respect to habitat conservation plans or natural community conservation plans since the Project Site is located in an urbanized area that does not support sensitive natural communities. Therefore, no further analysis of these topics in this Draft EIR is necessary.

## Project Characteristics and Project Design Features

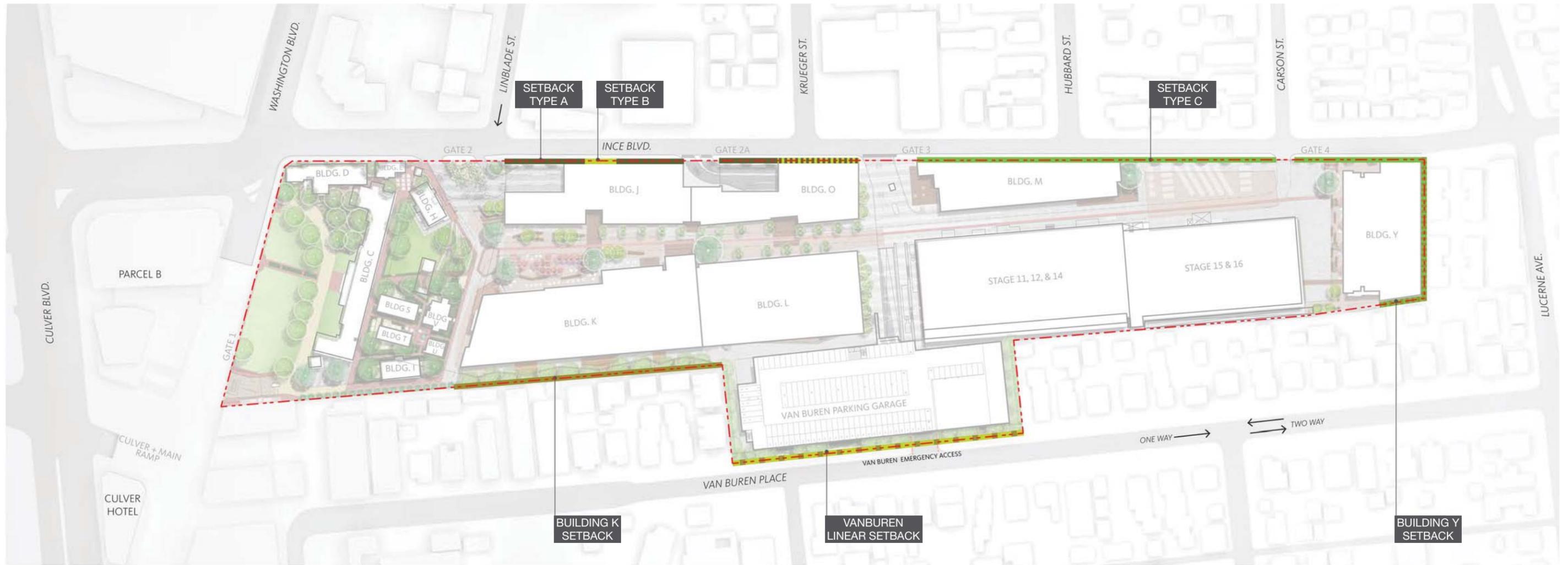
### *Project Characteristics*

As more fully described in Chapter 2, Project Description, the Project would involve the technological update and expansion of the facilities within the existing approximately 14-acre Studio Campus, construction of six Digital Media buildings (Buildings J, K, L, M, O, and Y) and eight stages colocated within the Digital Media buildings; and the demolition of some existing buildings and stages for a net new square footage total of approximately 413,127 square feet. Relocation of the historically significant bungalows has recently occurred under the observation of a qualified architectural historian. The bungalows are currently in the process of being rehabilitated in conformance with the Standards and subject to mitigation measures required under CPA No. 6. This change is also included as part of CPA No.7. The Project would also include the construction of two new parking structures: one structure would be two levels below grade and would be located south of the Mansion and existing Rear Lawn Parking Structure, and one structure would be two levels below grade and six levels above grade and would be located on the site of the existing parking structure along Van Buren Place (Van Buren Parking Structure). The Project would also include a connecting ramp on the northwest property line within the proposed below-grade driveway/ramp that would connect the existing Rear Lawn Parking Structure to Parcel B and Town Plaza, which together would provide access to Culver Boulevard; a new Gate 2A, located between existing Gates 2 and 3 on Ince Boulevard; and the realignment of Gates 3 and 4.

The Project would include landscaped setbacks, fencing, and other treatments along the western, eastern, and southern property boundaries where it interfaces with the surrounding neighborhoods. These improvements would occur either as a component of construction of individual buildings or as a large, continuous section. **Figure 4.8-5, *Proposed Landscape Setbacks***, depicts the setback type and location along the perimeter of the Project Site. The Van Buren Parking Structure would include a minimum 15-foot setback at the ground level, approximately 410 linear feet along Van Buren Place, that would include street trees and other landscaping, seating, pedestrian level lighting, and stormwater treatment. The parking structure would be screened with an articulated façade with subtle color variations and a vertical garden to minimize light, glare, and noise. In addition, the ground level of the parking structure would be fully enclosed, filtered, and ventilated. Building K would be setback from the western property line within a 20-to-30-foot variable landscaped setback. Additional landscaping would be provided along the eastern property line within landscaped setbacks or raised planters. Along Ince Boulevard landscaped setbacks would range from 18 inches adjacent to Buildings M and Y to variable landscaped setbacks of 2-to-6 feet adjacent to Buildings J and O. The types of setbacks proposed along Ince Boulevard are shown on **Figure 4.8-6, *Illustrative View of Proposed Landscape Setbacks along Ince Boulevard***. In addition, Building Y would include a 5 foot landscaped setback adjacent to residential uses to the south and east with a 12-foot high perimeter wall at the property line. Building Y would also include a canted roof line on the west façade (facing residential uses to the east) for an increased stepback from the property line and additional landscaping to reduce potential view into neighboring properties. The landscaping improvements and linear open space along Van Buren Place would enhance the pedestrian experience and provide a connection with the downtown area and local and regional transportation, including the Culver City Station and Expo Line.

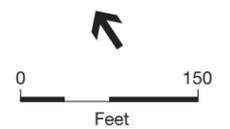
The square footage for the proposed Digital Media buildings represent a maximum development envelope, within which the mix of creative office, live and digital production, support, and other floor area would be permitted to change to respond to market conditions and tenant needs. Building footprints and massing also represent maximum development envelopes with specific architectural design, compatible with existing historically significant buildings and improvements on the Studio Campus, to be defined as the programs and uses within the buildings are more fully established. Such modifications may be made provided that:

- The development conforms to the broad development standards listed above within a Studio (S) District pursuant to Section 17.250.015 of the Culver City Zoning Code
- The total amount of net new building floor area does not exceed 413,127 square feet
- Parking is provided in accordance with the requirements of the Culver City Municipal Code
- The total amount of traffic generated by the development does not exceed the total amount of traffic projected for the development in the Final EIR for the Project on an average daily basis



**SETBACK TYPE (Measured from Property Line)**

- Setback Type A:** 2-foot wide raised planter
- Setback Type B:** Varies 5-feet to 6-feet wide
- Setback Type A & B:** Varies 2-feet to 6-feet wide
- Setback Type C:** 18-inches wide
- Building Y Setback:** 5-foot wide at southern and western boundaries
- Building K Setback:** Varies 20-feet to 30-feet wide
- Van Buren Linear Setback:** Minimum 15-foot wide



SOURCE: Gensler, 2017

The Culver Studios Innovation Plan  
**Figure 4.8-5**  
 Proposed Landscape Setbacks

Setback Type: **A**



Public R.O.W. - Street  
**Varies**

Public R.O.W. - Sidewalk  
Typically **6' - 8'** (Varies)

Raised Planter  
**2'**

Setback Type: **B**



Public R.O.W. - Street  
**Varies**

Public R.O.W. - Sidewalk  
Typically **6' - 8'** (Varies)

Landscape Setback  
**5' - 6'** (Varies)

Setback Type: **C**



Public R.O.W. - Street  
**Varies**

Public R.O.W. - Sidewalk  
Typically **6' - 8'** (Varies)

Landscape  
Setback  
**18"**

SOURCE: Gensler, 2017

The Culver Studios Innovation Plan

**Figure 4.8-6**

Illustrative View of Proposed Landscape Setbacks Along Ince Boulevard

The six Digital Media buildings would house a flexible mix of creative space, production space, and digital media stages; digital media stages and support buildings (i.e., set construction, utilities, props/grips, wardrobe, storage, and other services) would be collocated within the New Media buildings.

The Project would be designed and constructed to meet the Culver City Green Building Program requirements. Individual sustainable strategies would be considered during the design process for each of the components of the Project. Energy efficiency, water conservation, and the reduction of GHG emissions would be considered in the design, construction, and operation of proposed new facilities. Energy conservation would be implemented through a variety of strategies, including proactive design solutions to prevent heat gain within buildings, as well as through passive strategies such as site design and shading. Water-conserving fixtures would be installed throughout all proposed buildings and infrastructure for future gray water would be provided. Drought-tolerant and low-water usage plants and water-efficient irrigation would be used. As previously described, the Studio Campus would provide enhanced pedestrian connections to downtown Culver City and the nearby Culver City Station, reducing vehicle trips and associated greenhouse gas emissions.

Implementation of the Project would include, but not necessarily be limited to, the following discretionary entitlements, reviews, and approvals, as described in Chapter 2, Project Description:

**Comprehensive Plan Amendment No. 7:** City approval of the amendment to the existing Comprehensive Plan, superseding all previous amendments

**Certificate of Appropriateness:** under the City's Historic Preservation Ordinance

**Conveyance Agreement:** for discharge of public sewer waste through Studio conveyance system

**EIR Certification:** City certification of the EIR

**Development Agreement:** To protect the Applicant's right to implement CPA No. 7 over the term of the agreement and to secure for the City the public and economic benefits of the Project

Other approvals as needed and as may be required.

### ***Project Design Features***

There are no Project Design Features relative to land use and planning.

## **Analysis of Project Impacts**

### ***Consistency of Project with Applicable Plans and Policies***

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**Threshold LU-1:** The Project would have a potentially significant land use consistency impact if it substantially conflicts with the applicable environmental policies in the General Plan or other regional and local plans adopted for the purpose of avoiding or mitigating an environmental effect.

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**Impact Statement LU-1: The Project, with the approval of CPA No. 7 and associated entitlements, would be substantially consistent with applicable adopted land use plans, policies, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts with respect to land use plans, policies, guidelines, and regulations would be less than significant.**

Project consistency with applicable land use plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect are addressed below. This includes analysis of Project consistency with the City of Culver City General Plan Land Use, Circulation, and Open Space Elements; Culver City Bicycle & Pedestrian Master Plan; Culver City Urban Forest Master Plan; City of Culver City Zoning Code; Visioning Study for the Culver City Transit Oriented Development; SCAG's 2016 RTP/SCS, and Metro's ATSP. Project consistency or compatibility with policies of the General Plan Land Use Element, Circulation Element, and Open Space Element related to the visual environment and urban design is discussed in Section 4.1, Aesthetics.

Project consistency with three other applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect are addressed in other sections of this Draft EIR. These include the SCAQMD AQMP which is addressed in Section 4.2, Air Quality; Senate Bill 375 and SCAG's Sustainable Communities Strategy, which is discussed in Section 4.5, Greenhouse Gas Emissions; and the Metro CMP which is addressed in Section 4.11, Transportation and Traffic.

### **City of Culver City General Plan**

**Table 4.8-3, *Comparison of the Project to Applicable Policies of the Culver City General Plan***, evaluates the consistency of the Project with objectives and policies of the General Plan Land Use Element, Circulation Element, and Open Space Element. As discussed in Table 4.8-3, the Project would be consistent with applicable objectives and policies of the General Plan.

The Project would be consistent with the objectives and policies of the Land Use Element by providing landscaped setbacks, fencing, façade treatments, architectural details, and traffic measures to minimize impacts on adjacent residential neighborhoods. In addition, Development Standards would ensure compliance with the S Zoning District. The Project would be consistent with policies related to Studio Image and Historic Preservation by retaining the Studio's heritage while technologically updating and expanding its facilities within the existing Studio Campus footprint (as further described in Section 4.3.1, Historical Resources and Chapter 2, Project Description). The Project would be consistent with the objectives and policies of the Circulation Element by improving vehicular access and pedestrian safety, providing off-street parking facilities, and encouraging alternative transportation. The Project would be consistent with the objective of the Open Space Element by providing passive open space with pedestrian amenities along Van Buren Place. As the Project would be consistent with applicable objectives and policies of the General Plan, it would have a less than significant impact with respect to consistency with the General Plan.

**TABLE 4.8-3  
 COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY GENERAL PLAN**

Objective/Policy	Analysis of Project Consistency
Land Use Element	
<p><b>Policy 1.B</b> Protect the City's residential neighborhoods from the encroachment of incompatible land uses and environmental hazards which may have negative impacts on the quality of live (such as traffic, noise, air pollution, building scale and bulk, and visual intrusions).</p>	<p><b>Consistent.</b> The Project would be constructed within the existing Studio Campus and as such would not encroach into the adjacent residential neighborhood. The Project would provide additional landscaping and setbacks from property lines adjacent to residential uses. The Project would incorporate landscaped setbacks, fencing, façade treatments, and architectural details along the western, eastern, and southern boundaries, where it interfaces with residential neighborhoods. These include a minimum 15-foot linear setback with pedestrian amenities adjacent to the Van Buren Parking Structure; screening of the Van Buren Parking Structure as well as special lighting provisions and enclosure and ventilation of the ground level; a 20-to-30-foot variable landscaped setback of Buildings K and L from Van Buren Place; a 5-foot landscaped setback along Building Y and canted roofline; and landscaping, setbacks, windows, and architectural treatments to break up the building mass along Ince Boulevard. Among these design characteristics, landscaping, setbacks, window placement and other features would be employed to ensure that there would not be a line of sight between Building Y and Building K and adjacent residential uses. These features would reduce the effects of visual intrusion, building height and bulk, and noise. In addition, improvements to access and circulation would include more efficient movement of vehicles onto the Studio Campus from the surrounding street network with reduced production vehicle use of directly adjacent streets, along with implementation of Transportation Demand Measures, and other mitigation measures identified in Section 4.11, Transportation and Traffic, which would enhance pedestrian connections to downtown Culver City and public transit while reducing traffic congestion and vehicle trips and improving air quality. Furthermore, the Project would allow all buildings to be serviced from below-grade loading facilities which would reduce outdoor noise.</p>
<p><b>Objective 9. Studio Image.</b> Encourage and support entertainment and media businesses by promoting Culver City's image as the "Heartland of Screenland."</p>	<p><b>Consistent.</b> The Project would foster current and future content creation, digital media, creative technologies, virtual reality, and related entertainment industries synonymous with the Studio's heritage and the history and evolution of Culver City's image as "The Heart of Screenland." Upon completion of the Innovation Plan, The Culver Studios would be a state-of-the-art Campus of media and digital content stages and support facilities, ensuring its resilience and continued position at the cutting edge of innovation essential to the invention and production of entertainment and digital media for future generations</p>

Objective/Policy	Analysis of Project Consistency
<b>Policy 9.C</b> Encourage comprehensive studio development standards appropriate to the nature and intensity of entertainment studios and related uses.	<b>Consistent.</b> As described under Project Characteristics, CPA No. 7 would incorporate Development Standards to ensure that the proposed Digital Media buildings, stages, and support uses are in compliance with Section 17.250.15 (Studio (S) District Requirements), which establishes permitted uses and height limits within the S Zoning District. The Development Standards allow for modifications to respond to market conditions and tenant needs provided that the total amount of new building area does not exceed 413,127 square feet, parking is provided in accordance with the requirements of the Culver City Municipal Code, and the total amount of traffic generated by the Project does not exceed the total amount projected in the Final EIR. (See Section 4.11, Transportation and Traffic, for a description of Project-generated traffic.) CPA No. 7 includes comprehensive development standards regarding the architecture of the new buildings, access and circulation, parking, landscaping, setbacks, fencing, and infrastructure, and sustainability. These standards would ensure comprehensive development of the Studio Campus, while permitting the technological updated and expansion of its facilities within the existing Studio Campus footprint.
<b>Policy 9.D</b> Market the “Studio Image” to attract media businesses to Culver City.	<b>Consistent.</b> The Innovation Plan would allow the Studio Campus to adapt to the current and future needs of the entertainment industry and digital media within its existing Studio Campus footprint while maintaining the prominent aesthetic and historic features of The Culver Studios. In doing so, the Project would ensure the continued viability, adaptability, and competitive status of the Studio Campus while capitalizing on and strengthening the City’s historic and future identity as the “Heart of Screenland.”
<b>Objective 14. Historic Preservation.</b> Promote the City’s architectural and cultural heritage by preserving buildings and sites that reflect Culver City’s varied history and development.	<b>Consistent.</b> As stated in Chapter 2, Project Description, the Mansion (Building C) and Front Lawn, represent the most visible public face of the Studio Campus. As discussed in Section 4.3.1, Historical Resources, the Mansion and adjacent Buildings D, E, H, I are historic structures and no major exterior changes are proposed for these buildings. Interior rehabilitation of the Mansion would be undertaken in a manner that would protect the building’s eligibility as a historical resource under the City’s Historic Preservation Ordinance and would support compliance with the Secretary of the Interior’s Standards for Rehabilitation of Historic Structures (Standards). The Front Lawn would undergo minor changes and upgrades to reflect the early years of the Studio Campus.  In addition, the relocation of four existing historic bungalow Buildings S, T, U, and V from the western edge of the Studio Campus to a site immediately south of the Mansion has recently occurred under the observation of a qualified historian. The bungalows were arrayed in manner that retains their existing relationships and orientations to one another within a landscaped courtyard. The bungalows are currently in the process of being rehabilitated in conformance with the Standards and the requirements set forth for CPA No. 6.
<b>Policy 14.A</b> Encourage restoration of historic resources in a manner that complies with the U.S. Secretary of the Interior’s Standards for Rehabilitation of Historic Structures.	<b>Consistent.</b> As described above for Objective 14, Historic Preservation and in Section 4.3.1, Historical Resources, interior rehabilitation of the Mansion, rehabilitation of the historic bungalows, and changes to the Front Lawn would comply with the Secretary of the Interior’s Standards for Rehabilitation of Historic Structures.

Objective/Policy	Analysis of Project Consistency
<p><b>Policy 14.D</b> Provide public information and events to expand public awareness of the City's rich cultural heritage.</p>	<p><b>Consistent.</b> The Front Lawn, Rear Lawn and Bungalow Area would provide the Culver Studios with an opportunity to provide public information and events that celebrate the Studio, the City, and community. Furthermore, as discussed in Section 4.3.1, Historical Resources, the Project would include an Interpretive and Commemorative Program that would document development of the Studio and its history from 1918 to present time.</p>
<p>Circulation Element</p>	
<p><b>Objective 1. Improved Traffic Flow.</b> Reduce traffic congestion throughout the City.</p>	<p><b>Consistent.</b> The vehicular access and circulation improvements, including a new entrance and new Gate 2A, a new access off of Culver Boulevard from Parcel B, modifications to Gate 2, and the realignments of Gates 3 and 4 would provide more efficient ingress and egress by reducing vehicle queuing or delays and providing direct access to the below grade parking levels and increased pedestrian safety. Transportation Demand Measures and other mitigation measure presented in Section 4.11, Transportation and Traffic would also reduce Project-generated trips and traffic congestion at certain Study Intersections within the City.</p>
<p><b>Policy 2.G</b> Develop an outreach program to educate those who live or work in Culver City about transit and encourage their use of it.</p>	<p>Furthermore, alternative modes of transportation would be encouraged since the Project would enhance the pedestrian experience along Van Buren Place and Ince Boulevard and provide a connection with the downtown area and local and regional transportation, including the Metro Expo Line and numerous bus lines. In addition, 100 bicycle parking spaces and related amenities would be located within the Studio Campus in compliance with the City's applicable ordinances and plans.</p>
<p><b>Policy 2.P</b> Encourage large developments to contribute to City transportation capital and operation funding as part of project traffic mitigation measures.</p>	<p><b>Consistent.</b> As described in Section 4.11, Transportation and Traffic, Mitigation Measure MM-TRAF-1 would include Transportation Demand Management Program to encourage and facilitate the use of public transportation, ridesharing, walking, and bicycling.</p>
<p><b>Policy 4.C</b> Provide safe and attractive pedestrian walkways/sidewalks which link streets and parking areas to the entrances of major developments.</p>	<p><b>Partially Consistent.</b> Although the mitigation measures presented in Section 4.11, Transportation and Traffic, do not require the Project to contribute to the City's transportation capital and operation funding, the Project would implement a Transportation Demand Management Program and provide intersection improvements which would enhance the City's transportation system.</p>
<p><b>Policy 6.B</b> Reduce pressure on on-street parking through provision of private and public off-street parking facilities.</p>	<p><b>Consistent.</b> The Project would include landscaping, setbacks, and linear open space with pedestrian amenities along Van Buren Place that would provide a safe and attractive pedestrian linkage to the downtown area. The upgraded landscape and associated improvements to the Front Lawn area would also enhance connections between the Studio Campus and adjacent downtown area.</p>
<p><b>Policy 6.B</b> Reduce pressure on on-street parking through provision of private and public off-street parking facilities.</p>	<p><b>Consistent.</b> The Project would include two new parking structures within the Studio Campus. The below-grade Central Parking Structure would provide 836 parking spaces and the above- and below-grade Van Buren Parking Structure would provide 1,109 parking spaces. Fourteen surface parking spaces would also be provided in association with Building Y. In addition to providing adequate parking to serve the Project, the parking structures would also accommodate loading and unloading that periodically occurs on public streets which would reduce effects on on-street parking.</p>

Objective/Policy	Analysis of Project Consistency
<b>Objective 7. Traffic Safety.</b> Minimize potential traffic hazards at new developments.	<b>Consistent.</b> The Project would include vehicular access and circulation improvements that would reduce potential traffic hazards and vehicular/pedestrian conflicts, including enhanced pedestrian pathways, and greater separation of pedestrian/bicycle traffic and vehicular traffic at Gate 1 and Gate 2 and within the Project Site due to vehicle circulation occurring through the underground parking areas.
Open Space Element	
<b>Objective 3. Passive Recreation.</b> Provide passive recreational open space within walking distance of all City neighborhoods.	<b>Consistent.</b> The Innovation Plan would provide a linear open space along Van Buren Place and adjacent to the Van Buren Parking Structure, that is a minimum 15 feet in depth and 410 feet in length, that would provide passive open space to the surrounding neighborhoods and community. The open space would include landscaping, seating, and pedestrian level lighting. The upgraded landscape and associated improvements to the Front Lawn area would also provide passive open space that may be periodically available for public use.

Source: ESA PCR 2017

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### Culver City Bicycle & Pedestrian Master Plan

Although the objectives, policies, and actions of BPMP are directed towards the City and therefore not directly applicable to the Project, the Project would encourage alternative forms of transportation through the provision of bicycle parking and other bicycle amenities and linear open along a portion of Van Buren Place.

As previously described, existing bicycle facilities near the Project Site include a Class III Bike Route/Shared Lane Markings (sharrows) on Van Buren Place, Higuera Street, and Lucerne Avenue; the Ballona Creek Class I Bike Path/Multi-Use Path, with access off of Duquesne Avenue; and Class II Bike Lanes on Duquesne Avenue from Washington Place to Jefferson Boulevard. As identified in the BPMP, in the vicinity of the Project Site Washington Boulevard and Culver Boulevard are proposed Class III Bike Routes and Van Buren Place is designated as a Class III Bicycle Friendly Street. As also shown in the BPMP, a proposed pedestrian corridor is identified along Irving Place/Van Buren Place, Washington Boulevard, and Culver Boulevard. The Project would provide 100 bicycle parking spaces throughout the Studio, which is the same number currently on the Project Site. Bicycle parking would generally be located near the primary entrances of each building and within the Van Buren Parking Structure and Central Parking Structure. Bicycle racks and parking areas would conform to the BPMP Design Guide, included as Appendix 1 of the BPMP. As described in Section 4.11, Transportation and Traffic, bicycle parking and related amenities would be provided in compliance with City requirements.

Construction activities would be primarily contained within the Project Site. However, temporary lane closures along Van Buren Place and Ince Boulevard may be necessary for new utility connections and sewer line upgrade, street work, and other activities. As described in Section 4.11, Transportation and Traffic, the Project would include a Construction Management Plan as a Project Design Feature PDF-TRAF-1, which defines the scope of scheduling of planning

construction activities, identifies the proposed construction site management responsibilities, and provides measures to ensure minimal impacts to neighboring land uses or interruption of pedestrian, vehicle, and alternative transportation modes and public transit. With implementation of the measure identified in the Construction Management Plan impacts on bicyclists and pedestrians during construction would be less than significant.

Project implementation would not remove or interfere with the existing and future designations of Van Buren Place as Class III Bicycle Friendly Street and the linear open space would be supportive of the proposed Bicycle Friendly Street. As the Project would include facilities to enhance and support bicycling and pedestrian activity, including activity in an area proximate to downtown Culver City and the Culver City Station, it would benefit and not adversely affect the existing and planned bicycle network. The Project would be consistent with the intent of the BPMP and impacts would be less than significant.

### **Culver City Urban Forest Master Plan**

As previously described, the Urban Forest Master Plan includes recommendations for green connections throughout the City to encourage recreation, walking, biking and public transit use to be implemented by the City. As indicated in the Urban Forest Master Plan and in the vicinity of the Project Site, the areas between portions of Van Buren Place and Irving Place, and Washington Boulevard and Culver Boulevard are designated as proposed pedestrian areas and proposed pedestrian routes. As shown on Figure 4.8-5, the Project would include a minimum 15-foot landscaped setback from the Van Buren Parking Structure with pedestrian amenities, such as seating and lighting; and a variable 20-to-30-foot landscaped setback along Building K. Furthermore, trees within the parkway of Van Buren Place would be relocated or replaced based on a report prepared by a certified arborist and two new trees would be replaced for every tree removed. These features would provide a pedestrian area and enhance pedestrian access along Van Buren Place to the downtown area and nearby public transit. Therefore, the Project would be consistent with the green connections envisioned in the Culver City Urban Forest Master Plan and impacts would be less than significant.

### **City of Culver City Zoning Code**

As shown on Figure 4.8-4, the zoning designation of the Project Site is S (Studio), which is consistent with the General Plan Land Use designation of Studio. All development standards within the Studio zoning designation must be established by a Comprehensive Plan. Accordingly, Comprehensive Plan Amendment No. 6, is the approved Comprehensive Plan for the Studio Campus. The Project would be implemented through a new Comprehensive Plan Amendment (CPA No. 7). **Table 4.8-4, Comparison of the Project to Applicable Land Use Regulations of the Culver City Zoning Code**, evaluates the consistency of the proposed Project with applicable regulations of the Culver City Zoning Code that pertain to Studio District and Comprehensive Plan requirements. As described below, the Digital Media buildings are consistent with uses allowed within the Studio District and CPA No. 7 has been prepared. CPA No. 7 would be consistent with the requirements for preparing a Comprehensive Plan. CPA No. 7 permits the implementation of the Project, including a flexible mix of Digital Media space within the existing Studio Campus footprint, while ensuring compatibility with the surrounding neighborhoods and maintaining the integrity of historic structures.

**TABLE 4.8-4  
 COMPARISON OF THE PROJECT TO APPLICABLE LAND USE REGULATIONS OF THE CULVER CITY ZONING CODE**

Code Section	Code Provision	Analysis of Project Consistency
<b>17.250.015 Studio District Requirements:</b> 17.250.015.A (Uses Permitted)	No building or land shall be used and no building shall be erected, constructed or established except for uses customary or incidental to the production or distribution of motion pictures and other forms of audiovisual products, including but not limited to, education and entertainment films, tapes and other reproduction media. Restaurants, support and related retail and sales of alcoholic beverages, pursuant to an "on sale" license issued by the State Department of Alcoholic Beverage Control, are permitted if not accessible to the general public. Telecommunications facilities may be permitted with an Administrative Use Permit or Conditional Use Permit, as provided for in §17.400.110 (Telecommunications Facilities).	<b>Consistent.</b> The Digital Media buildings would include a flexible mix of creative space, production space, digital media stages, office uses, and support uses, all of which are customary or incidental to individual film/TV productions and their requirements. Restaurants, support and related retail and sales of alcoholic beverages, would be established pursuant to an "on sale" license issued by the State Department of Alcoholic Beverage Control and would not be accessible to the general public. Any new telecommunication facilities would require an Administrative Use Permit or Conditional Use Permit and would be installed in conformance with Culver City Municipal Code Section 17.400.100, which regulates the location, development, and operating standards for telecommunications facilities.
17.250.015.B (Comprehensive Plan to Establish Standards)	All development standards for sites within the S Zoning District, except the height limits established by Subsection 17.250.015.D (Height Limit) below, shall be established by a Comprehensive Plan in compliance with Chapter 17.560 (Comprehensive Plans).	<b>Consistent.</b> The Project is located within the S Zoning District and therefore an amendment to the previously approved Comprehensive Plan has been prepared for the Innovation Plan (CPA No. 7). CPA No. 7 provides development standards, as described below.
17.250.015.C (Temporary Structures)	Temporary structures constructed as part of a production set shall not be subject to the requirements of this Title; provided that the structures comply with applicable building, fire, and other applicable life safety regulations, and do not interfere with required site improvements, including parking spaces and aisles, and setbacks.	<b>Consistent.</b> All temporary structures would comply with applicable building, fire, and other applicable life safety regulations and would not interfere with required site improvements, including parking, access/circulation, and setbacks.
17.250.015.D (Height Limit)	No structure within the S Zoning District shall exceed a height of 56 feet. (This provision is as approved by Initiative Ordinance No. 90-0131½ adopted April 17, 1990, or as may be amended.)	<b>Consistent.</b> All new structures, including the Digital Media buildings and Van Buren Parking Structure would not exceed a maximum height of 56 feet, except parapets, architectural projections, mechanical screening, and other architectural features that are exempt from the height limit pursuant to Culver City Municipal Code Section 17.300.025.C.
<b>17.560 Comprehensive Plans</b> 17.560.005 (Purpose)	This Chapter provides procedures for reviewing Comprehensive Plans, which allow for flexibility in the application of zoning code standards to a proposed development. The purpose is to allow consideration of innovation in site planning and other aspects of project design, and more effective design responses to site features, uses on adjoining properties, and other impacts than the zoning code standards would produce without adjustment.	<b>Consistent.</b> CPA No. 7 would be subject to City review and approval and has been developed to allow for innovative site planning while employing design for buildings, landscaping, and circulation to minimize and improve neighborhood interfaces through such means as setbacks, landscaping, façade treatments, building placement, fencing, improved access, and servicing of production vehicles from below-grade loading facilities. The square footage of the proposed Digital Media buildings represent a maximum development envelope, within which the mix of creative office, live and digital production support, and other floor area would be permitted to change to respond to market conditions and tenant needs.
17.560.015.B (Comprehensive Plan Requirements)	All Comprehensive Plans . . . shall include, but not be limited to, the following: 1. A site plan, showing building(s), various functional use areas, parking and circulation.	<b>Consistent.</b> The content of CPA No. 7 conforms to these requirements, as preliminarily determined by the City and subject to final approval of CPA No. 7. CPA No. 7 includes over 200 pages and technical reports that includes a Site Plan; Project Summary; parking and circulation plans; development standards; parking requirements; building heights; setbacks

Code Section	Code Provision	Analysis of Project Consistency
17.560.020 (Findings and Decision)	<p>2. A description of development standards, which may include, but not be limited to, building heights, setbacks and parking requirements.</p> <p>3. Preliminary building plans, including floor plans and exterior elevations.</p> <p>4. Landscape plans, including a plant palette.</p> <p>5. Lighting and signage plans.</p> <p>6. Civil engineering plans, including site grading, public rights-of-way improvements, drainage, trash/recycling areas, and public utility extensions, as necessary.</p> <p>7. Proposed use and occupancy, construction type, building height and area of each building or structure, and proposed distances between buildings or structures, and setbacks to property lines.</p> <p>8. Other information or applicable materials as may be deemed necessary by the Director.</p>	<p>of proposed Digital Media buildings; building plans; landscape plans; lighting plans; identification of utility and trash/recycling areas; technical reports; and detailed information of the proposed New Media buildings by building level.</p> <p>A Master Sign Program would be developed to identify the type, area, height, location, design, and any additional requirements per Section 17.330.050 of the Culver City Zoning Code.</p>
	<p>A Comprehensive Plan may be approved, provided that the facts submitted and evaluated during the review process support the following findings . . .</p> <p>A. The proposed Comprehensive Plan can be substantially completed within 4 years.</p> <p>B. The proposed development is capable of creating an environment of sustained desirability and stability, or adequate assurance will be provided such objective will be attained.</p> <p>C. The proposed uses will not be substantially detrimental to present and potential surrounding uses, but will have a beneficial effect.</p> <p>D. The streets and thoroughfares serving the development are suitable and adequate to carry anticipated traffic, and the development will not generate traffic that will overload the adjacent street network.</p> <p>E. The proposed development is compatible with the surrounding area.</p> <p>F. The types and locations of any proposed commercial development can be economically justified.</p> <p>G. The Comprehensive Plan is in conformance with the General Plan, or a concurrent General Plan amendment is in process.</p> <p>H. Any exception from the standards and requirements of this Title is warranted by the design and amenities incorporated in the Comprehensive Plan, and is desired by the Council.</p> <p>I. Existing and proposed utility services are adequate for the proposed uses.</p> <p>J. The Comprehensive Plan has complied with all applicable City requirements.</p>	<p><b>Consistent.</b> Findings in support of the proposed CPA No. 7 would be prepared in accordance with Culver City Zoning Code 17.560.020. Project characteristics would be supportive of the required findings including the following:</p> <p>A. The proposed CPA No. 7 would be substantially completed in approximately 32 months with an estimated mid-2020 completion date</p> <p>B. The Innovation Plan would create an environment of desirability and stability through the technological update and expansion of the Studio facilities within the existing Studio Campus footprint, in order to sustain a prominent role as a dynamic, independent Studio in the entertainment, digital media, and other related creative industries. The Innovation Plan would also involve rehabilitation of the interior of the Mansion, in compliance with the Secretary of the Interior’s Standards; include sensitive treatment of neighborhood interfaces; and provide a connection with the downtown area and local and regional transportation. The approved resolution would include conditions of approval, and the Final EIR would include a Mitigation Monitoring Program to assure such objectives will be attained.</p> <p>C. As analyzed in Chapter 4, Environmental Impact Analysis, of this EIR numerous Project Design Features and mitigation measures would be incorporated as a component of the Project to reduce any identified impacts from implementation of CPA No. 7 to the greatest extent feasible. Furthermore, characteristics of the proposed Project that would have a beneficial effect include a minimum 15-foot landscaped setback with pedestrian amenities adjacent to the Van Buren Parking Structure and additional landscaping, setbacks, façade treatments, building placement, and fencing, and circulation and access improvements.</p>

Code Section	Code Provision	Analysis of Project Consistency
17.560.025.A (Comprehensive Plan Modifications, Major)	Major changes or alterations to an approved Comprehensive Plan shall be considered by the Commission at a public hearing, which shall make recommendations to the Council. The Council may then approve, conditionally approve, or disapprove the proposed changes or alteration, after a public hearing.	<p>D. As discussed in Section 4.11, Transportation and Traffic, the Project would implement a Transportation Demand Management Program and other mitigation measures to reduce traffic impacts.</p> <p>E. As analyzed in Chapter 4, Environmental Impact Analysis, of this EIR the Project would incorporate Project Design Features and mitigation measures to ensure compatibility with the surrounding area to the extent feasible.</p> <p>F. No commercial (retail) uses are proposed under CPA No. 7, therefore this finding would not be applicable.</p> <p>G. As described in Table 4.8-3, implementation of CPA No. 7 including the Digital Media buildings, access and parking improvements, relocation and rehabilitation of historic buildings, and sensitive treatment of neighborhood interfaces would be consistent with the General Plan Land Use Studio designation and the applicable objectives and policies of the General Plan.</p> <p>H. Any exceptions from the standards and requirements for CPA No. 7 would be determined by the Council as part of the approval process.</p> <p>I. As analyzed in Section 4.12 of this EIR, based on applicable Project characteristics and with the incorporation of Project Design Features and mitigation measures, there would be adequate infrastructure to accommodate additional demand on water supply, wastewater, and solid waste facilities generated by the Project</p> <p>J. As part of the approval process, the Planning Commission and City Council will ensure that CPA No. 7 complies with all applicable City requirements.</p>
17.560.030 (Conditions of Approval)	The Council may approve a Comprehensive Plan in compliance with Subsection 17.560.020 (Findings and Decision), and may impose conditions upon the project, including the City's "Comprehensive Standard Conditions of Approval for Site Plan Review and Other Discretionary Planning And Zoning Applications," as adopted by the Commission to ensure that the project will meet all of the required findings. Conditions may relate to both on- and off-site improvements that are necessary to mitigate project-related impacts, and to carry out the purpose and requirements of the Comprehensive Plan and all applicable development standards and design guidelines.	<p><b>Consistent.</b> CPA No. 7 would be subject to the final resolution and conditions of approval adopted by the Council.</p>

SOURCE: ESA PCR, 2017

CPA No. 7 would also be subject to conditions of approval to ensure that the Project would meet all of the required findings presented below. Therefore, with approval of CPA No. 7, the Project would be consistent with the Culver City Zoning Code and impacts would be less than significant.

### Comprehensive Plan Amendment No. 6

As previously described and shown in Table 4.8-2, the approved CPA No. 6 allows for demolition of seven buildings and structures encompassing 66,703 square feet of office, stage, and support area and the relocation of the bungalow Buildings S, T, U, and V. CPA No. 7 includes some of the improvements approved as part of CPA No. 6 but not yet constructed including demolition of Buildings L, O, X, Y, Z, the Commissary, and Stage 10; and the construction of Buildings O and Y and the Van Buren Parking Structure. As previously described, relocation of the bungalows has recently occurred, subject to mitigation measures required under CPA No. 6 and the bungalows are currently in the process of being rehabilitated in conformance with the Standards. This change to the Studio Campus is also included in CPA No. 7. Some of the other improvements to the Studio Campus that were approved under CPA No. 6, including key conditions of approval and Subsequent Conformance Review modifications, are also being incorporated into CPA 7. As summarized in **Table 4.8-5, Comparison of CPA No. 6 and CPA No. 7 Net New Development**, CPA No. 7 would result in an additional 341,539 square feet of new development and 495 additional parking spaces compared to CPA No. 6.<sup>16</sup> Compared to CPA No. 6, CPA No. 7 would provide additional setbacks, building height setbacks, landscaping, and building treatment along the property line and adjacent to residential uses. CPA No. 7 would replace CPA No. 6 upon its approval.

**TABLE 4.8-5  
COMPARISON OF CPA NO. 6 AND CPA NO. 7 NET NEW DEVELOPMENT**

Use	Net New CPA No. 7 (SF/spaces)	Net New CPA No. 6 (SF/spaces)	Net Change (CPA No. 7 compared to CPA No. 6)
Office/New Media Space <sup>a</sup>	521,632	180,093	341,539
Stage	-39,880	-3,280	-36,600
Support	-68,625	-37,816	-30,809
Parking	1,614 <sup>b</sup>	1,119	495

<sup>a</sup> New Media Space would include office, stage and support uses.

<sup>b</sup> New parking would be provided in the Van Buren Parking Structure and below grade Central Parking Structure

SOURCE: Gensler and ESA PCR, 2017

### Visioning Study for the Culver City Transit Oriented Development District

As previously described, the Visioning Study for the Culver City TOD District will focus on local mobility and area circulation within the TOD District, near the Project Site. The Innovation Plan would include a minimum 15-foot landscaped setback with pedestrian amenities along the Van

<sup>16</sup> As stated in Chapter 2, Project Description, the Project would result in 413,127 square feet of new development compared to existing on-site conditions.

Buren Parking Structure, a 30-foot landscaped setback along Building K, and additional landscaping along Van Buren Place and Ince Boulevard that would enhance pedestrian circulation and access to the Downtown area and nearby public transit. Thus the Project would be supportive of the intent of the Visioning Study for the Culver City TOD District.

**SCAG’s 2016 RTP/SCS**

SCAG’s 2016 RTP/SCS incorporate goals that are applicable to the proposed Project. These SCAG policies are discussed below. **Table 4.8-6, Consistency of the Project with Applicable Goals of the 2016 RTP/SCS**, provides a detailed analysis of the proposed Project’s consistency with applicable RTP/SCS goals.

**TABLE 4.8-6  
 CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS OF THE 2016 RTP/SCS**

Goal	Analysis of Proposed Project Consistency
1. Align the plan investments and policies with improving regional economic development and competitiveness.	<b>Consistent.</b> This policy pertains to SCAG funding and policies. The Project would not adversely affect the capacity to align plan investments and policies with economic development and competitiveness. As the Project does provide regional economic benefits and does so in a manner consistent with other RTP/SCS goals as discussed below, and within a HQTAs, the Project would support SCAG choices regarding this goal.
2. Maximize mobility and accessibility for all people and goods in the region.	<b>Consistent.</b> The location of the Culver Studios Campus adjacent to Downtown Culver City, near the Culver City Station and Expo Line; multiple regional and local bus lines; the I-10; and bicycle facilities; would maximize mobility and the accessibility to the Project Site.
3. Ensure travel safety and reliability for all people and goods in the region.	<b>Consistent.</b> The Project would include the reconfiguration of the existing controlled access gates that are designed to minimize pedestrian/vehicle conflicts associated with vehicles entering and exiting the Studio Campus. As under current conditions, employees would have pedestrian access to the Downtown area and public transit.
4. Preserve and ensure a sustainable regional transportation system.	<b>Consistent.</b> The proximity of the Culver Studios Campus to alternative transit modes, including regional rail and bus lines, would support the region’s transportation investment and the sustainability of the regional transportation system.
5. Maximize the productivity of our transportation system.	<b>Consistent.</b> The Project would locate in an area served by a range of existing local and regional bus lines, and the nearby Culver City Station and Expo Line. The close proximity of the Culver Studios Campus to the transit and freeway systems would maximize the productivity of the transportation system and, as such, would be consistent with this goal.
6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	<b>Consistent.</b> The Project would implement Project Design Features to reduce air quality impacts, including the incorporation of energy-saving green building measures (see Sections 4.2, Air Quality and 4.5, Greenhouse Gas Emissions of this EIR). The Culver Studios Campus is located near the downtown area and existing bicycle facilities that would provide opportunities for convenient pedestrian and bicycle access to nearby restaurants and other amenities. The Project would provide 100 bicycle parking spaces and a landscaped setback with pedestrian amenities along Van Buren Place.

Goal	Analysis of Proposed Project Consistency
7. Actively encourage and create incentives for energy efficiency, where possible.	<p><b>Consistent.</b> As noted above, and described in Sections 4.5, Greenhouse Gas Emissions and Chapter 6, Other CEQA Considerations, the Project would support a land use pattern that provides increased opportunity for use of alternative transportation modes which would contribute to reductions in vehicle miles traveled with resulting benefit to energy efficiency.</p> <p>The Project would be designed and operated to meet criteria that would be equivalent to a least a minimum LEED certified level and Culver City's Green Building Program requirements through the incorporation of green building techniques and other sustainability features. Some of the Project's key sustainability features that contribute to energy efficiency include incorporation of high efficiency fixtures and appliances, and provision of water conservation features.</p>
8. Encourage land use and growth patterns that facilitate transit and active transportation.	<p><b>Consistent.</b> The Project would intensify development in an area directly served by the Culver City Station and Expo Line; multiple local and regional bus lines; and would support bicycle and pedestrian improvements identified along Van Buren Place in the BPMP. Furthermore, the Culver Studios is located in an area with pedestrian access to a range of entertainment and commercial uses. Also, the Project would provide 100 bicycle parking spaces.</p>
9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	<p><b>Consistent.</b> This goal pertains to security provided by regional service agencies. The Project would not adversely affect the ability of the service agencies to perform their duties. The Innovation Plan would support economic growth and increased use of public transportation systems that would generate revenue that could be used to support security of the regional transportation system.</p>

Source: ESA PCR, 2017

Based on the analysis presented in Table 4.8-6, the proposed Project would be consistent with applicable 2016 RTP/SCS policies. The Culver Studios Campus is located near the Culver City Station and Expo Line, regional and local bus lines, the I-10, and bicycle facilities. The Project is also located near the Downtown area. Furthermore, the Innovation Plan would provide pedestrian amenities that would support bicycle and pedestrian improvements identified in the BPMP. As shown in Table 4.8-6, the Project would be consistent with 2016 RTP/SCS policies to improve regional economic development, maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, maximize the productivity of the transportation system, protect the environment, encourage energy efficiency and facilitate the use of alternative modes of transportation. Therefore, the Project would result in a less than significant impact with regard to consistency with the 2016 RTP/SCS.

### Active Transportation Strategic Plan

As previously stated, the ATSP provides strategies to increase walking, biking, and transit use; including improving first and last mile access to transit stations. Although many of the objectives, recommendations, and guiding principles are directed towards Metro and other jurisdictions and not individual private projects, the Project would include linear open space along Van Buren Place with seating and additional landscaping and setbacks along Van Buren Place and Ince Boulevard. These improvements would enhance pedestrian access to the Culver City Station and

to the Ballona Creek Channel, which are part of a proposed Regional Active Transportation Network.

The landscaping, setback, and linear open space improvements would be consistent with the objective of the ATSP to provide improvements that increase first last mile access to transit by active modes.

These features would also be consistent with several recommendations of the ATSP to improve first last mile access to transit stations such as: sidewalk widening or addition, street furniture, landscaping and shade, and lighting.

Furthermore, the Project would support the following regional active transportation network guiding principles of the ATSP:

- Connect cities and communities (by providing enhanced connections along Van Buren Place and Ince Boulevard to Town Plaza, downtown Culver City, the Culver City Station, and Ballona Creek)
- Serve desired lines/link to transit (including the Culver City Station and numerous bus lines along National Boulevard, Venice Boulevard, and Jefferson Boulevard)
- Serve Main Street (through enhancing connection with Town Plaza and downtown Culver City)

As described for the Culver City Bicycle & Pedestrian Master Plan, Project implementation would not interfere with existing Class III Bicycle Facilities along Van Buren Place. Therefore, based on the proposed landscaping, setback, and linear open space improvement which would facilitate access to the Culver City Station and support a regional network of active transportation facilities the Project would be consistent with the ATSP and impacts would be less than significant. Cumulative Impacts

Chapter 3, General Description of Environmental Setting, provides a list of projects that are planned or are under construction in the Project area, within an approximately 1.5-mile radius. These projects are summarized in Table 3-1, Related Projects List, and mapped on Figure 3-1, Related Projects Map. As shown, 57 related projects occur within an approximately two-mile radius of the Project Site, including 47 in Culver City and 10 in the City of Los Angeles. The related projects reflect infill development within the larger, built out Culver City and adjacent City of Los Angeles area. The related projects generally include residential, mixed-use, and commercial/retail. Other uses include office, schools, and recreational. Eleven related projects (Related Projects 2, 3, 9, 27, 32, 33, 34, 41, 49, 53, and 54) are concentrated around the area generally bounded by National Boulevard, Venice Boulevard, Washington Boulevard, and Higuera Street, which is generally within the Culver City TOC District. These projects primarily include high-density residential mixed use, and other office/retail mixed use. Adjacent to the Culver Studios Campus, is Parcel B, which is a mixed-use development that would include 74,600 square feet of office space, 21,700 square feet of restaurant use, and 21,700 square feet of retail use. As previously described, the Project would connect the existing Rear Lawn Parking Structure to Culver Boulevard via a below grade ramp.

The proposed Project would represent infill development on an already urbanized site, within the existing Culver Studios Campus in an area targeted for growth by the City and SCAG and near the Culver City Station. The Project would be consistent with the General Plan land use and zoning designation of Studio. The Project would also be consistent with other local and regional land use plans.

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

#### 4.8.5 Mitigation Measures

The Project would result in less than significant impacts with respect to land use consistency with plans, policies, and regulations. Therefore, no mitigation measures are required.

#### 4.8.6 Level of Significance after Mitigation

Not applicable. Project impacts are less than significant.

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## 4.9 Noise

### 4.9.1 Introduction

This section analyzes potential noise and vibration impacts that would result from the Project. The analysis describes the existing noise environment in the vicinity of the Project Site, estimates future noise and vibration levels at surrounding land uses resulting from construction and operation of the Project, and identifies the potential for significant impacts. An evaluation of the Project's contribution to potential cumulative noise impacts is also provided. Noise worksheets and technical data used in this analysis are provided in Appendix I, Noise and Vibration Technical Report, of this Draft EIR.

### 4.9.2 Environmental Setting

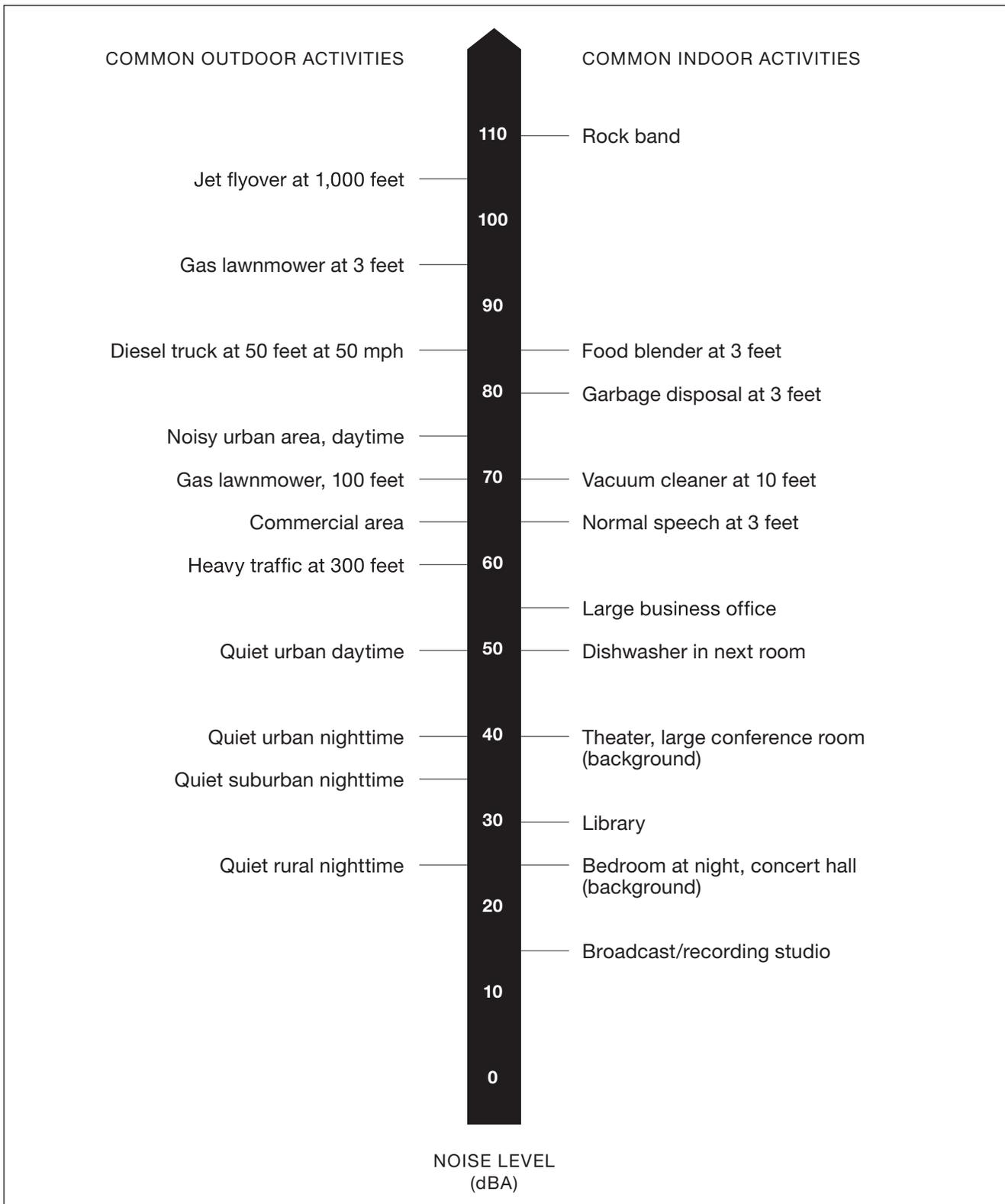
#### Noise and Vibration Basics

##### **Noise**

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound. In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Acoustics primarily addresses the propagation and control of sound.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. Pressure waves traveling through air exert a force registered by the human ear as sound.

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude, with audible frequencies of the sound spectrum ranging from 20 to 20,000 Hz. The typical human ear is not equally sensitive to this frequency range. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of frequency filtering or weighting is referred to as A-weighting, expressed in units of A-weighted decibels (dBA), which is typically applied to community noise measurements. Some representative common outdoor and indoor noise sources and their corresponding A-weighted noise levels are shown in **Figure 4.9-1, Decibel Scale and Common Noise Sources**.



SOURCE: Caltrans

The Culver Studio Innovation Plan

**Figure 4.9-1**

Decibel Scale and Common Noise Sources

### **Noise Exposure and Community Noise**

An individual's noise exposure is a measure of noise over a period of time; a noise level is a measure of noise at a given instant in time, as presented in Figure 4.9-1. However, noise levels rarely persist at that level over a long period of time. Rather, community noise varies continuously over a period of time with respect to the sound sources contributing to the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with many of the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding with the addition and subtraction of distant noise sources, such as changes in traffic volume. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual.

These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the noise exposure to be measured over periods of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. The following noise descriptors are used to characterize environmental noise levels over time, which are applicable to the Project.

$L_{eq}$ : The equivalent sound level over a specified period of time, typically, 1 hour ( $L_{eq(t)}$ ). The  $L_{eq}$  may also be referred to as the average sound level.

$L_{max}$ : The maximum, instantaneous noise level experienced during a given period of time.

$L_{min}$ : The minimum, instantaneous noise level experienced during a given period of time.

$L_x$ : The noise level exceeded a percentage of a specified time period. For instance,  $L_{50}$  and  $L_{90}$  represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

$L_{dn}$ : The average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dB to measured noise levels between the hours of 10:00 P.M. to 7:00 A.M. to account nighttime noise sensitivity. The  $L_{dn}$  is also termed the day-night average noise level (DNL).

CNEL: The Community Noise Equivalent Level (CNEL) is the average A-weighted noise level during a 24-hour day that includes an addition of 5 dB to measured noise levels between the hours of 7:00 A.M. to 10:00 P.M. and an addition of 10 dB to noise levels between the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively.

### **Effects of Noise on People**

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance)
- Interference effects (e.g., communication, sleep, and learning interference)
- Physiological effects (e.g., startle response)
- Physical effects (e.g., hearing loss)

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects interrupt daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep.

With regard to the subjective effects, the responses of individuals to similar noise events are diverse and influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity. Overall, there is no completely satisfactory way to measure the subjective effects of noise, or the corresponding reactions of annoyance and dissatisfaction on people. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships generally occur:<sup>1</sup>

- Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived.
- Outside of the laboratory, a 3 dBA change in ambient noise levels is considered to be a barely perceivable difference.
- A change in ambient noise levels of 5 dBA is considered to be a readily perceivable difference.
- A change in ambient noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

These relationships occur in part because of the logarithmic nature of sound and the decibel scale. The human ear perceives sound in a non-linear fashion; therefore, the dBA scale was developed. Because the dBA scale is based on logarithms, two noise sources do not combine in a simple additive fashion, but rather logarithmically. Under the dBA scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two sources are each producing sound of the same loudness, the resulting sound level at a given distance would be approximately 3 dBA

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<sup>1</sup> California Department of Transportation (Caltrans), *Technical Noise Supplement* (TeNS), Section 2.2.1, September, 2013.

higher than one of the sources under the same conditions. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. Under the dBA scale, three sources of equal loudness together produce a sound level of approximately 5 dBA louder than one source, and ten sources of equal loudness together produce a sound level of approximately 10 dBA louder than the single source.<sup>2</sup>

### **Noise Attenuation**

When noise propagates over a distance, the noise level reduces with distance depending on the type of noise source and the propagation path. Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as “spherical spreading.” Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (i.e., reduce) at a rate of between 6 dBA for acoustically “hard” sites and 7.5 dBA for “soft” sites for each doubling of distance from the reference measurement, as their energy is continuously spread out over a spherical surface (e.g., for hard surfaces, 80 dBA at 50 feet attenuates to 74 at 100 feet, 68 dBA at 200 feet, etc.). Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the reduction in noise levels with distance (i.e., distance loss) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees, which in addition to geometric spreading, provides an excess ground attenuation value of 1.5 dBA (per doubling distance).<sup>3</sup> Most sites are a combination of both hard and soft surfaces; therefore, using the hard site criteria of 6 dBA is the more conservative approach.

Roadways and highways consist of several localized noise sources on a defined path, and hence are treated as “line” sources, which approximate the effect of several point sources. Noise from a line source propagates over a cylindrical surface, often referred to as “cylindrical spreading.” Line sources (e.g., traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.<sup>4</sup> Therefore, noise due to a line source attenuates less with distance than that of a point source with increased distance.

Additionally, receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Atmospheric temperature inversion (i.e., increasing temperature with elevation) can increase sound levels at long distances (e.g., more than 500 feet). Other factors such as air temperature, humidity, and turbulence can also have significant effects on noise levels.<sup>5</sup>

<sup>2</sup> Caltrans, *Technical Noise Supplement* (TeNS), Section 2.2.1.1, September, 2013.

<sup>3</sup> Caltrans, *Technical Noise Supplement* (TeNS), Section 2.1.4.2, September, 2013.

<sup>4</sup> Caltrans, *Technical Noise Supplement* (TeNS), Section 2.1.4.1, September, 2013.

<sup>5</sup> Caltrans, *Technical Noise Supplement* (TeNS), Section 2.1.4.3 September, 2013.

## **Vibration**

Vibration can be interpreted as energy transmitted in waves through the ground or man-made structures, which generally dissipate with distance from the vibration source. Because energy is lost during the transfer of energy from one particle to another, vibration becomes less perceptible with increasing distance from the source.

As described in the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment*, groundborne vibration can be a serious concern for nearby neighbors of a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard.<sup>6</sup> In contrast to airborne noise, groundborne vibration is not a common environmental problem, as it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of groundborne vibration are trains, heavy trucks traveling on rough roads, and construction activities, such as blasting, pile-driving, and operation of heavy earth-moving equipment.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec), and is most frequently used to describe vibration impacts to buildings.

The effects of groundborne vibration include movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. In extreme cases, the vibration can cause damage to buildings. Building damage is not a factor for most projects, with the occasional exception of blasting and pile-driving during construction. Annoyance from vibration often occurs when the vibration levels exceed the threshold of perception by only a small margin. A vibration level that causes annoyance will be well below the damage threshold for normal buildings. The FTA measures of the threshold of architectural damage are 0.2 in/sec PPV for conventional sensitive structures and 0.12 in/sec PPV for extremely sensitive structures.<sup>7</sup>

In residential areas, the background vibration velocity level is usually around 0.0013 in/sec PPV, which is well below the vibration velocity level threshold of perception for humans, which is approximately 0.035 in/sec PPV.<sup>8</sup>

## **Existing Conditions**

### **Noise-Sensitive Receptor Locations**

Some land uses are considered more sensitive to noise than others due to the amount of noise exposure and the types of activities typically involved at the receptor location. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks are generally more sensitive to noise than commercial and industrial land uses. Existing noise sensitive uses within 500 feet of the Project Site include the following:

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<sup>6</sup> FTA, *Transit Noise and Vibration Impact Assessment*, Section 7.1.3, May, 2006.

<sup>7</sup> FTA, *Transit Noise and Vibration Impact Assessment*, Section 12.2.2, May, 2006.

<sup>8</sup> Caltrans, *Transportation and Construction Vibration Guidance Manual*, Chapter 6.B, June, 2004.

- North: The Culver Hotel
- East: Single- and low-density multi-family residential uses and studio facilities
- West: Single- and low-density multi-family residential uses on Van Buren Place about the Studio Campus, with Linwood E. Howe Elementary School located across Van Buren Place
- South: Multi-family residential uses about the Studio Campus and primarily front on Lucerne Avenue

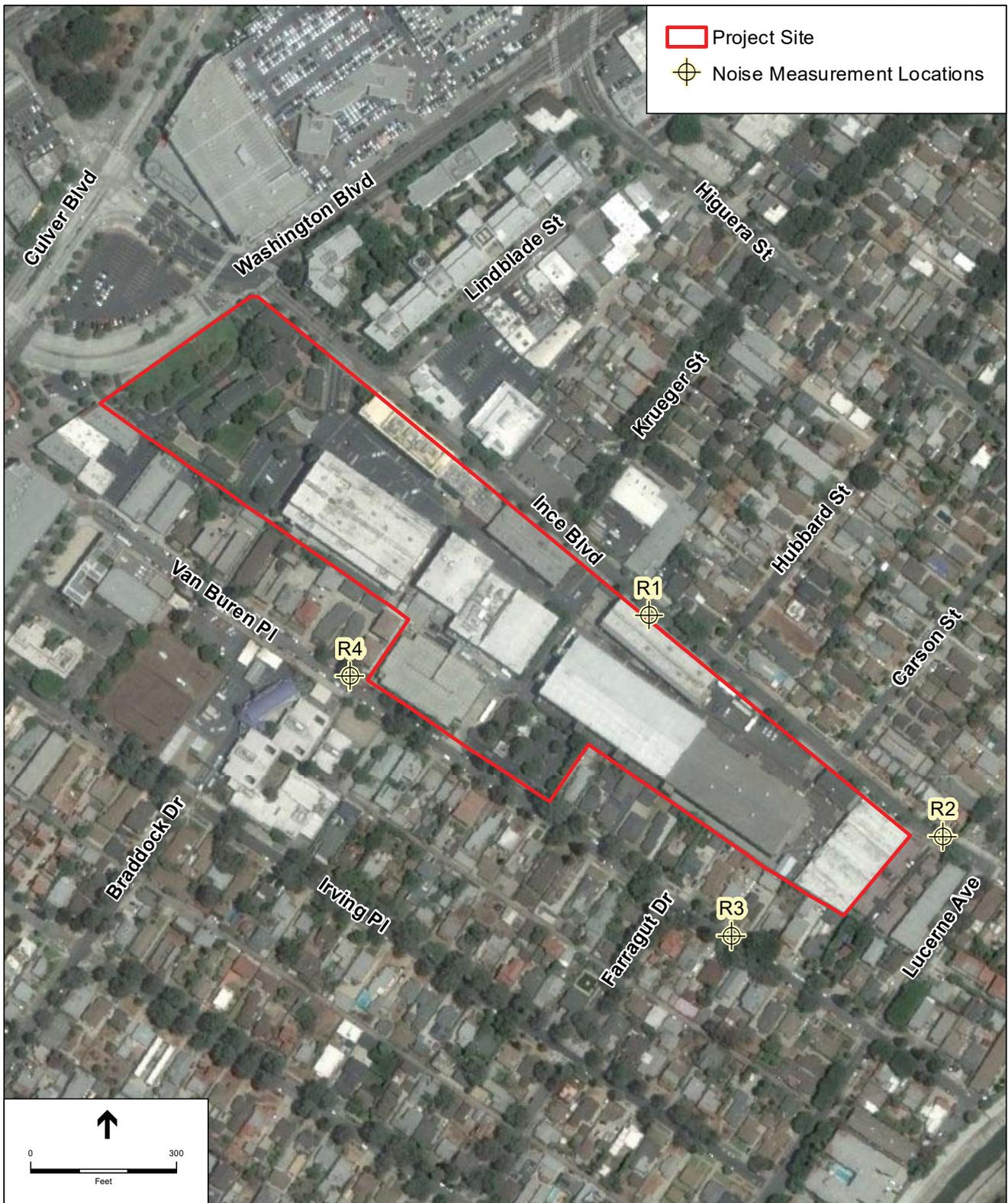
All other noise-sensitive uses are located at greater distances from the Project Site and would experience lower noise levels associated with the Project. Therefore, additional sensitive receptors beyond those identified above are not evaluated.

### ***Ambient Noise Levels***

The existing noise environment at the Project Site is comprised primarily of vehicle traffic including trucks, buses, etc. on Ince Boulevard, Van Buren Place, Lucerne Avenue, and Washington Boulevard. Secondary noise sources include nearby commercial and residential activities. To quantify the existing noise environment, short-term (15-minute) measurements were conducted at four locations, identified as R1 through R4 in **Figure 4.9-2, *Noise Measurement Locations***. A 15-minute measurement is a reasonable duration for sampling ambient noise levels where street traffic is the dominant source, as traffic noise generally does not vary significantly within an hour. Ambient sound measurements were conducted on Thursday, May 4, 2017, to characterize the existing noise environment in the Project vicinity.

- Measurement Location R1: The noise measuring device (sound level meter) was placed on the northern boundary of the Project Site approximately 250 feet east of the northeastern corner of Ince Boulevard and Krueger Street. Location R1 represents the existing general noise environment at the Project Site and nearby single-family residential uses along Ince Boulevard.
- Measurement Location R2: This measurement location represents the noise environment of the Project Site and residential uses along Lucerne Avenue. The sound level meter was placed on the northwestern corner of Ince Boulevard and Lucerne Avenue.
- Measurement Location R3: This measurement location represents the noise environment of the single family residential uses along Van Buren Place. The sound level meter was placed on the northeastern corner of Van Buren Place and Farragut Drive.
- Measurement Location R4: This measurement location represents the noise environment of the single-family residential uses and school uses along Van Buren Place. The sound level meter was placed near the Linwood E Howe Elementary school across the street from the existing Van Buren parking garage.

Noise measurements were conducted using Larson-Davis LxT1 Sound Level Meters (SLM). The Larson-Davis LxT1 SLM is a Type 1 standard instrument as defined in the American National Standard Institute (ANSI) S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The recording microphones were placed at a height of 5 feet above the local grade elevation. The sound level meters were setup to collect the hourly average noise level ( $L_{eq}$ ).



SOURCE: Google Earth, 7/8/2016 (Aerial)

The Culver Studios Innovation Plan  
**Figure 4.9-2**  
 Noise Measurement Locations

The results of the ambient sound measurements are summarized in **Table 4.9-1, Summary of Ambient Noise Measurements**. As shown therein, the measure noise levels ranged from 56 dBA  $L_{eq}$  at R4 to 71 dBA  $L_{eq}$  at R2 in which the primary source of noise was traffic along roadways as recorded by an ESA PCR technician.

**TABLE 4.9-1  
SUMMARY OF AMBIENT NOISE MEASUREMENTS**

<b>Location, Duration, Existing Land Uses, and Date of Measurements</b>	<b>Measured Ambient Noise Levels, dBA</b>
R1 5/4/17(9:54 A.M. to 10:09 A.M.)/Thursday	66
R2 5/4/17(9:34 A.M. to 9:49 A.M.)/Thursday	67
R3 5/4/17(9:14 A.M. to 9:29 A.M.)/Thursday	57
R4 5/4/17(10:17 A.M. to 10:32 A.M.)/Thursday	56

SOURCE: ESA PCR 2017.

### **Existing Roadway Noise Levels**

To further characterize the Project area’s ambient noise environment, CNEL noise levels attributed to existing traffic on local roadways were calculated using a traffic noise prediction model, which was developed based on calculation methodologies provided in the Federal Highway Administration (FHWA) Traffic Noise Model Technical Manual,<sup>9</sup> and traffic data provided in the Project’s Traffic Impact Study<sup>10</sup> (see Appendix K of this Draft EIR). The FHWA’s methodology, considered a noise industry standard, allows for the definition of roadway configurations, barrier information (if any), and receiver locations.

Existing roadway noise levels were calculated for 39 roadway segments located in the vicinity of the Project Site. The roadway segments selected for analysis are those expected to be most directly impacted by Project-related traffic, which, for the purpose of this analysis, includes the roadways located near and immediately adjacent to the Project Site. These roadways, when compared to roadways located further away from the Project Site, would experience the greatest percentage increase in traffic generated by the Project (as distances are increased from the Project Site, traffic is spread out over a greater geographic area and its effects are reduced).

Because the monitoring data validates the use of a project-specific traffic noise prediction model, the ambient noise environment of the Project vicinity can be characterized by 24-hour CNEL levels attributable to existing traffic on local roadways. As indicated in **Table 4.9-2, Predicted Existing Vehicular Traffic Noise Levels**, the calculated CNEL (at the roadway right-of-way) from

<sup>9</sup> Federal Highway Administration, Traffic Noise Model Technical Manual, February, 1998.

<sup>10</sup> Fehr & Peers, Culver Studios Modified Comprehensive Plan Update #7, May, 2017.

actual existing traffic volumes on the analyzed roadway segments ranged from 59.1 dBA to 70.2 dBA.

**TABLE 4.9-2  
 PREDICTED EXISTING VEHICULAR TRAFFIC NOISE LEVELS**

<b>Roadway Segment</b>	<b>Adjacent Land Use</b>	<b>Existing CNEL (dBA) at Adjacent Land Use <sup>a</sup></b>
<b>Culver Boulevard</b>		
Between Venice Boulevard and Ince Boulevard	Commercial	65.4
Between Ince Boulevard and Main Street	Commercial	69.4
Between Main Street and Cardiff Avenue	Commercial	68.9
Between Cardiff Avenue and Washington Boulevard	Commercial	69.0
Between Washington Boulevard and Lafayette Place	Commercial	66.2
Between Lafayette Place and Duquesne Avenue	Commercial	67.0
Between Duquesne Avenue and Madison Avenue	Residential/ Commercial	67.9
Between Madison Avenue and Overland Ave	Residential/ Commercial	69.2
<b>Ince Boulevard</b>		
Between Washington Boulevard and Culver Studio Gate 2	Commercial	64.6
Between Culver Studio Gate 2 and Culver Studio Gate 3	Commercial	59.4
Between Culver Studio Gate 3 and Lucerne Avenue	Residential/ Commercial	59.1
<b>Lucerne Avenue</b>		
Between Higuera Street and Ince Boulevard	Residential	61.5
Between Ince Boulevard and Duquesne Avenue	Residential	62.4
<b>Venice Boulevard</b>		
Between La Cienega Avenue and Cattaraugus Avenue	Lodging/Commercial	67.9
Between Cattaraugus Avenue and National Boulevard	Residential/Commercial	67.8
Between National Boulevard and Robertson Boulevard	Commercial	69.0
Between Robertson Boulevard and Culver Boulevard	Commercial	70.2
Between Culver Boulevard and Main Street/Bagley Avenue	Commercial	69.1
Between Main Street/Bagley Avenue and Hughes Avenue	Residential/Commercial	68.4
Between Hughes Avenue and Clarington Avenue	Residential/Commercial	68.5
Between Clarington Avenue and Motor Avenue	Commercial	68.5
Between Motor Avenue and Overland Avenue	Residential/Commercial	68.9
<b>Washington Boulevard</b>		
Between La Cienega Boulevard and National Boulevard	Commercial	68.7
Between National Boulevard and Higuera Street	Commercial	68.8
Between Higuera Street and Ince Boulevard	Commercial	68.9
Between Ince Boulevard and Culver Boulevard	Lodging/Commercial	68.1
Between Culver Boulevard and Duquesne Avenue	Commercial	67.6
Between Duquesne Avenue and Clarington Avenue	Residential/Commercial	67.6
Between Clarington Avenue and Motor Avenue	Religious/Commercial	69.6
Between Motor Avenue and Overland Avenue	Commercial	69.3

Roadway Segment	Adjacent Land Use	Existing CNEL (dBA) at Adjacent Land Use <sup>a</sup>
<b>Higuera Street</b>		
Between Washington Boulevard and Lucerne Avenue	Residential/Commercial	66.6
Between Lucerne Avenue and Jefferson Boulevard	Residential/Commercial	66.1
<b>Duquesne Avenue</b>		
Between Jefferson Boulevard and Lucerne Avenue	Residential/Commercial	68.7
Between Lucerne Avenue and Culver Boulevard	Residential/Commercial	66.8
<b>National Boulevard</b>		
Between Robertson Boulevard and I-10 EB On-Ramp	Commercial	69.5
Between I-10 EB On-Ramp and Venice Boulevard	Commercial	68.4
Between Venice Boulevard and Washington Boulevard	Commercial	67.3
Between Washington Boulevard and Hayden Avenue	Residential/Commercial	69.0
Between Hayden Avenue and Jefferson Boulevard	Residential/Park/Commercial	66.7

<sup>a</sup> Calculated based on existing traffic volumes.

SOURCE: ESA PCR 2017.

### ***Vibration-Sensitive Receptor Locations***

Typically, ground-borne vibration generated by man-made activities (i.e., rail and roadway traffic, operation of mechanical equipment, and typical construction equipment) diminishes rapidly with distance from the vibration source. The FTA uses a screening distance of 50 feet for residential uses and historic buildings. When vibration-sensitive uses are within these distances from a project site, vibration impact analysis is required. The Mansion, Bungalows, Building D, E, H, I, and Stage 11/12/14 and 15/16) are located within the area of potential vibration impact (within 50 feet) and could be affected by vibration caused by short-term construction. Low-density multi-family residential uses to the east of the Project Site, single- and low-density multi-family residential uses on Van Buren Place abut the Studio Campus, with Linwood E. Howe Elementary School located across Van Buren Place, and multi-family residential uses abut the Studio Campus and primarily front on Lucerne Avenue are located within the area of potential perceptible vibration generated on the Project Site (i.e., within 50 feet) and could be affected by vibration caused by short-term Project construction and long-term Project operation.

### **4.9.3 Regulatory Framework**

Many government agencies have established noise standards and guidelines to protect citizens from potential hearing damage and various other adverse physiological and social effects associated with noise and ground-borne vibration. Federal and local policies and/or standards such as those of the FTA, U.S. Environmental Protection Agency (USEPA), and regulations in the City of Culver City General Plan Noise Element, and the Culver City Municipal Code (CCMC) would be applicable to the Project, as summarized below.

## Federal

### ***Federal Noise and Vibration Standards***

Under the authority of the Noise Control Act of 1972, the USEPA established noise emission criteria and testing methods published in Parts 201 through 205 of Title 40 of the Code of Federal Regulations (CFR) that apply to some transportation equipment (e.g., interstate rail carriers, medium trucks, and heavy trucks) and construction equipment. In 1974, USEPA issued guidance levels for the protection of public health and welfare in residential land use areas<sup>11</sup> of an outdoor  $L_{dn}$  of 55 dBA and an indoor  $L_{dn}$  of 45 dBA. These guidance levels are not considered as standards or regulations and were developed without consideration of technical or economic feasibility. Groundborne vibration levels resulting from construction activities at the Project Site were estimated using data published by FTA in its *Transit Noise and Vibration Impact Assessment* (2006). The potential vibration levels at off-site sensitive locations resulting from implementation of the Project are analyzed against the vibration thresholds established by the FTA to determine whether an exceedance of allowable vibration levels would occur. The FTA has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities, which are shown in **Table 4.9-3, Construction Vibration Damage Criteria**.

**TABLE 4.9-3  
 CONSTRUCTION VIBRATION DAMAGE CRITERIA**

<b>Building Category</b>	<b>PPV (in/sec)</b>
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage (such as historic buildings)	0.12

SOURCE: FTA 2006.

In addition, the FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three land-use categories: Vibration Category 1 – High Sensitivity, Vibration Category 2 – Residential, and Vibration Category 3 – Institutional. The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference. The vibration thresholds associated with human annoyance for these three land-use categories are shown in **Table 4.9-4,**

<sup>11</sup> USEPA, *EPA Identifies Noise Levels Affecting Health and Welfare*, April, 1974.

*Groundborne Vibration Impact Criteria for General Assessment.* No thresholds have been adopted or recommended for commercial and office uses.

**TABLE 4.9-4  
GROUNDBORNE VIBRATION IMPACT CRITERIA FOR GENERAL ASSESSMENT**

Land Use Category	Frequent Events <sup>a</sup>	Occasional Events <sup>b</sup>	Infrequent Events <sup>c</sup>
<b>Category 1:</b> Buildings where vibration would interfere with interior operations.	65 VdB <sup>d</sup>	65 VdB <sup>d</sup>	65 VdB <sup>d</sup>
<b>Category 2:</b> Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
<b>Category 3:</b> Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB

- <sup>a</sup> "Frequent Events" is defined as more than 70 vibration events of the same source per day.
- <sup>b</sup> "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.
- <sup>c</sup> "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.
- <sup>d</sup> This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes.

SOURCE: FTA 2006.

## Local

### **City of Culver City General Plan Noise Element**

The City of Culver City Noise Standards are developed from those of several Federal and State agencies including the Federal Highway Administration, the Environmental Protection Agency, the Department of Housing and Urban Development, the American National Standards Institute, and the State of California Department of Health Services. These standards set limits on the noise exposure level for various land uses. **Table 4.9-5, City of Culver City Exterior Noise Standards,** lists exterior noise level standards and the type of occupancy to which they should be applied.

**TABLE 4.9-5  
CITY OF CULVER CITY EXTERIOR NOISE STANDARDS**

Zone	dBA CNEL
Residential	65
Commercial	65

SOURCE: City of Culver City Noise Element.

**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.

### ***City of Culver City Municipal Code***

Chapter 9.07 of the City of Culver City Municipal Code (CCMC) provides specific noise restrictions and exemptions for noise sources within the City. Several of these requirements are applicable to the proposed Project and are discussed below.

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.

## 4.9.4 Environmental Impacts

### **Methodology**

#### ***On-Site Construction Noise***

On-site construction noise impacts were evaluated by determining the noise levels generated by the different types of construction activity anticipated, calculating the construction-related noise level at nearby sensitive receptor locations, and comparing these construction-related noise levels to existing ambient noise levels (i.e., noise levels without construction noise) at those receptors. More, specifically, the following steps were undertaken to assess construction-period noise impacts.

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 4.9-1)
2. Typical noise levels for each type of construction equipment were obtained from the Federal Highway Administration roadway construction noise model;
3. Distances between construction site locations (noise sources) and surrounding sensitive receptors were measured using Project architectural drawings and site plans and Google Earth;
4. The construction noise level was then calculated, in terms of hourly Leq, for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance; and
5. Construction noise levels were then compared to the construction noise significance thresholds identified below.

#### ***Off-Site Roadway Noise (Construction and Operation)***

Roadway noise impacts have been evaluated using the Caltrans Technical Noise Supplement (TeNS) method based on the roadway traffic volume data provided in the Traffic Study prepared for the Project and included in Appendix K of this Draft EIR. This method allows for the definition of roadway configurations, barrier information (if any), and receiver locations.

Roadway noise attributable to Project development was calculated and compared to baseline noise levels that would occur under the “Without Project” condition.

### ***Stationary Point-Source Noise (Operations)***

Stationary point-source noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources, such as rooftop mechanical equipment, parking structure, special events, outdoor programming, and loading area activity, calculating the hourly  $L_{eq}$  noise level from each noise source at sensitive receptor property lines, and comparing such noise levels to existing ambient noise levels. More specifically, the following steps were undertaken to calculate outdoor stationary point-source noise impacts:

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table 4.9-1);
2. Distances between stationary noise sources and surrounding sensitive receptor locations were measured using Project architectural drawings, Google Earth, and site plans;
3. Stationary-source noise levels were then calculated for each sensitive receptor location based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance;
4. Noise level increases were compared to the stationary source noise significance thresholds identified below; and
5. For outdoor mechanical equipment, the maximum allowable noise emissions from any and all outdoor mechanical equipment were specified such that noise levels would not exceed the significance threshold identified below.

Parking related noise levels were estimated using the methodology recommended by FTA for the general assessment of stationary transit noise source. Using the methodology, the Project’s peak hourly noise level that would be generated by the onsite parking levels was estimated using the following FTA equation for a parking lot:

$$L_{eq}(h) = SEL_{ref} + 10\log(NA/1000) - 35.6, \text{ where}$$

$$L_{eq}(h) = \text{hourly } L_{eq} \text{ noise level at 50 feet}$$

$SEL_{ref}$  = reference noise level for stationary noise source represented in sound exposure level (SEL) at 50 feet

$N_A$  = number of automobiles per hour

### ***Ground-Borne Vibration (Construction and Operations)***

Ground-borne vibration impacts were evaluated by identifying potential vibration sources, measuring the distance between vibration sources and surrounding structure locations, and making a significance determination based on the significance thresholds described below.

## Thresholds of Significance

The significance thresholds below are derived from the Environmental Checklist questions in Appendix G of the State CEQA Guidelines. Accordingly, a significant noise or vibration impact would occur if the Project would result in:

NOISE 1: The exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

NOISE 2: The exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;

NOISE 3: A substantial permanent increase in ambient noise levels in the vicinity of the Project above levels existing without the Project;

NOISE 4: A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project.

As discussed in the Initial Study, provided in Appendix A of this Draft EIR, and in Chapter 6, Other CEQA Considerations, 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 the Los Angeles International Airport (LAX), located approximately three miles to the west and five 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. As such, no further analysis of these topics in this EIR section is necessary.

The following criteria are used to determine potential noise and vibration impacts of the Project pursuant to the thresholds of significance and based on the regulatory framework described above.

- Project construction activities 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.
- Project construction activities would not incorporate noise reduction techniques as specified in the City's General Plan Policy 2.A of the Noise Element.
- The Project-related operations would cause ambient noise levels to increase by 5 dBA,  $L_{eq}$  or more.
- The project-related operation of the loading dock, or refuse collection area exceeds the average ambient noise level by 10 dBA.
- Potential Building Damage – Project construction activities cause ground-borne vibration levels to exceed 0.2 inch-per-second PPV at the nearest residential and school buildings.
- Potential Building Damage – Project construction activities cause ground-borne vibration levels to exceed 0.12 inch-per-second PPV at historic structures (the Mansion, Bungalows, Building D, E, H, I, and Stage 11/12/14 and 15/16).

- Potential Human Annoyance – Project construction activities cause ground-borne vibration levels to exceed 80 VdB at nearby residential uses or 83 VdB at nearby school uses.

## **Project Characteristics and Project Design**

### ***Project Characteristics***

The Culver Studios Innovation Plan proposes to modernize and expand the existing Central Area, encompassing the portion of the Studio Campus south of the Mansion and proposed Relocated Bungalow Area just south of the Mansion. Proposed improvements include the construction of six new Digital Media buildings which would house a flexible mix of creative space, production space, and digital media stages, and would replace six existing buildings housing offices and support services (Buildings L, O, X, Y, Z, and the Commissary) and four existing buildings housing sound stages, which would be demolished. The Project would also include: (1) the development of a new subterranean Central Parking Structure, and would replace the existing Van Buren Parking Structure with a new below- at- and above-grade Van Buren Parking Structure; (2) the decentralization of central plant (e.g., utility) facilities; (3) the accommodation of production vehicle staging and parking, service vehicle operation, deliveries, and trash activities, below grade where they currently occur above-grade; and (4) circulation and Studio gate improvements intended to improve overall vehicle queuing and backups on Ince Boulevard.

Applicable regulations with which the Project must comply include the following:

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

### ***Project Design Features***

In addition to these compliance measures, the Project incorporates—and the analysis assumes implementation of—the following PDF to minimize noise and vibration impacts:

**PDF-AES-2 (Construction Staging):** All staging and storage of construction equipment and materials, including the construction dumpster, shall be on-site only. The Property Owner must obtain written permission from adjacent property owners for any construction staging occurring on adjacent property.

**PDF-NOISE-1 (Project Construction Schedule):** Prior to issuance of a building permit, notice of the Project construction schedule shall be provided to all abutting property owners and occupants. Evidence of such notification shall be provided to the Building Division. The notice shall identify the commencement date and proposed timing for all construction phases (demolition, grading, excavation/shoring, foundation, rough frame, plumbing, roofing, mechanical and electrical, and exterior finish).

**PDF-NOISE-2 (Foundation Piles):** Any foundation piles shall be drilled and cast not driven.

**PDF-NOISE-3 (Parking Structure Floors):** All parking structure levels in the new parking garage shall be treated with a broom finish or some other treatment that results in a no-skid surface.

**PDF-NOISE-4 (Van Buren Parking Structure – Noise Barrier):** A concrete wall shall be placed along level 1 of the new Van Buren parking structure that extend from the ground up to the underside of the Level 2 slab and the concrete wall shall be free from gaps or penetrations.

**PDF-NOISE-5 (Van Buren Parking Structure – Noise Barrier):** The pre-cast concrete panels at the north and south side of the parking structure shall weigh at least 4 lbs per square foot, form a continuous façade with no gaps between precast concrete panels.

**PDF-NOISE-6 (Parking Structure Noise Level):** All parking structure exhaust or ventilation systems shall be designed, through the use of quiet fans and duct silencers or similar methods, to not exceed 55 dBA  $L_{eq}$  from 7:00 AM to 10:00 PM and 50 dBA  $L_{eq}$  from 10:00 PM to 7:00 AM at the neighboring property lines including the west property line per sound level limits of the Culver City Noise Element.

**PDF-NOISE-7 (Construction Rules Sign):** During all phases of construction, a “Construction Rules Sign” that includes contact names and telephone numbers of the Applicant, Property Owner, construction contractor(s), and the City, shall be posted on the Property in a location that is visible to the public. These names and telephone numbers shall also be made available to adjacent property owners and occupants to the satisfaction of the Planning Manager and Building Official.

**PDF-NOISE-8 (Compliance with Noise Element):** The following noise standards from Policy 2.A of the City’s General Plan Noise Element shall be complied with at all times:

- A. No construction equipment shall be operated without an exhaust muffler, and all such equipment shall have mufflers and sound control devices (i.e., intake silencers and noise shrouds) that are no less effective than those provided on the original equipment;
- B. All construction equipment shall be properly maintained to minimize noise emissions;
- C. If any construction vehicles are serviced at a location onsite, the vehicle(s) shall be setback from any street and other property lines so as to maintain the greatest distance from the public right-of-way and from Noise Sensitive Receptors;
- D. Noise impacts from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) shall be minimized by proper selection of equipment and the installation of acoustical shielding as approved by the Planning Manager and the Building
- E. The Project shall not allow any delivery truck idling in the loading area. Signs shall be posted prohibiting idling.

**PDF-NOISE-9 (Outdoor Activities):** Shoots, production support film screenings, concerts, outdoor teaming space, housing of amenities, and passive recreational uses in any proposed balconies, courtyards, patios, walkways, and decks on proposed buildings, shall not occur where open to the nearby residences

## 4.9.5 Analysis of Project Impacts

**Threshold NOISE-1:** The Project would have a potentially significant impact on noise if it would result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

**Impact Statement NOISE-1: Construction activities would increase noise levels at off-site noise-sensitive receptors in excess of the applicable thresholds. However, with implementation of the identified construction mitigation measures and project design features, noise levels would be less than significant. Operation of the Project would not increase noise levels at off-site noise-sensitive receptors in the Project Area in excess of the applicable thresholds. Thus, operational noise impacts would be less than significant and operational mitigation measures would not be required.**

### Construction Noise

#### *On-Site Construction Noise*

Construction of the Project would require the use of heavy equipment during the various construction phases at the Project Site. During each stage of development, there would be a different mix of equipment. As such, construction activity noise levels at and near the Project Site would fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment.

Individual pieces of construction equipment anticipated during Project construction could produce maximum noise levels of 74 dBA to 89 dBA  $L_{max}$  at a reference distance of 50 feet from the noise source, as shown in **Table 4.9-6**. These maximum noise levels would occur when equipment is operating at full power. The estimated usage factor for the equipment is also shown in Table 4.9-6. The usage factors are based on FHWA's RCNM User's Guide.<sup>12</sup>

During Project construction, the nearest and most affected off-site noise sensitive receptors that would be exposed to increased noise levels would be the existing residential uses located in proximity to the Project Site as well as noise sensitive school uses. Specifically, the nearest off-site noise sensitive receptors include the following:

- R1: Single-family residential uses located along Ince Boulevard.
- R2: Residential uses located along Lucerne Avenue.
- R3: Single-family residential uses located along Van Buren Place.

<sup>12</sup> Federal Highway Administration, Roadway Construction Noise Model User's Guide, P. 3, 2006.

- R4: Single-family residential uses and Linwood E. Howe Elementary School located along Van Buren Place.

**TABLE 4.9-6  
 CONSTRUCTION EQUIPMENT NOISE LEVELS**

Construction Equipment	Estimated Usage Factor (%)	Noise Level at 50 Feet (dBA, Lmax)
Air Compressors	50	78
Bore/Drill Rig	20	79
Bulldozer	40	82
Crane	40	81
Dozer	40	82
Excavator	40	81
Forklift	10	75
Grader	40	85
Jackhammers	20	89
Man lift/Scissor Lift	20	75
Other Equipment	50	85
Pumps	50	81
Roller	25	80
Sweeper/Scrubbers	10	82
Tractor/Loader/Backhoe	25	80
Welders	40	74

SOURCE: FHWA 2006

Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are being operated concurrently. As discussed previously, the Project’s estimated construction noise levels were calculated for a scenario in which all construction equipment was assumed to be operating simultaneously and located at the construction area nearest to the affected receptors to present a conservative impact analysis. The estimated noise levels at the off-site sensitive receptors were calculated using the FHWA’s RCNM, and were based on a maximum concurrent operation of up to 82 pieces of hand tools and equipment (i.e., pneumatic hand tools/air compressors, cranes, tractor/loader/backhoe, forklift, generator sets, welders, etc.), which is considered a worst-case evaluation because the Project would typically use less overall equipment on a daily basis, and as such would generate lower noise levels. In addition, the noise levels were estimated including the assumption that there would be some construction phase overlap between excavation and foundations and building shell, Van Buren garage construction, and landscaping. **Table 4.9-7, Estimate of Construction Noise levels ( $L_{eq}$ ) at Existing Off-Site Sensitive Receptor Locations**, shows the estimated construction noise levels that would occur at the nearest off-site sensitive uses during a peak day of construction activity at the Project Site.

**TABLE 4.9-7  
ESTIMATE OF CONSTRUCTION NOISE LEVELS (L<sub>eq</sub>) AT EXISTING OFF-SITE SENSITIVE RECEIVER LOCATIONS**

Off-site Sensitive Land Uses	Location	Nearest Distance from Construction Activity to Noise Receptor (ft.)	Estimated Maximum Construction Noise Levels (dBA L <sub>eq</sub> )	Ambient Noise Levels	Exceed Ambient Noise Levels?
R1	North of the Project Site along Ince Boulevard	50	89	66	Yes
R2	East of the Project Site along Lucerne Avenue	75	85	67	Yes
R3	Southeast of the Project Site along Van Buren Place	40	90	57	Yes
R4	South of the Project Site along Van Buren Boulevard; near elementary school	50	89	56	Yes

SOURCE: ESA PCR 2017.

As shown in Table 4.9-7, construction noise levels are estimated to reach a maximum of 90 dBA at the nearest sensitive receptor (namely R3). Construction activities would temporarily increase the existing ambient noise in close proximity of the construction site. Construction activities would be required to comply with the City’s allowable hours as described above and would be temporary in nature. Therefore, construction activities would comply with the City’s noise standard.

Policy 2.A of the Noise Element requires noise reduction techniques to ensure that the noise impacts associated with construction activities would be minimized to the maximum extent feasible. Implementation of project design features PDF-NOISE-1 through -5, -8 and -9 would help reduce Project noise impacts during construction. However, construction noise impacts would be considered potentially significant without implementation of additional noise reduction techniques consistent with Policy 2.A.

**Off-Site Construction Noise**

Delivery and haul truck trips would occur throughout the construction period. Trucks traveling to and from the Project Site would be required to travel along the haul route approved by the City of Culver City for the Project. An estimated maximum of approximately 209 haul truck trips would occur per day. Haul truck traffic would take the most direct route to the appropriate freeway ramp. Haul trucks would enter and exit the Project Site from the Ince Boulevard gates along the eastern part of the property. The trucks would continue onto Washington Boulevard to Robertson Boulevard and then onto the Interstate 10 Freeway.

The Project’s truck trips would generate noise levels of approximately 64.2 dBA, L<sub>eq</sub> at 25 feet distance from the center line of roadways along the route. As shown in Table 4.9-2, the existing noise levels along the haul route are 64.6 dBA, L<sub>eq</sub> along Ince Street and 68.9 dBA, along Washington Boulevard. Construction traffic noise levels generated by truck trips would increase traffic noise levels along Ince Street by 2.8 dBA and along Washington Boulevard by 1.3 dBA.

As discussed above in Section 4.9.2, a 3 dBA change in ambient noise levels is considered to be a barely perceivable difference. Therefore, the noise levels generated by truck trips would not substantially increase the existing noise levels in the surrounding environment. Construction truck trips would be required to comply with the City’s allowable hours as described above and would be temporary in nature. Therefore, construction activities would comply with the City’s noise standard and impacts would be less than significant.

## Operational Noise

### **Operational Traffic Noise Compared to Existing Traffic Baseline Conditions**

Existing roadway noise levels were calculated along various arterial segments adjacent 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.

Project impacts are shown in **Table 4.9-8, Off-Site Traffic Noise Impacts-Existing With Project Conditions**. As indicated, the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 1.5 dBA CNEL, which would occur along Ince Boulevard, Between Culver Studio Gate 2 and Culver Studio Gate 3 adjacent to commercial uses. This increase in sound level would be below the 5 dBA increase threshold, and the increase in sound level would be lower at the remaining roadway segments analyzed. The Project-related noise increases would be less than significant, and no mitigation measures would be required.

**TABLE 4.9-8  
 OFF-SITE TRAFFIC NOISE IMPACTS – EXISTING WITH PROJECT CONDITIONS**

Roadway Segment	Existing Land Uses Located along Roadway Segment	Calculated Traffic Noise Levels along adjacent Land Uses (dBA CNEL)				
		Existing (A)	Existing with Project (B)	Project Increment (B-A)	Threshold	Exceed Threshold ?
<b>Culver Boulevard</b>						
Between Venice Boulevard and Ince Boulevard	Commercial	65.4	65.7	0.3	5	No
Between Ince Boulevard and Main Street	Commercial	69.4	69.5	0.1	5	No
Between Main Street and Cardiff Avenue	Commercial	68.9	69.1	0.2	5	No
Between Cardiff Avenue and Washington Boulevard	Commercial	69.0	69.2	0.2	5	No
Between Washington Boulevard and Lafayette Place	Commercial	66.2	66.5	0.3	5	No
Between Lafayette Place and Duquesne Avenue	Commercial	67.0	67.3	0.3	5	No
Between Duquesne Avenue and Madison Avenue	Residential/Commercial	67.9	68.1	0.2	5	No
Between Madison Avenue and Overland Ave	Residential/Commercial	69.2	69.3	0.1	5	No

**Calculated Traffic Noise Levels  
along adjacent Land Uses  
(dBA CNEL)**

Roadway Segment	Existing Land Uses Located along Roadway Segment	Existing (A)	Existing with Project (B)	Project Increment (B-A)	Threshold	Exceed Threshold ?
<b>Ince Boulevard</b>						
Between Washington Boulevard and Culver Studio Gate 2	Commercial	64.6	65.2	0.6	5	No
Between Culver Studio Gate 2 and Culver Studio Gate 3	Commercial	59.4	60.9	1.5	5	No
Between Culver Studio Gate 3 and Lucerne Avenue	Residential/Commercial	59.1	59.1	0.0	5	No
<b>Lucerne Avenue</b>						
Between Higuera Street and Ince Boulevard	Residential	61.5	61.5	0.0	5	No
Between Ince Boulevard and Duquesne Avenue	Residential	62.4	62.4	0.0	5	No
<b>Venice Boulevard</b>						
Between La Cienega Avenue and Cattaraugus Avenue	Lodging/Commercial	67.9	68.0	0.1	5	No
Between Cattaraugus Avenue and National Boulevard	Residential/Commercial	67.8	67.9	0.1	5	No
Between National Boulevard and Robertson Boulevard	Commercial	69.0	69.1	0.1	5	No
Between Robertson Boulevard and Culver Boulevard	Commercial	70.2	70.2	0.0	5	No
Between Culver Boulevard and Main Street/Bagley Avenue	Commercial	69.1	69.1	0.0	5	No
Between Main Street/Bagley Avenue and Hughes Avenue	Residential/Commercial	68.4	68.4	0.0	5	No
Between Hughes Avenue and Clarington Avenue	Residential/Commercial	68.5	68.5	0.0	5	No
Between Clarington Avenue and Motor Avenue	Commercial	68.5	68.6	0.1	5	No
Between Motor Avenue and Overland Avenue	Residential/Commercial	68.9	68.9	0.0	5	No
<b>Washington Boulevard</b>						
Between La Cienega Boulevard and National Boulevard	Commercial	68.7	68.9	0.2	5	No
Between National Boulevard and Higuera Street	Commercial	68.8	68.9	0.1	5	No
Between Higuera Street and Ince Boulevard	Commercial	68.9	69.3	0.4	5	No
Between Ince Boulevard and Culver Boulevard	Lodging/Commercial	68.1	68.3	0.2	5	No
Between Culver Boulevard and Duquesne Avenue	Commercial	67.6	67.7	0.1	5	No
Between Duquesne Avenue and Clarington Avenue	Residential/Commercial	67.6	67.7	0.1	5	No
Between Clarington Avenue and Motor Avenue	Religious/Commercial	69.6	69.7	0.1	5	No

**Calculated Traffic Noise Levels  
 along adjacent Land Uses  
 (dBA CNEL)**

Roadway Segment	Existing Land Uses Located along Roadway Segment	Existing (A)	Existing with Project (B)	Project Increment (B-A)	Threshold	Exceed Threshold ?
Between Motor Avenue and Overland Avenue	Commercial	69.3	69.3	0.0	5	No
<b>Higuera Street</b>						
Between Washington Boulevard and Lucerne Avenue	Residential/Commercial	66.6	66.6	0.0	5	No
Between Lucerne Avenue and Jefferson Boulevard	Residential/Commercial	66.1	66.1	0.0	5	No
<b>Duquesne Avenue</b>						
Between Jefferson Boulevard and Lucerne Avenue	Residential/Commercial	68.7	68.9	0.2	5	No
Between Lucerne Avenue and Culver Boulevard	Residential/Commercial	66.8	67.0	0.2	5	No
<b>National Boulevard</b>						
Between Robertson Boulevard and I-10 EB On-Ramp	Commercial	69.5	69.5	0.0	5	No
Between I-10 EB On-Ramp and Venice Boulevard	Commercial	68.4	68.4	0.0	5	No
Between Venice Boulevard and Washington Boulevard	Commercial	67.3	67.3	0.0	5	No
Between Washington Boulevard and Hayden Avenue	Residential/Commercial	69.0	69.1	0.1	5	No
Between Hayden Avenue and Jefferson Boulevard	Residential/Park/Commercial	66.7	66.8	0.1	5	No

SOURCE: ESA PCR 2017.

**Operational Traffic Noise Compared to Future (2021) Traffic Conditions**

Future roadway noise levels were also calculated along various arterial segments adjacent to the Project as compared to 2021 baseline traffic noise levels that would occur with implementation of the Project. Project impacts are shown in **Table 4.9-9, Off-Site Traffic Noise Impacts – Future (2021) With Project Conditions**. As indicated, the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 1.5 dBA CNEL, which would occur along Ince Boulevard, Between Culver Studio Gate 2 and Culver Studio Gate 3 adjacent to commercial uses. This increase in sound level would be below the 5 dBA increase threshold, and the increase in sound level would be lower at the remaining roadway segments analyzed. The Project-related noise increases would be less than significant, and no mitigation measures would be required.

**TABLE 4.9-9  
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2021) WITH PROJECT CONDITIONS**

Roadway Segment	Existing Land Uses Located along Roadway Segment	Calculated Traffic Noise Levels along adjacent Land Uses dBA CNEL				
		Future (A)	Future with Project (B)	Project Increment (B-A)	Threshold	Exceed Threshold ?
<b>Culver Boulevard</b>						
Between Venice Boulevard and Ince Boulevard	Commercial	66.1	66.2	0.3	5	No
Between Ince Boulevard and Main Street	Commercial	69.9	70.1	0.1	5	No
Between Main Street and Cardiff Avenue	Commercial	69.4	69.6	0.2	5	No
Between Cardiff Avenue and Washington Boulevard	Commercial	69.5	69.7	0.2	5	No
Between Washington Boulevard and Lafayette Place	Commercial	66.8	67.0	0.3	5	No
Between Lafayette Place and Duquesne Avenue	Commercial	67.5	67.7	0.3	5	No
Between Duquesne Avenue and Madison Avenue	Residential/ Commercial	68.3	68.5	0.2	5	No
Between Madison Avenue and Overland Ave	Residential/ Commercial	69.7	69.8	0.1	5	No
<b>Ince Boulevard</b>						
Between Washington Boulevard and Culver Studio Gate 2	Commercial	65.1	65.6	0.6	5	No
Between Culver Studio Gate 2 and Culver Studio Gate 3	Commercial	59.6	61.0	1.5	5	No
Between Culver Studio Gate 3 and Lucerne Avenue	Residential/ Commercial	59.3	59.4	0.0	5	No
<b>Lucerne Avenue</b>						
Between Higuera Street and Ince Boulevard	Residential	61.8	61.8	0.0	5	No
Between Ince Boulevard and Duquesne Avenue	Residential	62.7	62.7	0.0	5	No
<b>Venice Boulevard</b>						
Between La Cienega Avenue and Cattaraugus Avenue	Lodging/Commercial	68.7	68.7	0.1	5	No
Between Cattaraugus Avenue and National Boulevard	Residential/Commercial	68.6	68.6	0.1	5	No
Between National Boulevard and Robertson Boulevard	Commercial	69.8	69.9	0.1	5	No
Between Robertson Boulevard and Culver Boulevard	Commercial	71.0	71.1	0.0	5	No
Between Culver Boulevard and Main Street/Bagley Avenue	Commercial	70.0	70.0	0.0	5	No
Between Main Street/Bagley Avenue and Hughes Avenue	Residential/Commercial	69.2	69.3	0.0	5	No

Roadway Segment	Existing Land Uses Located along Roadway Segment	Calculated Traffic Noise Levels along adjacent Land Uses dBA CNEL				
		Future (A)	Future with Project (B)	Project Increment (B-A)	Threshold	Exceed Threshold ?
Between Hughes Avenue and Clarington Avenue	Residential/Commercial	69.4	69.4	0.0	5	No
Between Clarington Avenue and Motor Avenue	Commercial	69.3	69.3	0.1	5	No
Between Motor Avenue and Overland Avenue	Residential/Commercial	69.7	69.7	0.0	5	No
<b>Washington Boulevard</b>						
Between La Cienega Boulevard and National Boulevard	Commercial	69.6	68.6	0.2	5	No
Between National Boulevard and Higuera Street	Commercial	69.8	69.9	0.1	5	No
Between Higuera Street and Ince Boulevard	Commercial	69.4	69.7	0.4	5	No
Between Ince Boulevard and Culver Boulevard	Lodging/Commercial	68.6	68.7	0.2	5	No
Between Culver Boulevard and Duquesne Avenue	Commercial	68.0	68.1	0.1	5	No
Between Duquesne Avenue and Clarington Avenue	Residential/Commercial	68.1	68.2	0.1	5	No
Between Clarington Avenue and Motor Avenue	Religious/Commercial	70.0	70.1	0.1	5	No
Between Motor Avenue and Overland Avenue	Commercial	69.7	69.7	0.0	5	No
<b>Higuera Street</b>						
Between Washington Boulevard and Lucerne Avenue	Residential/Commercial	66.9	66.9	0.0	5	No
Between Lucerne Avenue and Jefferson Boulevard	Residential/Commercial	66.5	66.5	0.0	5	No
<b>Duquesne Avenue</b>						
Between Jefferson Boulevard and Lucerne Avenue	Residential/Commercial	69.2	69.2	0.2	5	No
Between Lucerne Avenue and Culver Boulevard	Residential/Commercial	67.2	67.4	0.2	5	No
<b>National Boulevard</b>						
Between Robertson Boulevard and I-10 EB On-Ramp	Commercial	70.2	70.2	0.0	5	No
Between I-10 EB On-Ramp and Venice Boulevard	Commercial	69.4	69.5	0.0	5	No
Between Venice Boulevard and Washington Boulevard	Commercial	68.5	68.6	0.0	5	No
Between Washington Boulevard and Hayden Avenue	Residential/Commercial	69.8	69.8	0.1	5	No
Between Hayden Avenue and Jefferson Boulevard	Residential/Park/Commercial	66.7	66.8	0.1	5	No

SOURCE: ESA PCR 2017.

### **Operational Fixed Mechanical Equipment Noise**

The operation of mechanical equipment such as air conditioning equipment may generate audible noise levels. However, mechanical equipment would be shielded from nearby noise sensitive uses to attenuate noise and avoid conflicts with adjacent uses. In addition, the project's mechanical equipment would need to comply with the City's Exterior Noise Standards shown in Table 4.9-5, 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.

### **Parking Structure Noise**

Two new parking structures are proposed as part of the Innovation Plan, the below-grade Central Parking Structure, and the Van Buren Parking Structure. The proposed below-grade Central Parking Structure would be located south of the Mansion and existing Rear Lawn Parking Structure, within the existing Central Area of the Studio Campus.

The Van Buren Parking Structure would be constructed on the western edge of the Studio Campus on the site of an existing above-grade parking structure, existing surface parking, and the Bungalow Area containing Buildings S, T, U, and V. The Van Buren Parking Structure would include two below-grade, one at-grade, and five above-grade levels. It would be constructed with a solid concrete wall free of gaps or penetrations surrounding the at-grade level, to reduce off-site noise impacts from operations as prescribed in PDF-NOISE-4 and -5. An articulated screen would run the length of its Van Buren Place façade and provide visual interest, screening from potential noise sources.

For the purpose of providing a conservative, quantitative estimate of the noise levels that would be generated from vehicles entering and exiting the project's parking structure, the methodology recommended by FTA for the general assessment of stationary transit noise sources is used discussed in the Methodology Section.

Based on the Project's traffic study prepared by Fehr & Peers<sup>13</sup> and provided in Appendix J of this Draft EIR, the Project is forecasted to generate 5,834 total daily vehicle trips with an anticipated 616 trips and 592 trips during the A.M. and P.M. peak hours, respectively. Using the FTA's reference noise level of 92 dBA SEL<sup>14</sup> at 50 feet from the noise source for a parking lot, it was determined that the project's highest peak hour vehicle trips, which would be 616 trips during the A.M. peak hour, would generate noise levels of approximately 54 dBA, L<sub>eq</sub> at 50 feet from the Project's access gates. The nearest noise sensitive use to any one of the two entrances would be approximately 75 feet. Based on this distance, the vehicle related noise levels would be approximately 51 dBA L<sub>eq</sub> along Ince Boulevard (R1). All other noise sensitive uses would have lower parking related noise levels. This also conservatively assumes the peak hour traffic would all occur at one entrance. The noise level would not increase the ambient noise levels of 66 dBA L<sub>eq</sub> at the noise sensitive uses (R1) along Ince Boulevard by 5 dBA (combining noise levels of 51

<sup>13</sup> Fehr & Peers, Culver Studios Modified Comprehensive Plan Update #7, May, 2017.

<sup>14</sup> FTA, Transit Noise and Vibration Impact Assessment. May 2006.

dB(A) and 61 dB(A) would result in 61.4 dB(A), which would be a change of 0.4 dB(A) over existing). As such, impacts would be less than significant, no mitigation measures would be required.

Car alarm and horn noise within parking structures would generate noise levels with the potential to adversely impact adjacent land uses during Project operations. However, the parking structures would be constructed with a solid concrete wall free of gaps or penetrations surrounding the at-grade level, to reduce off-site noise impacts from operations. PDF-NOISE-6 is also prescribed to reduce off-site noise impacts from exhaust or ventilation systems operations. Therefore, car alarm, horn noise, and exhaust or ventilation system would not increase ambient noise levels at nearby residences. As such, impacts would be less than significant.

### ***Operational Loading Dock Area Noise***

Loading bays/cores would be provided beneath each building, with numerous truck maneuvering areas between those bays to allow passing, turnaround, and egress.

Loading dock activities such as truck movements/idling and loading/unloading operations generate noise levels that have the potential to adversely impact adjacent land uses during long-term Project operations. However, since the proposed loading areas would be enclosed within the subterranean parking structures and shielded from surrounding off-site sensitive uses there would be no perceptible increases in noise from loading dock areas at off-site sensitive receptor locations. As such, impacts would be less than significant.

### ***Operational Special Events and Outdoor Programming Noise***

The Front Lawn is currently used for a variety of special events including filming, screenings and concerts, weddings, picnics, and “pop-up” events, educational events, and community events. Following implementation of the Project, the Front Lawn would continue to support these and similar uses and events. If activities are ultimately proposed, including those in association with Parcel B and Town Plaza, that would include use of the Front Lawn or otherwise change the nature of existing uses and events in a manner that could result in significant noise or other environmental impacts, such activities/uses would be addressed through the City special permit process, including the need for any mitigation measures to address noise. Therefore, activities on the Front Lawn would be consistent with the existing ambient noise levels, or would be addressed through the City special permit process, and accordingly impacts would be less than significant at the nearby noise sensitive uses.

The Central Courtyard would be used for a range of activities and special events, including but not limited to shoots, production support film screenings, concerts, outdoor teaming space, housing of amenities, and passive recreational uses. Other on-site areas that could be used for outdoor programming and special events include balconies, courtyards, patios, walkways, and decks on proposed buildings. Proposed buildings are located north and south of the Central Courtyard area and other on-site areas and block the line-of-sight to nearby residences. Furthermore, PDF-NOISE-9 is proposed which would prohibit outdoor special event and recreational activities where adjacent to off-site residential uses. Therefore, the Central Courtyard

and related noise and other outdoor activity noise would not increase ambient noise levels at nearby residence by 5 dBA threshold, and impacts would be less than significant.

### **Composite Noise Level Impacts from Project Operations**

An evaluation of the combined noise levels from the Project's various operational noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum Project-related noise level increase that may occur at the nearest noise-sensitive receptors. Noise sources associated with the Project include the incremental increase in traffic noise, on-site mechanical equipment, parking structure, and loading area activities noise.

The maximum composite noise impacts would generally occur close to the Project Site. Since with the exception of the Project's incremental contribution to roadway traffic noise, Project noise sources would be located on the Project Site. As shown in Table 4.9-8 and Table 4.9-9, the Project would result in a maximum increase in traffic noise of 1.5 dBA CNEL, which would occur along Ince Boulevard, Between Culver Studio Gate 2 and Culver Studio Gate 3 adjacent to commercial uses.

As discussed previously, mechanical equipment would be shielded from nearby noise sensitive uses to attenuate noise and avoid conflicts with adjacent uses. Therefore, mechanical related noise is expected to be a minimum of 10 dBA below the ambient noise levels, which would have a contribution of approximately 0.4 dBA or less to the composite noise level.<sup>15</sup> Noise from vehicle activity at the Studio gates would generate a noise level of 51 dBA along Ince Boulevard (R1), which would have a contribution of approximately 0.1 dBA. Loading dock would be located in the subterranean parking structures and would not increase ambient noise levels at nearby sensitive receptor locations. Operational special events and outdoor programming related noise would increase ambient noise levels up to 1 dBA. Overall, relative to the existing noise environment, the Project is estimated to increase the ambient noise level by approximately 3.0 dBA (1.5+0.4+0.1+1 dBA) at the nearest noise-sensitive receptors along Ince Boulevard (R1), which is less than the significance threshold of a 5 dBA increase. Composite noise level increases at all other receptor locations are expected to be less than significant as well, given their distance from the Project Site and the presence of intervening structures. As such, the composite noise level impact on the nearest sensitive receptors due to the Project's future operations would be less than significant, and no mitigation would be required.

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**Threshold NOISE-2:** The Project would have a potentially significant impact on noise if it would result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

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<sup>15</sup> Caltrans, *Technical Noise Supplement* (TeNS), Section 2.1.3.5, September, 2013.

**Impact Statement NOISE-2: Operational activities would not exceed the vibration significance thresholds. Thus, operational vibration impacts would be less than significant. However, construction activities would result in sporadic, temporary vibration effects adjacent to the Project area, which would exceed the vibration significance thresholds. Impacts due to vibration from on-site construction activity would be potentially significant.**

### Construction Vibration

Construction activities at the Project Site have the potential to generate low levels of groundborne vibration as the operation of heavy equipment (i.e., backhoe, dozer, excavators, grader, loader, scraper, and haul trucks, etc.) generates vibrations that propagate through the ground and diminish in intensity with distance from the source. No high-impact activities, such as pile driving or blasting, would be used during Project construction. The nearest off-site sensitive buildings to the Project Site are residential buildings approximately from 5 feet to 50 feet from the Project Site including low-density multi-family residential uses to the east, single- and low-density multi-family residential uses on Van Buren Place abut the Studio Campus, and multi-family residential uses abut the Studio Campus and primarily front on Lucerne Avenue. In addition, the Linwood E. Howe Elementary School buildings are located approximately 75 feet from the Project Site. Groundborne vibrations from construction activities very rarely reach the levels that can damage structures, but they may be perceived in buildings very close to a construction site.

The PPV vibration velocities for several types of construction equipment that can generate perceptible vibration levels are identified in **Table 4.9-10, *Vibration Source Levels for Construction Equipment***. Based on the information presented in Table 4.9-10, vibration velocities could range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity.

**TABLE 4.9-10  
 VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT**

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Hoe Ram	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

SOURCE: FTA 2006; ESA PCR 2017.

At a distance of 5 feet from the nearest residential buildings, the maximum vibration level would be up to approximately 0.523 in/sec PPV for a large bulldozer and would be reduce to 0.19 in/sec PPV at 15 feet from a large bulldozer, which would be below the significance threshold of 0.2 in/sec PPV. The Linwood E. Howe Elementary School buildings would be exposed to vibration

velocities up to 0.017 in/sec PPV from construction activities. All other structures are located farther away and vibration velocities would be substantially lower at these more distant structures. Therefore, residential buildings located within 15 feet from the Project Site would experience potentially significant vibration impacts from the Project construction. Mitigation measures are therefore prescribed to reduce construction vibration impacts to these vibration sensitive receptors, as presented in subsection 4.9.6, Mitigation Measures, below.

On-site historic buildings such as the Mansion, Bungalows, Building D, E, H, I, and Stage 11/12/14 and 15/16) are located from 15 feet to 70 feet from operation of construction equipment. Historic buildings located within 20 feet from a large dozer would be exposed to vibration levels up to 0.124 in/sec PPV, which would exceed the significance threshold of 0.12 in/sec PPV. Therefore, historic buildings located within 20 feet from operation of heavy construction equipment would experience potentially significant vibration impacts from the Project construction. Mitigation measures are therefore prescribed to reduce construction vibration impacts to these vibration sensitive receptors, as presented in subsection 4.9.6, Mitigation Measures.

With respect to human annoyance, the nearest residential uses located within 45 feet from the Project Site would be exposed to vibration levels exceeding 80 VdB. Under the FTA's vibration annoyance potential criteria (refer to Table 4.9-4), vibration levels exceeding 80 VdB would be considered distinctly perceptible for residential uses. The Linwood E. Howe Elementary School buildings would be exposed to vibration velocities up to 73 VdB, which would be below the significance threshold of 83 VdB for schools. Therefore, residential buildings located within 45 feet of the Project Site would experience potentially significant vibration impacts from Project construction. Mitigation measures are therefore prescribed to reduce construction vibration impacts to this sensitive vibration receptor, as presented in subsection 4.9.6, Mitigation Measures, below.

## Operational Vibration

The Project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration would be passenger vehicle circulation within the proposed parking area. However, vibration isolators and mount would be installed to reduce vibration velocities from typical commercial-grade station machinery. Therefore, ground-borne vibration generated by each of the above-mentioned activities would generate approximately up to 50 VdB adjacent to the Project Site.<sup>16</sup> The potential vibration levels from all Project operational sources at the closest existing and future sensitive receptor locations would be less than the significance threshold of 80 VdB for perceptibility. As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.

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<sup>16</sup> FTA, Transit Noise and Vibration Impact Assessment, Section 7.2.1, May, 2006.

**Threshold NOISE-3:** The Project would have a potentially significant impact on noise if it would result in a substantial permanent increase in ambient noise levels in the vicinity of the Project above levels existing without the Project.

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**Impact Statement NOISE-3: Operational activities would not substantially increase the ambient noise levels in the vicinity of the Project. Thus, impacts would be less than significant.**

As discussed in detail under Threshold NOISE-1, overall, relative to the existing noise environment, the Project is estimated to increase the ambient noise level by approximately 2.0 dBA at the nearest noise-sensitive receptor, which is less than the significance threshold of a 5 dBA increase. Composite noise level increases at all other receptor locations are expected to be less than significant as well, given their distance from the Project Site and the presence of intervening structures. As such, the composite noise level impact on the nearest sensitive receptors due to the Project's future operations would be less than significant, and no mitigation would be required.

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**Threshold NOISE-4:** A significant impact would occur if Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project.

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**Impact Statement NOISE-4: Construction activities would increase noise levels at off-site noise-sensitive receptors in the Project Area in excess of ambient noise levels. Impacts due to noise from on-site construction activity would be potentially significant at off-site sensitive use locations. However, with implementation of the identified construction mitigation measure, noise levels would be reduced to below the threshold. Thus, construction noise impacts would be less than significant with implementation of mitigation.**

As discussed in Threshold NOISE-1, construction noise levels are estimated to reach 85 dBA to 90 dBA at the nearby sensitive receptors. This would substantially increase ambient noise levels at those locations. As such, the Project would have a potentially significant construction noise impact on sensitive receptors in the vicinity of the Project. Mitigation measures are prescribed to reduce construction noise impacts as presented below in Section 4.9-6, Mitigation Measures.

Construction traffic noise levels generated by truck trips would increase traffic noise levels along Ince Street by 2.8 dBA and along Washington Boulevard by 1.3 dBA. The noise level increases by truck trips would be below substantial increase of a 5 dBA. Therefore, off-site construction traffic noise impacts would be less than significant.

## **Cumulative Impacts**

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and significantly reduces in magnitude as the distance from the source increases. As such, only cumulative projects and growth due to occur in the immediate Project area within 500 feet would be likely to contribute to cumulative

noise impacts. However, the cumulative impacts on roadway noise would be affected by traffic from all cumulative projects throughout a larger vicinity.

As discussed in Chapter 3.0, General Description of Environmental Setting, Subsection 3.B, Related Projects, of this Draft EIR, there are 56 related projects identified in the vicinity of the Project. The three closest related projects, situated approximately 180 feet to 500 feet from the Project Site, are Related Project No. 22, Office and Apartment, 9355 Culver Boulevard, Related Project No. 24, Office, Restaurant, and Retail, 9300 Culver Boulevard, and Related Project No. 54, Apartment, 4227 Ince Boulevard. All other related projects are a minimum of 1,000 feet away from the Project Site. The potential for noise impacts to occur are specific to the location of each Related Project as well as cumulative traffic on the surrounding roadway network.

### **Construction**

As stated above, of the Project's 56 Related Projects, three are located within the immediate vicinity of the Project Site. By contrast, at the Project Site construction traffic from all Related Projects would contribute to noise levels on major thoroughfares throughout the area, although the Related Projects are located in different areas and to some extent would have varied haul routes and traffic patterns associated with their construction.

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, a 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.

Sensitive receptors R1 and R3 are located away from the related projects and existing building are located between the sensitive receptors located at R1 and R3 and the related projects. The existing buildings would block construction noise from the related projects at locations R1 and R3. Therefore, cumulative construction noise impacts would not occur on the sensitive receptor location R1 and R3 with implementation of the prescribed mitigation measures and project design features.

The nearest project which may be under construction concurrently with the Project that has potential for cumulative impacts to sensitive receptors at location R2 would be Related Project No. 54, located 180 feet to the east of the Project Site and within 50 feet from the receptor locations (R2) along Lucerne Avenue. Construction of this project could overlap with construction of the Project. The Project would result in a maximum construction noise level of 85 dBA  $L_{eq}$  at the off-site receptor locations (R2) along Lucerne Avenue. Policy 2.A of the Noise Element would require the Project to implement noise reduction techniques to ensure that the noise impacts associated with construction activities would be minimized to the maximum extent feasible. Implementation of construction mitigation measures would reduce the Project's impact to less than significant.

If Related Project No. 24 and Related Project No. 54 proceed simultaneously with the Project, the Related Project No. 24 and Related Project No. 54 could contribute to cumulative construction noise impacts on the noise sensitive receptor locations R4.

Noise associated with other cumulative construction projects would be required to comply with the City's construction noise standards and Noise Element Policy 2.A, similar to this Project, and would be required under CEQA, if necessary, to reduce construction noise levels to the degree reasonably and technically feasible through proposed mitigation measures for each individual project, including time restrictions for construction activities. Furthermore, as stated in PDF-TRAF-1, Construction Management Plan, in Section 4.11, Transportation and Traffic of this EIR, biweekly construction management meetings with City Staff and other representatives of surrounding developments if under construction at around the same time as the Project shall be required, as determined appropriate by City Staff, to ensure concurrent construction projects are managed in collaboration with one another. This type of planning and collaboration would further serve to reduce cumulative construction noise levels. Therefore, with implementation of design features and mitigation measures, cumulative construction noise impacts would be less than significant.

### **Operations**

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to operation of the Project and Related Projects, as traffic is the greatest source of operational noise in the Project area. Cumulative traffic-generated noise impacts were assessed based on a comparison of the future cumulative base traffic volumes with the Project to the existing base traffic volumes without the Project. The noise levels associated with existing base traffic volumes without the Project, and cumulative base traffic volumes with the Project are provided in **Table 4.9-11, Off-Site Traffic Noise Impacts – Future 2021 Cumulative Increment**. Table 4.9-11 shows the Project's contribution to the cumulative noise levels. The maximum cumulative noise increase from the Project plus cumulative project traffic would be 1.6 dBA CNEL, CNEL, which would occur along Ince Boulevard, Between Culver Studio Gate 2 and Culver Studio Gate 3 adjacent to commercial uses. This increase in sound level would be below 5 dBA increase, and the increase in sound level would be lower at the remaining roadway segments analyzed. The Project-related noise increases would be less than significant, and no mitigation measures would be required.

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

**TABLE 4.9-11  
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE 2021 CUMULATIVE INCREMENT**

Roadway Segment	Existing Land Uses Located along Roadway Segment	Existing (A)	Future with Project (B)	Calculated Traffic Noise Levels along adjacent Land Uses dBA CNEL		
				Cumulative Increment (B-A)	Threshold	Exceed Threshold?
<b>Culver Boulevard</b>						
Between Venice Boulevard and Ince Boulevard	Commercial	65.4	66.2	0.8	5	No
Between Ince Boulevard and Main Street	Commercial	69.4	70.1	0.7	5	No
Between Main Street and Cardiff Avenue	Commercial	68.9	69.6	0.7	5	No
Between Cardiff Avenue and Washington Boulevard	Commercial	69.0	69.7	0.7	5	No
Between Washington Boulevard and Lafayette Place	Commercial	66.2	67.0	0.8	5	No
Between Lafayette Place and Duquesne Avenue	Commercial	67.0	67.7	0.7	5	No
Between Duquesne Avenue and Madison Avenue	Residential/ Commercial	67.9	68.5	0.6	5	No
Between Madison Avenue and Overland Ave	Residential/ Commercial	69.2	69.8	0.6	5	No
<b>Ince Boulevard</b>						
Between Washington Boulevard and Culver Studio Gate 2	Commercial	64.6	65.6	1.0	5	No
Between Culver Studio Gate 2 and Culver Studio Gate 3	Commercial	59.4	61.0	1.6	5	No
Between Culver Studio Gate 3 and Lucerne Avenue	Residential/ Commercial	59.1	59.4	0.3	5	No
<b>Lucerne Avenue</b>						
Between Higuera Street and Ince Boulevard	Residential	61.5	61.8	0.3	5	No
Between Ince Boulevard and Duquesne Avenue	Residential	62.4	62.7	0.3	5	No
<b>Venice Boulevard</b>						
Between La Cienega Avenue and Cattaraugus Avenue	Lodging/Commercial	67.9	68.7	0.8	5	No
Between Cattaraugus Avenue and National Boulevard	Residential/Commercial	67.8	68.6	0.8	5	No
Between National Boulevard and Robertson Boulevard	Commercial	69.0	69.9	0.9	5	No
Between Robertson Boulevard and Culver Boulevard	Commercial	70.2	71.1	0.9	5	No
Between Culver Boulevard and Main Street/Bagley Avenue	Commercial	69.1	70.0	0.9	5	No
Between Main Street/Bagley Avenue and Hughes Avenue	Residential/Commercial	68.4	69.3	0.9	5	No
Between Hughes Avenue and Clarington Avenue	Residential/Commercial	68.5	69.4	0.9	5	No

Roadway Segment	Existing Land Uses Located along Roadway Segment	Calculated Traffic Noise Levels along adjacent Land Uses dBA CNEL				
		Existing (A)	Future with Project (B)	Cumulative Increment (B-A)	Threshold	Exceed Threshold?
Between Clarington Avenue and Motor Avenue	Commercial	68.5	69.3	0.8	5	No
Between Motor Avenue and Overland Avenue	Residential/Commercial	68.9	69.7	0.8	5	No
<b>Washington Boulevard</b>						
Between La Cienega Boulevard and National Boulevard	Commercial	68.7	68.6	-0.1	5	No
Between National Boulevard and Higuera Street	Commercial	68.8	69.9	1.1	5	No
Between Higuera Street and Ince Boulevard	Commercial	68.9	69.7	0.8	5	No
Between Ince Boulevard and Culver Boulevard	Lodging/Commercial	68.1	68.7	0.6	5	No
Between Culver Boulevard and Duquesne Avenue	Commercial	67.6	68.1	0.5	5	No
Between Duquesne Avenue and Clarington Avenue	Residential/Commercial	67.6	68.2	0.6	5	No
Between Clarington Avenue and Motor Avenue	Religious/Commercial	69.6	70.1	0.5	5	No
Between Motor Avenue and Overland Avenue	Commercial	69.3	69.7	0.4	5	No
<b>Higuera Street</b>						
Between Washington Boulevard and Lucerne Avenue	Residential/Commercial	66.6	66.9	0.3	5	No
Between Lucerne Avenue and Jefferson Boulevard	Residential/Commercial	66.1	66.5	0.4	5	No
<b>Duquesne Avenue</b>						
Between Jefferson Boulevard and Lucerne Avenue	Residential/Commercial	68.7	69.2	0.5	5	No
Between Lucerne Avenue and Culver Boulevard	Residential/Commercial	66.8	67.4	0.6	5	No
<b>National Boulevard</b>						
Between Robertson Boulevard and I-10 EB On-Ramp	Commercial	69.5	70.2	0.7	5	No
Between I-10 EB On-Ramp and Venice Boulevard	Commercial	68.4	69.5	1.1	5	No
Between Venice Boulevard and Washington Boulevard	Commercial	67.3	68.6	1.3	5	No
Between Washington Boulevard and Hayden Avenue	Residential/Commercial	69.0	69.8	0.8	5	No
Between Hayden Avenue and Jefferson Boulevard	Residential/Park/Commercial	66.7	66.8	0.1	5	No

SOURCE: ESA PCR 2017.

### **Ground-Borne Vibration**

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

## 4.9.6 Mitigation Measures

### **Construction Noise and Vibration**

Construction-related vibration has the potential to result in potential significant vibration impacts on the surrounding area. In addition, the City requires the implementation of construction noise reduction techniques consistent with General Plan Noise Element Policy 2.A. Thus, the following mitigation measures are required to reduce construction-related vibration impacts and to minimize the generation of construction noise:

**MM-NOISE-1:** The Project shall provide a temporary 20-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 20 dBA between the Project Site and the surrounding residences and elementary school. Prior to the commencement of any excavation, the applicant shall install a temporary construction fence with screening around the site. The height, fence and screening materials are subject to approval by the City Engineer or his/her designee. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptors during early Project construction phases (up to the start of framing) when the use of heavy equipment is prevalent. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel.

**MM-NOISE-2:** Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously.

**MM-NOISE-3:** Heavy equipment, such as use of a large bulldozer (greater than 600 horsepower), shall not be used within 45 feet of the neighboring residential structures. If such proximate construction is required, alternative equipment and methods such as small bulldozers (less than 300 horsepower), shall be used to ensure that vibration effects on adjacent residential uses.

**MM-NOISE-4:** To avoid or minimize potential construction vibration damage to finish materials on historic buildings, the condition of such materials shall be documented by a qualified preservation consultant, prior to initiation of construction. During construction, the contractor shall install and maintain at least two continuously operational automated vibrational monitors on historic buildings. The monitors must be capable of being programmed with two predetermined vibratory velocities levels: a first-level alarm equivalent to a 0.1 inches per second at the face of the building and a regulatory alarm level equivalent to 0.12 inches per second at the face of the buildings. The monitoring system must produce real-time specific alarms (via text message and/or email to on-site personnel) when velocities exceed either of the predetermined levels. In the event of a first-level alarm, feasible steps to reduce vibratory levels shall be undertaken, including

but not limited to halting/staggering concurrent activities and utilizing lower-vibratory techniques. In the event of an exceedance of the regulatory level, work in the vicinity shall be halted and the historic buildings visually inspected for damage. Results of the inspection must be logged. In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant, and if warranted, in a manner that meets the Secretary of the Interior's Standards.

## **Operational Noise and Vibration**

As discussed above, the Project would result in less than significant impacts associated with operational noise and vibration. Therefore, no operational noise and vibration mitigation measures would be required.

### 4.9.7 Level of Significance After Mitigation

#### **Construction Noise and Vibration**

Mitigation measure MM-NOISE-1 would provide at least 20 dBA noise reduction at the noise sensitive receptor locations R1 through R4. Implementation of MM-NOISE-2, MM-NOISE-3, PDF-NOISE-8, and PDF-AES-2 would reduce construction noise at least 10 dBA at the noise sensitive receptor locations R1 through R4. Therefore, with implementation of MM-NOISE-1 through MM-NOISE-3, and PDF-NOISE-8 and PDF-AES-2, the maximum construction noise levels of up to 90 dBA would be reduced to 60 dBA ( $90 - 20 - 10 = 60$ ) at the noise sensitive receptor location R3, which would not substantially increase the ambient noise level of 57 dBA at the noise sensitive receptor location R3. As such, construction noise impacts would be reduced by a level that is technically feasible as set forth in mitigation measures MM-NOISE-1 through MM-NOISE-9 and consistent with Policy 2.A of the City General Plan Noise Element. Accordingly, construction noise impacts would be less than significant.

With implementation of Mitigation Measure NOISE-3, the use of smaller bulldozers (less than 300 horsepower) would result in vibration levels of 0.15 inch-per second PPV at residential buildings located within 15 feet from the Project Site and of 70 VdB at residential uses within 45 feet from the Project, which would not exceed the 0.2 inch-per second PPV building damage and 80 VdB perception threshold, respectively.

With the implementation of MM-NOISE-4, vibration levels in excess of the threshold would transmit an alarm to on-site personnel with authorization to halt work in the vicinity. Furthermore, in the event damage occurs to historic finish materials due to construction vibration, such materials would be repaired in consultation with a qualified preservation consultant in a manner that meets the Secretary of the Interior's Standards. Thus, construction vibration impacts on historic buildings would be less than significant.

PDF-NOISE-7 would ensure the proper implementation of Mitigation Measures MM-NOISE-1 through MM-NOISE-4 and PDF-NOISE-8 and PDF-AES-2. The construction liaison would ensure that Project related construction noise and vibration would not substantially increase the ambient noise levels at the noise sensitive receptor locations R1 through R4.

In addition, with implementation of design features, including City requirements for Construction Management Plans, and mitigation measures, cumulative construction noise impacts would be less than significant at the nearby noise sensitive receptor locations.

### **Operational Noise and Vibration**

Not applicable. Less than significant operational noise and vibration impacts would occur with Project implementation.

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# CHAPTER 5

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## Alternatives

### 5.1 Introduction

Under CEQA, and as indicated in California Public Resources Code Section 21002.1(a), the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process intended to consider ways to mitigate or avoid the significant environmental effects of a project. Guidance regarding the definition of project alternatives is provided in State *CEQA Guidelines* Section 15126.6(a) as follows:

*An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*

The State CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce significant impacts relative to the proposed project, “even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.”<sup>1</sup> The State *CEQA Guidelines* further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are analyzed.<sup>2</sup>

In selecting project alternatives for analysis, potential alternatives should be feasible. The State CEQA Guidelines Section 15126.6(f)(1) explains that:

*Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.*

The State CEQA Guidelines require the analysis of a “no project” alternative and, depending on the circumstances, evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.<sup>3</sup>

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<sup>1</sup> CEQA Guidelines Section 15126.6(b).

<sup>2</sup> CEQA Guidelines Section 15126.6(f).

<sup>3</sup> CEQA Guidelines Section 15126.6(e)(2).

Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented in the same level of detail as the assessment of the proposed project. Rather, the EIR is required to provide sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project. If an alternative would cause one or more significant impacts in addition to those of the proposed project, analysis of those impacts is to be discussed, but in less detail than for the proposed project.

## 5.2 Proposed Project

### 5.2.1 Project Description Summary

The Project proposes to modernize and expand the existing Central Area of the approximately 14-acre campus, encompassing the portion of the Studio Campus south of the Mansion and proposed Relocated Bungalow Area just south of the Mansion. Proposed improvements include construction of six new Digital Media buildings consisting of a flexible mix of creative space, production space, and digital media stages. The Digital Media buildings would replace six existing buildings consisting of offices and support services (Buildings L, O, X, Y, Z, and the Commissary) and four existing buildings consisting of sound stages, which would be demolished. Existing Stages 11/12/14 and Stages 15/16, all of which are contained in a single interconnected building in the southwestern portion of the Studio Campus, would remain in place for continued use. The buildings consisting of Stages 2/3/4, Stages 5/6, Stages 7/8/9, and Stage 10 would be demolished.

Eight new digital media stages would be provided within the Central Area of the Studio Campus, co-located with media office and support uses. Buildings to be demolished would total approximately 236,293 sf (including 87,788 sf of digital media/office, 79,880 sf of stage, and 68,625 sf of support use) and new construction at Project buildout would total approximately 649,420 sf (including 609,420 sf of digital media/office, and 40,000 sf of stage), for a net new square footage total of approximately 413,127 sf (including 521,632 sf of digital media, and a reduction of 39,880 sf of stage, and 68,625 sf of support use), Campus-wide. Two new parking structures are proposed, the Central Parking Structure with 836 spaces and the Van Buren Parking Structure with 1,109 spaces. **Table 5-1, Proposed Project**, provides a development summary for the Project.

**TABLE 5-1  
PROPOSED PROJECT**

Use	Development (sf) <sup>a</sup>				
	Existing	Demolition	New	Net New	Net
Digital Media/Office	117,872	(87,788)	609,420	521,632	639,504
Stage	155,480	(79,880)	40,000	(39,880)	115,600
Support	74,197	(68,625)	0	(68,625)	5,572
Total	347,549	(236,293)	649,420	413,127	760,676

<sup>a</sup> Excludes parking structure square footage.

Source: ESA PCR, September 2017.

## 5.2.2 Project Purpose and Objectives

The underlying purpose and primary objective of the Project is to: Sustain The Culver Studio's prominent role as a dynamic, independent studio in the entertainment, digital media, and related creative industries, and support a wide range of related activities through expansion and modernization of the Studio Campus. The Project objectives include the following:

- **Objective 1.** Create a state-of-the-art Studio Campus of media and digital content stages, film and television production offices, and support facilities that will ensure the Studio's resilience, competitiveness, and continued position at the cutting edge of innovation essential to the invention and production of entertainment and digital media for future generations.
- **Objective 2.** Through new and upgraded facilities foster current and further content creation, digital media, creative technologies, virtual reality, and related uses consistent with the Studio's heritage and the history and evolution of the entertainment industry.
- **Objective 3.** Support the continued economic viability of the Studio and its ability to respond to changing industry needs and market conditions through a plan that technologically updates and expands Campus facilities while allowing flexibility in the application of development standards.
- **Objective 4.** Implement an innovative plan that supports development of flexible and sustainable new media space, inviting/collaborative landscaped open areas, sensitive treatment of neighborhood interfaces, and redesigned and improved access.
- **Objective 5.** Upgrade and rehabilitate the Mansion in a manner that protects its eligibility as a historical resource under the City's preservation ordinance while allowing for interior alterations to accommodate future uses and bring the building up to current standards. Upgrade the Front Lawn of the Mansion in a manner that respects the original landscape design intent and scale.
- **Objective 6.** Provide a circulation plan that: moves vehicles as efficiently as possible onto the Studio Campus from the surrounding street network with a minimum of queuing or delays; reduces production vehicle use of directly adjacent streets; minimizes truck/passenger vehicle and truck/emergency vehicle and fire lane conflicts; and frees up at-grade areas for use as attractive and usable outdoor open space.
- **Objective 7.** Promote environmental sustainability through development of updated and expanded facilities on an existing Studio Campus within convenient walking distance to the nearby Metro Station and other public transit consistent with regional and local mobility goals to reduce vehicle trips and infrastructure costs.
- **Objective 8.** Update and redevelop the Studio Campus with a high quality state-of-the-art design that supports environmental sustainability by: meeting or exceeding Culver City Green Building Program requirements; provision of more energy efficient buildings, high efficiency HVAC systems, and infrastructure; water conservation features; stormwater filtration systems; photovoltaics and passive solar design; use of renewable, recycled and low VOC materials; and, EV ready parking.

### 5.2.3 Significant Unavoidable Impacts of the Project

Based on the analysis contained in Chapter 4.0, *Environmental Impact Analysis*, of this Draft EIR, the Project would result in the following significant and unavoidable environmental impacts:

- Cultural Resources (Historical Resources): The Project would require removal of Stage 2/3/4 and Stage 7/8/9, both of which are historical resources recommended eligible at the national, State and local levels.
- Traffic and Circulation (Construction): Substantial delays and disruptions of existing traffic flow based on the operational thresholds at intersections during peak hours. Also, there could be some temporary incompatibilities between existing motor vehicle traffic and Project construction traffic.
- Transportation and Circulation (Intersection Service Levels): Under the standard analysis, the Project would result in significant operational level of service impacts after mitigation at the following eight study intersections during the AM and/or PM peak hours:
  3. Duquesne Ave/Lucerne Ave (Culver City, AM peak hour)
  8. Washington Blvd/Culver Blvd (Culver City, AM peak hour)
  13. Robertson Blvd/Exposition Blvd/Venice Blvd (City of LA, AM & PM peak hours)
  14. National Blvd/Washington Blvd (Culver City, AM peak hour)
  19. Overland Ave/Culver Blvd (Culver City, AM peak hour)
  33. Overland Ave/Venice Blvd (City of Los Angeles, AM peak hours)
  38. Robertson Blvd/National Blvd (City of Los Angeles, AM & PM peak hours)
  42. Duquesne Ave/Braddock Dr (Culver City, AM & PM peak hours)

If optional Mitigation Measures TRAF-9 and TRAF-10 were implemented in order to address queuing issues at Intersection 10 and other mobility considerations, requiring a left turn prohibition from westbound Ince Boulevard to southbound Washington Boulevard at Intersection 10 (Ince Blvd/Washington Blvd), and reconfiguring the westbound approach at Intersection 11 (Canfield Ave/Washington Blvd/ & Culver Blvd) to include an exclusive westbound left-only lane, a shared left/through lane, and a shared through/right turn lane, traffic would be shifted such that new significant unavoidable impacts would occur at the following four intersections:

11. Canfield Ave/Washington Blvd & Culver Blvd
22. National Blvd/Venice Blvd
29. La Cienega Blvd/Venice Blvd
10. Ince Blvd/Washington Blvd

At the same time, the following two intersections, which would be significantly and unavoidably impacted by the Project, would no longer be significantly impacted with implementation of optional Mitigation Measures TRAF-9 and TRAF-10:

14. National Blvd/Washington Blvd

## 15. Higuera St/Washington Blvd

Under the Micro-Simulation analysis, the Project would also result in significant operational level of service impacts after mitigation at the intersections above as well as the following four study intersections during the AM and/or PM peak hours:

- 6. Duquesne Ave/Lucerne Ave (Culver City, AM and PM peak hours)
- 10. Ince Blvd/Washington Blvd (Culver City, PM peak hour)
- 15. Higuera St/Washington Blvd (Culver City, AM and PM peak hours)
- 37. Lafayette Pl/Culver Blvd (Culver City, PM peak hour)

No feasible mitigation measures are available to reduce the above impacts to less than significant levels.

### 5.3 Alternatives Selected for Analysis

The alternatives listed below were selected for analysis. Descriptions of each of these alternatives is provided in Section 5.6 later in this chapter.

- 1. No Project/No Build
- 2. No Project/CPA No. 6 Buildout
- 3. Reduced Density
- 4. Full Historic Preservation - Retain Stages 2/3/4 and 7/8/9 as Sound Stages
- 5. Historic Preservation - Retain Stages 2/3/4 as Sound Stages
- 6. Historic Preservation - Retain Stages 7/8/9 as Sound Stages
- 7. Full Adaptive Reuse - Retain Stages 2/3/4 and Stages 7/8/9 for Digital Media
- 8. Adaptive Reuse - Retain Stages 2/3/4 for Digital Media
- 9. Adaptive Reuse - Retain Stages 7/8/9 for Digital Media

**Table 5-2, Comparison of the Project and Alternatives,** provides a comparison of the net new development under the Project and each of the alternatives.

**TABLE 5-2  
COMPARISON OF THE PROJECT AND ALTERNATIVES**

Use	Project	Alternatives (Net New Development in sf) <sup>a</sup>								
		1	2	3	4	5	6	7	8	9
Digital Media/Office	521,632	0	180,093	386,632	285,912	350,832	456,712	335,112	383,232	472,712
Stage	(39,880)	0	(3,280)	(39,880)	(10,680)	(7,480)	(23,880)	(59,880)	(39,880)	(59,080)
Support	(68,625)	0	(37,816)	(68,625)	(68,625)	(68,625)	(68,625)	(68,625)	(68,625)	(68,625)
Total	413,127	0	138,997	278,127	206,607	274,727	345,007	206,607	274,727	345,007

<sup>a</sup> Excludes parking structure square footage.  
Source: ESA PCR, September 2017.

## 5.4 Alternatives Considered and Rejected

The State CEQA Guidelines Section 15126.6(c) recommends that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the State CEQA Guidelines, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic Project Objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives that have been considered and rejected as infeasible are discussed below.

### 5.4.1. Alternative Off-Site Locations

CEQA does not require that analysis of alternative sites always be included in an EIR. However, if all the surrounding circumstances make it reasonable to consider an alternative site, then an alternative location should be considered and analyzed in the EIR. Per CEQA Guidelines Section 15126.6(f)(2), in making the decision to include or exclude analysis of an alternative site, the "key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR." If no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion. Among the factors that may be considered when addressing the feasibility of an alternative site is suitability, economic viability, availability of infrastructure, general plan consistency, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. The above is in light of the fact that, per CEQA Section 15126.6(a), "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project"

While there is the potential that the development of the proposed Project at an off-site location in Culver City could avoid or substantially lessen one or more of the significant unavoidable adverse impacts of the Project listed above, development of the Project at an alternative site would be both infeasible and would not feasibly attain most of the basic objectives of the Project.

Developing the Project at an alternative site would be infeasible because a large portion of the existing buildings and other structures at the Project Site would be retained and continue to be utilized for studio production uses under the Project, and developing all of these existing studio uses at an alternative site would be economically prohibitive.

Similarly, developing the Project at an alternative site would not feasibly attain most of the basic objectives of the Project because it would not: technologically update and expand the existing Studio Campus; adaptively reuse existing buildings designated as Landmark and Significant historical structures; update and rehabilitate the Mansion in a manner that protects its eligibility as a historical resources; and/or update and redevelop the Studio Campus with a high quality state-of-the-art design that supports environmental sustainability.

Lastly, there are no existing vacant parcels in the City of approximately 14 acres or larger that are designated and zoned by the City as Studio and S Zoning District (Studio), respectively, and it

would be unlikely to secure a site of similar size, in a location with the amenities provided at the current Studio Campus location in downtown Culver City and in close proximity to the Metro Station.

Therefore, an off-site alternative is not considered further in this Draft EIR.

## 5.4.2. Alternative On-Site Uses

As indicated previously, CEQA requires that an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.

While the development of uses other than those proposed by the Project could avoid or substantially lessen one or more of the significant unavoidable adverse impacts of the Project listed previously, doing so would not achieve the underlying purpose of the Project which is to sustain The Culver Studio's prominent role as a dynamic, independent studio in the entertainment, digital media, and creative industries, through transformation and technological updates to its approximately 14-acre Studio Campus. Doing so would also not feasibly attain most of the basic objectives of the Project because it would not: ensure the continued viability, adaptability, and competitive status of the Studio Campus while capitalizing on and strengthening the City's historic and future identity as the "Heart of Screenland"; create a state-of-the-art Studio Campus of media and digital content stages, film and television production offices, and support facilities; foster current and further content creation, digital media, creative technologies, virtual reality, and related uses consistent with the Studio's heritage; technologically update and expand the existing Studio Campus; support the continued economic viability of the Studio and its ability to respond to changing industry needs; and implement an innovative plan that supports development of flexible and sustainable new media space.

Furthermore, the Project Site is currently designated and zoned by the City as Studio and S Zoning District (Studio), and developing non-studio uses at the Project Site would be inconsistent with this land use designation and zoning.

Lastly, development on the Studio Campus is governed by a Comprehensive Plan, pursuant to Section 17.250.015 of the City's Zoning Code, which specifies that the Project Site shall be developed with studio uses.

Therefore, alternative on-site land use uses are not considered further in this Draft EIR.

## 5.5 Analysis Format

In accordance with State CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified in Chapter 2, Project Description would be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

- A description of the alternative.
- The net environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental issue area analyzed in the EIR are described. Where applicable, the evaluation is divided between temporary impacts that would occur during the Project's construction phase, and impacts that would occur during the Project's operational phase.
- Post-mitigation and less than significant environmental impacts of the alternative and the Project are compared for each environmental topic area. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar." Where the impacts of the alternative would be the same as the Project, the comparative impact is said to be the "same." The evaluation also documents whether compared to the Project an impact would be entirely avoided, whether a significant impact could be reduced to a less than significant level, or whether a significant unavoidable impact would be feasible to mitigate to a less than significant level.
- The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives are attained by the alternative.

At the end of the section, a relative comparison of the alternative's impacts and consistency with Project Objectives is provided. Pursuant to State CEQA Guidelines Section 15126.6(e)(2) an "Environmentally Superior Alternative" is identified.

## 5.6 Alternatives Analysis

### 5.6.1 Alternative 1: No Project/No Build

#### Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the Guidelines states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Under the No Project/No Build Alternative, the Project would not be developed and use of the entire Studio Campus would continue as under current conditions. **Table 5-3, Alternative 1: No Project/No Build**, provides a development summary for this alternative. (discussion).

**TABLE 5-3  
ALTERNATIVE 1: NO PROJECT/NO BUILD**

Use	Development (sf) <sup>a</sup>				
	Existing	Demolition	New	Net New	Net
Digital Media/Office	117,872	0	0	0	0
Stage	155,480	0	0	0	0
Support	74,197	0	0	0	0
Total	347,549	0	0	0	347,549

<sup>a</sup> Excludes parking structure square footage.

Source: ESA PCR, September 2017.

## Environmental Impacts

### Aesthetics

*Note: As the Project is located on an infill site in an urban transit priority area, pursuant to SB 743 evaluation of aesthetic impacts in an EIR pursuant to CEQA is not required. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to aesthetic issues, including visual quality, views, light, glare, and shading.*

### Aesthetic Character

Under the No Project/No Build Alternative, the Project Site would remain in its current condition, and as such, this Alternative would have no impact with respect to visual character (both during construction and operation). The existing on-site building square footage would remain at 347,549 sf, and existing maximum building heights would remain at 56 ft and 64 ft for office/support and stage uses, respectively. The No Project/No Build Alternative would not provide the landscaped setbacks along the western or southern property lines, the landscape improvements at the Studio gates along Ince Boulevard, or the distinctive architecture and more visual interest proposed to support compatibility with surrounding development under the Project which is considered in the impact analysis for the Project to be beneficial. The No Project/No Build Alternative would however avoid the less than significant temporary construction impacts on aesthetic character that would occur under the Project associated with construction activities. Therefore, the No Project/No Building Alternative would have less of an impact on aesthetic character than the Project.

### Aesthetics Plan Consistency

The No Project/No Build Alternative would not generate any design changes and, as such, would not present new issues with respect to consistency with applicable plans and policies. As discussed in Section 4.1, Aesthetics, the Project would be substantially consistent with the aesthetic policies of the Culver City (City) General Plan, Culver City (City) Residential Parkway Design Guidelines, and Culver City Municipal Code (CCMC). The Project would enhance landscaping and architecture at the Project Site, and would improve the pedestrian experience along Washington Boulevard, Ince Boulevard and Van Buren Place. Furthermore, the Project would comply with CCMC requirements for landscaping, outdoor lighting, signage, and art in public places. The Project would be consistent with and support applicable plans and policies.

Although the No Project/No Build Alternative would not present new issues with respect to the Campus's consistency with relevant aesthetic plans and policies, it would not support a greater degree of consistency with plans and policies like the Project through its improvements to visual character in and around the Campus. Therefore, the No Project/No Build Alternative would be less beneficial and would not support the same degree of consistency with aesthetic plans and policies as the Project.

### **Light/Glare**

The No Project/No Build Alternative would not change existing lighting conditions at and adjacent to the Project Site and, this alternative would result in no impact with respect to light and glare. By comparison, the Project would result in a net increase in on-site development of approximately 413,127 sf feet, and this development would increase on-site lighting (e.g., exterior lighting at driveways, security lighting, architectural/landscape accent lighting, and lighting from the interiors of the proposed buildings/structures). As discussed in Section 4.1, Aesthetics, Project lighting would be shielded and directed onto the Project Site to avoid glare and minimize light trespass onto adjacent residential properties, illuminance intensity would be controlled, and design characteristics would be implemented to address light trespass (such as opaque screens as part of the new Van Buren Parking Structure), consistent with CCMC and the Comprehensive Plan applicable to the Studio. These measures would not be implemented at the Project Site under the No Project/No Build Alternative. However, as no increase in light/glare would occur under the No Project/No Build Alternative, impacts would be less than the Project.

### **Shading**

The No Project/No Build Alternative would not include new development or associated net new shading of sensitive uses, and thus would result in no impact with respect to shading. By comparison, as discussed in Section 4.1, Aesthetics, of this Draft EIR, the Project would include new development of up to 56 feet in height which would result in net new shading of sensitive uses, winter solstice shading of three residences east of the Project Site (associated with proposed Buildings M and Y), in excess of applicable standards. Therefore, under the No Project/No Build Alternative shading effects would be less than the Project.

### **Air Quality**

#### **Construction Emissions**

The No Project/No Build Alternative would not require new construction and, as such, would result in no impact with respect to regional or localized construction emissions. The Project would generate regional and localized construction emissions over an approximately 32-month time period, with the greatest level of emissions occurring during the demolition, excavation, foundations/concrete pouring phases. As discussed in Section 4.2, Air Quality, of this EIR, while the South Coast Air Basin is designated as non-attainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> under federal and/or state ambient air quality standards, construction of the Project would not exceed the applicable SCAQMD daily regional numeric thresholds for regional VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>, or localized numeric thresholds for concentrations of NO<sub>x</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub> and, as such, Project regional and localized construction emission impacts would be less than significant. However, because the No Project/No Build Alternative would avoid the less than significant

construction emission impacts of the Project, construction emissions impacts would be less than the Project.

### **Operational Emissions**

The No Project/No Build Alternative would not include new development or an increase/expansion of existing studio operations at the Project Site, and thus would not generate operational air emissions; no impact would occur. By comparison, the Project would include both new development and an expansion of existing operations at the Studio Campus that would generate regional and localized operational air emissions. While the South Coast Air Basin is designated as non-attainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, the Project would not generate a net increase in the emission of operational criteria and precursor pollutants (e.g., VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) that exceeds SCAQMD thresholds or NAAQS/CAAQS with implementation of the proposed PDFs (e.g., compliance with CALGreen Building Standards, equivalency with LEED certification requirements, etc.). Therefore, Project regional and localized operational emissions impacts would be less than significant. Still, because the No Project/No Build Alternative would not increase existing operational emissions, operational emissions impacts would be less than the Project.

### **Carbon Monoxide Hotspots**

The No Project/No Build Alternative would not result in increased concentrations of CO at area intersections over existing condition; no CO hotspot impacts would occur. As discussed in Section 4.2, Air Quality, the Project would not cause or contribute considerably to the formation of CO hotspots, CO concentrations at impacted intersections would remain well below the CAAQS one-hour and eight-hour CO standards. Therefore, the Project would result in less than significant CO hotspot impacts. However, because the No Project/No Build Alternative would not generate CO hotspots and would avoid the less than significant CO hotspot impacts of the Project, CO hotspot impacts would be less than the Project.

### **Toxic Air Contaminants**

The No Project/No Build Alternative would not change existing conditions and, as such, would not result in increased diesel emissions or other diesel particulate matter (DPM) or toxic air contaminants (TACs); no impact would occur. As discussed in Section 4.2, Air Quality, the Project would not increase DPM above the SCAQMD threshold of 10 in one million at sensitive sites, including nearby residences and Linwood E. Howe Elementary School. For carcinogenic exposures, the cancer risk from DPM emissions from construction of the Project would be an estimated 6.1 per million at the nearest adjacent residences and 0.09 per million to students and 0.01 per million to staff at Linwood El Howe Elementary. DPM levels would be less during Project operation since less truck traffic would be generated during operation than construction. In addition, loading areas would be moved to the interior of the Project Site under the Project thereby increasing separation distances from off-site sensitive receptors, and PDF-NOISE-8 would prohibit the idling of trucks within the loading areas and thus eliminate TAC emissions associated with idling trucks. Therefore, Project TACs impacts would be less than significant. However, because the No Project/No Build Alternative would have no impact with respect to TACs, TACs impacts would be less than the Project.

### **AQMP Consistency**

The No Project/No Build Alternative would not change existing conditions and, as such, would have no impact with respect to consistency with the AQMP. The Project would require an amendment to the Comprehensive Plan governing development at the Project Site in accordance with the Culver City “S” (Studio) zoning of the Project Site. However, as discussed in Section 4.2, Air Quality, the Project would be consistent with the Culver City “S” (Studio) zoning of the Project Site; SCAG’s 2016 RTP/SCS policies for concentrating growth in proximity to transit; the control strategies in the AQMP; and the long-term employment projections upon which the AQMP is based. Also, the Project would not increase or induce residential growth not otherwise anticipated in SCAG regional growth forecasts for Culver City. Lastly, Project construction activities would be consistent with CARB requirements to minimize emissions from diesel equipment and SCAQMD Rule 4031 regulations for controlling fugitive dust. Therefore, Project AQMP consistency impacts would be less than significant. However, because the No Project/No Build Alternative would not require an amendment of the Comprehensive Plan governing development at the Project Site, and would avoid the less than significant AQMP consistency impacts of the Project, impacts would be less than the Project.

### **Cultural Resources**

#### **Historical Resources**

The No Project/No Build Alternative would not alter existing conditions at the Project Site or affect on-site historical resources, and as such, it would have no impact on historical resources. By comparison, the Project would: (1) renovate two existing buildings (Buildings C – Mansion, and D) designated by the City as landmark structures and eligible for listing in the National and California Registers; and, (2) demolish Stages 2/3/4 and 7/8/9 which appear eligible for listing in the National, California and Local Registers. While the Project would result in less than significant indirect historical resources impacts (e.g., would not reduce or materially impair the integrity of significance of important historical resources in the project vicinity), impacts to Stages 2/3/4 and 7/ 8/9 would be significant and unavoidable even after mitigation. Therefore, historical resources impacts would be less under the No Project/No Build Alternative.

#### **Archaeological/Tribal Resources**

No known archaeological resources (historic or prehistoric) have been recorded within or immediately adjacent to the Project Site according to an SLF database search conducted through the NAHC, and no known tribal cultural resources were identified within the Project Site or vicinity during the AB 52 Native American consultations. However, five prehistoric archaeological resources and one historic archaeological resource were noted within a one-half mile radius of the Project Site in the database survey, and the Project Site was determined to have sensitivity for encountering archaeological resources in the event excavation extends into native soils. The No Project/No Build Alternative would not alter existing conditions at the Project Site and no excavation would occur. As such, no impact would occur with respect to archaeological resources. In contrast, the Project would have a potentially significant impact on archaeological resources due to excavations of up to 33 ft in depth and other ground disturbing activities, should such resources be present. Although this impact under the Project would be less than significant with mitigation incorporated, the No Project/No Building Alternative would have no impact on

archaeological resources. Therefore, archaeological resource impacts would be less under the No Project/No Build Alternative.

### **Paleontological Resources**

No known paleontological resources have been recorded on or within the immediate vicinity of the Project Site. However, the Project Site is located within the western Los Angeles basin which is known to contain paleontological resources, and a Phase I Archaeological/ Paleontological Resources Survey determined that the Project Site is located with an area with medium sensitivity for paleontological resources.<sup>4</sup> The No Project/No Build Alternative would not alter existing conditions at the Project Site and would not include excavation for additional development. As such, no impact would occur with respect to paleontological resources. In contrast, the Project would include excavations of up to 33 ft in depth that could potentially disturb native soil below the thin veneer of fill at the Project Site and potentially encounter buried paleontological resources, should such resources be present. This would represent a less than significant impact of the Project with mitigation incorporated that would not occur under the No Project/No Building Alternative. Therefore, paleontological resources impacts would be less under the No Project/No Build Alternative.

### **Geology and Soils**

#### **Seismic Hazards**

The Project Site is not subject to fault rupture, and thus neither the No Project/No Building Alternative nor the Project would expose people or structures to a fault rupture hazard. However, the Project Site is subject to strong seismic ground shaking and liquefaction. The No Project/No Build Alternative would not include new development and thus there would be no change in the potential to expose people or structures to potential seismic ground shaking and liquefaction hazards; therefore, no impact would occur. By comparison, the Project would include a net increase in on-site studio uses of 413,127 sf, along with two parking structures and a Culver/Main Tunnel connection that could expose people and structures to these hazards. While the seismic ground shaking and liquefaction impacts of the Project would be less than significant with mitigation incorporated, because the No Project/No Build Alternative would not change the potential for or potential extent of such hazards, seismic hazards would be less under the No Project/No Build Alternative.

#### **Geotechnical Hazards**

The Project Site is subject to potential subsidence, collapse, lateral spreading, and liquefaction. The No Project/No Build Alternative would not include new development and thus there would be no change in the potential to expose people or structures to these potential hazards; therefore, no impact would occur. By contrast, the Project would include new development with the potentially for increased exposure of people and structures to these hazards. While compliance with existing regulations (CBC, etc.) would avoid substantial subsidence and collapse hazards, and while the lateral spreading and liquefaction impacts of the Project would be less than significant with mitigation incorporated, because the No Project/No Build Alternative would

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<sup>4</sup> City of Culver City, Initial Study and Mitigated Negative Declaration for Culver Studios CPA No. 6, October 28, 2015.

avoid new exposure to these hazards, geotechnical hazards impacts would be less under the No Project/No Build Alternative.

### **Soils/Erosion**

The Project Site does not have corrosive soils. Therefore, neither the No Project/No Build Alternative nor the Project would expose structures to potential damage from corrosive soils. However, the Project Site is subject to expansive soils and soil erosion. The No Project/No Build Alternative would not include new development and thus would not expose people or structures to new potential for exposure to expansive soils hazards, and it would not generate construction- or operations-related soil erosion. By comparison, the Project would include ground-disturbing activities during construction that could result in soil erosion, and would include a net increase in on-site studio uses of 413,127 sf, along with two parking structures and a Culver/Main Tunnel connection, that could expose people and structures to hazards associated with expansive soils. However, compliance with existing regulations (for example, CBC, SCAQMD Rule 403, and SWPPP requirements) would substantially reduce the potential for expansive soils and soil erosion under the Project, and any residual impacts would be less than significant with the incorporation of mitigation measures. Because the No Project/No Build Alternative would have no impact with respect to expansive soils and soil erosion, soils/erosion impacts would be less than the Project.

### **Greenhouse Gas Emissions**

#### **GHG Emissions**

The existing land uses on the Project Site currently emit approximately 5,675 metric tons per year of CO<sub>2</sub>e (GHG emissions) associated with mobile sources, energy use water and wastewater conveyance and treatment, and waste. This output would continue under the No Project/No Build Alternative, which would involve no changes to the existing studio use. Because the No Project/No Build Alternative would not change existing conditions, it would have no impact with respect to GHG emissions. The Project, with the proposed green and GHG-reducing PDFs, would generate an estimated 7,464 metric tons per year of CO<sub>2</sub>e during operation (includes both operational GHG emissions and construction GHG emissions amortized over the 30-year life of the project). The Project would be consistent with relevant goals and actions to reduce Project emissions as much as feasibly possible, and would be consistent with the HSC Division 25.5 goals and CARB guidelines for assessing GHG emissions. Project operational emissions would also represent a 25.7 percent reduction as compared to business as usual (BAU) due to the infill nature of the Project, access to nearby transit, and the proposed green and GHG-reducing PDFs. Therefore, the Project's GHG emissions and associated impacts associated with GHG emissions would be less than significant. Because the No Project/No Build Alternative would generate no incremental increase in GHG emissions over existing conditions (e.g., no impact), GHG emissions impacts would be less than the Project.

#### **GHG Plan Consistency**

As discussed in Section 4.5, Greenhouse Gas Emissions, of this EIR, the Project would comply with the City's Green Building Code and Solar Photovoltaic requirements, LEED certification equivalent standards, and the CALGreen Code, to reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, and installing

energy-efficient appliances and equipment. These measures are consistent with the City's GHG reduction strategies for sustainability and smart-growth goals of improving energy and water efficiency in buildings, decreasing per-capita water use, and using energy efficient appliances and equipment. The Project would also be consistent with Executive Orders S-3-05 and B-30-15 to reduce GHG emissions. Although the No Project/No Build Alternative would not change existing conditions or increase GHG emissions, it would not support achievement of the objectives of the City's GHG reduction strategies or the Executive Order standards. However, because the No Project/No Build Alternative would generate fewer GHG emissions than the Project, it would have no adverse effect in association with GHG emissions and related GHG reduction plans and regulations. As such, the No Project/No Build Alternative would have less effect in association with GHG reduction plan and regulatory compliance than the Project.

### **Hazards and Hazardous Materials**

#### **Hazardous Materials Management**

The No Project/No Build Alternative would not include construction or increased operational activities at the Project Site, or the associated use of hazardous materials; therefore, no impact would occur with respect to hazardous materials management under this alternative. The Project, on the other hand, would include the demolition of several existing on-site buildings, and both the construction and operation of an additional 413,127 sf of studio uses, with routine transport, use, storage and disposal of hazardous materials associated with these activities. Because hazardous materials management under the Project would occur in accordance with applicable regulations (Cal-OSHA, CFR Section 1910, CCR Title 8, CUPA, etc.) which have been formulated to provide for the safe use of these materials, hazardous materials management impacts under the Project as well as under Alternative 2 would be less than significant. The No Project/No Build Alternative would have more stage uses than the Project, which typically utilizes greater amounts of hazardous materials (i.e., for set construction) than do digital media/office uses. However, the Project would increase studio square footage by an order of magnitude greater than the No Project/No Build Alternative, with associated hazardous materials use. Therefore, impacts would be less under Alternative 2 than under the Project.

#### **Upset/Accident Conditions and Hazardous Materials Database Listings**

According to the Phase I/II ESA prepared for the Project Site in 2013 by GRS Group, the Project Site is listed in 10 regulatory agency hazardous materials databases; however, none of these listings represent Recognized Environmental Conditions (RECs) at the Project Site.<sup>5</sup> Therefore, neither the No Project/No Build Alternative nor the Project would result in upset/accident conditions involving listed hazardous materials sites.

Due to the age of the on-site buildings, the majority of the on-site buildings may contain ACM and/or LBP. Furthermore, although not referenced in the Phase I ESA, public concern was expressed during the CEQA review and approval process for CPA No. 6 regarding vectors (e.g., specifically rodents) at the Project Site. The No Project/No Build Alternative would not include construction at the Project Site, and thus would not have the potential to result in upset/accident conditions associated with listed hazardous materials sites and/or vectors; no impacts would

<sup>5</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

occur. In contrast, the Project would include the renovation, demolition, or relocation of multiple existing on-site buildings which may contain ACMs and/or LBPs, and could result in vector issues due to demolition. However, Project ACM and LBP impacts would be less than significant with adherence to applicable regulations (e.g., SCAQMD Rule 1403, Cal;/OSHA, DTSC, Culver City Building Code, ACM and LBP O&M Program, etc.) for the proper identification, remediation, removal and disposal of ACM and LBP, and vector impacts would be less than significant with implementation of PDF-HAZ-1 requiring implementation of a vector/pest control abatement plan.

Lastly, the groundwater underlying the Project Site was previously documented with contaminants above applicable action levels such that the LACDPW has required that groundwater from ongoing dewatering operations at the Project Site be treated, prior to discharge. It is anticipated that dewatering would be required for the additional subterranean structures proposed under the Project. However, with implementation of PDF-HAZ-2 requiring that any additional dewatered groundwater be treated, and PDF-WW-1 requiring that any additional treated dewater groundwater be used as on-site landscape irrigation, potential impacts due to groundwater contamination under the Project would be less than significant.

Because the No Project/No Build Alternative would not involve demolition and construction, it would avoid the less than significant ACM/LBP, vector, and groundwater contamination impacts of the Project, and upset/accident conditions impacts would be less.

### **Hazardous Emissions Near Schools**

There are two schools located within one-quarter mile radius of the Project Site: Lynwood Howe Elementary School, at 4100 Irving Place, approximately 60 feet west (across Van Buren Place); and Park Century School, at 3939 Landmark Street, approximately 0.25 miles to the northeast. The No Project/No Build Alternative would not include construction activities or new development, and thus would not emit hazardous materials within one-quarter mile of a school, therefore, no impact would occur. By comparison, the Project would include the demolition of buildings that may contain ACM and/or LBP, and the use of hazardous materials during construction and operation typical of construction and studio production activities, and these could potentially result in hazardous materials emissions within one-quarter mile of a school. However, ACM and LBP identification and removal would occur in accordance with applicable regulations (e.g., SCAQMD Rule 1403, etc.), and the use of hazardous materials during Project construction and operation would be in accordance with both applicable regulations and manufacturer instructions formulated to ensure the safe use of hazardous materials. Furthermore, according to the Health Risk Assessment (HRA) performed in support of the toxic air contaminants (TACs) analysis in Section 4.2, Air Quality, of this Draft EIR, Project construction activities would not generate diesel particulate matter (DPM) or other TAC emissions that would result in significant health effects to nearby sensitive receptors, including to the students at the two schools. Therefore, Project hazardous emissions impacts would be less than significant. Because the No Project/No Build Alternative would avoid the less than significant hazardous emissions impacts of the Project, the impacts would be less under this alternative.

## **Emergency Response Plan Consistency**

The No Project/No Build Alternative would not include construction or increased operational activities at the Project Site; therefore, no impact would occur with respect to emergency response plan consistency. By comparison, the Project would include construction activities which would generate temporary construction traffic and potentially require temporary lane closures along surrounding streets, including potentially along Ince, Washington and/or Culver Boulevard which are of secondary arterial status or higher and thus may act as evacuation routes during an emergency. However, the generation of construction traffic would be offset by the elimination of operational Studio traffic during the construction period, and a Construction Management Plan would be implemented during construction under PDF-TRAF-1 to, among other things, ensure that emergency access is maintained during construction. During operation, the Project would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemical plant), and while Project operation would generate increased traffic along the aforementioned streets which could potentially slow emergency response: (1) the streets would still be available for emergency response; (2) multiple alternative routes are available to emergency vehicles; and (3) no policy or procedural changes would be required to an existing risk management plan, emergency response plan, or evacuation plan. Furthermore, during an unanticipated disaster event, the City would implement operational plans, programs and protocols to facilitate emergency response and/or evacuation, which would consider traffic conditions at the time of the emergency, and in such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate, by the applicable responding City agencies to maximize effectiveness. Thus, Project construction and operational impacts on emergency response plan consistency would be less than significant. Still, because the No Project/No Build Alternative would avoid these less than significant impacts, emergency response plan consistency impacts would be less under this alternative.

## **Hydrology and Water Quality**

### **Hydrology (Drainage)**

Neither the No Project/No Build Alternative or the Project would change the course of a stream or river, or increase the rate or amount of surface runoff from the Project Site in a manner, that could lead to flooding. Under existing conditions, approximately 84 percent of the Project Site is covered with impervious surfaces, existing peak (50-year or Q50) stormwater runoff from the site is estimated at 35.53 cubic feet per second (cfs), and this runoff drains via sheet flow and on-site storm drains to catch basins along the adjacent streets and to a 36-inch LACFCD-owned storm drain in Ince Boulevard. The No Project/No Build Alternative would not change existing hydrology conditions, and as such, would have no impact with respect to hydrology. The Project would increase on-site impervious surfaces to approximately 90 percent of the Project Site which would increase stormwater runoff, but the Project would include 13 on-site EPIC stormwater treatment areas totaling 0.56 acres (under PDF-H/WQ-1) to retain the SWQDv on-site through capture and reuse such that peak stormwater runoff flows from the Project Site would decrease to 17.44 cfs, and this runoff would be safely conveyed to the off-site storm drain in Ince Boulevard via existing and proposed new on-site storm drains approved by the City. This would result in a

net benefit to the conveyance capacity of the Ince storm drain (less than significant impact).<sup>6</sup> Project construction activities would also be subject to NPDES, SWPPP and City grading permit requirements, which require that stormwater runoff during construction be controlled and routed to avoid flooding (a less than significant impact). Therefore, due to greater stormwater runoff flows, hydrology impacts under the No Project/No Build Alternative would be greater than the Project.

### Surface Water Quality

The No Project/No Build Alternative would not require construction activity and, as such, would have no impact with respect to construction or operational surface water quality. In contrast, the Project would include construction activities that could result in sediment and pollutant loading of stormwater runoff from the Project Site, but would implement the required SWPPP, SUSMP and Wet Weather Erosion Control Plan to minimize such loading such that the impact would be less than significant. The Project would also increase operations at the Project Site which could introduce pollutants, such as nutrients, pesticides, organic compounds, sediments, oil and grease, suspended solids, metals, gasoline, pathogens, trash, and debris into stormwater runoff to the municipal storm drain system and ultimately to protected receiving waters. However, the Project would be required to implement SUSMP and LID measures throughout the operational life of the Project to comply with the Upper Los Angeles Watershed Enhanced Watershed Management Programs (EWMP), MS4 Permit, LID Ordinance, and other applicable plans and regulations to, among other things, help achieve the TMDLs for the Ballona Creek Estuary, Dockweiler Beach, and Santa Monica Bay. This would include the proposed development of 13 on-site EPIC stormwater treatment areas totaling 0.56 acres (under PDF-H/WQ-1) to retain the SWQDv on-site through capture and reuse, and the implementation of on-site non-structural water quality BMPs (under PDF-H/WQ-2). As such, the Project would result in a net benefit to surface water quality during operation, and operational water quality impacts would be less than significant.<sup>7</sup> Because the No Project/No Build Alternative would not result in the beneficial operational surface water quality impacts of the Project, surface water quality impacts would be greater under this alternative.

### Land Use and Planning

The No Project/No Build Alternative would not include construction or increased operational activities at the Project Site, and operation of the existing Studio would continue under this alternative consistent with the existing “Studio” General Plan land use designation, “S” (Studio), and applicable Comprehensive Plan Amendment (e.g., CPA No. 6) applicable to the Project Site. Therefore, no impact would occur under this alternative with respect to land use and planning. On the other hand, the Project would include the construction and operation of a net increase in on-site studio development of approximately 413,127 sf (not include the parking structures), an

<sup>6</sup> While the hydrology (drainage) and water quality impacts of the Project are identified as “less than significant” in this EIR, the Project would result in beneficial impacts in both categories. Beneficial impacts are not identified as a significance conclusion in this EIR consistency with the Appendix G (CEQA Checklist) which includes no such category.

<sup>7</sup> While the hydrology (drainage) and water quality impacts of the Project are identified as “less than significant” in this EIR, the Project would result in beneficial impacts in both categories. Beneficial impacts are not identified as a significance conclusion in this EIR consistency with the Appendix G (CEQA Checklist) which includes no such category.

associated increase in on-site employment, and the need for approval of a CPA for the Project Site which would supersede all previous CPAs for the Project Site. According to Section 4.8, Land Use and Planning, of this Draft EIR:

*CPA No. 7 would incorporate Development Standards to ensure that the proposed New Digital Media buildings, stages, and support uses are in compliance with Section 17.250.15 (Studio (S) District Requirements), which establishes permitted uses and height limits within the S Zoning District. The Development Standards allow for modifications to respond to market conditions and tenant needs provided that the total amount of new building area does not exceed 413,127 sf, parking is provided in accordance with the requirements of the Culver City Municipal Code, and the total amount of traffic generated by the Project does not exceed the total amount projected in the Final EIR. (See Section 4.11, Transportation and Traffic, for a description of Project-generated traffic.) CPA No. 7 includes comprehensive development standards regarding the architecture of the new buildings, access and circulation, parking, landscaping, setbacks, fencing, and infrastructure, and sustainability. These standards would ensure comprehensive development of the Studio Campus, while permitting the technological updated and expansion of its facilities within the existing Studio Campus footprint.*

With the approval of CPA No. 7, the Project would be consistent with applicable land use plans, policies, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, and would be compatible with surrounding land uses. Therefore, the land use and planning impacts of the Project would be less than significant. Nonetheless, because the No Project/No Build Alternative would not result in physical changes or require a CPA and associated land use entitlements, less land use and planning impacts would occur under the No Project/No Build Alternative.

## **Noise and Vibration**

### **Construction Noise**

The No Project/No Build Alternative would not include construction activities and thus would not generate associated construction noise; no impact would occur. Under the Project, construction activities would increase noise levels at existing off-site noise-sensitive receptors in the Project area in excess of the applicable thresholds. However, Project construction activities would be restricted to the times of day when construction activities may occur (generally, daytime hours) as prescribed in Chapter 9.07 of the CCMC, and the increase in construction noise during the times of day when construction may occur would be less than significant with adherence to the City's standard conditions of approval (e.g., use of muffling in construction equipment, etc.) and through implementation of the prescribed mitigation measures and PDFs. Project off-site construction traffic would also increase noise levels at noise-sensitive uses along the proposed construction haul route, but this noise would similarly be restricted to the hours prescribed by the CCMC, and would not increase by the barely perceivable level of 3 dBA or more, such that Project off-site construction noise impacts would also be less than significant. However, because the No Project/No Build Alternative would not result in any construction noise impacts, it would have less construction noise impacts than the Project.

### **Operational Noise**

The No Project/No Build Alternative would not increase operational traffic or on-site activity over existing conditions and, as such, would have no impact with respect to operational noise. The Project would increase operational traffic noise at off-site noise-sensitive uses in the Project area, but these increases would be below both the perceivable level of 3 dBA and the threshold, and thus would be less than significant. The Project would also increase operational stationary source noise at the off-site noise-sensitive associated with fixed mechanical equipment, human activity in open space areas (including special events), parking structures, and loading docks. However, this noise, when taken both individually and in composite (e.g., as a combination of the traffic and stationary noise sources) would be less than significant with adherence to the City's Exterior Noise Standards special event permitting requirements, and with implementation of the proposed PDFs. Still, because the No Project/No Build Alternative would not increase operational traffic or stationary source noise, operational noise impacts would be less under the No Project/No Build Alternative.

### **Construction Vibration**

The No Project/No Build Alternative would not include construction activities, and therefore no impact would occur under this alternative with respect to construction ground-borne vibration. In contrast, while the Project would not include high-impact construction activities (e.g., pile driving, blasting, etc.), it would include other construction activities. This could include construction activities (specifically, the operation of heavy construction equipment 600 horsepower) that could generate short-term ground-borne vibration above applicable thresholds at on-site historic buildings within 20 ft of such activities and at off-site residential uses within 45 ft of such activities.<sup>8</sup> Any such vibration would be less than significant with implementation of the specified mitigation. However, as the No Project/No Build Alternative would avoid the less than significant construction vibration impacts of the Project, vibration impacts would be less under this alternative.

### **Operational Vibration**

The No Project/No Build Alternative would not include an increase in on-site operational activities, including activities often associated with operational ground-borne vibration (e.g., traffic and the operation of commercial-grade stationary equipment such as HVACs, condenser units and exhaust fans. Therefore, the No Project/No Build Alternative would result in no impact with respect to operational vibration. On the other hand, the Project would include an increase in on-site operational activities, including an increase in both traffic and the operation of commercial-grade stationary equipment. These would generate ground-borne vibration below the significance threshold for perceptibility, and thus the impact would be less than significant. However, as the No Project/No Build Alternative would avoid the less than significant operational vibration impacts of the Project, vibration impacts would be less under this alternative.

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<sup>8</sup> Linwood E. Howe Elementary School is located too far away from the Project Site to be significant impacted.

## ***Public Services***

### **Fire Protection**

The No Project/No Build Alternative would not include construction or an increase in on-site operation activities, and would not generate additional demand for fire protection and EMS services, block emergency access, slow emergency responses times, or create additional fire flow demand. In contrast, during construction the Project could temporarily: increase the fire potential at the construction site(s) which could increase service demand; impede emergency access; and generate construction traffic on the surrounding roadways and/or temporarily close travel lanes that could slow emergency response. During operation, the Project would: increase Studio operations, on-site employees and traffic on the surrounding roadways which would increase service and fire flow requirements; and could incrementally slow emergency response. However, as discussed in Section 4.10.1, Fire Protection, with adherence to CBC and City Fire Code requirements (covering building design, fire safety features, emergency safety provisions, CCFD access, construction measures, fire flow, and site plan review) and implementation of the proposed PDFs (e.g., Construction Management Plan, use of fire proof/retardant materials, sprinklering of buildings, etc.), Project construction and operation would not require new or expanded fire protection facilities. Therefore, the impact would be less than significant. However, because the No Project/No Build Alternative would avoid these less than significant impacts, fire protection impacts would be less under Alternative 2 than the Project.

### **Police Protection**

The No Project/No Build Alternative would not include construction or an increase in on-site operation activities, and would not generate additional demand for police protection services, impede emergency access, or incrementally slow emergency responses times. Thus, no impact would occur. In contrast, Project construction could temporarily: expose the construction site to trespassing, theft, vandalism and graffiti which would increase service demand; impede emergency access; and generate construction traffic and/or temporarily close travel lanes that slows emergency response. During operation, Project-related increase in on-site studio operations, employees and traffic, could increase service demand and slow emergency response. However, as discussed in Section 4.10.2, Police Protection, CCPD's police station is located only 2½ blocks south of the Project Site, and with adherence to CBC and CCMC requirements (covering building design, security provisions, CCPD access, etc.) and implementation of the PDFs (e.g., construction fencing, Construction Management Plan, security lighting, provision of private on-site security personnel, etc.), Project construction and operation would not require new or expanded police protection facilities. Therefore, the impact would be less than significant. However, because the No Project/No Build Alternative would avoid these less than significant impacts, police protection impacts would be less under Alternative 2 than the Project.

## ***Transportation and Circulation***

### **Construction Traffic/Parking**

The No Project/No Build Alternative would not include construction and would not generate construction traffic or construction parking demand; no impact would occur. The development of the Project, on the other hand, would include construction activity that would generate truck/construction worker traffic and associated traffic congestion, construction worker parking

demand, and potentially lane closures and reductions in access, during the approximately 32-month construction period. However, with implementation of the specified mitigation (e.g. restricting construction truck staging on-site or within reserved off-site lots, provision of flagmen, restricting deliveries/picks-ups and lane closures to off-peak hours, preserving emergency access, etc.), and implementation of the proposed PDFs (e.g., Construction Management Plan, provision of construction worker parking on-site or in reserved off-site lots, etc.), construction traffic/parking impacts would be less than significant with mitigation incorporated with the exception of construction-related level of service impacts which would be significant and unavoidable. As the No Project/No Build Alternative would avoid the less than significant construction traffic/parking impacts and significant unavoidable construction intersection level of service of the Project, construction traffic/parking impacts would be less than the Project.

### **Intersection Service Levels**

The No Project/No Build Alternative would not involve any new development or generate traffic over existing conditions, and as such would have no impact with respect to intersection service levels or signal warrants. The Project would include approximately 413,127 net sf of new studio development at the Project Site (not including parking structures) which would generate associated traffic. Although this traffic would not result in the exceedance of signal warrants at the two unsignalized intersections analyzed, it would result in significant level of service impacts at 10 intersections under Future (2021) With Project Conditions (five under the micro-simulation analysis) during the AM and/or PM peak hours. The implementation of specified mitigation measures would reduce these impacts, but significant unavoidable impacts would remain at eight intersections under Future (2021) With Project Conditions (10 if optional Mitigation Measures TRAF-9 and TRAF-10 were implemented, and four under the micro-simulation analysis). Therefore, as the No Project/No Build Alternative would maintain existing conditions and not increase traffic, intersection service level and signal warrant impacts would be less than the Project.

### **Intersection Queuing**

The No Project/No Build Alternative would not involve any new development or generate traffic over existing conditions, and as such would have no impact with respect to intersection queuing distances. The Project would include approximately 413,127 net sf of new studio development at the Project Site (not including parking structures) which would generate associated traffic. In accordance with the traffic MOU between the Applicant and Culver City, peak hour intersection queuing distance analysis was conducted for informational purposes only at three intersections in which it was found that the Project would result in significant queuing distance impacts at two intersections before mitigation. Because these inadequacies would not necessarily result from the Project alone (e.g., the related projects could contribute to the inadequacies), and because this analysis is provided in the Traffic Section of this Draft EIR for informational purposes only, no mitigation is specified. Still, as the No Project/No Build alternative would not change traffic conditions, intersection queuing distance impacts would be less than the Project.

### **Public Transit**

The No Project/No Build Alternative would not involve any new development or generate public transit ridership over existing conditions. As such, the No Project/No Build Alternative would

have no impact with respect to public transit. By comparison, the Project would include approximately 413,127 net sf of new studio development at the Project Site (not including parking structures) which would generate an estimate increase in transit demand 121 persons during the weekday AM peak hour and 116 during the weekday PM peak hour. However, as the Project Site and greater Traffic Study Area is well served by numerous established local and regional transit routes, and as the Project would utilize only approximately 2.8 percent of the combined capacity of these routes, it is anticipated that adequate capacity exists in the public transit system to serve the Project. Furthermore, the Project would be consistent with applicable plans, policies and programs supporting alternative transportation by representing infill development, concentrating development along established transit routes and bikeways, implementing TDM measures, providing on-site bicycle facilities, etc. Therefore, Project public transit impacts would be less than significant. Still, as the No Project/No Build Alternative would not change demand for public transit, it would avoid these less than significant impacts, and public transit impacts would be less than the Project.

### **Access and Circulation**

The No Project/No Build Alternative would not involve any new development or generate vehicle trips over existing conditions, and thus would have no access and circulation impacts. The Project's vehicular access would be via five gates (four along Ince Blvd., and one pedestrian/emergency vehicle only gate along Washington Blvd.) and a Culver/Main Tunnel connection from Culver Boulevard to the Rear Lawn Parking Structure. All gates, driveways, on-site roadways, sidewalks, etc., would be designed and constructed in accordance with Culver City standards and be reviewed and approved by the City during the Site Plan Review process to provide safe travel (including pedestrian travel by school children), required emergency access, and avoid impedance of traffic movements on City streets. Also, the existing network of off-site roadways, travel lanes, public sidewalks and pedestrian crosswalks would be largely maintained, and vehicular and pedestrian/bicycle traffic would be largely separated by both the Culver/Main Tunnel connection and separate vehicular and pedestrian/bicycle routes at the gates. Furthermore, the Project would provide separate truck loading areas, thereby further separating Project truck and employee/visitor vehicular traffic, would not result in substantial neighborhood cut-through traffic, and would not require the removal or relocation of existing bus stops. Lastly, the Project would be developed along, and connect to, existing pedestrian facilities and bicycle paths, and would provide on-site bicycle parking. Therefore, the Project's access and circulation impacts would be less than significant. Still, the No Project/No Build Alternative would avoid the less than significant access and circulation impacts of the Project, and access and circulation impacts would be less than the Project.

### **Parking**

*Note: Under SB 743, as a qualifying infill project in an urban transit priority area, the Project is not required to evaluate parking impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to parking.*

The No Project/No Build Alternative would not include new development and would not require additional on-site parking; no impact would occur. The Project, on the other hand, would include a net increase in on-site studio development of 413, 127 sf along with two new parking structures:

a two-level subterranean Central Parking Structure, and a below-, at- and above-grade replacement of the Van Buren Parking Structure. In all, the Project would provide 2,370 on-site vehicle parking spaces compared to the CCMC requirement of 1960 spaces. The Project would also require an estimated 93 on-site bicycle parking spaces, and at least the number of parking spaces required by Code would be provided. Thus, the Project would provide adequate parking to meet demand. However, as the No Project/No Build Alternative would not require additional parking, parking impacts would be less under this alternative.

## ***Utilities and Service Systems***

### **Wastewater**

The No Project/No Build Alternative would not involve any new development or increase occupancy of the Project Site over existing conditions. As such, the No Project/No Build Alternative would have no impact on wastewater collection capacity. By comparison, the Project would include a net increase in on-site studio development of 413,127 sf which would generate wastewater requiring collection and conveyance by the existing 8- to 10-inch Ince and 6-inch Western sewer mains. This increase would exceed the half flow capacity of the Ince sewer main during operation, resulting in a less than significant impact with mitigation incorporated (the mitigation being upsizing of the Ince sewer main from 10 to 12 inches between Hubbard St. Lucerne Ave.). As the No Project/No Build Alternative would not generate an increase in demand for wastewater collection capacity or require the upsizing of sewer mains, wastewater collection capacity impacts would be less than the Project.

With respect to wastewater treatment, the No Project/No Build Alternative would not include new development or generate wastewater requiring treatment; no impact would occur. In contrast, the Project would generate wastewater requiring treatment at the Hyperion Treatment Plant (HTP). The existing treatment capacity of Hyperion Treatment Plant (HTP) is 450 million gpd, with remaining available treatment capacity in 2020 projected to be 15 million gpd. Because the wastewater generated by the Project would represent only about 0.6 percent of the HTP's projected remaining available treatment capacity in 2020, the HTP would have adequate treatment capacity to serve the Project. As such, the Project would have a less than significant impact with respect to treatment capacity. However, as the No Project/No Build Alternative would not increase sewer flows, it would avoid the less than significant treatment capacity impacts of the Project, therefore wastewater treatment capacity impacts would be less than the Project.

### **Water**

The No Project/No Build Alternative would not include new development or increase the occupancy of the Project Site over existing conditions, and thus would not generate a demand for either domestic or fire flow water infrastructure conveyance capacity; no impact would occur. The Project would increase domestic and fire flow water demand at the Project Site compared to existing conditions and result in an associated increase in demand for water infrastructure conveyance capacity. According to the Water Infrastructure and Demand Analysis prepared for the Project, the water mains in the surrounding streets (e.g., 12-inch mains in Ince and Washington Boulevards, and an 8-inch main in Van Buren Pl.) have adequate domestic and fire

flow capacity to serve the Project.<sup>9</sup> Given this, and with development of the proposed on-site water line improvements, compliance with applicable domestic water/fire flow requirements, and implementation of the water conservation measures and fire protection infrastructure improvements proposed as PDFs, the water conveyance infrastructure impacts of the Project would be less than significant. However, as the No Project/No Build Alternative would not increase water demand, it would avoid the less than significant water conveyance infrastructure impacts of the Project. Therefore, under Alternative 2 domestic and fire flow water infrastructure conveyance impacts would be less than the Project.

With respect to water demand and supply, the No Project/No Build Alternative would not include new development and would not increase water demand; no impact would occur. By comparison, the Project would include 413,127 sf of net new studio development which would increase the on-site demand for potable water from the Golden State Water Company (GSWC). However, according to the WSA for the Project, the Project would not add any increments of demand in excess of those that were anticipated at the time the 2015 UWMP was published.<sup>10</sup> In addition, the Project would comply with State Title 24 and 20 water efficiency standards, and PDFs are proposed to provide for additional water conservation. As such, the Project's water demand falls within the GSWC's projected increases in Citywide water demands through at least 2040, sufficient water supplies would be available to serve the Project, and the water demand and supply impact of the Project would be less than significant. However, because the No Project/No Build Alternative would not increase water demand over existing conditions, water demand and supply impacts would be less than the Project.

### **Solid Waste**

The No Project/No Build Alternative would not include construction or an increase in on-site operation activities, would not generate an increase in construction- or operations-related solid waste, and would not conflict with regulations related to solid waste; no impact would occur. Under the Project, construction activities would generate non-hazardous construction and demolition debris and excavated soil requiring disposal at inert landfills, while increased operational activities would generate non-hazardous municipal solid waste requiring disposal at Class III landfills. However, the Project includes PDFs requiring that the Project: (1) be designed to meet the standards for LEED certification which identifies and gives credit for green building techniques and other sustainability features that reduce solid waste generation; (2) implement a Demolition Debris Recycling Plan for Construction and a Trash/Recycling Management Plan for Operations for solid waste handling and minimization; and (3) comply with the diversion and recycling requirements of AB 939, AB 341 and other applicable regulations (including diverting at least 65 percent of C&D waste and 50 percent of Class III solid waste by 2020, and diverting at least 75 percent of both C&D and Class III solid waste thereafter). Furthermore, adequate disposal capacity exists at the applicable Los Angeles County and Ventura County inert and Class III landfills to serve the Project, and the Project would not conflict with regulations related to solid waste. Therefore, Project construction and operational solid waste impacts would be less than significant. As the No Project/No Build Alternative would not increase solid waste disposal,

<sup>9</sup> Water Infrastructure and Demand Analysis for the Culver Studios Innovation Plan, KPFF, June 2017.

<sup>10</sup> Golden State Water Company, Water Supply Assessment for Culver Studios Innovation Plan, April 26, 2017, page 11, include in Appendix M-1 of this EIR.

it would avoid the less than significant solid waste impacts of the Project, therefore, solid waste impacts would be less than the Project.

## **Relationship of the Alternative to Project Objectives**

The No Project/No Development Alternative would provide no new development on the Project Site. Therefore, this alternative would not meet any of the Project objectives which relate to the underlying purpose of the Project to sustain The Culver Studio's prominent role as a dynamic, independent studio in the entertainment, digital media, and creative industries, through expansion and modernization of the Studio Campus. The No Project/No Development Alternative would not create a start-of-the-art Studio Campus that would ensure the Studio's competitiveness and continued position at the cutting edge of innovation essential to the invention and production of entertainment as it would retain existing stages and buildings that are not suited to transition to digital media. It would not, through new and upgraded facilities, foster current and further content creation, digital media, creating technologies, and virtual reality, would not support the continued economic viability of the Studio and its ability to respond to changing industry needs, nor would it technologically update the Studio Campus, develop flexible and sustainable new media space or inviting/collaborative landscaped open areas, and improved access. The No project/No Development Alternative would also not upgrade and rehabilitate the Mansion, reduce production vehicle use of directly adjacent streets, promote environmental sustainability through updated and expanded facilities to reduce vehicle trips, or provide a Studio Campus which meets Green Building Program requirements.

### **5.6.2 Alternative 2: No Project/CPA No. 6 Buildout**

#### **Description of the Alternative**

Under the No Project/CPA No. 6 Buildout Alternative, the Studio Campus would be built out in compliance with zoning pursuant to CPA No. 6. This Alternative would include the construction of Buildings O, Y, R, and the Van Buren Parking Structure, and demolition of existing Buildings L, O, X, Y, Z; the Commissary, and Stage 10, for a net new building square footage of approximately 138,997 sf (including 180,093 sf of office/digital media, and a reduction of 3,280 sf of stage and 37,816 of support use). CPA No. 6 would result in an overall reduction of 274,130 sf (including 341,539 sf of digital media, and an increase of 36,600 sf of stage and 30,809 sf of support use), compared to the Project. Overall, this Alternative would result in 138,997 sf of net new development versus 413,127 sf under the Project.

Access and circulation improvements (with the exception of new Gate 2A), relocation of the Bungalows, and landscaping of the Front Lawn, Van Buren Place, and Ince Boulevard, would occur as proposed under the Project. Other proposed improvements include: relocation of the existing guard shack at Gate 1; realignment of existing Gate 4; upgrades to aging Studio Campus infrastructure including heating/ventilation/air conditioning, electrical, and domestic and fire water systems; and some off-site improvements including new curbs, gutters, sidewalks, streetlights, parking meters, and street trees on Ince Boulevard and Van Buren Place.

Lastly, this alternative reflects relocation of four historically significant bungalows near the Mansion (Buildings S, T, U and V) subject to a required Relocation and Rehabilitation Plan and

approval of a Certificate of Appropriateness by the City consistent with requirements under CPA No. 6.

**Table 5-4, Alternative 2: No Project/CPA No. 6 Buildout**, provides a development summary for this alternative.

**TABLE 5-4  
ALTERNATIVE 2: NO PROJECT/CPA NO. 6 BUILDOUT**

Use	Development (sf) <sup>a</sup>			Net New	Total Net (Existing + Net New)
	Existing	Demolition	New		
Digital Media/Office	117,872	(25,607)	205,700	180,093	297,965
Stage	155,480	(3,280)	0	(3,280)	152,200
Support	74,197	(37,816)	0	(37,816)	36,381
<b>Total</b>	<b>347,549</b>	<b>(66,703)</b>	<b>205,700</b>	<b>138,997</b>	<b>486,546</b>

<sup>a</sup> Excludes parking structure square footage.

Source: ESA PCR, September 2017.

## Environmental Impacts

### *Aesthetics*

*Note: As the Project is located on an infill site in an urban transit priority area, pursuant to SB 743 evaluation of aesthetic impacts in an EIR pursuant to CEQA is not required. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to aesthetic issues, including visual quality, views, light, glare, and shading.*

### **Aesthetic Character**

Under the No Project/CPA No. 6 Buildout Alternative, existing building square footage at the Project Site would increase by approximately 138,997, with landscaped setbacks proposed around new Van Buren Parking Structure. This is compared to under the proposed Project where building square footage would increase by approximately 413,127 sf with landscaped setbacks proposed around the new Van Buren Parking Structure, along the western boundary of the Project Site from the bungalow area to the Van Buren Parking Structure, and along the southern and western boundaries of the Project Site at proposed Building Y, and with landscape improvements at the Studio gates along Ince Boulevard. Both this Alternative and the Project would include distinctive architecture and more visual interest to support compatibility with surrounding development which, along with the proposed landscaped setbacks, would be beneficial. However, as the No Project/CPA No. 6 Buildout Alternative would result in substantially less on-site development than the Project, this Alternative would result in less of an impact on aesthetic character than the Project.

### **Aesthetics Plan Consistency**

As discussed in the IS/MND for CPA No. 6 and Section 4.1, Aesthetics, of this Draft EIR, the No Project/CPA No. 6 Buildout Alternative and the Project would each be substantially consistent with the aesthetic policies of the City's General Plan, Residential Parkway Design Guidelines, and the CCMC. Both projects would enhance landscaping and architecture at the Project Site, improve the pedestrian experience along Van Buren Place, and comply with CCMC requirements for landscaping, outdoor lighting, signage, and art in public places. However, the Project would also improve the pedestrian experience along Washington and Ince Boulevards by providing Studio gate landscaping and streetscape improvements, landscape setbacks along the entire western boundary of the Project (rather than just along the west side of the Van Buren Parking Structure as proposed under CPA No. 6), and landscaped setbacks on the south and east sides of proposed new Building Y; improvements not proposed under the CPA No. 6 Buildout Alternative. Still, as the No Project/CPA No. 6 Buildout Alternative would result in substantially less on-site development than the Project, it is conservatively concluded that this alternative would have less aesthetics plan consistency impacts than the Project.

### **Light/Glare**

Under the No Project/CPA No. 6 Buildout Alternative, existing building square footage at the Project Site would increase by approximately 138,997 compared to an approximately 413,127 sf increase under the Project. As with the Project, this increase in on-site development would incrementally increase existing on-site lighting (e.g., exterior lighting at driveways, security lighting, architectural/landscape accent lighting, and lighting from the interiors of the proposed buildings/structures). As discussed in the IS/MND for CPA No. 6 and Section 4.1, Aesthetics, of this EIR, lighting would be shielded and directed onto the Project Site to avoid glare and minimize light trespass onto adjacent residential properties, illuminance intensity would be controlled, and design characteristics would be implemented to address light trespass (such as opaque screens as part of the new Van Buren Parking Structure), consistent with CCMC and the Comprehensive Plan applicable to the Studio. However, as the No Project/CPA No. 6 Buildout Alternative would result in substantially less on-site development than the Project, this Alternative would result in less light and glare impacts than the Project.

### **Shading**

Both the No Project/CPA No.6 Buildout Alternative and the Project would include new development of up to 56 feet in height that would result in net new shading of sensitive uses. As indicated in the IS/MND for CPA No. 6, the No Project/CPA No.6 Building Alternative would not result in shading of adjacent sensitive uses above applicable standards. By comparison, as indicated in Section 4.1, Aesthetics, of this Draft EIR, the Project (specifically Buildings M and Y) would result in winter shading of three residences east of the Project Site above applicable standards. Therefore, shading impacts would be less under the No Project/CPA No. 6 Buildout Alternative.

### **Air Quality**

#### **Construction Emissions**

The No Project/CPA No. 6 Buildout Alternative would generate regional and localized construction emissions over an approximately 27-month period, while the Project would generate

regional and localized construction emissions over an approximately 32-month time period, with the greatest level of construction emissions under the Project and Alternative 2 occurring during the demolition, excavation, foundations/concrete pouring phases. While the South Coast Air Basin is designated as non-attainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> under federal and/or state ambient air quality standards, construction activities associated with the Project and Alternative 2 would not exceed the applicable SCAQMD daily regional numeric thresholds for regional VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>, or localized numeric thresholds for concentrations of NO<sub>x</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub>. As such, as with the Project regional and localized construction emission impacts would be less than significant under Alternative 2. However, as the No Project/CPA No. 6 Buildout Alternative would include a shorter construction period, less construction activity, and less construction emissions than the Project, construction emission impacts would be less than the Project.

### **Operational Emissions**

Both the No Project/CPA No. 6 Buildout Alternative and the Project would include new development and an expansion of existing operations at the Studio Campus that would generate operational air emissions. While the South Coast Air Basin is designated as non-attainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, the Project would not generate a net increase in the emission of operational criteria and precursor pollutants (e.g., VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) that exceeds SCAQMD thresholds or NAAQS/CAAQS with implementation of the proposed PDFs (e.g., compliance with CALGreen Building Standards, consistency with LEED certification requirements, etc.). Similarly, according to the IS/MND for CPA No. 6, the No Project/CPA No. 6 Buildout Alternative would not generate a net increase in the emission of operational criteria and precursor pollutants that exceeds SCAQMD thresholds and NAAQS/CAAQS.<sup>11</sup> However, because the No Project/CPA No. 6 Buildout Alternative would include substantially less net new development than the Project, and thus result in less operational emissions, operational emissions impacts would be less than the Project.

### **Carbon Monoxide Hotspots**

According to the IS/MND for CPA No. 6, traffic volumes would not reach the screening threshold of 31,600 vehicles per hour at any of the intersections evaluated in the Project vicinity. Therefore, federal and state CO standards would not be exceeded at these intersections, and the No Project/CPA No. 6 Buildout Alternative would have less than significant CO hotspot impacts.<sup>12</sup> As discussed in Section 4.2, Air Quality, the Project would not cause or contribute considerably to the formation of CO hotspots. Project-generated CO concentrations at impacted intersections would remain well below the CAAQS one-hour and eight-hour CO standards. Therefore, the Project would result in less than significant CO hotspot impacts. However, as the No Project/CPA No. 6 Buildout Alternative would result in less traffic and less CO at area intersections than the Project, CO hotspot impacts would be less under this alternative.

<sup>11</sup> City of Culver City, Initial Study and Mitigated Negative Declaration for Culver Studios CPA No. 6, October 28, 2015.

<sup>12</sup> City of Culver City, Initial Study and Mitigated Negative Declaration for Culver Studios CPA No. 6, October 28, 2015.

## **Toxic Air Contaminants**

Development under the No Project/CPA No. 6 Buildout Alternative would result in less than significant TACs impacts.<sup>13</sup> As discussed in Section 4.2, Air Quality, of this Draft EIR, the Project would not increase DPM above the SCAQMD threshold of 10 in one million at sensitive sites, including nearby residences and Linwood E. Howe Elementary School. For carcinogenic exposures, the cancer risk from DPM emissions from construction of the Project would be an estimated 6.1 per million at the nearest adjacent residences and 0.09 per million to students and 0.01 per million to staff at Linwood E. Howe Elementary. DPM levels would be less during Project operation since less truck traffic would be generated during operation than construction. In addition, loading areas would be relocated to the interior of the Project Site thereby increasing separation distances from off-site sensitive receptors, and PDF-NOISE-8 would prohibit the idling of trucks within the loading areas. Therefore, Project TACs impacts would be less than significant. Because the No Project/CPA No. 6 Buildout Alternative would include substantially less development than the Project, and thus generate less construction and operational emissions including the emission of TACs, TACs impacts would be less under this alternative compared to the Project.

## **AQMP Consistency**

The Project would require an amendment to the Comprehensive Plan governing development at the Project Site in accordance with the Culver City “S” (Studio) zoning of the Project Site. However, both the Project and Alternative 2 would be consistent with; the “S” zoning of the Project Site; SCAG’s 2016 RTP/SCS policies for concentrating growth in proximity to transit; the control strategies in the AQMP; and the long-term employment projections upon which the AQMP is based. Also, neither the Project or Alternative 2 would increase or induce residential growth not otherwise anticipated in SCAG regional growth forecasts for Culver City. As with the Project, the construction activities under Alternative 2 would be consistent with CARB requirements to minimize emissions from diesel equipment and SCAQMD Rule 403 regulations for controlling fugitive dust. Therefore, AQMP consistency impacts would be less than significant under Alternative 2. However, as the No Project/CPA No. 6 Buildout Alternative would include substantially less development than the Project, and thus generate less traffic and air emissions than the Project, AQMP consistency impacts would be less under this alternative.

## **Cultural Resources**

### **Historical Resources**

As indicated previously, the Project Site contains multiple existing historical resources, including but not limited to: Buildings C (Mansion) and D which are designated by the City as Landmark structures and eligible for listing in the National and California Registers; the four existing bungalows (Buildings S, T, U, and V) which are designated by the City as Significant Structures and eligible for listing in the National and California Registers; and Stages 2/3/4 and 7/8/9 which appear eligible for listing in the National, California and Local Registers. Both the No Project/CPA No. 6 Buildout Alternative and the Project would include the demolition of several existing on-site buildings, the construction of several new on-site buildings, and the relocation of

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<sup>13</sup> City of Culver City, Initial Study and Mitigated Negative Declaration for Culver Studios CPA No. 6, October 28, 2015.

the bungalows. As with the Project Alternative 2 would result in less than significant indirect historical resources impacts (e.g., would not reduce or materially impair the integrity of significance of important historical resources in the project vicinity). Alternative 2 would also result in less than significant impacts to the bungalows with mitigation incorporated. However, the No Project/CPA No.6 Buildout Alternative would retain Stages 2/3/4 and 7/8/9 with only an addition to the former resulting in a less than significant impact with mitigation incorporated, while the Project would include the demolition of Stages 2/3/4 and 7/8/9 resulting in a significant unavoidable impact even with incorporation of mitigation measures. Therefore, historical resources impacts under the No Project/CPA No. 6 Buildout Alternative would be less than under the Project.

### **Archaeological/Tribal Resources**

No known archaeological resources (historic or prehistoric) have been recorded within or immediately adjacent to the Project Site according to an SLF database search conducted through the NAHC. However, five prehistoric archaeological resources and one historic archaeological resource were noted within a one-half mile radius of the Project Site in the database survey, No known tribal cultural resources were identified within the Project Site or vicinity during the AB 52 Native American consultations. Both the No Project/CPA No.6 Buildout Alternative and the Project would include excavations and other ground disturbing activities that could potentially encounter buried archaeological resources, should such resources be present. However, with mitigation, Alternative 2 as with the Project would result in a less than significant impact. Alternative 2 would include less development and thus less excavation and other ground disturbing activities than the Project. Therefore, Alternative 2 would have less potential to affect buried archaeological resources, if present. Thus, archaeological/tribal resources impacts would be less under the No Project/CPA No. 6 Buildout Alternative than the Project.

### **Paleontological Resources**

No known paleontological resources have been recorded on or within the immediate vicinity of the Project Site. However, the Project Site is located within the western Los Angeles basin which is known to contain paleontological resources. A Phase I Archaeological/ Paleontological Resources Survey determined that the Project Site is located with an area with medium sensitivity for paleontological resources.<sup>14</sup> Both the No Project/CPA No.6 Buildout Alternative and the Project would include excavations into native soils that could potentially encounter buried paleontological resources, if such resources are present. With mitigation incorporated under the Project and Alternative 2, impacts would be less than significant. However, the No project/CPA No. 6 Buildout Alternative would include less development and thus less excavation than the Project. Thus, Alternative 2 would have less of a potential to affect buried paleontological resources, if present. Therefore, paleontological resources impacts would be less under the No Project/CPA No. 6 Buildout Alternative.

<sup>14</sup> City of Culver City, Initial Study and Mitigated Negative Declaration for Culver Studios CPA No. 6, October 28, 2015.

## **Geology and Soils**

### **Seismic Hazards**

The Project Site is not subject to fault rupture, and thus neither the No Project/CPA No. 6 Alternative nor the Project would expose people or structures to a fault rupture hazard. However, the Project Site is subject to strong seismic ground shaking and liquefaction, and both the No Project/CPA No.6 Buildout Alternative and the Project would include new development that could expose people and structures to these hazards. While these hazards would be less than significant with mitigation incorporated under the Project and Alternative 2. Since the No Project/CPA No. 6 Buildout Alternative would include less development than the Project, Alternative 2 would expose fewer people to these hazards. Thus, seismic hazards impacts would be less under the No Project/CPA No. 6 Buildout Alternative than the Project.

### **Geotechnical Hazards**

The Project Site is subject to potential subsidence, collapse, lateral spreading, and liquefaction, and both the No Project/CPA No. 6 Buildout Alternative and the Project would include new development that could expose people and structures to these hazards. Compliance with existing regulations (CBC, etc.) would avoid substantial subsidence and collapse hazards, and while the lateral spreading and liquefaction impacts would be less than significant with mitigation incorporated under both the Project and Alternative 2. However, since the No Project/CPA No. 6 Alternative would include less development and expose fewer people to these hazards, geotechnical hazards impacts would be less under the No Project/CPA No.6 Buildout Alternative than the Project.

### **Soils/Erosion**

The Project Site does not have corrosive soils. Therefore, neither the No Project/CPA No. 6 Buildout Alternative nor the Project would expose structures to potential damage from corrosive soils. However, the Project Site is subject to expansive soils and soil erosion. Both the No Project/CPA No.6 Buildout Alternative and the Project would include ground-disturbing activities during construction that could result in soil erosion, and would include new development that could expose people and structures to an expansive soils hazard. Compliance with existing regulations (for example, CBC, SCAQMD Rule 403, and SWPPP requirements) would substantially reduce the potential for expansive soils and soil erosion under the Project and Alternative 2, and any residual impacts would be less than significant with mitigation incorporated. However, the No Project/CPA No. 6 Alternative would include less development and fewer people than the Project and thus expansive soils hazards that may remain after mitigation would be less under Alternative 2. Furthermore, the Project would include substantially more development than this alternative and would involve a substantially greater amount of excavation and other ground disturbing activities. Thus, Alternative 2 would have less potential for soil erosion during construction (even if Project impacts would be less than significant after mitigation). Therefore, soils/erosion impacts would be less under the No Project/CPA No. 6 Buildout Alternative than the Project.

## ***Greenhouse Gas Emissions***

### **GHG Emissions**

Both the No Project/CPA No. 6 Buildout Alternative and the Project would include the construction and operation of new studio uses that would generate GHG emissions. The No Project/CPA No. 6 Alternative and the Project would generate a net increase of 2,913 and 7,464 metric tons of CO<sub>2</sub>e per year, respectively (includes both operational GHG emissions and construction GHG emissions amortized over the 30-year life of the project). Both the Project and Alternative 2 would be consistent with relevant goals and actions to reduce emissions as much as feasibly possible, as well as consistent with the HSC Division 25.5 goals and CARB guidelines for assessing GHG emissions. Project operational emissions would also represent a 25.7 percent reduction as compared to business as usual (BAU) due to the infill nature of the Project, access to nearby transit, and the proposed green and GHG-reducing PDFs. The No Project/CPA No. 6 Alternative would be expected to have a similar BAU reduction for the same reasons. Hence, GHG emissions impacts would be less than significant under Alternative 2. However, as the No Project/CPA No. 6 Alternative would include substantially less net new development and would generate less construction- and operations-related GHG emissions than the Project, GHG emissions impacts would be less under the No Project/CPA No. 6 Buildout Alternative.

### **GHG Plan Consistency**

Both the No Project/CPA No. 6 Buildout Alternative and the Project would comply with the City's Green Building Code and Solar Photovoltaic requirements, LEED certification standards, and the CALGreen Code, to reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. These measures are consistent with the City's GHG reduction strategies for sustainability and smart-growth goals of improving energy and water efficiency in buildings, decreasing per-capita water use, and using energy efficient appliances and equipment. As with the Project, Alternative 2 would also be consistent with Executive Orders S-3-05 and B-30-15 to reduce GHG emissions. However, as the No Project/CPA No. 6 Buildout Alternative has already been approved, there is no additional action that could or would be inconsistent with applicable GHG Plans; hence, it would result in no impact with respect to GHG Plan consistency, as opposed to the Project which would result in a less than significant GHG Plan consistency impact. Therefore, GHG Plan consistency impacts would be less under the No Project/CPA No. 6 Buildout Alternative.

## ***Hazards and Hazardous Materials***

### **Hazardous Materials Management**

Both the No Project/CPA 6 Buildout Alternative and the Project would include the demolition of several existing on-site buildings, and the construction and operation of additional studio uses, with routine transport, use, storage and disposal of hazardous materials associated with each of these activities. Because hazardous materials management under the Project and Alternative 2 would occur in accordance with applicable regulations (Cal-OSHA, CFR Section 1910, CCR Title 8, CUPA, etc.), which have been formulated to provide for the safe use of these materials, the hazardous materials management impacts of the Project and Alternative 2 would be less than significant. As with the Project, less hazardous materials would be expected to be used during

operation of the Studio on a per square foot basis under Alternative 2 than currently occurs due to the transition that would occur to modern digital production methods in place of physical set construction. However, the extent of hazardous materials transport, use, storage and disposal, and thus the associated less than significant hazardous materials management impacts, would be less under the No Project/CPA No. 6 Buildout Alternative because, while this alternative would include somewhat less on-site stage use than the Project than the Project. While stage use (specifically, set construction) typically involves the use of hazardous materials, there would be orders of magnitude less net new development under this alternative (138,997 sf under this alternative vs. 413,127 sf under the Project) than under the Project (not including parking structures).

### **Upset/Accident Conditions and Hazardous Materials Database Listings**

According to the Phase I/II ESA prepared for the Project Site in 2013 by GRS Group, the Project Site is listed in 10 regulatory agency hazardous materials databases; however, none of these listings represent Recognized Environmental Conditions (RECs) at the Project Site.<sup>15</sup> Therefore, neither the No Project/CPA No. 6 Buildout Alternative nor the Project would result in upset/accident conditions involving listed hazardous materials sites.

Due to the age of the existing buildings, the majority of the on-site buildings may contain ACM and/or LBP. Furthermore, although not referenced in the Phase I ESA, public concern was expressed during the CEQA review and approval process for CPA No. 6 regarding vectors (e.g., specifically rodents) at the Project Site. Both the Project and Alternative 2 would include the demolition and relocation of multiple existing on-site buildings which may contain ACMs and/or LBPs, and would include both demolition and construction activities which could potentially result in vector issues. However, ACM and LBP impacts would be less than significant under both the Project and Alternative 2 with adherence to applicable regulations (e.g., SCAQMD Rule 1403, Cal;/OSHA, DTSC, Culver City Building Code, ACM and LBP O&M Program, etc.) for the proper identification, remediation, removal and disposal of ACM and LBP. Vector impacts would be less than significant under the Project and Alternative 2 with implementation of PDF-HAZ-1 under the Project and Condition of Approval 31 under this alternative requiring the implementation of a vector/pest control abatement plan.

Lastly, the groundwater underlying the Project Site was previously documented with concentrations of dichloroethane and trichloroethane above applicable action levels such that the LACDPW has required that groundwater from ongoing dewatering operations at the Project Site be treated, with the treated dewatered groundwater discharged to the local sewer system until 2014 after which it has been used as on-site landscape irrigation. It is anticipated that dewatering would be required for the additional subterranean structures proposed under both the No Project/CPA No. 6 Alternative and the Project. However, with implementation of PDF-HAZ-2 requiring that any additional dewatered groundwater be treated, and PDF-WW-1 requiring that any additional treated dewatered groundwater be used as on-site landscape irrigation, the

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<sup>15</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

groundwater contamination impact under the Project and Alternative 2 would be less than significant.

Because the No Project/CPA No. 6 Alternative would include less demolition and construction activities, none of the renovation activities, and less new subterranean structures than the Project, Alternative 2 would result in less upset/accident condition and hazardous materials impacts than the Project.

### **Hazardous Emissions Near Schools**

There are two schools located within a one-quarter mile radius of the Project Site: Lynwood Howe Elementary School, at 4100 Irving Place, approximately 60 feet west (across Van Buren Place); and Park Century School, at 3939 Landmark Street, approximately 0.25 miles to the northeast. Both the No Project/CPA No. 6 Alternative and the Project would include the demolition of buildings that may contain ACM and/or LBP, and the use of hazardous materials during construction and operation typical of construction and studio production activities, and these could potentially result in hazardous materials emissions within one-quarter mile of a school. However, ACM and LBP identification and removal would occur in accordance with applicable regulations (e.g., SCAQMD Rule 1403, etc.), while the use of hazardous materials during construction and operation would occur in accordance with applicable regulations and manufacturer instructions formulated to ensure the safe removal of ACM and LBP and the safe use of hazardous materials. Furthermore, according to the Health Risk Assessment (HRA) performed in support of the toxic air contaminants (TACs) analysis in Section 4.2, Air Quality, of this Draft EIR, Project construction activities would not generate diesel particulate matter (DPM) or other TAC emissions that would result in significant health effects to nearby sensitive receptors (including to the students at the two schools). This finding also applies to the No Project/CPA No. 6 Alternative. Therefore, as with the Project hazardous emissions impacts would be less than significant under Alternative 2. Still, because the No Project/CPA No. 6 Alternative would demolish fewer on-site buildings which may contain ACM/LBP, would include none of the renovation of buildings that may contain ACM/LBP, and would result in less construction and operational activity emissions than the Project, hazardous emissions impacts would be less under this alternative.

### **Emergency Response Plan Consistency**

Both the No Project/CPA No. 6 Alternative and the Project would include construction activities which would generate temporary construction traffic and potentially require temporary lane closures along surrounding streets, including potentially along Ince, Washington and/or Culver Boulevards which are secondary arterial status or higher and thus may act as evacuation routes during an emergency. However, the generation of construction traffic would be offset by the elimination of operational Studio traffic during the construction period and no streets would be fully closed during the construction period. In addition, as with the Project Alternative 2 would implement a Construction Management Plan during construction under Condition of Approval #29 (PDF-TRAF-1 for the Project) to, among other things, ensure that emergency access is maintained during construction. During operation, neither the Project or Alternative 2 would include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemical plant) or include the closure of public streets. Furthermore, while

operations under Alternative 2 like the Project would generate increased traffic along the aforementioned streets which could potentially slow emergency response: (1) the streets would still be available for emergency response; (2) multiple alternative routes are available to emergency vehicles; and (3) no policy or procedural changes would be required to an existing risk management plan, emergency response plan, or evacuation plan. Lastly, during an unanticipated disaster event, the City would implement operational plans, programs and protocols to facilitate emergency response and/or evacuation, which would consider traffic conditions at the time of the emergency, and in such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate, by the applicable responding City agencies to maximize effectiveness. Thus, as with the Project construction and operational impacts on emergency response plan consistency would be less than significant under Alternative 2. Still, because the No Project/CPA No. 6 Alternative would result in less construction- and operations-related traffic than the Project, and would generate a smaller on-site population potentially requiring evacuation during an emergency, emergency response plan consistency impacts would be less under this alternative.

## ***Hydrology and Water Quality***

### **Hydrology (Drainage)**

Neither the No Project/CPA No. 6 Buildout Alternative or the Project would change the course of a stream or river, or increase the rate or amount of surface runoff from the Project Site in a manner, that could lead to flooding. Under existing conditions, approximately 84 percent of the Project Site is covered with impervious surfaces, existing peak (50-year or Q50) stormwater runoff from the site is estimated at 35.53 cubic feet per second (cfs), and this runoff drains via sheet flow and on-site storm drains to catch basins along the adjacent streets and to a 36-inch LACFCD-owned storm drain in Ince Boulevard. Both the Project and Alternative 2 would include construction activities that could temporarily alter drainage conditions at the Project Site, but these construction activities would be subject to NPDES, SWPPP and City grading permit requirements which require that stormwater runoff during construction be controlled and routed to avoid flooding (a less than significant impact). The Project would increase on-site impervious surfaces to approximately 90 percent of the Project Site which would increase stormwater runoff, but the Project would include 13 on-site EPIC stormwater treatment areas totaling 0.56 acres (under PDF-H/WQ-1) to retain the SWQDv on-site through capture and reuse such that existing peak stormwater runoff flows from the Project Site would decrease to 17.44 cfs, and this runoff would be safely conveyed to the off-site storm drain in Ince Boulevard via existing and proposed new on-site storm drains approved by the City. This would result in a net benefit to the conveyance capacity of the Ince storm drain, or a less than significant impact.<sup>16</sup> By comparison, the No Project/CPA No. 6 Alternative would increase impervious surfaces at the Project Site and would not include on-site retention, thereby increasing stormwater discharges to the Ince storm drain although this increase would not be substantial (e.g., a less than significant impact).

<sup>16</sup> While the hydrology (drainage) and water quality impacts of the Project are identified as "less than significant" in this EIR, the Project would result in beneficial impacts in both categories. Beneficial impacts are not identified as a significance conclusion in this EIR consistency with the Appendix G (CEQA Checklist) which includes no such category.

Therefore, hydrology impacts would be greater under the No Project/CPA No.6 Buildout Alternative.

### **Surface Water Quality**

Both the No Project/CPA 6. Buildout Alternative and the Project would include construction activities that could result in sediment and pollutant loading of stormwater runoff from the Project Site, but would implement the required SWPPP, SUSMP and Wet Weather Erosion Control Plan to minimize such loading such that the impact would be less than significant. Both the Project and Alternative 2 would also include new on-site development that would increase operational activities at the Project Site which could introduce pollutants, such as nutrients, pesticides, organic compounds, sediments, oil and grease, suspended solids, metals, gasoline, pathogens, trash, and debris into stormwater runoff from the site, and in turn drain to the municipal storm drain system and ultimately to protected receiving waters. While the No Project/CPA No. 6 Alternative would include a relatively modest increase in on-site operations associated with the net increase of 138,997 sf of studio uses, the Project would include a more substantial increase in operations associated with the net increase of 413,127 sf of studio uses. Hence, there would be a greater potential for the Project to generate and introduce pollutants to protected receiving waters than the No Project/CPA No. 6 Alternative. As with the Project, Alternative 2 would implement the required SUSMP and LID measures throughout their operational lives to comply with the Upper Los Angeles Watershed Enhanced Watershed Management Programs (EWMP), MS4 Permit, LID Ordinance, and other applicable plans and regulations to, among other things, help achieve the TMDLs for the Ballona Creek Estuary, Dockweiler Beach, and Santa Monica Bay. However, only the Project proposes the development of 13 on-site EPIC stormwater treatment areas totaling 0.56 acres (under PDF-H/WQ-1) to retain the SWQDv on-site through capture and reuse thereby resulting in a net reduction in pollutants in stormwater runoff from the Project Site, a less than significant impact.<sup>17</sup> Furthermore, truck parking and deliveries would continue to occur at ground level under the No Project/CPA No. 6 Alternative, with the associated potential for the deposition of pollutants on the pavement that could be washed into the local storm drain system and ultimately to receiving waters, whereas truck parking and deliveries would be undergrounded under the Project thereby avoiding or substantially reducing this potential. Therefore, surface water quality impacts would be greater under the No Project/CPA No. 6 Alternative than under the Project.

### **Land Use and Planning**

Both the No Project/CPA No. 6 Alternative and the Project would include the construction and operation of additional on-site studio development. Under the No Project/CPA No. 6 Alternative, development would occur at the Project Site in accordance with CPA No. 6 which sets development standards for, and permits up to, approximately 138,997 sf of new studio development (not including parking structures). Under the Project, a net increase in on-site studio development of approximately 413,127 sf (not include the parking structures) would occur, and a

<sup>17</sup> While the hydrology (drainage) and water quality impacts of the Project are identified as “less than significant” in this EIR, the Project would result in beneficial impacts in both categories. Beneficial impacts are not identified as a significance conclusion in this EIR consistency with the Appendix G (CEQA Checklist) which includes no such category.

new CPA (CPA No. 7) would be approved for the Project Site superseding all previous CPAs for the site. According to Section 4.8, Land Use and Planning, of this Draft EIR:

*CPA No. 7 would incorporate Development Standards to ensure that the proposed New Digital Media buildings, stages, and support uses are in compliance with Section 17.250.15 (Studio (S) District Requirements), which establishes permitted uses and height limits within the S Zoning District. The Development Standards allow for modifications to respond to market conditions and tenant needs provided that the total amount of new building area does not exceed 413,127 sfsf, parking is provided in accordance with the requirements of the Culver City Municipal Code, and the total amount of traffic generated by the Project does not exceed the total amount projected in the Final EIR. (See Section 4.11, Transportation and Traffic, for a description of Project-generated traffic.) CPA No. 7 includes comprehensive development standards regarding the architecture of the new buildings, access and circulation, parking, landscaping, setbacks, fencing, and infrastructure, and sustainability. These standards would ensure comprehensive development of the Studio Campus, while permitting the technological updated and expansion of its facilities within the existing Studio Campus footprint.*

CPA No. 6 has already been approved by the City. Hence, the No Project/CPA No.6 Building Alternative would be consistent with applicable land use plans, polices, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. The same would be true for the Project with approval of CPA No. 7. Therefore, as with the Project, Alternative 2 would result in less than significant land use and planning impacts. However, because the No Project/CPA No. 6 Alternative would not require a CPA, less land use and planning impacts would occur than under the Project.

## **Noise and Vibration**

### **Construction Noise**

Both the No Project/CPA No. 6 Alternative and the Project would include construction activities that would generate associated construction noise. Both the Project and Alternative 2 would increase noise levels at existing off-site noise-sensitive receptors in the Project area in excess of the applicable thresholds. However, construction activities would be restricted to the times of day when construction activities may occur (generally, daytime hours) as prescribed in Chapter 9.07 of the CCMC. Furthermore, this increase in construction noise during the times of day when construction may occur would be less than significant with adherence to the City's standard conditions of approval (e.g., use of muffling in construction equipment, etc.) and implementation of the prescribed mitigation measures in the IS/MND for the No Project/CPA No. 6 Alternative, and less than significant with adherence to the City's standard conditions and implementation of both prescribed mitigation measures and PDFs under the Project. Both the Project and Alternative 2 would also include off-site construction traffic during the construction period which would increase noise levels at noise-sensitive uses along the proposed construction haul route. However, this noise would similarly be restricted to the hours prescribed by the CCMC, and would not increase by the barely perceivable level of 3 dBA or more, such that the off-site construction noise impacts under the Project and Alternative 2 would be less than significant. However, because the No Project/CPA No. 6 Alternative would include substantially less net new

development (138,997 sf) than the Project (413,127 sf), and thus generate less construction activities and therefore less construction noise, construction noise impacts would be less under this alternative.

### **Operational Noise**

As with the Project, the No Project/CPA No. 6 Alternative would increase operational traffic noise at off-site noise-sensitive uses in the Project area; this traffic noise would be below both the perceivable level of 3 dBA and the threshold. Therefore, operational traffic noise impacts would be less than significant. In addition, Alternative 2 as with the Project would increase operational stationary source noise at the off-site noise-sensitive associated with fixed mechanical equipment, human activity in open space areas (including special events), parking structures, and loading docks. Under the No Project/CPA No. 6 Alternative, this noise, when taken both individually and in composite (e.g., as a combination of the traffic and stationary noise sources) would be less than significant with adherence to the City's Exterior Noise Standards and special event permitting requirements, and with implementation of the specified mitigation measures. The same is true of the operational stationary and composite noise under the Project, except that instead of mitigation measures, PDFs are proposed to avoid significant impacts. While operational noise would be less than significant under the Project and Alternative 2, the No Project/CPA No. 6 Alternative would include substantially less net new development (138,997 sf) than the Project (413,127 sf), and less associated traffic and operational activity. Therefore, Alternative 2 would generate less operational noise than the Project.

### **Construction Vibration**

Neither the No Project/CPA No. 6 Alternative nor the Project would include high-impact construction activities (e.g., pile driving, blasting, etc.) that could generate high levels of ground-borne vibration. However, as with the Project, Alternative 2 would include other construction activities, specifically the operation of heavy construction equipment of 600 horsepower or more, that could generate lower-intensity short-term ground-borne vibration. Under the No Project/CPA No. 6 Alternative, construction-related ground-borne vibration levels would be below applicable thresholds, and construction activities would be limited to daytime hours, such that the impact would be less than significant. Under the Project, construction-related vibration levels above applicable thresholds could occur at on-site historic buildings within 20 ft of such activities and at off-site residential uses within 45 ft of such activities, even with adherence to the City's limitations concerning when construction activities can occur, with any such vibration less than significant with mitigation incorporated.<sup>18</sup> While construction-related vibration would be less than significant under Alternative 2 and less than significant with mitigation incorporated under the Project, such impacts would be less under the No Project/CPA No. 6 Alternative due to less construction activity compared to the Project.

### **Operational Vibration**

Both the No Project/CPA No. 6 Alternative and the Project would result in an increase in operations, including operational activities often associated with ground-born vibration (e.g., traffic and the operation of commercial-grade stationary equipment such as HVACs, condenser

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<sup>18</sup> Linwood E. Howe Elementary School is located too far away from the Project Site to be significant impacted.

units and exhaust fans). These would generate ground-borne vibration below the significance threshold for perceptibility under the Project and under Alternative 2, and thus the impact would be less than significant. However, operational vibration impacts would be less under the No Project/CPA No. 6 Alternative owing to less new net development compared with the Project.

## **Public Services**

### **Fire Protection**

During construction, the No Project/CPA No. 6 Alternative and the Project could result in occasional exposure of combustible materials that would temporarily impede emergency access and increase the demand for fire protection and emergency medical services. During operation, as with the Project, Alternative 2 would increase traffic on surrounding roadways which could slow emergency response times and increase the demand for fire protection/EMS service and fire flow. As discussed in Section 4.10.1, Fire Protection, with adherence to CBC and City Fire Code requirements covering building design, fire safety features, emergency safety provisions, CCFD access, construction measures, fire flow, and site plan review, and with implementation of the proposed PDFs (e.g., Construction Management Plan, use of fire proof/retardant materials, sprinklering of buildings, etc.), Project construction and operation would not require new or expanded fire protection facilities, and impacts would be less than significant. Because the No Project/CPA No. 6 Alternative would be required to adhere to the same regulatory requirements, and would generate less traffic and service demand than the Project, and because the CCFD previously indicated in the context of the IS/MND for CPA No. 6 that CCFD could accommodate the additional demand, the impacts of this alternative would also be less than significant.<sup>19</sup> Fire protection impacts would be less under the No Project/CPA No. 6 Alternative than the Project owing to less new net development, traffic, and service demand.

### **Police Protection**

As with the Project, the No Project/CPA No. 6 Alternative would include construction and increased operational activities. During construction, the Project and Alternative 2 could temporarily: expose the construction site to trespassing, theft, vandalism and graffiti which would increase service demand; impede emergency access; and generate construction traffic and/or temporarily close travel lanes that slows emergency response. During operation, Alternative 2 would increase on-site studio operations and associated traffic, which could increase service demand and slow emergency response. However, as discussed in Section 4.10.2, Police Protection, CCPD's police station is located only 2½ blocks south of the Project Site, and with adherence to CBC and CCMC requirements (covering building design, security provisions, CCPD access, etc.) and implementation of the PDFs (e.g., construction fencing, Construction Management Plan, security lighting, provision of private on-site security personnel, etc.), Project construction and operation would not require new or expanded police protection facilities. The No Project/CPA No. 6 Alternative would be required to adhere to the same regulatory requirements as, and would include less development and therefore generate less traffic and service demand than the Project. Furthermore, conditions of approval for CPA No. 6 require the same types of impact-reducing measures as the Project (e.g., Construction Management Plan,

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<sup>19</sup> City of Culver City, Initial Study and Mitigation Negative Declaration for CPA No. 6, October 28, 2015.

etc.), and the CCPD did not identify any concerns regarding CPA No. 6 during its internal review.<sup>20</sup> Therefore, as with the Project, the police protection impacts under Alternative 2 would be less than significant.<sup>21</sup> However, because the No Project/CPA No. 6 Alternative would include substantially less new development and employee population requiring police protection than the Project, police protection impacts would be less.

## **Transportation and Circulation**

### **Construction Traffic/Parking**

Both the No Project/CPA No. 6 Alternative and the Project would include construction activity that would generate truck/construction worker traffic and associated traffic congestion, construction worker parking demand, and potentially lane closures and reductions in access, during the construction period. However, with implementation of the specified mitigation (e.g. restricting construction truck staging on-site or within reserved off-site lots, provision of flagmen, restricting deliveries/picks-ups and lane closures to off-peak hours, preserving emergency access, etc.), and implementation of the proposed PDFs (e.g., Construction Management Plan, provision of construction worker parking on-site or in reserved off-site lots, etc.), Project construction traffic/parking impacts would be less than significant with the exception of construction-related intersection level of service impacts which would be significant and unavoidable. The No Project/CPA No. 6 Alternative would include substantially less development than the Project and thus be expected to generate less construction traffic and construction parking demand. Furthermore, similar construction traffic/parking measures proposed as PDFs and mitigation under the Project are required as conditions of approval under CPA No. 6. Hence, it is anticipated that the No Project/CPA No. 6 Alternative would also result in less than significant construction traffic/parking impacts, with the level of impact less than under the Project.

### **Intersection Service Levels**

The Project would include approximately 413,127 net sf of new development at the Project Site (not including parking structures) that would generate associated operational traffic. Although this traffic would not result in the exceedance of signal warrants at the two unsignalized intersections analyzed, it would result in significant unavoidable intersection level of service impacts at eight intersections under Future (2021) With Project Conditions (10 if optional Mitigation Measures TRAF-9 and TRAF-10 were implemented). Under the No Project/CPA No. 6 Alternative, less net new development (138,997 sf) would be built compared with the Project. As a result, trip generation would be reduced by 332 vehicles in the AM peak hour and 309 vehicles in the PM peak from those that would be generated under the Project. The reduced trip generation under Alternative 2 would result in significant and unavoidable intersection level of service impacts at one of the eight intersections significantly and unavoidably impacted under the Project, Intersection 13 (Robertson Blvd/Exposition Blvd & Venice Blvd) (see Appendix E of the Traffic Study). If optional Mitigation Measures TRAF-9 and TRAF-10 were implemented, it is possible but unlikely due to less traffic under this alternative that two additional intersections would be significantly and unavoidably impacted under this alternative (see the listing of significant unavoidable impacts of the Project at the beginning of this section for listing of

<sup>20</sup> City of Culver City, Initial Study and Mitigation Negative Declaration for CPA No. 6, October 28, 2015.

<sup>21</sup> City of Culver City, Initial Study and Mitigation Negative Declaration for CPA No. 6, October 28, 2015.

potential additional intersections impacted). Furthermore, it can be reasonably assumed that this alternate, like the Project, would not exceed signal warrants. Therefore, while this alternative would result in significant unavoidable intersection level of service impacts at one intersection, impacts would be less under this alternative than under the Project.

### **Intersection Queuing**

Both the No Project/CPA No. 6 Alternative and the Project would generate traffic and associated intersection queuing distance impacts. According to the IS/MND prepared for CPA No. 6, the No Project/CPA No. 6 Alternative would result in less than significant queuing distance impacts with mitigation incorporated at two intersection.<sup>22</sup> This is compared to the Project which would result in less than significant queuing impacts at two intersections (with mitigation not specified because, per the MOU, the intersection queuing distance analysis in the Draft EIR is provided for information purposes only, and these inadequacies would not necessarily be caused by the Project along). Because mitigation is identified that would mitigate the impacts under the No Project/CPA No. 6 Alternative, whereas no mitigation is identified to mitigate the impacts under the Project, and because the No Project/CPA No. 6 Alternative would generate substantially less traffic than the Project, intersection queuing distance impacts would be less under this alternative.

### **Public Transit**

Both the No Project/CPA No. 6 Alternative and the Project would generate a demand for public transit. The No Project/CPA No. 6 Alternative would generate an increase in transit demand of 42 persons during the weekday AM peak hour and 39 during the weekday PM peak hour, or approximately 0.6 percent of the combined capacity of the public transit lines serving the Project Site and vicinity.<sup>23</sup> This is compared to the Project, which would generate an increase in transit demand of 121 persons during the weekday AM peak hour and 116 during the weekday PM peak hour, or approximately 2.8 percent of the combined capacity of the transit lines. While the Project would generate higher transit demand, it is anticipated that adequate capacity exists in the public transit system to serve the Project. Furthermore, as with the Project, Alternative 2 would be consistent with applicable plans, policies and programs supporting alternative transportation by representing infill development, concentrating development along established transit routes and bikeways, implementing TDM measures (required for the alternative by conditions of approval and for the Project by mitigation), providing on-site bicycle facilities, etc. Therefore, public transit impacts would be less than significant under Alternative 2. Still, as the No Project/CPA No. 6 Alternative would result in less demand for public transit than the Project, public transit impacts would be less under this alternative.

### **Access and Circulation**

Both the No Project/CPA No. 6 Alternative and the Project would include vehicular access via studio gates along Ince and Washington Boulevards, while the Project would increase the number of gate entries and also include a Culver/Main Tunnel connection from Culver Boulevard to the Rear Lawn Parking Structure. All gates, driveways, on-site roadways, sidewalks, etc. under either Alternative 2 or the Project would be designed and constructed in accordance with Culver City

<sup>22</sup> City of Culver City, Initial Study and Mitigation Negative Declaration for CPA No. 6, October 28, 2015.

<sup>23</sup> City of Culver City, Initial Study and Mitigation Negative Declaration for CPA No. 6, October 28, 2015.

standards and would be reviewed and approved by the City during the Site Plan Review process to provide safe travel (including pedestrian travel by school children), required emergency access, and avoid impedance of traffic movements on City streets. Also, as with the Project, Alternative 2 would be developed along existing pedestrian routes and bicycle paths, would include on-site bicycle parking, would largely maintain the existing network of off-site roadways, travel lanes, public sidewalks and pedestrian crosswalks, would avoid the need to removal or relocate existing bus stops, and would avoid substantial neighborhood cut-through traffic. The Project would include several features to improve pedestrian and bicycle safety that would not be provided under the No Project/CPA No. 6 Alternative, such as providing the Culver/Main Tunnel Connection and restricting the Studio entry along Washington Boulevard to pedestrian/bicycle traffic, which would help separate vehicular and pedestrian/bicycle traffic and improve pedestrian/bicycle safety. At the same time, the No Project/CPA No. 6 Alternative would generate substantially less vehicular traffic. Therefore, Alternative 2 would result in less than significant access and circulation impacts. The the level of impact would generally be equivalent between the the alternative and the Project.

### **Parking**

*Note: Under SB 743, as an infill project within an urban transit oriented area, the Project is not required to evaluate parking impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to parking.*

The No Project/CPA No. 6 Alternative and the Project would result in net increases in studio development at the Project Site of 138,997 sf and 413, 127 sf, respectively, which would generate a demand for parking. The No Project/CPA No. 6 Alternative and Project would provide a total of 1,875 spaces and 2,370 on-site vehicle parking spaces, respectively, versus the number required by the CCMC of 1,541 spaces and 1,960 spaces, respectively. Thus, as with the Project, Alternative 2 would provide sufficient vehicle parking spaces to meet code requirements. Furthermore, Alternative 2 would provide the number of on-site bicycle parking spaces required by Code. As with the Project, Alternative 2 would provide sufficient parking spaces to meet code requirements, parking impacts would be less than significant and generally equivalent between the No Project/CPA No. 6 Alternative and the Project.

### **Utilities and Service Systems**

#### **Wastewater**

As with the Project, the additional development that would occur under the No Project/CPA No. 6 Alternative would generate additional wastewater requiring collection and conveyance by the local sewer system. The Project would include a net increase in on-site studio development of 413,127 sf which would generate wastewater requiring collection and conveyance by the existing 8- to 10-inch Ince and 6-inch Western sewer mains. This increase would exceed the half flow capacity of the Ince sewer main during operation, resulting in a less than significant impact with mitigation incorporated (the mitigation being upsizing of the Ince sewer main from 10 to 12 inches between Hubbard St. Lucerne Ave.). The No Project/CPA No. 6 Alternative, by comparison, would include a net increase in on-site studio development of 138,997 sf and would generate approximately 17 percent of the wastewater of the Project, which according to the IS/MND for this alternative, would result in a less than significant wastewater collection

impact.<sup>24</sup> As the No Project/CPA No. 6 Alternative would avoid the need to upsize the Ince sewer main, wastewater capacity impacts would be less under this alternative.

With respect to wastewater treatment, both projects would generate additional wastewater requiring treatment at the HTP. The existing treatment capacity of HTP) is 450 million gpd, with remaining available treatment capacity in 2020 projected to be 15 million gpd. Because the wastewater generated by the Project would represent only about 0.6 percent of the HTP's projected remaining available treatment capacity in 2020, the HTP would have adequate treatment capacity to serve the Project. Similarly, because the No Project/CPA No. 6 Alternative would generate approximately 17 percent of the wastewater generated under the Project, the HTP would have adequate treatment capacity to serve the No Project/CPA No.6 Building Alternative. Thus, wastewater treatment capacity impacts would be less than significant under Alternative 2. The No Project/CPA No. 6 Alternative's impacts would be less than those of the Project.

### **Water**

As with the Project, the No Project/CPA No. 6 Alternative would increase domestic water and fire flow demand at the Project Site compared to existing conditions thereby resulting in an increase in demand for water infrastructure conveyance capacity. According to the Water Infrastructure and Demand Analysis prepared for the Project, the water mains in the surrounding streets (e.g., 12-inch mains in Ince and Washington Boulevards, and an 8-inch main in Van Buren Place) have adequate domestic and fire flow capacity to serve the Project.<sup>25</sup> Given this, and with development of the proposed on-site water line improvements, compliance with applicable domestic water/fire flow requirements, and with implementation of the water conservation measures and fire protection infrastructure improvements proposed as PDFs, the water conveyance infrastructure impacts of the Project would be less than significant. The same can be expected under the No Project/CPA No. 6 Alternative, especially as this alternative would include substantially less development than the Project (e.g., 138,997 sf vs. 413,127 sf under the Project) and thus would generate substantially less water demand. Furthermore, the IS/MND for the No Project/CPA No. 6 Alternative concluded that water infrastructure capacity impacts of this alternative would be less than significant.<sup>26</sup> Because the No Project/CPA No. 6 Alternative would create demand for substantially less water than the Project, domestic and fire flow water infrastructure conveyance impacts would be less than under the Project.

With respect to water supply, both projects would include new development and would increase the on-site demand for domestic water from GSWC. According to the WSA prepared for the Project, the Project would not add increments of demand in excess of those that were anticipated at the time the 2015 UWMP was published.<sup>27</sup> In addition, the Project would comply with State Title 24 and 20 water efficiency standards, and PDFs are proposed to provide for additional water conservation. As such, the Project's water demand falls within the GSWC's projected increases in Citywide water demands through at least 2040. Sufficient water supplies would be available to

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<sup>24</sup> City of Culver City, Initial Study and Mitigation Negative Declaration for CPA No. 6, October 28, 2015.

<sup>25</sup> Water Infrastructure and Demand Analysis for the Culver Studios Innovation Plan, KPFF, June 2017.

<sup>26</sup> City of Culver City, Initial Study and Mitigation Negative Declaration for CPA No. 6, October 28, 2015.

<sup>27</sup> Golden State Water Company, Water Supply Assessment for Culver Studios Innovation Plan, April 26, 2017, page 11, include in Appendix M-1 of this EIR.

serve the Project, and the water supply impact of the Project would be less than significant. Similarly, because the No Project/CPA No. 6 Alternative would result in approximately 17 percent of the development and thus, would generate approximately 17 percent of the water demand of the Project, the GSWC would also have adequate water supplies to serve the No Project/CPA No. 6 Alternative. Thus, water demand and supply impacts would be less than significant under Alternative 2, with less impacts under the No Project/CPA No. 6 Alternative.

### **Solid Waste**

Under both the No Project/CPA No. 6 Alternative and the Project, construction activities would generate non-hazardous construction/demolition debris and excavated soil requiring disposal at inert landfills, while increased operational activities would generate non-hazardous municipal solid waste requiring disposal at Class III landfills. As with the Project, Alternative 2 would be subject to the waste diversion and recycling requirements of AB 939, AB 341 and other application regulations (including diverting at least 65 percent of C&D waste and 50 percent of Class III solid waste by 2020, and diverting at least 75 percent of both C&D and Class III solid waste thereafter). Furthermore, as adequate capacity exists at the applicable Los Angeles County and Ventura County C&D and Class III landfills to serve the construction and operational waste disposal needs of the Project, adequate capacity would exist to serve the No Project/CPA No. 6 Alternative as this alternative would include substantially less net new development than the Project (138,997 sf under this alternative vs. 413,127 sf under the Project, not including parking structures). Therefore, the solid waste impacts under Alternative 2 as with the Project would be less than significant. Although this alternative would not include several of the PDFs of the Project designed to reduce solid waste generation (e.g., LEED certification, Demolition Debris Recycling Plan for Construction, etc.), the solid waste impacts would be less under the No Project/CPA No. 6 Alternative.

### **Relationship of the Alternative to Project Objectives**

The No Project/CPA No. 6 Buildout Alternative would provide some new development on the Project Site, and would accomplish some of the Project objectives. Because the No Project/CPA No. 6 Buildout Alternative would provide some new digital media/office space while removing some existing outdated stage facilities, it would support the underlying purpose of the Project, although to a substantially lesser degree than the Project. It would create some state-of-the-art studio facilities that might help ensure the Studio's competitiveness and continued position at the cutting edge of innovation essential to the invention and production of entertainment. It would also, through some new and upgraded facilities, foster some further content creation, digital media, creative technologies and virtual reality, and would promote environmental sustainability in some (but not all) studio structures through updated and expanded facilities to reduce vehicle trips. However, the No Project/CPA No. 6 Buildout Alternative would not provide sufficient changes to support the continued economic viability of the Studio and its ability to respond to changing industry needs, would not provide inviting/collaborative landscaped open areas, and would not improve access to the same degree as the Project. All-in-all, the No Project/CPA No. 6 Buildout Alternative would not achieve the underlying purpose of the Project, which is to sustain The Culver Studio's prominent role as a dynamic, independent studio in the entertainment, digital media, and creative industries, through expansion and modernization of the Studio Campus,

because the changes to the Studio Campus under this alternative (for example, the amount of new digital media space) would be limited and incremental rather than transformative.

### 5.6.3 Alternative 3: Reduced Density Alternative

#### Description of the Alternative

Under the Reduced Density Alternative, the Project would be reduced in size by approximately 135,000 sf, or an approximately 33 percent reduction in net new building sf, through a reduction in digital media/office use floor area. The reduction in floor area would be achieved through smaller building footprints (the heights of the proposed buildings would be the same as under the Project). As with the Project, this alternative would involve minor changes to the Mansion largely focused on interior rehabilitation, a connection to the Culver/Main Tunnel, relocation/rehabilitation of the Bungalows, and construction of six new Digital Media buildings which would house a flexible mix of creative space, production space, and digital media stages, and would replace six existing buildings housing offices and support services (Buildings L, O, X, Y, Z, and the Commissary) and four existing buildings housing sound stages.

New construction would be located throughout the existing Central Area, and along the eastern, western, and southern sides of the Studio Campus. As with the Project, Stage 11/12/14 and Stage 15/16 would be retained. New buildings would be a maximum of 56 feet in height, consistent with the height limitation of the Culver Studios Comprehensive Plan as well as the Studio Zoning district in the City's Zoning Code. Building exteriors would be constructed and finished in an architectural style compatible with the existing historically significant buildings. As with the Project, there would be a common open space area, improved Studio Campus access and internal circulation with associated gate changes, and below-grade, at-grade, and above-grade structured parking, including the Van Buren Parking Structure.

**Table 5-5, *Alternative 3: Reduced Density***, provides a development summary for this alternative.

**TABLE 5-5  
ALTERNATIVE 3: REDUCED DENSITY**

Use	Development (sf) <sup>a</sup>				
	Existing	Demolition	New	Net New	Total Net (Existing + Net New)
Digital Media/Office	117,872	(87,788)	474,420	386,632	504,504
Stage	155,480	(79,880)	40,000	(39,880)	115,600
Support	74,197	(68,625)	0	(68,625)	5,572
Total	347,549	(236,293)	514,420	278,127	625,676

<sup>a</sup> Excludes parking structure square footage.

Source: ESA PCR, September 2017.

## Environmental Impacts

### **Aesthetics**

*Note: As the Project is located on an infill site in an urban transit priority area, pursuant to SB 743 evaluation of aesthetic impacts in an EIR pursuant to CEQA is not required. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to aesthetic issues, including visual quality, views, light, glare, and shading.*

### **Aesthetic Character**

Both the Reduced Density Alternative and the Project would: retain the Mansion, front lawn, bungalows, and Stages 11 through 16; include development of new Buildings J, L, O, Y, and the Central and Van Buren parking structure; relocate the bungalows; provide new landscape setbacks along the western site boundary from the bungalow area to the Van Buren Parking Structure, and along the southern and western site boundaries at proposed Building Y; provide landscape improvements at the Studio gates along Ince Boulevard; and provide distinctive architecture and more visual interest. As with the Project, Alternative 3 would intensify development at the Project Site, but would also provide increased visual interest and landscape buffering. However, as the Reduced Density Alternative would include new buildings with smaller footprints and less net new development than the Project (278,127 sf vs. 413,127 sf under the Project), aesthetic character impacts would be less under this alternative.

### **Aesthetics Plan Consistency**

Both the Reduced Density Alternative and the Project would: provide new landscape setbacks along the western site boundary from the bungalow area to the Van Buren Parking Structure, and along the southern and western site boundaries at proposed Building Y; enhance landscaping and architecture at the Project Site; improve the pedestrian experience along Washington and Ince Boulevards, Van Buren Place, and the Studio gates by providing landscaping and pedestrian improvements; and comply with CCMC requirements for landscaping, outdoor lighting, signage, and art in public places. Alternative 3, as with the Project, would be consistent with applicable aesthetic plans. Therefore, the level of impact between Alternative 3 and the Project would be generally equivalent.

### **Light/Glare**

Under the Reduced Density Alternative, existing building square footage at the Project Site would increase by approximately 278,127 sf. This is compared to an approximately 413,127 sf increase under the Project. This increase in on-site development would incrementally increase existing on-site lighting (e.g., exterior lighting at driveways, security lighting, architectural/ landscape accent lighting, and lighting from the interiors of the proposed buildings/structures). As with the Project, under Alternative 3 exterior lighting would be shielded and directed onto the Project Site to avoid glare and minimize light trespass onto adjacent residential properties, illuminance intensity would be controlled, and design characteristics would be implemented to address light trespass (such as opaque screens as part of the new Van Buren Parking Structure), consistent with CCMC and the Comprehensive Plan applicable to the Studio. However, as the Reduced Density Alternative would result in less on-site development than the Project, this alternative would result in less light and glare impacts than the Project.

## **Shading**

Both the Reduced Density Alternative and the Project would include new development of up to 56 feet in height that would result in net new shading of sensitive uses. As indicated in Section A, Aesthetics, of this Draft EIR, the Project (specifically proposed Buildings M and Y) would result in winter shading of three residences east of the Project Site above applicable standards. Because the footprints of Buildings M and Y would be smaller under the Reduced Density Alternative, shading associated with Building M would potentially be less under this alternative (e.g., the three existing residences would be shaded for slightly less time, but likely still above applicable standards). Therefore, shading impacts would be less under the Reduced Density Alternative.

## **Air Quality**

### **Construction Emissions**

Both the Reduced Density Alternative and the Project would generate regional and localized construction emissions over an approximately 32-month time period, with the greatest level of construction emissions under both projects occurring during the demolition, excavation, foundations/concrete pouring phases. While the South Coast Air Basin is designated as non-attainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> under federal and/or state ambient air quality standards, construction activities associated with both projects would not exceed the applicable SCAQMD daily regional numeric thresholds for regional VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>, or localized numeric thresholds for concentrations of NO<sub>x</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub> and, as such, regional and localized construction emission impacts would be less than significant under both projects. However, while the two projects would include an equivalent amount of demolition, the Reduced Density Alternative would include less construction activities than the Project owing to approximately 33 percent less net new development under this alternative. Therefore, construction emissions would be less under this alternative.

### **Operational Emissions**

Both the Reduced Density Alternative and the Project would include new development and an expansion of existing operations at the Studio Campus that would generate operational air emissions. While the South Coast Air Basin is designated as non-attainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, neither project would generate a net increase in the emission of operational criteria and precursor pollutants (e.g., VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) that exceeds SCAQMD thresholds or NAAQS/CAAQS with implementation of the proposed PDFs (e.g., compliance with CALGreen Building Standards, consistency with LEED certification requirements, etc.). Therefore, operational air emissions impacts would be less than significant under both projects. As the Reduced Density Alternative would include less development and thus generate less operational air emissions than the Project, operational emission impacts would be less under this alternative than under the Project.

### **Carbon Monoxide Hotspots**

As discussed in Section 4.2, Air Quality, the Project would not cause or contribute considerably to the formation of CO hotspots, CO concentrations at impacted intersections would remain well below the CAAQS one-hour and eight-hour CO standards. Therefore, the Project would result in less than significant CO hotspot impacts. The Reduced Density Alternative would include less development than the Project and therefore, would generate less traffic. Therefore, CO hotspot

impacts would be less than significant under this alternative as well, and would be less than under the Project.

### **Toxic Air Contaminants**

Both the Reduced Density Alternative and the Project would include studio uses rather than industrial, power plant, and other uses most often associated with TAC emissions. Furthermore, as discussed in Section 4.2, Air Quality, of this Draft EIR: the Project would not increase DPM above the SCAQMD threshold of 10 in one million at sensitive sites, including at nearby residences and Linwood E. Howe Elementary School, during either construction or operation; loading areas would be moved to the interior of the Project Site under the Project, thereby increasing separation distances from off-site sensitive receptors; and PDF-NOISE-8 would be implemented under the Project which would prohibit the idling of trucks within the loading areas and thus eliminate TAC emissions associated with idling trucks. For these same reasons, and because less development would occur under the Reduced Density Alternative than under the Project, TACs impacts under this alternative would similarly be less than significant and less than under the Project.

### **AQMP Consistency**

Both the Reduced Density Alternative and the Project would require an amendment to the Comprehensive Plan governing development at the Project Site in accordance with the Culver City “S” (Studio) zoning of the Project Site. However, both projects would be consistent with; the “S” zoning of the Project Site; SCAG’s 2016 RTP/SCS policies for concentrating growth in proximity to transit; the control strategies in the AQMP; and the long-term employment projections upon which the AQMP is based. Also, neither project would increase or induce residential growth not otherwise anticipated in SCAG regional growth forecasts for Culver City. Lastly, the construction activities of both projects would be consistent with CARB requirements to minimize emissions from diesel equipment and SCAQMD Rule 403 regulations for controlling fugitive dust. Therefore, as with the Project AQMP consistency impacts would be less than significant under Alternative 3. However, as the Reduced Density Alternative would include less development than the Project, and thus generate less population, traffic, and air emissions than the Project, AQMP consistency impacts would be less under this alternative.

### **Cultural Resources**

#### **Historical Resources**

As indicated previously, the Project Site contains multiple existing historical resources, including but not limited to: Buildings C (Mansion) and D which are designated by the City as Landmark structures and eligible for listing in the National and California Registers; the four existing bungalows (Buildings S, T, U, and V) which are designated by the City as Significant Structures and eligible for listing in the National and California Registers; and Stages 2/3/4 and 7/8/9 which appear eligible for listing in the National, California and Local Registers. Both the Reduced Density Alternative and the Project would include demolition of several existing on-site buildings, the construction of several new on-site buildings, and the relocation of the bungalows. As with the Project, Alternative 3 would result in less than significant indirect historical resources impacts (e.g., would not reduce or materially impair the integrity of significance of important historical resources in the project vicinity, and both would result in less than significant impacts

to the bungalows with mitigation incorporated. However, both projects would demolish and replace Stages 2/3/4 and 7/8/9 with new development, which would represent a significant unavoidable historical resources impact (even with incorporation of mitigation recommended to reduce this impact). Alternative 3 would impact existing historical resources at the Project Site in the same way and to the same extent as the Project. Thus, historical resources impacts would be generally equivalent.

### **Archaeological/Tribal Resources**

No known archaeological resources (historic or prehistoric) have been recorded within or immediately adjacent to the Project Site according to an SLF database search conducted through the NAHC, and no known tribal cultural resources were identified within the Project Site or vicinity during the AB 52 Native American consultations. However, five prehistoric archaeological resources and one historic archaeological resource were noted within a one-half mile radius of the Project Site in the database survey. Both the Reduced Density Alternative and the Project would include excavations and other ground disturbing activities that could potentially encounter buried archaeological resources, should such resources be present. This would represent a less than significant impact with mitigation incorporated Alternative 3 as with the Project. However, the Reduced Density Alternative would include new buildings with smaller footprints and associated ground disturbing activities than the Project, and thus would have less of a potential to affect buried archaeological resources, if present.

### **Paleontological Resources**

No known paleontological resources have been recorded on or within the immediate vicinity of the Project Site. However, the Project Site is located within the western Los Angeles basin which is known to contain paleontological resources, and a Phase I Archaeological/ Paleontological Resources Survey determined that the Project Site is located with an area with medium sensitivity for paleontological resources. Both the Reduced Density Alternative and the Project would include excavations into native soils that could potentially encounter buried paleontological resources, should such resources be present. This would represent a less than significant impact with mitigation incorporated under both projects. However, the Reduced Density Alternative would include new buildings with smaller footprints and associated ground disturbing activities than the Project, and thus would have less of a potential to affect buried paleontological resources, if present.

### ***Geology and Soils***

#### **Seismic Hazards**

The Project Site is not subject to fault rupture, and thus neither the Reduced Density nor the Project would expose people or structures to a fault rupture hazard. However, the Project Site is subject to strong seismic ground shaking and liquefaction, and both the Reduced Density Alternative and the Project would include new development that could expose people and structures to these hazards. These hazards would be less than significant with mitigation incorporated under Alternative 3 as with the Project. However, the Reduced Density Alternative would include less development and would thus expose less development and fewer people to these hazards. Therefore, seismic hazards impacts would be less under this alternative.

### **Geotechnical Hazards**

The Project Site is subject to potential subsidence, collapse, lateral spreading, and liquefaction, and both the Reduced Density Alternative and the Project would include new development that could expose people and structures to these hazards. While compliance with existing regulations (CBC, etc.) would avoid substantial subsidence and collapse hazards, and while the lateral spreading and liquefaction impacts would be less than significant with mitigation incorporated, the Reduced Density Alternative would include less development and thus would expose less development fewer people to these hazards. Therefore, geotechnical hazards impacts would be less under this alternative.

### **Soils/Erosion**

The Project Site does not have corrosive soils. Therefore, neither the Reduced Density Alternative nor the Project would expose structures to potential damage from corrosive soils. However, the Project Site is subject to expansive soils and soil erosion. Both the Reduced Density Alternative and the Project would include ground-disturbing activities during construction that could result in soil erosion, and would include new development that could expose people and structures to an expansive soils hazard. Compliance with existing regulations (for example, CBC, SCAQMD Rule 403, and SWPPP requirements) would substantially reduce the potential for expansive soils and soil erosion, and any residual impacts would be less than significant with mitigation incorporated. As the Reduced Density Alternative would include less development, and thus would potentially generate less erosion and expose less development and fewer people to any residual expansive soils hazards that may remain after mitigation, impacts would be less under this alternative.

### **Greenhouse Gas Emissions**

#### **GHG Emissions**

Both the Reduced Density Alternative and the Project would include the construction and operation of new studio uses that would generate GHG emissions. The Project would generate a net increase of 7,464 metric tons of CO<sub>2</sub>e per year (includes both operational GHG emissions and construction GHG emissions amortized over the 30-year life of the Project). The Reduced Density Alternative would be expected to generate somewhat less GHG emissions than the Project given less development. As with the Project, Alternative 3 would be consistent with relevant goals and actions to reduce Project emissions as much as feasibly possible, as well as consistent with the HSC Division 25.5 goals and CARB guidelines for assessing GHG emissions. Project operational emissions would also represent a 25.7 percent reduction as compared to business as usual (BAU) due to the infill nature of the Project, access to nearby transit, and the proposed green and GHG-reducing PDFs, and the Reduced Density Alternative would be expected to have a similar BAU reduction for the same reasons. Hence, GHG emissions impacts would be less than significant. However, as the Reduced Density Alternative would include less development and would generate less construction- and operations-related GHG emissions than the Project, GHG emissions impacts would be less under this alternative.

#### **GHG Plan Consistency**

Both the Reduced Density Alternative and the Project would comply with the City's Green Building Code and Solar Photovoltaic requirements, LEED certification standards, and the

CALGreen Code, to reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. These measures are consistent with the City's GHG reduction strategies for sustainability and smart-growth goals of improving energy and water efficiency in buildings, decreasing per-capita water use, and using energy efficient appliances and equipment. Both projects would also be consistent with Executive Orders S-3-05 and B-30-15 to reduce GHG emissions. Alternative 3 would be consistent with applicable GHG plans and, as with the Project, would result in less than significant GHG Plan consistency impacts. The GHG plan consistency impacts of Alternative 3 compared with the Project would be generally equivalent.

### ***Hazards and Hazardous Materials***

#### **Hazardous Materials Management**

Both the Reduced Density Alternative and the Project would include the demolition of several existing on-site buildings, and both the construction and operation of additional studio uses, with routine transport, use, storage and disposal of hazardous materials associated with each of these activities. Because hazardous materials management under both projects would occur in accordance with applicable regulations (Cal-OSHA, CFR Section 1910, CCR Title 8, CUPA, etc.) which have been formulated to provide for the safe use of these materials, the hazardous materials management impacts of both projects would be less than significant. Furthermore, less hazardous materials would be expected to be used during operation of the Studio under Alternative 3 and the Project than currently occurs due to the transition to modern digital production methods in place of noise stages and associated physical set construction and tear-down activities common to sound stage use. This reduction would be expected to be greater under the Reduced Density Alternative owing to less new development and thus less hazardous materials use under this alternative. Hence, hazardous materials management impacts would be less under the Reduced Density Alternative than under the Project.

#### **Upset/Accident Conditions and Hazardous Materials Database Listings**

According to the Phase I/II ESA prepared for the Project Site in 2013 by GRS Group, the Project Site is listed in 10 regulatory agency hazardous materials databases; however, none of these listings represent RECs at the Project Site.<sup>28</sup> Therefore, neither the Reduced Density Alternative nor the Project would result in upset/accident conditions involving listed hazardous materials sites.

Due to the age of the on-site buildings, the majority of the on-site buildings may contain ACM and/or LBP. Furthermore, although not referenced in the Phase I ESA, public concern was expressed during the CEQA review and approval process for CPA No. 6 regarding vectors (e.g., specifically rodents) at the Project Site. As with the Project, Alternative 3 would include the demolition and relocation of multiple existing on-site buildings which may contain ACMs and/or LBPs, and would include both demolition and construction activities which could potentially result in vector issues. However, ACM and LBP impacts would be less than significant with adherence to applicable regulations (e.g., SCAQMD Rule 1403, Cal;/OSHA, DTSC, Culver City Building Code, ACM and LBP O&M Program, etc.) for the proper identification, remediation,

<sup>28</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

removal and disposal of ACM and LBP, while vector impacts would be less than significant under the Project and Alternative 3 with implementation of a vector/pest control abatement plan.

Lastly, the groundwater underlying the Project Site was previously documented with concentrations of dichloroethane and trichloroethane above applicable action levels such that the LACDPW has required that groundwater from ongoing dewatering operations at the Project Site be treated prior to discharge, with the treated dewatered groundwater being discharged to the local sewer system until 2014 after which it has been used as on-site landscape irrigation. It is anticipated that dewatering would be required for the additional subterranean structures proposed under both the Reduced Density Alternative and the Project. However, with implementation of PDF-HAZ-2 requiring that any additional dewatered groundwater be treated, and PDF-HAZ-3 requiring that any additional treated dewater groundwater be used as on-site landscape irrigation, the groundwater contamination impact under the Project and Alternative 3 would be less than significant.

The Reduced Intensity Alternative would include the same amount of demolition activities as the Project, and thus could potentially disturb the same amount of ACMs and LBPs. Furthermore, while the Reduced Density Alternative would potentially require less additional dewatering than the Project, owing to the smaller footprint of proposed subterranean structures, the treatment of the dewatered water would avoid adverse upset/accident conditions involving hazardous materials. Therefore, upset/accident condition and hazardous materials database listing impacts under Alternative 3 would be generally equivalent to the Project.

### **Hazardous Emissions Near Schools**

There are two schools located within a one-quarter mile radius of the Project Site: Lynwood Howe Elementary School, at 4100 Irving Place, approximately 60 feet west (across Van Buren Place); and Park Century School, at 3939 Landmark Street, approximately 0.25 miles to the northeast. Both the Reduced Density Alternative and the Project would include the demolition of buildings that may contain ACM and/or LBP, and the use of hazardous materials during construction and operation typical of construction and studio production activities, and these could potentially result in hazardous materials emissions within one-quarter mile of a school. However, ACM and LBP identification and removal would occur in accordance with applicable regulations (e.g., SCAQMD Rule 1403, etc.), while the use of hazardous materials during construction and operation would occur in accordance with both applicable regulations and manufacturer instruction, and these regulations and instructions have been formulated to ensure the safe removal of ACM and LBP and the safe use of hazardous materials. Furthermore, according to the refined Health Risk Assessment (HRA) performed in support of the toxic air contaminants (TACs) analysis in Section 4.2, Air Quality, of this Draft EIR, Project construction activities would not generate DPM or other TAC emissions that would result in significant health effects to nearby sensitive receptors (including to the students at the two schools). Given that the Reduced Density Alternative would include the same amount of demolition as the Project but less development and therefore less construction and operational emissions, it can be reasonably assumed that this conclusion applies to the Reduced Density Alternative as well. Therefore, hazardous emissions impacts would be less than significant. Because the Reduced Density Alternative would include less development and therefore, would result in less construction and

operational emissions than the Project, hazardous emissions impacts would be less under this alternative.

### **Emergency Response Plan Consistency**

Both the Reduced Density Alternative and the Project would include construction activities which would generate temporary construction traffic and potentially require temporary lane closures along surrounding streets, including potentially along Ince, Washington and/or Culver Boulevards which are of secondary arterial status or higher and thus may act as evacuation routes during an emergency. However, the generation of construction traffic would be offset by the elimination of operational studio traffic during the construction period. No streets would be fully closed during the construction period and a Construction Management Plan would be implemented during construction under Alternative 3 as would occur under PDF-TRAF-1. The Construction Management Plan would, among other things, ensure that emergency access is maintained during construction. During operation, Alternative 3 like the Project would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemical plant) or include the closure of public streets. Furthermore, while operations would generate increased traffic along the aforementioned streets which could potentially slow emergency response: (1) the streets would still be available for emergency response; (2) multiple alternative routes are available to emergency vehicles; and (3) no policy or procedural changes would be required to an existing risk management plan, emergency response plan, or evacuation plan. Lastly, during an unanticipated disaster event, the City would implement operational plans, programs and protocols to facilitate emergency response and/or evacuation, which would consider traffic conditions at the time of the emergency, and in such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate, by the applicable responding City agencies to maximize effectiveness. Thus, construction and operational impacts on emergency response plan consistency would be less than significant under Alternative 3. Still, because the Reduced Density Alternative would result in less development and thus less construction- and operations-related traffic than the Project, and because this alternative would generate a smaller on-site population potentially requiring evacuation during an emergency, emergency response plan consistency impacts would be less under this alternative.

### ***Hydrology and Water Quality***

#### **Hydrology (Drainage)**

Neither the Reduced Density Alternative nor the Project would change the course of a stream or river, or increase the rate or amount of surface runoff from the Project Site in a manner that could lead to flooding. Alternative 3 like the Project would include construction activities that could temporarily alter drainage conditions at the Project Site, but these construction activities would be subject to NPDES, SWPPP and City grading permit requirements which require that stormwater runoff during construction be controlled and routed to avoid flooding (a less than significant impact). The Project would increase on-site impervious surfaces to approximately 90 percent of the Project Site which would increase stormwater runoff, but the Project would include 13 on-site EPIC stormwater treatment areas totaling 0.56 acres (under PDF-H/WQ-1) to retain the SWQDv on-site through capture and reuse such that existing peak stormwater runoff flows from the Project Site would decrease to 17.44 cfs, and this runoff would be safely conveyed to the off-site storm drain in Ince Boulevard via existing and proposed new on-site storm drains approved by

the City. This would result in a net benefit to the conveyance capacity of the Ince storm drain, and a less than significant impact.<sup>29</sup> It can be reasonably assumed that the Reduced Density Alternative would result in a similar percentage of the Project Site in impervious surfaces (or less given the smaller building footprints) and would generate a similar decrease in stormwater discharges from the Project with implementation of PDF-H/WQ-1, and would similarly result in a net benefit to conveyance capacity and a less than significant impact. Because Alternative 3 would result in a similar amount of stormwater runoff and would handle this runoff in the same fashion, and because impacts would be less than significant, hydrology impacts would be generally equivalent between the two projects.

### **Surface Water Quality**

Both the Reduced Density Alternative and the Project would include construction activities that could result in sediment and pollutant loading of stormwater runoff from the Project Site, but would implement the required SWPPP, SUSMP and Wet Weather Erosion Control Plan to minimize such loading so that the impact would be less than significant. As with the Project, Alternative 3 would include new on-site development that would increase operational activities at the Project Site which could introduce pollutants, such as nutrients, pesticides, organic compounds, sediments, oil and grease, suspended solids, metals, gasoline, pathogens, trash, and debris into stormwater runoff from the site, and in turn drain to the municipal storm drain system and ultimately to protected receiving waters. However, Alternative 3 would implement the required SUSMP and LID measures throughout their operational lives to comply with the Upper Los Angeles Watershed EWMP, MS4 Permit, LID Ordinance, and other applicable plans and regulations to, among other things, help achieve the TMDLs for the Ballona Creek Estuary, Dockweiler Beach, and Santa Monica Bay. As with the Project, Alternative 3 would provide the 13 on-site EPIC stormwater treatment areas under PDF-H/WQ-1 to retain the SWQDv on-site through capture and reuse, resulting in a net improvement in the quality of stormwater discharges from the project site. Therefore, surface water quality impacts would be less than significant.<sup>30</sup> Furthermore, while the Reduced Density Alternative would include less development, generate less traffic, and thus potentially generate less pollutants in stormwater runoff from the Project Site than the Project, most vehicular circulation and parking at the Project Site would be undergrounded such that associated pollutants would likely not be washed into receiving water by stormwater runoff. Based on the above, surface water quality impacts would be generally equivalent between Alternative 3 and the Project.

### **Land Use and Planning**

Both the Reduced Density Alternative and the Project would include the construction and operation of additional on-site studio development, with net new development of 278,127 sf under this alternative and 413,127 sf under the Project (not including parking structures). Under,

<sup>29</sup> While the hydrology (drainage) and water quality impacts of the Project are identified as “less than significant” in this EIR, the Project would result in beneficial impacts in both categories. Beneficial impacts are not identified as a significance conclusion in this EIR consistency with the Appendix G (CEQA Checklist) which includes no such category.

<sup>30</sup> While the hydrology (drainage) and water quality impacts of the Project are identified as “less than significant” in this EIR, the Project would result in beneficial impacts in both categories. Beneficial impacts are not identified as a significance conclusion in this EIR consistency with the Appendix G (CEQA Checklist) which includes no such category.

both projects, a new CPA (CPA No. 7) would be approved for the Project Site superseding all previous CPAs for the site. According to Section 4.8, Land Use and Planning, of this Draft EIR:

*CPA No. 7 would incorporate Development Standards to ensure that the proposed New Digital Media buildings, stages, and support uses are in compliance with Section 17.250.15 (Studio (S) District Requirements), which establishes permitted uses and height limits within the S Zoning District. The Development Standards allow for modifications to respond to market conditions and tenant needs provided that the total amount of new building area does not exceed 413,127 sf, parking is provided in accordance with the requirements of the Culver City Municipal Code, and the total amount of traffic generated by the Project does not exceed the total amount projected in the Final EIR. (See Section 4.11, Transportation and Traffic, for a description of Project-generated traffic.) CPA No. 7 includes comprehensive development standards regarding the architecture of the new buildings, access and circulation, parking, landscaping, setbacks, fencing, and infrastructure, and sustainability. These standards would ensure comprehensive development of the Studio Campus, while permitting the technological updated and expansion of its facilities within the existing Studio Campus footprint.*

With the approval of CPA No. 7 (with CPA No. 7 being modified, as required, for the Reduced Density Alternative), Alternative 3 would be consistent with applicable land use plans, polices, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Therefore, as with the Project, Alternative 3 would result in less than significant land use and planning impacts and would be consistent with applicable land use plans. Land use planning impacts would be generally equivalent between Alternative 3 and the Project.

## **Noise and Vibration**

### **Construction Noise**

Both the Reduced Density Alternative and the Project would include construction activities that would generate associated construction noise. As with the Project, Alternative 3 would increase noise levels at existing off-site noise-sensitive receptors in the Project area in excess of the applicable thresholds. However, construction activities would be restricted to the times of day when construction activities may occur (generally, daytime hours) as prescribed in Chapter 9.07 of the CCMC. Furthermore, this increase in construction noise during the times of day when construction may occur would be less than significant with adherence to the City's standard conditions of approval (e.g., use of muffling in construction equipment, etc.) and implementation of the mitigation measures and PDFs identified in Section 4.9, Noise, of this Draft EIR. Alternative 3 would also include off-site construction traffic during the construction period which would increase noise levels at noise-sensitive uses along the proposed construction haul route, but this noise would similarly be restricted to the hours prescribed by the CCMC, and would not increase by the barely perceivable level of 3 dBA or more. Thus, off-site construction noise impacts under Alternative 3 would also be less than significant. However, the Reduced Density Alternative would include less net new development (278,127 sf) than the Project (413,127 sf) and therefore, less construction activities. Thus, less construction noise would be generated under this alternative.

### Operational Noise

The Reduced Density Alternative and the Project would each increase operational traffic noise at off-site noise-sensitive uses in the Project area. This traffic noise would be below both the perceivable level of 3 dBA and the threshold under the Project, and because the Reduced Density Alternative would include less net new development (278,127 sf) than the Project (413,127 sf), this alternative would generate less operational traffic and thus less operational traffic noise than the Project. Therefore, operational traffic noise impacts would be less than significant. As with the Project, Alternative 3 would increase operational stationary source noise at the off-site noise-sensitive associated with fixed mechanical equipment, human activity in open space areas (including special events), parking structures, and loading docks. This noise, when taken both individually and in composite (e.g., as a combination of the traffic and stationary noise sources) would be less than significant with implementation of the PDFs proposed in Section 4.9, Noise, of this Draft EIR. While operational noise would be less than significant under the Project and Alternative 3, such noise would be less under the Reduced Density Alternative owing to less net new development and associated operational traffic and on-site stationary noise sources that would occur under this alternative.

### Construction Vibration

Neither the Reduced Density Alternative nor the Project would include high-impact construction activities (e.g., pile driving, blasting, etc.) that could generate high levels of ground-borne vibration. However, as with the Project, Alternative 3 would include other construction activities, specifically the operation of heavy construction equipment of 600 horsepower or more, that could generate lower-intensity short-term ground-borne vibration. Under the Project, construction-related vibration levels above applicable thresholds could occur at on-site historic buildings within 20 ft of such activities and at off-site residential uses within 45 ft of such activities, even with adherence to the City's limitations concerning when construction activities. However, any such vibration impacts would be less than significant with implementation of the mitigation prescribed in Section 4.9, Noise, of this Draft EIR.<sup>31</sup> Because the Reduced Density Alternative would include less net new development (278,127 sf) than the Project (413,127 sf), less construction-related vibration would be expected under this alternative, and it can thus be assumed that with implementation of the mitigation prescribed for the Project, construction vibration impacts would similarly be less than significant under this alternative. While construction-related vibration would be less than significant with mitigation incorporated, such impacts would be less under the Reduced Density Alternative owing to less new development.

### Operational Vibration

Both the Reduced Density Alternative and the Project would include an increase in operations, including activities often associated with ground-born vibration (e.g., traffic and the operation of commercial-grade stationary equipment such as HVACs, condenser units and exhaust fans). These would generate ground-borne vibration below the significance threshold for perceptibility under the Project and Alternative 3, and thus the impact would be less than significant. However,

<sup>31</sup> Linwood E. Howe Elementary School is located too far away from the Project Site to be significant impacted.

operational vibration impacts would be less under the Reduced Density Alternative owing to less new net development.

## **Public Services**

### **Fire Protection**

During construction, the Reduced Density Alternative and the Project could result in occasional exposure of combustible materials that would temporarily obstruct emergency access and increase the demand for fire protection and emergency medical services. During operation, Alternative 3 would increase traffic on surrounding roadways and increases in on-site studio operations and employees which could slow emergency response times and increase the demand for fire protection/EMS service and fire flow, respectively. As discussed in Section 4.10.1, Fire Protection, with adherence to CBC and City Fire Code requirements covering building design, fire safety features, emergency safety provisions, CCFD access, construction measures, fire flow, and site plan review, and with implementation of the proposed PDFs (e.g., Construction Management Plan, use of fire proof/retardant materials, sprinklering of buildings, etc.), Project construction and operation would not require new or expanded fire protection facilities, and impacts would be less than significant. Because the Reduced Density Alternative would include less development than the Project and would be required to adhere to the same regulatory requirements as the Project, the impacts of this alternative would similarly be less than significant. Fire protection impacts would be less under the Reduced Density Alternative owing to less new net new development and associated traffic and service demand under this alternative.

### **Police Protection**

Both the Reduced Density Alternative and the Project would include construction and increased operational activities. During construction, Alternative 3 could temporarily: expose the construction site to trespassing, theft, vandalism and graffiti which would increase service demand; block emergency access; and generate construction traffic and/or temporarily close travel lanes that slows emergency response. During operation, Alternative 3 would increase in on-site studio operations, employees and associated traffic, which could increase service demand and slow emergency response. However, as discussed in Section 4.10.2, Police Protection, CCPD's police station is located only 2½ blocks south of the Project Site, and with adherence to CBC and CCMC requirements (covering building design, security provisions, CCPD access, etc.) and implementation of the PDFs (e.g., construction fencing, Construction Management Plan, security lighting, provision of private on-site security personnel, etc.), Project construction and operation would not require new or expanded police protection facilities. Therefore, the impact would be less than significant. Because the Reduced Density Alternative would be required to adhere to the same regulatory requirements as, and would include less development and therefore generate less traffic and service demand than the Project, it too would result in a less than significant impact with implementation of the PDFs. Because the Reduced Density Alternative would include less net new development and associated employee population requiring police protection than the Project, police protection impacts would be less under this alternative.

## ***Transportation and Circulation***

### **Construction Traffic/Parking**

Both the Reduced Density Alternative and the Project would include construction activity that would generate truck/construction worker traffic and associated traffic congestion, construction worker parking demand, and potentially lane closures and reductions in access, during the construction period. However, with implementation of the mitigation specified in Section 4.11, Transportation and Traffic (e.g. restricting construction truck staging on-site or within reserved off-site lots, provision of flagmen, restricting deliveries/picks-ups and lane closures to off-peak hours, preserving emergency access, etc.) and the proposed PDFs (e.g., Construction Management Plan, provision of construction worker parking on-site or in reserved off-site lots, etc.), Project construction traffic/parking impacts would be less than significant with mitigation incorporated with the exception of construction-related intersection level of service impacts which would be significant unavoidable. The Reduced Density Alternative would include less net new development (278,127 sf) than the Project (413,127 sf), and thus would be expected to generate less construction traffic and construction parking demand than the Project, with the impact similarly less than significant with implementation of the specified mitigation and PDFs, with the exception of construction-related intersection level of service impacts which would be significant unavoidable. However, because the Reduced Density Alternative would include less net new development and thus generate less construction traffic and parking demand than the Project, construction traffic/parking impacts would be less under this alternative.

### **Intersection Service Levels**

The Project would include approximately 413,127 net sf of new development at the Project Site (not including parking structures) that would generate associated operational traffic. Although this traffic would not result in the exceedance of signal warrants at the two unsignalized intersections analyzed, it would result in significant unavoidable intersection level of service impacts at eight intersections under Future (2021) With Project Conditions (10 if optional Mitigation Measures TRAF-9 and TRAF-10 were implemented). Under the Reduced Density Alternative, less net new development (278,127 sf) would be developed at the Project Site than under the Project. As a result, trip generation would be reduced by 134 vehicles in the AM peak hour and 130 vehicles in the AM peak from those that would be generated under the Project. The resulting reduced trip generation would result in significant unavoidable intersection level of service impacts at the following four of the eight intersections to be significantly and unavoidably impacted under the Project (see Appendix E of the Traffic Study):

8. Washington Blvd/Culver Blvd
13. Robertson Blvd/Exposition Blvd & Venice Blvd
33. Overland Ave/Venice Blvd
38. Robertson Blvd/National Blvd

If optional Mitigation Measures TRAF-9 and TRAF-10 were implemented, it is possible, but unlikely due to less traffic under this alternative, that six instead of four intersections could be significantly and unavoidably impacted under this alternative (see the list of significant

unavoidable impacts at the beginning of this chapter for listing of the potential additional intersections that could be impacted).

### **Intersection Queuing**

Both the Reduced Density Alternative and the Project would generate traffic and associated intersection queuing distance impacts. As indicated in Section 4.11, Transportation and Traffic, of this Draft EIR, the Project would result in significant queuing impacts at two intersections (with mitigation not specified because, per the MOU, the intersection queuing distance analysis in the Draft EIR is provided for information purposes only, and these inadequacies would not necessarily be caused by the Project alone). Under the Reduced Density Alternative, less net new development (278,127 sf) would be developed at the Project Site than under the Project such that it can be reasonably assumed that, while this alternative would potentially result in significant intersection queuing distance impacts at the same two intersections as the Project, these impacts would likely be less than under the Project owing to the reduced amount of net new development and associated operational traffic under this alternative.

### **Public Transit**

Both the Reduced Density Alternative and the Project would generate a demand for public transit. According to the analysis in Section 4.11, Transportation and Traffic, of this Draft EIR, the Project would generate an increase in transit demand of 121 persons during the weekday AM peak hour and 116 during the weekday PM peak hour, or approximately 2.8 percent of the combined capacity of the transit lines, but that it is anticipated that adequate capacity exists in the public transit system to serve the Project. Because the Reduced Density Alternative would include less net new development (278,127 sf) than the Project (413,127 sf), this alternative would generate less transit demand than the Project such that adequate transit capacity would also be available to serve this alternative. Furthermore, as with the Project, Alternative 3 would be consistent with applicable plans, policies and programs supporting alternative transportation by representing infill development, concentrating development along established transit routes and bikeways, implementing TDM measures (required for the alternative by conditions of approval and for the Project by mitigation), providing on-site bicycle facilities, etc. Therefore, public transit impacts would be less than significant. Still, as the Reduced Density Alternative would result in less net new development and thus less transit demand than the Project, public transit impacts would be less under this alternative.

### **Access and Circulation**

Both the Reduced Density Alternative and the Project would include vehicular access via studio gates along Ince and Washington Boulevards, increase the number of gate entries, and include a Culver/Main Tunnel connection from Culver Boulevard to the Rear Lawn Parking Structure. All gates, driveways, on-site roadways, sidewalks, etc. under both projects would be designed and constructed in accordance with Culver City standards and would be reviewed and approved by the City during the Site Plan Review process to provide safe travel (including pedestrian travel by school children), required emergency access, and avoid impedance of traffic movements on City streets. Also, Alternative 3 would be developed along existing pedestrian routes and bicycle paths, both would include on-site bicycle parking, both would largely maintain the existing network of off-site roadways, travel lanes, public sidewalks and pedestrian crosswalks, both

would avoid the need to removal or relocate existing bus stops, and both would avoid substantial neighborhood cut-through traffic. Furthermore, as with the Project, Alternative 3 would include several features to improve pedestrian and bicycle safety, including providing the Culver/Main Tunnel Connection and restricting the Studio entry along Washington Boulevard to pedestrian/bicycle traffic, both of which would help separate vehicular and pedestrian/bicycle traffic and improve pedestrian/bicycle safety. Therefore, Alternative 3 would result in less than significant access and circulation impacts, with the level of impact generally equivalent to that of the Project.

## **Parking**

*Note: Under SB 743, as an infill project located within an urban transit priority area, the Project is not required to evaluate parking impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to parking.*

The Reduced Density Alternative and the Project would result in net increases in new studio development at the Project Site of 278,127 sf and 413,127 sf, respectively, which would generate a demand for parking. As indicated in Section 4.11, Transportation and Traffic, of this Draft EIR, the Project would provide a total of 2,370 on-site vehicle parking spaces versus the number required by the CCMC of 1,960 spaces. Thus, the Project would provide more than the number of vehicle parking spaces required to meet Code requirements. Similarly, while the Reduced Density Alternative would include less net new development and thus generate less demand for parking than the Project, it too would meet or exceed CCMC parking space requirements. Furthermore, Alternative 3 would provide the number of on-site bicycle parking spaces required by Code. As Alternative 3 would provide the required number of parking spaces to meet Code, parking impacts would be generally equivalent to the Project.

## **Utilities and Service Systems**

### **Wastewater**

Both the Reduced Density Alternative and the Project would include additional development at the Project Site and generate additional wastewater requiring collection and conveyance by the local sewer system. The Project would include a net increase in on-site studio development of 413,127 sf which would generate wastewater requiring collection and conveyance by the existing 8- to 10-inch Ince and 6-inch Western sewer mains. This would exceed the half flow capacity of the Ince sewer main during operation, resulting in a less than significant impact with mitigation incorporated (the mitigation being upsizing of the Ince sewer main from 10 to 12 inches between Hubbard St. Lucerne Ave.). The Reduced Density Alternative, by comparison, would include a net increase in on-site studio development of 278,127 sf which would generate less sewage and therefore less demand for off-site sewer collection and conveyance capacity than the Project. Therefore, wastewater collection and conveyance impacts under this alternative would similarly be less than significant and it is possible than the Reduced Density Alternative would not require mitigation required under the Project to upgrade the Ince sewer main. As the Reduced Density Alternative would generate less sewage than the Project, wastewater collection and conveyance impacts would be less under this alternative than under the Project (including, potentially, avoiding the need to upsize the Ince sewer main).

With respect to wastewater treatment, both projects would generate additional wastewater requiring treatment at the HTP. The existing treatment capacity of HTP) is 450 million gpd, with the remaining available treatment capacity in 2020 projected to be 15 million gpd. Because the wastewater generated by the Project would represent only about 0.6 percent of the HTP's projected remaining available treatment capacity in 2020, the HTP would have adequate treatment capacity to serve the Project. Similarly, because the Reduced Density Alternative would generate even less wastewater than the Project, owing to the smaller net increase in development under this alternative, the HTP would also have adequate treatment capacity to serve the Reduced Density Alternative. Thus, wastewater treatment capacity impacts would be less than significant under the Project and Alternative 3. As the Reduced Density Alternative would generate less wastewater and require less treatment capacity at the HTP than the Project, wastewater treatment capacity impacts would be less under this alternative.

### **Water**

The Reduced Density Alternative would increase domestic and fire flow water demand at the Project Site compared to existing conditions and result in an associated increase in demand for water infrastructure conveyance capacity. According to the Water Infrastructure and Demand Analysis prepared for the Project, the water mains in the surrounding streets (e.g., 12-inch mains in Ince and Washington Boulevards, and an 8-inch main in Van Buren Pl.) have adequate domestic and fire flow capacity to serve the Project.<sup>32</sup> Given this, and with development of the proposed on-site water line improvements, compliance with applicable domestic water/fire flow requirements, and implementation of the proposed water conservation and fire protection infrastructure PDFs, the water conveyance infrastructure impacts of the Project would be less than significant. The same would be true of the Reduced Density Alternative which would be subject to the same requirements and implement the same improvements and PDFs as the Project, but would include less development (e.g., 278,127 sf vs. 413,127 sf under the Project) and thus generate less water demand than the Project. Because the Reduced Density Alternative would generate less water demand than the Project, water conveyance infrastructure impacts would be less under this alternative.

With respect to water supply, Alternative 3 would include new development and increase the on-site demand for domestic water from GSWC. According to the WSA for the Project, the Project would not add any increments of demand in excess of those that were anticipated at the time the 2015 UWMP was published.<sup>33</sup> In addition, the Project would comply with State Title 24 and 20 water efficiency standards, and PDFs are proposed to provide for additional water conservation. As such, the Project's water demand would fall within the GSWC's projected increases in Citywide water demands through at least 2040, sufficient water supplies would be available to serve the Project, and the water demand and supply impact of the Project would be less than significant. Similarly, because the Reduced Density Alternative would include less development and thus less water demand than the Project, the GSWC would also have adequate water supplies

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<sup>32</sup> Water Infrastructure and Demand Analysis for the Culver Studios Innovation Plan, KPFF, August 2017.

<sup>33</sup> Golden State Water Company, Water Supply Assessment for Culver Studios Innovation Plan, April 26, 2017, page 11, include in Appendix M-1 of this EIR.

to serve the Reduced Density Alternative. Thus, water supply impacts would be less than significant under both projects, with less impact under the Reduced Density Alternative.

### **Solid Waste**

Under both the Reduced Density Alternative and the Project, construction activities would generate non-hazardous construction/demolition debris and excavated soil requiring disposal at inert landfills, while increased operational activities would generate non-hazardous municipal solid waste requiring disposal at Class III landfills. Alternative 3 would be subject to the waste diversion and recycling requirements of AB 939, AB 341 and other application regulations (including diverting at least 65 percent of C&D waste and 50 percent of Class III solid waste by 2020, and diverting at least 75 percent of both C&D and Class III solid waste thereafter). As with the Project, Alternative 3 would implement proposed PDFs designed to reduce solid waste generation (e.g., LEED certification, implement a Demolition Debris Recycling Plan for Construction, etc.). Furthermore, as adequate capacity exists at the applicable Los Angeles County and Ventura County C&D and Class III landfills to serve the construction and operational waste disposal needs of the Project, adequate capacity would also exist to serve the Reduced Density Alternative which would include less development and thus generate less construction- and operations-related solid waste than the Project. Thus, the solid waste impacts would be less than significant, with the solid waste impacts of this alternative being less than under the Project.

### **Relationship of the Alternative to Project Objectives**

The Reduced Density Alternative would provide the majority of the new and renovated development proposed at the Project Site under the Project, and all of the proposed circulation, landscaping, and infrastructure improvements (although the number of proposed parking spaces would be revised downward to meet the reduced parking demand under this alternative). The Reduced Density Alternative would also achieve some of the Project objectives, including: upgrading and rehabilitating the Mansion in a manner that protects its eligibility as a historical resource; reducing production vehicle use of directly adjacent streets; providing improved access; and providing inviting/collaborative landscaped open areas. However, because this alternative would not include as much net new development as the Project (e.g., 278,127 sf vs. 413,127 sf under the Project), it would be less effective than the Project in achieving other Project objectives including: creating start-of-the-art studio facilities to ensure the Studio's competitiveness and continued position at the cutting edge of innovation essential to the invention and production of entertainment; fostering content creation, digital media, creative technologies and virtual reality; promoting environmental sustainability through updated and expanded facilities to reduce vehicle trips; supporting the continued economic viability of the Studio and its ability to respond to changing industry needs. All-in-all, the Reduced Density Alternative would support the underlying purpose of the Project, which is to sustain The Culver Studio's prominent role as a dynamic, independent studio in the entertainment, digital media, and creative industries, through expansion and modernization of the Studio Campus, but to a substantially lesser degree than the Project.

## 5.6.4 Alternative 4: Full Historic Preservation – Retain Stages 2/3/4 and 7/8/9 as Sound Stages

### Description of the Alternative

Under Alternative 4, Stages 2/3/4 (32,400 sf) and 7/8/9 (16,800 sf) would be retained in their current condition for continued use as Sound Stages. This would eliminate the development of Buildings K and M proposed under the Project. Of the proposed new space eliminated, the majority would be digital media space. This Alternative would result in net new construction of 285,912 sf of digital media/office and a decrease in existing stage of 10,680 sf (although the retention of the stages under this alternative would result in approximately 40,000 sf more stage use than under the Project). Also compared to the Project, this Alternative would reduce the overall amount of development, with most of this in digital media/office square. This Alternative would result in total net new square footage of 206,607 sf versus 413,127 sf under the Project. Other than these changes and a reduction in the size of the Central Parking Structure, other aspects of the Alternative would be similar to the Project. Most notably, the construction of new Buildings J, L, O and Y would be retained, along with the Van Buren Parking Structure. Access/circulation improvements, relocation of the Bungalows, landscape/Central Courtyard improvements would occur as proposed under the Project. **Table 5-6, Alternative 4: Full Historic Preservation – Retain Stages 2/3/4 and 7/8/9 as Sound Stages**, provides a development summary for this alternative.

**TABLE 5-6  
ALTERNATIVE 4: FULL HISTORIC PRESERVATION – RETAIN STAGES 2/3/4 AND 7/8/9 AS SOUND STAGES**

Use	Development (sf) <sup>a</sup>			Net New	Net New (Existing + Net New)
	Existing	Demolition	New		
	Digital Media/Office	117,872	(87,788)		
Stage	155,480	(30,680)	20,000	(10,680)	144,800
Support	74,197	(68,625)	0	(68,625)	5,572
<b>Total</b>	<b>347,549</b>	<b>(187,093)</b>	<b>393,700</b>	<b>206,607</b>	<b>554,156</b>

<sup>a</sup> Excludes parking structure square footage.  
Source: ESA PCR, September 2017.

## Environmental Impacts

### Aesthetics

*Note: As the Project is located on an infill site in an urban transit priority area, pursuant to SB 743 evaluation of aesthetic impacts in an EIR pursuant to CEQA is not required. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to aesthetic issues, including visual quality, views, light, glare, and shading.*

### **Aesthetic Character**

Both the Full Historic Preservation Alternative and the Project would: retain the Mansion, front lawn, bungalows, and Stages 11 through 16; include development of new Buildings J, L, O, Y, and the Central and Van Buren parking structure; relocate the bungalows; provide new landscape setbacks along the western site boundary from the bungalow area to the Van Buren Parking Structure, and along the southern and western site boundaries at proposed Building Y; provide landscape improvements at the Studio gates along Ince Boulevard; and provide distinctive architecture and more visual interest. Both projects would intensify development at the Project Site, but would also provide increased visual interest and landscape. However, as the Full Historic Preservation Alternative would retain Stages 2/3/4 and 7/8/9 as stages instead of replacing these stages with new buildings, and would result in less net new development than the Project ( 206,607 sf vs. 413,127 sf under the Project), aesthetic character impacts would be less under this alternative.

### **Aesthetics Plan Consistency**

Both the Full Historic Preservation Alternative and the Project would: provide new landscape setbacks along the western site boundary from the bungalow area to the Van Buren Parking Structure, and along the southern and western site boundaries at proposed Building Y; enhance landscaping and architecture at the Project Site; improve the pedestrian experience along Washington and Ince Boulevards, Van Buren Place, and the Studio gates by providing landscaping and pedestrian improvements; and comply with CCMC requirements for landscaping, outdoor lighting, signage, and art in public places. Alternative 4 would be consistent with applicable aesthetic plans. Therefore, the level of impact under Alternatvie 4 would be generally equivalent to the Project.

### **Light/Glare**

Under the Full Historic Preservation Alternative, net new building square footage would be 206,607 sf. This is compared to 413,127 sf under the Project. This increase in on-site development would incrementally increase existing on-site lighting (e.g., exterior lighting at driveways, security lighting, architectural/ landscape accent lighting, and lighting from the interiors of the proposed buildings/structures) under both projects. Under both projects, exterior lighting would be shielded and directed onto the Project Site to avoid glare and minimize light trespass onto adjacent residential properties, illuminance intensity would be controlled, and design characteristics would be implemented to address light trespass (such as opaque screens as part of the new Van Buren Parking Structure), consistent with CCMC and the Comprehensive Plan applicable to the Studio. However, as the Full Historic Preservation Alternative would result in less on-site development than the Project, this alternative would result in less light and glare impacts than the Project.

### **Shading**

Both the Full Historic Preservation Alternative and the Project would include new development of up to 56 feet in height that would result in net new shading of sensitive uses. As indicated in Section A, Aesthetics, of this Draft EIR, the Project (specifically proposed Buildings M and Y) would result in winter shading of three residences east of the Project Site above applicable standards. Because Stages 7/8/9 would be retained and Building M would not be developed under

the Full Historic Preservation Alternative, the shading impacts associated with Building M would be avoided under this alternative. Therefore, shading impacts would be less under the Full Historic Preservation Alternative.

## ***Air Quality***

### **Construction Emissions**

Both the Full Historic Preservation Alternative and the Project would generate the greatest level of construction emissions during the demolition, excavation, foundations/concrete pouring phases. While the South Coast Air Basin is designated as non-attainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> under federal and/or state ambient air quality standards, construction activities associated with both projects would not exceed the applicable SCAQMD daily regional numeric thresholds for regional VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>, or localized numeric thresholds for concentrations of NO<sub>x</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub> and, as such, regional and localized construction emission impacts would be less than significant under both projects. However, as the Full Historic Preservation Alternative would include less demolition and construction activities than the Project, as this alternative would retain Stages 2/3/4 and 7/8/9 rather than demolish these stages and construct Buildings K and M as proposed under the Project, construction emissions would be less under this alternative.

### **Operational Emissions**

Both the Full Historic Preservation Alternative and the Project would include new development and an expansion of existing operations at the Studio Campus that would generate operational air emissions. While the South Coast Air Basin is designated as non-attainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, neither project would generate a net increase in the emission of operational criteria and precursor pollutants (e.g., VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) that exceeds SCAQMD thresholds or NAAQS/CAAQS with implementation of the proposed PDFs (e.g., compliance with CALGreen Building Standards, consistency with LEED certification requirements, etc.). Therefore, operational air emissions impacts would be less than significant under the Project and Alternative 4. As the Full Historic Preservation Alternative would include less development and thus generate less operational air emissions than the Project, operational emission impacts would be less under this alternative than under the Project.

### **Carbon Monoxide Hotspots**

As discussed in Section 4.2, Air Quality, the Project would not cause or contribute considerably to the formation of CO hotspots, CO concentrations at impacted intersections would remain well below the CAAQS one-hour and eight-hour CO standards, and no further CO analysis is warranted. Therefore, the Project would result in less than significant CO hotspot impacts. The Full Historic Preservation Alternative would include less development than the Project, and especially less digital media/office use which generates more operational traffic and thus greater operational air emissions (including less CO) than do sound stages. Therefore, similar to the Project, CO hotspot impacts would be less than significant under this alternative, and would be less than under the Project.

## **Toxic Air Contaminants**

Both the Full Historic Preservation Alternative and the Project would include studio uses rather than industrial, power plant, and other uses most often associated with TAC emissions. Furthermore, as discussed in Section 4.2, Air Quality, of this Draft EIR: the Project would not increase DPM above the SCAQMD threshold of 10 in one million at sensitive sites, including at nearby residences and Linwood E. Howe Elementary School, during either construction or operation; loading areas would be moved to the interior of the Project Site under the Project, thereby increasing separation distances from off-site sensitive receptors; and PDF-NOISE-8 would be implemented under the Project which would prohibit the idling of trucks within the loading areas and thus eliminate TAC emissions associated with idling trucks. For these same reasons, and because less development would occur under the Full Historic Preservation Alternative than under the Project, TACs impacts under this alternative would similarly be less than significant and less than under the Project.

## **AQMP Consistency**

Both the Full Historic Preservation Alternative and the Project would require an amendment to the Comprehensive Plan governing development at the Project Site in accordance with the Culver City “S” (Studio) zoning of the Project Site. However, both projects would be consistent with; the “S” zoning of the Project Site; SCAG’s 2016 RTP/SCS policies for concentrating growth in proximity to transit; the control strategies in the AQMP; and the long-term employment projections upon which the AQMP is based. Also, neither project would increase or induce residential growth not otherwise anticipated in SCAG regional growth forecasts for Culver City. Lastly, the construction activities under Alternative 4 would be consistent with CARB requirements to minimize emissions from diesel equipment and SCAQMD Rule 403 regulations for controlling fugitive dust. Therefore, AQMP consistency impacts would be less than significant under the Project and Alternative 4. However, as the Full Historic Preservation Alternative would include less development than the Project, and thus generate less population, traffic, and air emissions than the Project, AQMP consistency impacts would be less under this alternative.

## **Cultural Resources**

### **Historical Resources**

As indicated previously, the Project Site contains multiple existing historical resources, including but not limited to: Buildings C (Mansion) and D which are designated by the City as Landmark structures and eligible for listing in the National and California Registers; the four existing bungalows (Buildings S, T, U, and V) which are designated by the City as Significant Structures and eligible for listing in the National and California Registers; and Stages 2/3/4 and 7/8/9 which appear eligible for listing in the National, California and Local Registers. Both the Full Historic Preservation Alternative and the Project would include demolition of several existing on-site buildings, the construction of several new on-site buildings, and the relocation of the bungalows. Both projects would result in less than significant indirect historical resources impacts (e.g., would not reduce or materially impair the integrity of significance of important historical resources in the project vicinity, and both would result in less than significant impacts to the bungalows with mitigation incorporated. However, while the Project would demolish and replace

Stages 2/3/4 and 7/8/9 with new development, which would represent a significant unavoidable historical resources impact (even with incorporation of mitigation recommended to reduce this impact), the Full Historic Preservation Alternative would retain Stages 2/3/4 and 7/8/9 as sound stages, and thus would avoid this impact (e.g., less than significant impact). Therefore, historical resources impacts would be less under the Full Historic Preservation Alternative as compared to the Project which would have significant unavoidable impacts due to demolition of Stages 2/3/4 and 7/8/9.

### **Archaeological/Tribal Resources**

No known archaeological resources (historic or prehistoric) have been recorded within or immediately adjacent to the Project Site according to an SLF database search conducted through the NAHC. However, five prehistoric archaeological resources and one historic archaeological resource were noted within a one-half mile radius of the Project Site in the database survey. No known tribal cultural resources were identified within the Project Site or vicinity during the AB 52 Native American consultations. Both the Full Historic Preservation Alternative and the Project would include excavations and other ground disturbing activities that could potentially encounter buried archaeological resources, should such resources be present. This would represent a less than significant impact with mitigation incorporated under the Project and Alternative 4. However, this alternative would include less development and associated ground disturbing activities than the Project, and thus would have less potential to affect buried archaeological resources, if present.

### **Paleontological Resources**

No known paleontological resources have been recorded on or within the immediate vicinity of the Project Site. However, the Project Site is located within the western Los Angeles basin which is known to contain paleontological resources, and a Phase I Archaeological/ Paleontological Resources Survey determined that the Project Site is located with an area with medium sensitivity for paleontological resources. Both the Full Historic Preservation Alternative and the Project would include excavations into native soils that could potentially encounter buried paleontological resources, should such resources be present. This would represent a less than significant impact with mitigation incorporated under the Project and Alternative 4. However, the Full Historic Preservation Alternative would include less development and associated ground disturbing activities than the Project, and thus would have less of a potential to affect buried paleontological resources, if present.

### ***Geology and Soils***

#### **Seismic Hazards**

The Project Site is not subject to fault rupture, and thus neither the Full Historic Preservation nor the Project would expose people or structures to a fault rupture hazard. However, the Project Site is subject to strong seismic ground shaking and liquefaction, and both the Full Historic Preservation Alternative and the Project would include new development that could expose people and structures to these hazards. While these hazards would be less than significant with mitigation incorporated under the Project and Alternative 4, the Full Historic Preservation Alternative would include less development (especially less media/office development that has a higher employee per sf ratio than stages), and would expose fewer people to these hazards. On the

other hand, this alternative would retain Stages 2/3/4 and 7/8/9 which would otherwise be replaced with new buildings under the Project constructed to the latest building codes, which would potentially be better able to withstand seismic groundshaking. Because of these competing factors, and because impacts would be less than significant with mitigation incorporated and Alternative 4, the seismic hazards impacts of the Full Historic Preservation Alternative and the Project are considered to be generally equivalent.

### **Geotechnical Hazards**

The Project Site is subject to potential subsidence, collapse, lateral spreading, and liquefaction, and both the Full Historic Preservation Alternative and the Project would include new development that could expose people and structures to these hazards. While compliance with existing regulations (CBC, etc.) would avoid substantial subsidence and collapse hazards, and while the lateral spreading and liquefaction impacts would be less than significant with mitigation incorporated under both Projects, the Full Historic Preservation Alternative would include less development and expose fewer people to these hazards. On the other hand, this alternative would retain Stages 2/3/4 and 7/8/9 which would otherwise be replaced with new buildings under the Project constructed to the latest building codes that would potentially better able to withstand geotechnical hazards. Because of these competing factors, and because impacts would be less than significant with mitigated incorporated under both projects, the geotechnical hazards impacts of the Full Historic Preservation Alternative and the Project are considered to be generally equivalent.

### **Soils/Erosion**

The Project Site does not have corrosive soils. Therefore, neither the Full Historic Preservation Alternative or the Project would expose structures to potential damage from corrosive soils. However, the Project Site is subject to expansive soils and soil erosion. Both the Full Historic Preservation Alternative and the Project would include ground-disturbing activities during construction that could result in soil erosion, and would include new development that could expose people and structures to an expansive soils hazard. Compliance with existing regulations (for example, CBC, SCAQMD Rule 403, and SWPPP requirements) would substantially reduce the potential for expansive soils and soil erosion under both projects, and any residual impacts would be less than significant with mitigation incorporated. While the Full Historic Preservation Alternative would include less development and fewer people than the Project and thus expose less development and fewer people to any residual expansive soils hazards that may remain after mitigation, it would retain the stages which would be replaced with new buildings constructed to the latest building codes that would potentially better be able to withstand expansive soils. On the other hand, this alternative would include less development and grading activities and expose less soil during construction, thereby potentially resulting in less erosion potential during the construction period. Because of these competing factors, and because impacts would be less than significant with mitigation incorporated under both projects with compliance with existing regulations, the soil/erosion impacts of the Full Historic Preservation Alternative and the Project are considered here to be generally equivalent.

## ***Greenhouse Gas Emissions***

### **GHG Emissions**

Both the Full Historic Preservation Alternative and the Project would include the construction and operation of new studio uses that would generate GHG emissions. The Project would generate a net increase of 7,464 metric tons of CO<sub>2</sub>e per year (includes both operational GHG emissions and construction GHG emissions amortized over the 30-year life of the Project). The Full Historic Preservation Alternative would be expected to generate somewhat less GHG emissions than the Project given that less development would occur under this alternative (especially less digital media/office development which generates more employees and traffic per sq ft than does studio use). Alternative 4 would be consistent with relevant goals and actions to reduce Project emissions as much as feasibly possible, as well as consistent with the HSC Division 25.5 goals and CARB guidelines for assessing GHG emissions. Project operational emissions would also represent a 25.7 percent reduction as compared to business as usual (BAU) due to the infill nature of the Project, access to nearby transit, and the proposed green and GHG-reducing PDFs, and the Full Historic Preservation Alternative would be expected to have a similar BAU reduction for the same reasons. Hence, GHG emissions impacts would be less than significant under Alternative 4. However, as the Full Historic Preservation Alternative would include less development and generate less construction- and operations-related GHG emissions than the Project, GHG emissions impacts would be less under this alternative.

### **GHG Plan Consistency**

Both the Full Historic Preservation Alternative and the Project would comply with the City's Green Building Code and Solar Photovoltaic requirements, LEED certification standards, and the CALGreen Code, to reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. These measures are consistent with the City's GHG reduction strategies for sustainability and smart-growth goals of improving energy and water efficiency in buildings, decreasing per-capita water use, and using energy efficient appliances and equipment. Both projects would also be consistent with Executive Orders S-3-05 and B-30-15 to reduce GHG emissions. As with the Project, Alternative 4 would be consistent with applicable GHG plans, and would result in less than significant GHG Plan consistency impacts. The GHG plan consistency impacts under the Project and Alternative 4 would be generally equivalent.

## ***Hazards and Hazardous Materials***

### **Hazardous Materials Management**

Both the Full Historic Preservation Alternative and the Project would include the demolition of several existing on-site buildings, and both the construction and operation of additional studio uses, with routine transport, use, storage and disposal of hazardous materials associated with each of these activities. Because hazardous materials management under both projects would occur in accordance with applicable regulations (Cal-OSHA, CFR Section 1910, CCR Title 8, CUPA, etc.) which have been formulated to provide for the safe use of these materials, the hazardous materials management impacts of both projects would be less than significant. Furthermore, less hazardous materials would be expected to be used during operation of the Studio under both projects than currently occurs due to the transition under both projects to modern digital

production methods in place of physical set construction. However, the use of hazardous materials at the Project Site would be greater under the Full Historic Preservation Alternative compared to under the Project because, while the alternative would include substantially less net new development than the Project, it would retain substantially more of the existing on-site studio use and most of the on-site activities that utilize hazardous materials (e.g., set building, prop manufacturing, etc.). Therefore, hazardous materials management impacts would be greater under this alternative than under the Project.

### **Upset/Accident Conditions and Hazardous Materials Database Listings**

According to the Phase I/II ESA prepared for the Project Site in 2013 by GRS Group, the Project Site is listed in 10 regulatory agency hazardous materials databases; however, none of these listings represent RECs at the Project Site.<sup>34</sup> Therefore, neither the Full Historic Preservation Alternative nor the Project would result in upset/accident conditions involving listed hazardous materials sites.

Due to the age of the on-site buildings, the majority of the on-site buildings may contain ACM and/or LBP. Furthermore, although not referenced in the Phase I ESA, public concern was expressed during the CEQA review and approval process for CPA No. 6 regarding vectors (e.g., specifically rodents) at the Project Site. Both projects would include the demolition and relocation of multiple existing on-site buildings which may contain ACMs and/or LBPs, and would include both demolition and construction activities which could potentially result in vector issues. However, ACM and LBP impacts would be less than significant under Alternative 4 and the Project with adherence to applicable regulations (e.g., SCAQMD Rule 1403, Cal;/OSHA, DTSC, Culver City Building Code, ACM and LBP O&M Program, etc.) for the proper identification, remediation, removal and disposal of ACM and LBP. Vector impacts would be less than significant under the Project and Alternative 4 with implementation of a vector/pest control abatement plan.

Lastly, the groundwater underlying the Project Site was previously documented with concentrations of dichloroethane and trichloroethane above applicable action levels such that the LACDPW has required that groundwater from ongoing dewatering operations at the Project Site be treated, with the treated dewatered groundwater discharged to the local sewer system until 2014 after which it has been used as on-site landscape irrigation. It is anticipated that dewatering would be required for the additional subterranean structures proposed under both the Full Historic Preservation Alternative and the Project. However, with implementation of PDF-HAZ-2 requiring that any additional dewatered groundwater be treated, and PDF-WW-1 requiring that any additional treated dewatered groundwater be used as on-site landscape irrigation, the groundwater contamination impact under Alternative 4 would be less than significant.

Because the Full Historic Preservation Alternative would include less demolition and construction activities, Alternative 4 would result in less upset/accident condition and hazardous materials database listing impacts than the Project.

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<sup>34</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

### **Hazardous Emissions Near Schools**

There are two schools located within a one-quarter mile radius of the Project Site: Lynwood Howe Elementary School, at 4100 Irving Place, approximately 60 feet west (across Van Buren Place); and Park Century School, at 3939 Landmark Street, approximately 0.25 miles to the northeast. Both the Full Historic Preservation Alternative and the Project would include the demolition of buildings that may contain ACM and/or LBP, and the use of hazardous materials during construction and operation typical of construction and studio production activities, and these could potentially result in hazardous materials emissions within one-quarter mile of a school. However, ACM and LBP identification and removal would occur in accordance with applicable regulations (e.g., SCAQMD Rule 1403, etc.), while the use of hazardous materials during construction and operation would occur in accordance with both applicable regulations and manufacturer instruction, and these regulations and instructions have been formulated to ensure the safe removal of ACM and LBP and the safe use of hazardous materials. Furthermore, according to the refined Health Risk Assessment (HRA) performed in support of the toxic air contaminants (TACs) analysis in Section 4.2, Air Quality, of this Draft EIR, Project construction activities would not generate DPM or other TAC emissions that would result in significant health effects to nearby sensitive receptors (including to the students at the two schools). It can be reasonably assumed that this conclusion applies to the Full Historic Preservation Alternative as well. Therefore, hazardous emissions impacts would be less than significant. Still, because the Full Historic Preservation Alternative would demolish fewer on-site buildings which may contain ACM/LBP and result in less construction and operational activities and thus less construction and operational emissions than the Project, hazardous emissions impacts would be less under this alternative.

### **Emergency Response Plan Consistency**

Both the Full Historic Preservation Alternative and the Project would include construction activities which would generate temporary construction traffic and potentially require temporary lane closures along surrounding streets, including potentially along Ince, Washington and/or Culver Boulevards which are of secondary arterial status or higher and thus may act as evacuation routes during an emergency. However, the generation of construction traffic would be offset by the elimination of operational studio traffic during the construction period, no streets would be fully closed during the construction period, and a Construction Management Plan would be implemented (under PDF-TRAF-1) to, among other things, ensure that emergency access is maintained during construction. During operation, Alternative 4 would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemical plant) or include the closure of public streets. Furthermore, while operations under Alternative 4, as with the Project, would generate increased traffic along the aforementioned streets which could potentially slow emergency response: (1) the streets would still be available for emergency response; (2) multiple alternative routes are available to emergency vehicles; and (3) no policy or procedural changes would be required to an existing risk management plan, emergency response plan, or evacuation plan. Lastly, during an unanticipated disaster event, the City would implement operational plans, programs and protocols to facilitate emergency response and/or evacuation, which would consider traffic conditions at the time of the emergency, and in such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate, by the applicable responding City agencies to maximize effectiveness. Thus, construction and

operational impacts on emergency response plan consistency would be less than significant. Still, because the Full Historic Preservation Alternative would result in less development and thus less construction- and operations-related traffic than the Project (especially due to less digital media/office space under this alternative which generates more employees and trips per sf than does studio uses), and because this alternative would generate a smaller on-site population potentially requiring evacuation during an emergency, emergency response plan consistency impacts would be less under this alternative.

## ***Hydrology and Water Quality***

### **Hydrology (Drainage)**

Neither the Full Historic Preservation Alternative nor the Project would change the course of a stream or river, or increase the rate or amount of surface runoff from the Project Site in a manner, that could lead to flooding. Both projects would include construction activities that could temporarily alter drainage conditions at the Project Site, but these construction activities would be subject to NPDES, SWPPP and City grading permit requirements which require that stormwater runoff during construction be controlled and routed to avoid flooding (a less than significant impact). The Project would increase on-site impervious surfaces to approximately 90 percent of the Project Site which would increase stormwater runoff, but the Project would include 13 on-site EPIC stormwater treatment areas totaling 0.56 acres (under PDF-H/WQ-1) to retain the SWQDv on-site through capture and reuse such that existing peak stormwater runoff flows from the Project Site would decrease to 17.44 cfs, and this runoff would be safely conveyed to the off-site storm drain in Ince Boulevard via existing and proposed new on-site storm drains approved by the City. This would result in a net benefit to the conveyance capacity of the Ince storm drain, a less than significant impact.<sup>35</sup> It can be reasonably assumed that the Full Historic Alternative would result in a similar percentage of the Project Site in impervious surfaces and generate a similar decrease in stormwater discharges from the Project with implementation of PDF-H/WQ-1, and would similarly result in a net benefit to stormwater conveyance capacity and a less than significant impact. Because both projects would result in a similar amount of stormwater runoff and would handle this runoff in the same fashion, and because impacts would be less than significant under both projects, hydrology impacts would be generally equivalent between the two projects.

### **Surface Water Quality**

Both the Full Historic Preservation Alternative and the Project would include construction activities that could result in sediment and pollutant loading of stormwater runoff from the Project Site, but would implement the required SWPPP, SUSMP and Wet Weather Erosion Control Plan to minimize such loading such that the impact would be less than significant. Both projects would also include new on-site development that would increase operational activities at the Project Site which could introduce pollutants, such as nutrients, pesticides, organic compounds, sediments, oil and grease, suspended solids, metals, gasoline, pathogens, trash, and debris into stormwater runoff from the site, and in turn drain to the municipal storm drain system and ultimately to

<sup>35</sup> While the hydrology (drainage) and water quality impacts of the Project are identified as “less than significant” in this EIR, the Project would result in beneficial impacts in both categories. Beneficial impacts are not identified as a significance conclusion in this EIR consistency with the Appendix G (CEQA Checklist) which includes no such category.

protected receiving waters. However, both projects would implement the required SUSMP and LID measures throughout their operational lives to comply with the Upper Los Angeles Watershed EWMP, MS4 Permit, LID Ordinance, and other applicable plans and regulations to, among other things, help achieve the TMDLs for the Ballona Creek Estuary, Dockweiler Beach, and Santa Monica Bay, and both projects would provide the 13 on-site EPIC stormwater treatment areas under PDF-H/WQ-1 to retain the SWQDv on-site through capture and reuse. Therefore, surface water quality impacts would be beneficial and less than significant under both projects.<sup>36</sup> Furthermore, while the Full Historic Preservation Alternative would include less development, generate less traffic, and thus potentially generate less pollutants in stormwater runoff from the Project Site than the Project, most vehicular circulation and parking at the Project Site would be undergrounded such that associated pollutants would likely not be washed into receiving water by stormwater runoff. Based on the above, surface water quality impacts would be generally equivalent between the two projects.

### **Land Use and Planning**

Both the Full Historic Preservation Alternative and the Project would include the construction and operation of additional on-site studio development, with an increase in net new development of 206,607 sf under this alternative and 413,127 sf under the Project (not including parking structures). Under, both projects, a new CPA (CPA No. 7) would be approved for the Project Site superseding all previous CPAs for the site. According to Section 4.8, Land Use and Planning, of this Draft EIR:

*CPA No. 7 would incorporate Development Standards to ensure that the proposed New Digital Media buildings, stages, and support uses are in compliance with Section 17.250.15 (Studio (S) District Requirements), which establishes permitted uses and height limits within the S Zoning District. The Development Standards allow for modifications to respond to market conditions and tenant needs provided that the total amount of new building area does not exceed 413,127 sfsf, parking is provided in accordance with the requirements of the Culver City Municipal Code, and the total amount of traffic generated by the Project does not exceed the total amount projected in the Final EIR. (See Section 4.11, Transportation and Traffic, for a description of Project-generated traffic.) CPA No. 7 includes comprehensive development standards regarding the architecture of the new buildings, access and circulation, parking, landscaping, setbacks, fencing, and infrastructure, and sustainability. These standards would ensure comprehensive development of the Studio Campus, while permitting the technological updated and expansion of its facilities within the existing Studio Campus footprint.*

With the approval of CPA No. 7 (with CPA No. 7 being modified, as required, for the Full Historic Preservation Alternative), both projects would be consistent with applicable land use plans, polices, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Therefore, both projects would result in less than significant land use and

<sup>36</sup> While the hydrology (drainage) and water quality impacts of the Project are identified as “less than significant” in this EIR, the Project would result in beneficial impacts in both categories. Beneficial impacts are not identified as a significance conclusion in this EIR consistency with the Appendix G (CEQA Checklist) which includes no such category.

planning impacts, and as both projects would be consistent with applicable land use plans, land use planning impacts would be generally equivalent between the two alternatives.

## **Noise**

### **Construction Noise**

Both the Full Historic Preservation Alternative and the Project would include construction activities that would generate associated construction noise. Both projects would increase noise levels at existing off-site noise-sensitive receptors in the Project area in excess of the applicable thresholds. However, construction activities would be restricted to the times of day when construction activities may occur (generally, daytime hours) as prescribed in Chapter 9.07 of the CCMC. Furthermore, this increase in construction noise during the times of day when construction may occur would be less than significant under both project with adherence to the City's standard conditions of approval (e.g., use of muffling in construction equipment, etc.) and implementation of both the mitigation measures and PDFs identified in Section 4.9, Noise, of this Draft EIR. Both projects would also include off-site construction traffic during the construction period which would increase noise levels at noise-sensitive uses along the proposed construction haul route, but this noise would similarly be restricted to the hours prescribed by the CCMC, and would not increase by the barely perceivable level of 3 dBA or more, such that the off-site construction noise impacts under both projects would also be less than significant. However, because the Full Historic Preservation Alternative would include less net new development (206,607 sf) than the Project (413,127 sf), and would avoid the demolition of Stages 2/3/4 and 7/8/9 that would occur under the Project, less construction activities and therefore less construction noise would be generated under this alternative.

### **Operational Noise**

The Full Historic Preservation Alternative and the Project would each increase operational traffic noise at off-site noise-sensitive uses in the Project area. This traffic noise would be below both the perceivable level of 3 dBA and the threshold under the Project, and because the Full Historic Preservation Alternative would include less net new development (206,607 sf) than the Project (413,127 sf), especially less digital media/office space which generates more employees and traffic per sf than does studio space, this alternative would generate less traffic and thus less traffic noise than the Project. Therefore, operational traffic noise impacts under both projects would be less than significant. Both projects would also increase operational stationary source noise at the off-site noise-sensitive associated with fixed mechanical equipment, human activity in open space areas (including special events), parking structures, and loading docks. Under both project, this noise, when taken both individually and in composite (e.g., as a combination of the traffic and stationary noise sources) would also be less than significant with implementation of the PDFs proposed in Section 4.9, Noise, of this Draft EIR. While operational noise would be less than significant under both projects, such noise would be less under the Full Historic Preservation Alternative owing to less net new development and associated traffic under this alternative.

### **Construction Vibration**

Neither the Full Historic Preservation Alternative nor the Project would include high-impact construction activities (e.g., pile driving, blasting, etc.) that could generate high levels of ground-borne vibration. However, both projects would include other construction activities, specifically

the operation of heavy construction equipment of 600 horsepower or more, that could generate lower-intensity short-term ground-borne vibration. Under the Project, construction-related vibration levels above applicable thresholds could occur at on-site historic buildings within 20 ft of such activities and at off-site residential uses within 45 ft of such activities, even with adherence to the City's limitations concerning when construction activities. However, any such vibration impacts would be less than significant with implementation of the mitigation prescribed in Section 4.9, Noise, of this Draft EIR.<sup>37</sup> Because the Full Historic Preservation Alternative would include less net new development (206,607 sf) than the Project (413,127 sf), less construction-related vibration would be expected under this alternative, and it can thus be assumed that with implementation of the mitigation prescribed for the Project, construction vibration impacts would similarly be less than significant under this alternative. While construction-related vibration would be less than significant under both projects with mitigation incorporated, such impacts would be less under the Full Historic Preservation Alternative owing to less new development under this alternative.

### **Operational Vibration**

Both the Full Historic Preservation Alternative and the Project would include increase operations, including operational activities often associated with ground-born vibration (e.g., traffic and the operation of commercial-grade stationary equipment such as HVACs, condenser units and exhaust fans). These would generate ground-borne vibration below the significance threshold for perceptibility under both projects, and thus the impact would be less than significant. However, operational vibration impacts would be less under the Full Historic Preservation Alternative owing to less new net development and thus traffic and stationary equipment under this alternative.

### **Public Services**

#### **Fire Protection**

During construction, the Full Historic Preservation Alternative and the Project could result in occasional exposure of combustible materials that would temporarily obstruct emergency access and increase the demand for fire protection and emergency medical services. During operation, both projects would increase traffic on surrounding roadways and increases in on-site studio operations and employees which could slow emergency response times and increase the demand for fire protection/EMS service and fire flow. As discussed in Section 4.10.1, Fire Protection, with adherence to CBC and City Fire Code requirements covering building design, fire safety features, emergency safety provisions, CCFD access, construction measures, fire flow, and site plan review, and with implementation of the proposed PDFs (e.g., Construction Management Plan, use of fire proof/retardant materials, sprinklering of buildings, etc.), Project construction and operation would not require new or expanded fire protection facilities, and impacts would be less than significant. Because the Full Historic Preservation Alternative would include less development than the Project and be required to adhere to the same regulatory requirements as the Project, the impacts of this alternative would similarly be less than significant. Fire protection

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<sup>37</sup> Linwood E. Howe Elementary School is located too far away from the Project Site to be significant impacted.

impacts would be less under the Full Historic Preservation Alternative owing to less new net new development, traffic, and service demand under this alternative.

### **Police Protection**

Both the Full Historic Preservation Alternative and the Project would include construction and increased operational activities. During construction, both projects could temporarily: expose the construction site to trespassing, theft, vandalism and graffiti which would increase service demand; block emergency access; and generate construction traffic and/or temporarily close travel lanes that slows emergency response. During operation, both projects would increase in on-site studio operations, employees and traffic, and could increase in on-site special events, which could increase service demand and slow emergency response. However, as discussed in Section 4.10.2, Police Protection, CCPD's police station is located only 2½ blocks south of the Project Site, and with adherence to CBC and CCMC requirements (covering building design, security provisions, CCPD access, etc.) and implementation of the PDFs (e.g., construction fencing, Construction Management Plan, security lighting, provision of private on-site security personnel, etc.), Project construction and operation would not require new or expanded police protection facilities. Therefore, the impact would be less than significant. Because the Full Historic Preservation Alternative would be required to adhere to the same regulatory requirements as, and would include less development and therefore generate less traffic and service demand than, the Project, it too would result in a less than significant impact with implementation of the PDFs. However, because the Full Historic Preservation Alternative would include less net new development and associated employee population requiring police protection than the Project, police protection impacts would be less under this alternative.

### ***Transportation and Circulation***

#### **Construction Traffic/Parking**

Both the Full Historic Preservation Alternative and the Project would include construction activity that would generate truck/construction worker traffic and associated traffic congestion, construction worker parking demand, and potentially lane closures and reductions in access, during the construction period. However, with implementation of the mitigation specified in Section 4.11, Transportation and Traffic (e.g. restricting construction truck staging on-site or within reserved off-site lots, provision of flagmen, restricting deliveries/picks-ups and lane closures to off-peak hours, preserving emergency access, etc.) and the proposed PDFs (e.g., Construction Management Plan, provision of construction worker parking on-site or in reserved off-site lots, etc.), Project construction traffic/parking impacts would be less than significant with mitigation incorporated, with the exception of construction-related intersection level of service impacts which would be significant unavoidable. The Full Historic Preservation Alternative would include less net new development (206,607 sf) than the Project (413,127 sf), and thus would be expected to generate less construction traffic and construction parking demand than the Project, with the impact similarly less than significant with implementation of the specified mitigation and PDFs, with the exception of construction-related intersection level of service impacts which would be significant unavoidable. However, because the Full Historic Preservation Alternative would include less net new development and thus generate less construction traffic and parking demand than the Project, construction traffic/parking impacts would be less under this alternative.

### **Intersection Service Levels**

The Project would include approximately 413,127 net sf of new development at the Project Site (not including parking structures) that would generate associated operational traffic. Although this traffic would not result in the exceedance of signal warrants at the two unsignalized intersections analyzed, it would result in significant unavoidable intersection level of service impacts at eight intersections under Future (2021) With Project Conditions (10 if optional Mitigation Measures TRAF-9 and TRAF-10 were implemented). Under the Full Historic Preservation Alternative, less net new development (206,607 sf) would be developed at the Project Site than under the Project. As a result, trip generation would be reduced by 227 vehicles in the AM peak hour and 217 vehicles in the PM peak from those that would be generated under the Project. The resulting reduced trip generation would result in significant unavoidable intersection level of service impacts at the following two of the eight intersections to be significantly and unavoidably impacted under the Project (see Appendix E of the Traffic Study):

13. Robertson Blvd/Exposition Blvd & Venice Blvd
38. Robertson Blvd & National Blvd

If optional Mitigation Measures TRAF-9 and TRAF-10 were implemented, it is possible, but unlikely due to less traffic under this alternative, that four instead of two intersections could be significantly and unavoidably impacted under this alternative (see the list of significant unavoidable impacts at the beginning of this chapter for listing of the potential additional intersections that could be impacted).

Furthermore, it can be reasonably assumed that this alternate, like the Project, would not exceed signal warrants. Therefore, while this alternative would result in significant unavoidable intersection level of service impacts at two intersections, impacts would be less under this alternative than under the Project.

### **Intersection Queuing**

Both the Full Historic Preservation Alternative and the Project would generate traffic and associated intersection queuing distance impacts. As indicated in Section 4.11, Transportation and Traffic, of this Draft EIR, the Project would result in significant queuing impacts at two intersections (with mitigation not specified because, per the MOU, the intersection queuing distance analysis in the Draft EIR is provided for information purposes only, and these inadequacies would not necessarily be caused by the Project alone). Under the Full Historic Preservation Alternative, less net new development (206,607 sf) would be developed at the Project Site than under the Project such that it can be reasonably assumed that, while this alternative would potentially result in significant intersection queuing distance impacts at the same two intersections as the Project, these impacts would likely be less than under the Project owing to the reduced amount of net new development and associated operational traffic under this alternative.

### **Public Transit**

Both the Full Historic Preservation Alternative and the Project would generate a demand for public transit. According to the analysis in Section 4.11, Transportation and Traffic, of this Draft

EIR, the Project would generate an increase in transit demand of 121 persons during the weekday AM peak hour and 116 during the weekday PM peak hour, or approximately 2.8 percent of the combined capacity of the transit lines, but that it is anticipated that adequate capacity exists in the public transit system to serve the Project. Because the Full Historic Preservation Alternative would include less net new development (206,607 sf) than the Project, especially less digital media/office space which generates more employees per sf than does studio space, this alternative would generate less transit demand than the Project such that adequate transit capacity would also be available to serve this alternative. Furthermore, both projects would be consistent with applicable plans, policies and programs supporting alternative transportation by representing infill development, concentrating development along established transit routes and bikeways, implementing TDM measures (required for the alternative by conditions of approval and for the Project by mitigation), providing on-site bicycle facilities, etc. Therefore, public transit impacts would be less than significant under both projects. Still, as the Full Historic Preservation Alternative would result in less net new development and thus less transit demand than the Project, public transit impacts would be less under this alternative.

### **Access and Circulation**

Both the Full Historic Preservation Alternative and the Project would include vehicular access via studio gates along Ince and Washington Boulevards, increase the number of gate entries, and include a Culver/Main Tunnel connection from Culver Boulevard to the Rear Lawn Parking Structure. All gates, driveways, on-site roadways, sidewalks, etc. under both projects would be designed and constructed in accordance with Culver City standards and would be reviewed and approved by the City during the Site Plan Review process to provide safe travel (including pedestrian travel by school children), required emergency access, and avoid impedance of traffic movements on City streets. Also, both projects would be developed along existing pedestrian routes and bicycle paths, both would include on-site bicycle parking, both would largely maintain the existing network of off-site roadways, travel lanes, public sidewalks and pedestrian crosswalks, both would avoid the need to removal or relocate existing bus stops, and both would avoid substantial neighborhood cut-through traffic. Furthermore, both projects would include several features to improve pedestrian and bicycle safety, including providing the Culver/Main Tunnel Connection and restricting the Studio entry along Washington Boulevard to pedestrian/bicycle traffic, both of which would help separate vehicular and pedestrian/bicycle traffic and improve pedestrian/bicycle safety. Therefore, both projects result in less than significant access and circulation impacts, with the level of impact generally equivalent between the two projects.

### **Parking**

*Note: Under SB 743, as an infill development located within an urban transit priority area, the Project is not required to evaluate parking impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to parking.*

The Full Historic Preservation Alternative and the Project would result in increases in net new studio development at the Project Site of 206,607 sf and 413,127 sf, respectively, which would generate a demand for parking. As indicated in Section 4.11, Transportation and Traffic, of this Draft EIR, the Project would provide a total of 2,370 on-site vehicle parking spaces versus the

number required by the CCMC of 1,960 spaces. Thus, the Project would provide more than the number of vehicle parking spaces required to meet Code. Similarly, while the Full Historic Preservation Alternative would include less net new development and thus generate less demand for parking than the Project, it too would meet or exceed CCMC parking space requirements. Furthermore, both projects would provide the number of on-site bicycle parking spaces required by Code. As both projects would provide the required number of parking spaces to meet Code, parking impacts would be generally equivalent between the two projects.

## ***Utilities and Service Systems***

### **Wastewater**

Both the Full Historic Preservation Alternative and the Project would include additional development at the Project Site and generate additional wastewater requiring collection and conveyance by the local sewer system. The Project would include a net increase in on-site studio development of 413,127 sf which would generate wastewater requiring collection and conveyance by the existing 8- to 10-inch Ince and 6-inch Western sewer mains. This increase would exceed the half flow capacity of the Ince sewer main during operation, resulting in a less than significant impact with mitigation incorporated (the mitigation being upsizing of the Ince sewer main from 10 to 12 inches between Hubbard St. Lucerne Ave.). The Full Historic Preservation Alternative, by comparison, would include a net increase in on-site studio development of 206,607 sf which would generate less sewage and therefore less demand for off-site sewer collection and conveyance capacity than the Project. Therefore, wastewater collection and conveyance impacts under this alternative would similarly be less than significant with mitigation incorporated. As the Full Historic Preservation Alternative would generate less sewage, wastewater collection and conveyance impacts would be less under this alternative than under the Project (including, potentially, avoiding the need to upsize the Ince sewer main).

With respect to wastewater treatment, both projects would generate additional wastewater requiring treatment at the HTP. The existing treatment capacity of HTP) is 450 million gpd, with the remaining available treatment capacity in 2020 projected to be 15 million gpd. Because the wastewater generated by the Project would represent only about 0.6 percent of the HTP's projected remaining available treatment capacity in 2020, the HTP would have adequate treatment capacity to serve the Project. Similarly, because the Full Historic Preservation Alternative would generate even less wastewater than the Project, owing to the smaller net increase in development under this alternative, the HTP would also have adequate treatment capacity to serve the Full Historic Preservation Alternative. Thus, wastewater treatment capacity impacts would be less than significant under both projects. As the Full Historic Preservation Alternative would generate less wastewater and require less treatment capacity at the HTP than the Project, wastewater treatment capacity impacts would be less under this alternative.

### **Water**

The Full Historic Preservation Alternative and the Project would each increase domestic and fire flow water demand at the Project Site compared to existing conditions and result in an associated increase in demand for water infrastructure conveyance capacity. According to the Water Infrastructure and Demand Analysis prepared for the Project, the water mains in the surrounding streets (e.g., 12-inch mains in Ince and Washington Boulevards, and an 8-inch main in Van Buren

Pl.) have adequate domestic and fire flow capacity to serve the Project.<sup>38</sup> Given this, and with development of the proposed on-site water line improvements, compliance with applicable domestic water/fire flow requirements, and implementation of the proposed water conservation and fire protection infrastructure PDFs, the water conveyance infrastructure impacts of the Project would be less than significant. The same would be true of the Full Historic Preservation Alternative which would be subject to the same requirements and implement the same improvements and PDFs as the Project, but would include less development (e.g., 206,607 sf vs. 413,127 sf under the Project) and thus generate less water demand than the Project. Because the Full Historic Preservation Alternative would generate less water demand than the Project, water conveyance infrastructure impacts would be less under this alternative.

With respect to water supply, both projects would include new development and increase the on-site demand for domestic water from GSWC. According to the WSA for the Project, the Project would not add any increments of demand in excess of those that were anticipated at the time the 2015 UWMP was published.<sup>39</sup> In addition, the Project would comply with State Title 24 and 20 water efficiency standards, and PDFs are proposed to provide for additional water conservation. As such, the Project's water demand would fall within the GSWC's projected increases in Citywide water demands through at least 2040, sufficient water supplies would be available to serve the Project, and the water demand and supply impact of the Project would be less than significant. Similarly, because the Full Historic Preservation Alternative would include less development and thus less water demand than the Project, the GSWC would also have adequate water supplies to serve the Full Historic Preservation Alternative. Thus, water supply impacts would be less than significant under both projects, with less impact under the Full Historic Preservation Alternative.

### **Solid Waste**

Under both the Full Historic Preservation Alternative and the Project, construction activities would generate non-hazardous construction/demolition debris and excavated soil requiring disposal at C&D landfills, while increased operational activities would generate non-hazardous municipal solid waste requiring disposal at Class III landfills. Both projects would be subject to the waste diversion and recycling requirements of AB 939, AB 341 and other application regulations (including diverting at least 65 percent of C&D waste and 50 percent of Class III solid waste by 2020, and diverting at least 75 percent of both C&D and Class III solid waste thereafter), and both would implement proposed PDFs designed to reduce solid waste generation (e.g., LEED certification, implement a Demolition Debris Recycling Plan for Construction, etc.). Furthermore, as adequate capacity exists at the applicable Los Angeles County and Ventura County C&D and Class III landfills to serve the construction and operational waste disposal needs of the Project, adequate capacity would also exist to serve the Full Historic Preservation Alternative which would include less development and thus generate less construction- and

<sup>38</sup> Water Infrastructure and Demand Analysis for the Culver Studios Innovation Plan, KPFF, June 2017.

<sup>39</sup> Golden State Water Company, Water Supply Assessment for Culver Studios Innovation Plan, April 26, 2017, page 11, include in Appendix M-1 of this EIR.

operations-related solid waste than the Project.<sup>40</sup> Thus, the solid waste impacts of both projects would be less than significant, with the solid waste impacts of this alternative being less than under the Project.

## Relationship of the Alternative to Project Objectives

The Full Historic Preservation Alternative would reduce by approximately half, the amount of new and renovated development at the Project Site compared to the Project, while still including proposed parking, circulation, landscaping, and infrastructure improvements (although the number of proposed parking spaces would be revised downward to meet the reduced parking demand under this alternative). However, this alternative would retain Stages 2/3/4 and 7/8/9 as sound stages instead of replacing these stages with new digital media/office buildings. The Full Historic Preservation Alternative would achieve the Project objectives of upgrading and rehabilitating the Mansion in a manner that protects its eligibility as a historical resource; reducing production vehicle use of directly adjacent streets; providing improved access; and providing inviting/collaborative landscaped open areas. However, because this alternative would retain some of the existing outdated stages rather than replacing these stages with new digital media space, and because new digital media space would be substantially reduced, it would be much less effective than the Project in achieving other Project objectives including: creating start-of-the-art studio facilities to ensure the Studio's competitiveness and continued position at the cutting edge of innovation essential to the invention and production of entertainment; fostering content creation, digital media, creative technologies and virtual reality; promoting environmental sustainability through updated and expanded facilities to reduce vehicle trips; supporting the continued economic viability of the Studio and its ability to respond to changing industry needs; and providing a Studio Campus which meets Green Building Program requirements..

### 5.6.5 Alternative 5: Historic Preservation - Retain Stages 2/3/4 as Sound Stages

#### Description of the Alternative

Under Alternative 5, Stages 2/3/4 (32,400sf) would be retained in their current condition for continued use as sound stages. Proposed Building K would not be constructed. This Alternative would include 347,549 sf of net new development versus 413,127 sf under the Project (although due to the retention of Stages 2/3/4, this alternative would result in more stage use than under the Project). Other than these changes and a reduction in the size of the Central Parking Structure, other aspects of the Alternative would be similar to the proposed Project. **Table 5-7, Alternative 5: Historic Preservation – Retain Stages 2/3/4 as Sound Stages**, provides a development summary for this alternative.

<sup>40</sup> As indicated in Tables 4.12.3-1 and 4.12.3-3 in Section 4.12.3, Utilities and Service Systems – Solid Waste, in this Draft EIR, digital media/office uses generate more operational solid waste per 1,000 sf per day than does stage use. Therefore, while set construction and tear-down associated with the existing stages at the Project Site may generate more solid waste during set tear-down, over time, digital media/office uses generate more solid waste per 1,000 sf. This, combined with the greater increase in net sf under the Project (413,127 sf vs. 206,607 sf under this alternative, means that this alternative would generate less operational solid waste than the Project.

**TABLE 5-7**  
**ALTERNATIVE 5: HISTORIC PRESERVATION - RETAIN STAGES 2/3/4 AS SOUND STAGES**

Use	Development (sf) <sup>a</sup>			Net New	Total Net (Existing + Net New)
	Existing	Demolition	New		
Digital Media/Office	117,872	(87,788)	438,620	350,832	468,704
Stage	155,480	(47,480)	40,000	(7,480)	148,000
Support	74,197	(68,625)	0	(68,625)	5,572
Total	347,549	(203,893)	478,620	274,727	622,276

<sup>a</sup> Excludes parking structure square footage.

Source: ESA PCR, September 2017

## Environmental Impacts

### Aesthetics

*Note: As the Project is located on an infill site in a urban transit priority area, pursuant to SB 743 evaluation of aesthetic impacts in an EIR pursuant to CEQA is not required. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to aesthetic issues, including visual quality, views, light, glare, and shading.*

#### Aesthetic Character

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have less impact than the Project (no significance determination – informational item).

#### Aesthetics Plan Consistency

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have an equivalent impact to the Project (no significance determination – informational item).

#### Light/Glare

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have less impact than the Project (no significance determination – informational item).

#### Shading

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the

Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have less impact than the Project (no significance determination – informational item).

### ***Air Quality***

#### **Construction Emissions**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project .

#### **Operational Emissions**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

#### **Carbon Monoxide Hotspots**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

#### **Toxic Air Contaminants**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

#### **AQMP Consistency**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

### ***Cultural Resources***

#### **Historical Resources**

Under Alternative 5, Stages 2/3/4 (32,400 sf) would be retained in their current condition for continued use as sound stages and Stages 7/8/9 would be demolished. Both Alternative 5 and the Project would include demolition of several existing on-site buildings, the construction of several

new on-site buildings, and the relocation of the bungalows. Both projects would result in less than significant indirect historical resources impacts (e.g., would not reduce or materially impair the integrity of significance of important historical resources in the project vicinity, and both would result in less than significant impacts to the bungalows with mitigation incorporated). However, while the Project would demolish and replace Stages 2/3/4 and 7/8/9 with new development, which would represent significant unavoidable historical resource impacts (even with incorporation of mitigation recommended to reduce this impact), Alternative 5 would retain Stages 2/3/4 as sound stages and thus would avoid potential impacts to Stage 2/3/4. However, Alternative 5 would result in a significant unavoidable impact to Stages 7/8/9 due to demolition. While impacts to historical resources under Alternative 5 would be greater than under the Full Historic Preservation Alternative and less than under the Project, impacts to historical resources would remain significant and unavoidable under Alternative 5 because Stages 7/8/9 would be demolished.

### **Archaeological/Tribal Resources**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact with mitigation incorporated, and less impact than the Project.

### **Paleontological Resources**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant with mitigation incorporated, and less impact than the Project.

### **Geology and Soils**

#### **Seismic Hazards**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant with mitigation incorporated, and an equivalent impact to the Project.

#### **Geotechnical Hazards**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact with mitigation incorporated, and an equivalent impact to the Project.

**Soils/Erosion**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant with mitigation incorporated, and an equivalent impact to the Project.

***Greenhouse Gas Emissions*****GHG Emissions**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

**GHG Plan Consistency**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and an equivalent impact to the Project.

***Hazards and Hazardous Materials*****Hazardous Materials Management**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and a greater impact than the Project.

**Upset/Accident Conditions and Hazardous Materials Database Listings**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have less than significant impact, and less impact than the Project.

**Hazardous Emissions Near Schools**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

### **Emergency Response Plan Consistency**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

### ***Hydrology and Water Quality***

#### **Hydrology (Drainage)**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the difference in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and an equivalent impact to the Project.

#### **Surface Water Quality**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and an equivalent impact to the Project.

### ***Land Use and Planning***

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and an equivalent impact to the Project.

### ***Noise and Vibration***

#### **Construction Noise**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact with mitigation incorporated, and less impact than the Project.

#### **Operational Noise**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

**Construction Vibration**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact with mitigation incorporated, and less impact than the Project.

**Operational Vibration**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

**Public Services****Fire Protection**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

**Police Protection**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

**Transportation and Circulation****Construction Traffic/Parking**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would result in a less than significant impact with mitigation incorporated, with the exception of construction-related intersection level of service impacts which would be significant unavoidable, and less impact than the Project.

**Intersection Service Levels**

The Project would include approximately 413,127 net sf of new development at the Project Site (not including parking structures) that would generate associated operational traffic. Although this traffic would not result in the exceedance of signal warrants at the two unsignalized intersections analyzed, it would result in significant unavoidable intersection level of service impacts at eight intersections under Future (2021) With Project Conditions (10 if optional Mitigation Measures TRAF-9 and TRAF-10 were implemented). Under Alternative 5 (Historic

Preservation – Retain Stages 2/3/4 as Sound Stages), less net new development (274,727 sf) would be developed at the Project Site than under the Project. As a result, trip generation would be reduced by 162 vehicles in the AM peak hour and 155 vehicles in the AM peak from those that would be generated under the Project. The resulting reduced trip generation would result in significant unavoidable intersection level of service impacts at the following four of the eight intersections to be significantly and unavoidably impacted under the Project (see Appendix E of the Traffic Study):

8. Washington Boulevard & Culver Boulevard
13. Robertson Blvd/Exposition Blvd & Venice Blvd
33. Overland Ave/Venice Blvd
38. Robertson Blvd/National Blvd

If optional Mitigation Measures TRAF-9 and TRAF-10 were implemented, it is possible, but unlikely due to less traffic under this alternative, that six instead of four intersections could be significantly and unavoidably impacted under this alternative (see the list of significant unavoidable impacts at the beginning of this chapter for listing of the potential additional intersections that could be impacted).

**Furthermore, it can be reasonably assumed that this alternate, like the Project, would not exceed signal warrants. Therefore, while this alternative would result in significant unavoidable intersection level of service impacts at four intersections, impacts would be less under this alternative than under the Project.**

**Intersection Queuing**  
The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have less impact than the Project. (no significance determination – informational item).

### **Public Transit**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.

### **Access and Circulation**

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and an equivalent impact to the Project.

## Parking

*Note: Under SB 743 as an infill project located within an urban transit priority area, the Project is not required to evaluate parking impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to parking.*

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), with parking provided to meet or exceed code, with an equivalent impact to the Project (no significance determination – informational item).

## Utilities and Service Systems

### Wastewater

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant with mitigation incorporated, and less impact than the Project, with respect to wastewater collection, and a less than significant impact, and less than the Project, with respect to wastewater treatment.

### Water

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project, with respect to both water conveyance and supply.

### Solid Waste

The impacts of this alternative would be similar to those of Alternative 4 (Full Historic Preservation Alternative), except that the reduction in impacts between this alternative and the Project would not be as great owing to the retention of half as many existing stages under this alternative. This alternative would have a less than significant impact, and less impact than the Project.<sup>41</sup>

## Relationship of the Alternative to Project Objectives

The relationship of this alternative to the Project objectives would be similar to that of Alternative 4 (Full Historic Preservation Alternative). Like the Full Preservation Alternative, it would achieve the Project objectives of upgrading and rehabilitating the Mansion in a manner that protects its eligibility as a historical resource; reducing production vehicle use of directly adjacent streets; providing improved access; and providing inviting/collaborative landscaped open areas.

However, because this alternative would retain some of the existing outdated stages rather than

<sup>41</sup> As indicated in Tables 4.12.3-1 and 4.12.3-3 in Section 4.12.3, Utilities and Service Systems – Solid Waste, in this Draft EIR, digital media/office uses generate more operational solid waste per 1,000 sf per day than does stage use. Therefore, while set construction and tear-down associated with the existing stages at the Project Site may generate more solid waste during set tear-down, over time, digital media/office uses generate more solid waste per 1,000 sf. This, combined with the greater increase in net sf under the Project (413,127 sf vs. 206,607 sf under this alternative, means that this alternative would generate less operational solid waste than the Project.

replacing these stages with new digital media space, and because new digital media space would be substantially reduced, it would be much less effective than the Project in achieving other Project objectives including: creating start-of-the-art studio facilities to ensure the Studio's competitiveness and continued position at the cutting edge of innovation essential to the invention and production of entertainment; fostering content creation, digital media, creative technologies and virtual reality; promoting environmental sustainability through updated and expanded facilities to reduce vehicle trips; supporting the continued economic viability of the Studio and its ability to respond to changing industry needs; and providing a Studio Campus which meets Green Building Program requirements.

## 5.6.6 Alternative 6: Historic Preservation - Retain Stages 7/8/9 as Sound Stages

### Description of the Alternative

Under Alternative 6, Stages 7/8/9 (16,000 sf) would be retained in their current condition for continued use as sound stages. Proposed Building M would not be constructed. This alternative would include 347,007 sf of net new development versus 413,127 sf under the Project (although due to the retention of Stages 7/8/9, this alternative would result in more stage use than under the Project. Other than these changes and a reduction in the size of the Central Parking Structure, other aspects of the Alternative would be similar to the proposed Project. **Table 5-8, Alternative 6: Historic Preservation - Retain Stages 7/8/9 as Sound Stages**, provides a development summary for this alternative.

**TABLE 5-8  
ALTERNATIVE 6: HISTORIC PRESERVATION - RETAIN STAGES 7/8/9 AS SOUND STAGES**

Use	Development (sf) <sup>a</sup>			Net New	Total Net (Existing + Net New)
	Existing	Demolition	New		
	Digital Media/Office	117,872	(87,788)		
Stage	155,480	(63,080)	20,000	(43,080)	72,400
Support	74,197	(68,625)	0	(68,625)	5,572
<b>Total</b>	<b>347,549</b>	<b>(219,493)</b>	<b>564,500</b>	<b>345,007</b>	<b>692,556</b>

<sup>a</sup> Excludes parking structure square footage.

Source: ESA PCR, September 2017.

## Environmental Impacts

### Aesthetics

*Note: Under SB 743, as an infill project within an urban transit priority area, the Project is not required to evaluate aesthetic impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to visual quality, views, light, glare, and shading.*

### **Aesthetic Character**

The impacts of Alternative 6 would be similar to those of Alternative 5 (Historic Preservation – Retain Stages 2/3/4 as Sound Stages), although there would be less visual change along Ince Boulevard with retention of Stages 7/8/9. This alternative would have less impact than the Project (no significance determination – informational item).

### **Aesthetics Plan Consistency**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have an equivalent impact to the Project (no significance determination – informational item).

### **Light/Glare**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have less impact than the Project (no significance determination – informational item).

### **Shading**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have less impact than the Project (no significance determination – informational item).

### **Air Quality**

#### **Construction Emissions**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

#### **Operational Emissions**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

#### **Carbon Monoxide Hotspots**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

#### **Toxic Air Contaminants**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

#### **AQMP Consistency**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

### **Cultural Resources**

#### **Historical Resources**

The impacts of this alternative would be similar to those of Alternative 5 which would retain Stages 2/3/4 and demolish Stages 7/8/9, resulting in a significant and unavoidable impact to historical resources. Under Alternative 6, Stages 7/8/9 (16,000 sf) would be retained in their current condition for continued use as sound stages and Stages 2/3/4 would be demolished. Both

Alternative 6 and the Project would include demolition of several existing on-site buildings, the construction of several new on-site buildings, and the relocation of the bungalows. Both projects would result in less than significant indirect historical resources impacts (e.g., would not reduce or materially impair the integrity of significance of important historical resources in the project vicinity, and both would result in less than significant impacts to the bungalows with mitigation incorporated. However, while the Project would demolish and replace Stages 2/3/4 and 7/8/9 with new development, which would represent significant unavoidable historical resources impacts (even with incorporation of mitigation recommended to reduce this impact), Alternative 6 would retain Stages 7/8/9 as sound stages, which appear eligible for listing in the National, California and Local Registers and thus avoid the significant unavoidable impact of the Project associated with their demolition. Stages 7/8/9 However, Alternative 6 would still have one significant unavoidable historical resource impact due to demolition of Stages 2/3/4.

### **Archaeological/Tribal Resources**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact with mitigation incorporated, and less impact than the Project.

### **Paleontological Resources**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact with mitigation incorporated, and less impact than the Project.

### ***Geology and Soils***

#### **Seismic Hazards**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact with mitigation incorporated, and an equivalent impact to the Project.

#### **Geotechnical Hazards**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact with mitigation incorporated, and an equivalent impact to the Project.

#### **Soils/Erosion**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact with mitigation incorporated, and an equivalent impact to the Project.

### ***Greenhouse Gas Emissions***

#### **GHG Emissions**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

#### **GHG Plan Consistency**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and an equivalent impact to the Project.

## ***Hazards and Hazardous Materials***

### **Hazardous Materials Management**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and a greater impact than the Project.

### **Upset/Accident Conditions and Hazardous Materials Database Listings**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

### **Hazardous Emissions Near Schools**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

### **Emergency Response Plan Consistency**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

## ***Hydrology and Water Quality***

### **Hydrology (Drainage)**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and an equivalent impact to the Project.

### **Surface Water Quality**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and an equivalent impact to the Project.

## ***Land Use and Planning***

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and an equivalent impact to the Project.

## ***Noise***

### **Construction Noise**

The impacts of this alternative would be similar to those of Alternative 5, although somewhat reduced due to less construction along Ince Boulevard in proximity to residential uses. This alternative would have a less than significant impact with mitigation incorporated, and less impact than the Project.

### **Operational Noise**

The impacts of this alternative would be similar to those of Alternative 5, although with somewhat greater mobile source noise impacts due to comparatively more traffic. This alternative would have a less than significant impact, and less impact than the Project.

### **Construction Vibration**

The impacts of this alternative would be similar to those of Alternative 5, although somewhat reduced due to less construction along Ince Boulevard in proximity to residential uses. This

alternative would have a less than significant impact with mitigation incorporated, and less impact than the Project.

### **Operational Vibration**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

### **Public Services**

#### **Fire Protection**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

#### **Police Protection**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

### **Transportation and Circulation**

#### **Construction Traffic/Parking**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would result in a less than significant impact with mitigation incorporated, with the exception of construction-related intersection level of service impacts which would be significant unavoidable, and less impact than the Project.

#### **Intersection Service Levels**

The Project would include approximately 413,127 net sf of new development at the Project Site (not including parking structures) that would generate associated operational traffic. Although this traffic would not result in the exceedance of signal warrants at the two unsignalized intersections analyzed, it would result in significant unavoidable intersection level of service impacts at eight intersections under Future (2021) With Project Conditions (ten if optional Mitigation Measures TRAF-9 and TRAF-10 were implemented). Under Alternative 6 (Historic Preservation – Retain Stages 7/8/9 as Sound Stages), less net new development (345,007 sf) would be developed at the Project Site than under the Project. As a result, trip generation would be reduced by 66 vehicles in the AM peak hour and 63 vehicles in the PM peak from those that would be generated under the Project. The resulting reduced trip generation would result in significant unavoidable intersection level of service impacts at the following seven of the eight intersections to be significantly and unavoidably impacted under the Project (see Appendix E of the Traffic Study):

3. Duquesne Ave/Lucerne Ave
8. Washington Blvd/Culver Blvd
13. Robertson Blvd/Exposition Blvd & Venice Blvd
14. National Blvd/Washington Blvd
33. Overland Ave/Venice Blvd

- 38. Robertson Blvd/National Blvd
- 42. Duquesne Ave/Braddock Dr.

If optional Mitigation Measures TRAF-9 and TRAF-10 were implemented, it is possible, but unlikely due to less traffic under this alternative, that nine instead of seven intersections could be significantly and unavoidably impacted under this alternative (see the list of significant unavoidable impacts at the beginning of this chapter for listing of the potential additional intersections that could be impacted).

**Furthermore, it can be reasonably assumed that this alternate, like the Project, would not exceed signal warrants. Therefore, while this alternative would result in significant unavoidable intersection level of service impacts at seven intersections, impacts would be less under this alternative than under the Project.**

**Intersection Queuing**  
The impacts of this alternative would be similar to those of Alternative 5, although somewhat increased due to comparatively greater traffic generation. This alternative would have less impact than the Project (no significance determination – informational item).

### **Public Transit**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and less impact than the Project.

### **Access and Circulation**

The impacts of this alternative would be similar to those of Alternative 5. This alternative would have a less than significant impact, and an equivalent impact to the Project.

### **Parking**

*Note: Under SB 743, as an infill project located within an urban transit priority area, the Project is not required to evaluate parking impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to parking.*

The impacts of this alternative would be of the same as Alternative 5 and the Project due to provision of parking at a level that would meet or exceed Code. The impact of this alternative would be equivalent to the Project.

### **Utilities and Service Systems**

#### **Wastewater**

The impacts of this alternative would be similar to those of Alternative 5, although slightly increased due to a greater extent of digital media development on the Project Site. This alternative would have a less than significant with mitigation incorporated, and less impact than the Project, with respect to wastewater collection, and a less than significant impact, and less impact than the Project, with respect to wastewater treatment.

#### **Water**

The impacts of this alternative would be similar to those of Alternative 5, although slightly increased due to a greater extent of digital media development on the Project Site. This alternative

would result in a less than significant impact, and less impact than the Project, with respect to both water conveyance and water supply.

### **Solid Waste**

The impacts of this alternative would be similar to those of Alternative 5, although slightly increased due to a greater extent of digital media development on the Project Site. This alternative would have a less than significant impact, and less impact than the Project.<sup>42</sup>

### **Relationship of the Alternative to Project Objectives**

Alternative 6 would achieve the Project objectives of upgrading and rehabilitating the Mansion in a manner that protects its eligibility as a historical resource; reducing production vehicle use of directly adjacent streets; providing improved access; and providing inviting/collaborative landscaped open areas. However, because this alternative would retain some of the existing outdated stages rather than replacing these stages with new digital media space, and because new digital media space would be reduced, it would be somewhat less effective than the Project in achieving other Project objectives including: creating start-of-the-art studio facilities to ensure the Studio's competitiveness and continued position at the cutting edge of innovation essential to the invention and production of entertainment; fostering content creation, digital media, creative technologies and virtual reality; promoting environmental sustainability through updated and expanded facilities to reduce vehicle trips; supporting the continued economic viability of the Studio and its ability to respond to changing industry needs; and providing a Studio Campus which meets Green Building Program requirements. All-in-all, Alternative 6 would achieve the underlying purpose of the Project, which is to sustain The Culver Studio's prominent role as a dynamic, independent studio in the entertainment, digital media, and creative industries, through expansion and modernization of the Studio Campus. However, this alternative would not be as effective as the proposed Project in doing so.

## **5.6.7 Alternative 7: Full Adaptive Reuse – Retain Stages 2/3/4 and 7/8/9 for Digital Media**

### **Description of the Alternative**

Under Alternative 7, Stages 2/3/4 (32,400 sf) and 7/8/9 (16,800 sf) would be adaptively reused to balance historic preservation with the need for efficient digital media production space. Proposed Buildings K (170,800) and M (84,920 sf) would not be constructed. Overall, this alternative would result in 206,607 sf of net new development versus 413,127 sf under the Project. Other than these changes and associated reductions in parking spaces, other aspects of the Project would not change. **Table 5-9, *Alternative 7: Full Adaptive Reuse – Retain Stages 2/3/4 and 7/8/9 for Digital Media***, provides a development summary for this alternative.

<sup>42</sup> As indicated in Tables 4.12.3-1 and 4.12.3-3 in Section 4.12.3, Utilities and Service Systems – Solid Waste, in this Draft EIR, digital media/office uses generate more operational solid waste per 1,000 sf per day than does stage use. Therefore, while set construction and tear-down associated with the existing stages at the Project Site may generate more solid waste during set tear-down, over time, digital media/office uses generate more solid waste per 1,000 sf. This, combined with the greater increase in net sf under the Project (413,127 sf vs. 206,607 sf under this alternative, means that this alternative would generate less operational solid waste than the Project.

**TABLE 5-9  
ALTERNATIVE 7: FULL ADAPTIVE REUSE – RETAIN STAGES 2/3/4 AND 7/8/9 FOR DIGITAL MEDIA**

Use	Development (sf) <sup>a</sup>			Net New	Total Net (Existing + Net New)
	Existing	Demolition	New		
	Digital Media/Office	117,872	(87,788)		
Stage	155,480	(79,880)	20,000	(59,880)	95,600
Support	74,197	(68,625)	0	(68,625)	5,572
<b>Total</b>	<b>347,549</b>	<b>(236,293)</b>	<b>442,900<sup>b</sup></b>	<b>206,607</b>	<b>554,156</b>

<sup>a</sup> Excludes parking structure square footage.  
Source: ESA PCR, September 2017.

## Environmental Impacts

### Aesthetics

*Note: Under SB 743, as an infill project located within an urban transit priority area, the Project is not required to evaluate aesthetic impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to visual quality, views, light, glare, and shading.*

### Aesthetic Character

The impacts of this alternative would be similar to those of the Full Preservation Alternative, although there would be potential for somewhat greater impacts due to changes required to adapt Stages 2/3/4 and 7/8/9 for digital media/office use. Under Alternative 7, impacts on aesthetic character would be less than under the Project (no significance determination – informational item).

### Aesthetics Plan Consistency

The impacts of this alternative would be similar to those of the Full Preservation Alternative. Under Alternative 7, impacts on aesthetic plan consistency would be less than under the Project (no significant determination – informational item).

### Light/Glare

The impacts of this alternative would be similar to those of the Full Preservation Alternative. Under Alternative 7, impacts on light and glare would be less than under the Project (no significant determination – informational item).

### Shading

The impacts of this alternative would be the same as those of the Full Preservation Alternative. Under Alternative 7, impacts on shading associated with Building M would be avoided, and impacts would be less than under the Project (no significant determination, informational item).

## **Air Quality**

### **Construction Emissions**

Both the Full Adaptive Reuse Alternative and the Project would generate regional and localized construction emissions with the greatest level of construction emissions under both projects occurring during the demolition, excavation, foundations/concrete pouring phases. While the South Coast Air Basin is designated as non-attainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> under federal and/or state ambient air quality standards, construction activities associated with both projects would not exceed the applicable SCAQMD daily regional numeric thresholds for regional VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>, or localized numeric thresholds for concentrations of NO<sub>x</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub> and, as such, regional and localized construction emission impacts would be less than significant under both projects. However, as the Full Adaptive Reuse Alternative would include less demolition and construction activities than the Project, as this alternative would retain Stages 2/3/4 and 7/8/9 for digital media/office use rather than demolish these stages and construct Buildings K and M as proposed under the Project, construction emissions would be less under this alternative.

### **Operational Emissions**

Both the Full Adaptive Reuse Alternative and the Project would include new development and an expansion of existing operations at the Studio Campus that would generate operational air emissions. While the South Coast Air Basin is designated as non-attainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, neither project would generate a net increase in the emission of operational criteria and precursor pollutants (e.g., VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) that exceeds SCAQMD thresholds or NAAQS/CAAQS with implementation of the proposed PDFs (e.g., compliance with CALGreen Building Standards, consistency with LEED requirements, etc.). Therefore, operational air emissions impacts would be less than significant under both projects. As the Full Adaptive Reuse Alternative would include less development and thus generate less operational air emissions than the Project, operational emission impacts would be less under this alternative than under the Project.

### **Carbon Monoxide Hotspots**

As discussed in Section 4.2, Air Quality, the Project would not cause or contribute considerably to the formation of CO hotspots, CO concentrations at impacted intersections would remain well below the CAAQS one-hour and eight-hour CO standards, and no further CO analysis is warranted. Therefore, the Project would result in less than significant CO hotspot impacts. The Full Adaptive Reuse Alternative would include less development than the Project, including especially less digital media/office use which generates more operational traffic and thus greater operational air emissions (including less CO) than do studio stage and support uses. Therefore, similar to the Project, CO hotspot impacts would be less than significant under this alternative, and would be less than under the Project.

### **Toxic Air Contaminants**

Both the Full Adaptive Reuse Alternative and the Project would include studio uses rather than industrial, power plant, and other uses most often associated with TAC emissions. Furthermore, as discussed in Section 4.2, Air Quality, of this Draft EIR: the Project would not increase DPM above the SCAQMD threshold of 10 in one million at sensitive sites, including at nearby

residences and Linwood E. Howe Elementary School during either construction or operation; loading areas would be moved to the interior of the Project Site under the Project, thereby increasing separation distances from off-site sensitive receptors' and PDF-NOISE-9 would be implemented under the Project which would prohibit the idling of trucks within the loading areas and thus eliminate TAC emissions associated with idling trucks. For these same reasons, and because less development would occur under the Full Adaptive Reuse Alternative than under the Project, TACs impacts under this alternative would similarly be less than significant and less than under the Project.

### **AQMP Consistency**

Both the Full Adaptive Reuse Alternative and the Project would require an amendment to the Comprehensive Plan governing development at the Project Site in accordance with the Culver City "S" (Studio) zoning of the Project Site. However, both projects would be consistent with; the "S" zoning of the Project Site; SCAG's 2016 RTP/SCS policies for concentrating growth in proximity to transit; the control strategies in the AQMP; and the long-term employment projections upon which the AQMP is based. Also, neither project would increase or induce residential growth not otherwise anticipated in SCAG regional growth forecasts for Culver City. Lastly, the construction activities of both projects would be consistent with CARB requirements to minimize emissions from diesel equipment and SCAQMD Rule 403 regulations for controlling fugitive dust. Therefore, AQMP consistency impacts would be less than significant under both projects. However, as the Full Adaptive Reuse Alternative would include less development than the Project, and thus generate less population, traffic, and air emissions than the Project, AQMP consistency impacts would be less under this alternative.

### **Cultural Resources**

#### **Historical Resources**

As indicated previously, the Project Site contains multiple existing historical resources, including but not limited to: Buildings C (Mansion) and D which are designated by the City as Landmark structures and eligible for listing in the National and California Registers; the four existing bungalows (Buildings S, T, U, and V) which are designated by the City as Significant Structures and eligible for listing in the National and California Registers; and Stages 2/3/4 and 7/8/9 which appear eligible for listing in the National, California and Local Registers. Both the Full Adaptive Reuse Alternative and the Project would include demolition of several existing on-site buildings, the construction of several new on-site buildings, and the relocation of the bungalows. Both projects would result in less than significant indirect historical resources impacts (e.g., would not reduce or materially impair the integrity or significance of important historical resources in the project vicinity, and both would result in less than significant impacts to the bungalows with mitigation incorporated. However, while the Project would demolish and replace Stages 2/3/4 and 7/8/9 with new development, which would represent a significant unavoidable historical resources impact (even with incorporation of mitigation recommended to reduce this impact), the Full Adaptive Reuse Alternative would retain but adaptively reuse Stages 2/3/4 and 7/8/9 for digital media/office use, which would reduce and could avoid this impact (e.g. less than significant impact).

Under the Full Adaptive Reuse Alternative, Stages 2/3/4 and 7/8/9 would be upgraded and retrofitted to accommodate digital media use, requiring changes to both the interiors and exteriors of the buildings. The changes needed to alter these buildings from their current traditional stage use, to digital media space are expected to be extensive, as the space would need to support a wide range of entertainment activities, including a mix of creative space, production space, and digital media stages, with a higher proportion of office space than stage set area. Alterations that would be required are expected to include a substantial increase in openings for windows, doors, and skylights; structural changes to accommodate two levels of space, including foundation work; changes to accommodate vertical circulation (stairs and elevators) and meet accessibility requirements; seismic upgrades; HVAC upgrades; and utility and building/fire safety upgrades. Given the extent of these changes they might not be economically feasible. Furthermore, the extent of these changes would have adverse impacts on the stage buildings that could rise to the level of compromising their integrity and eligibility as historical resources. Early twentieth century sound stages were characterized by their large open interior spaces, sound proof walls, and lack of windows, reflecting the needs of film technology at the time. The changes caused by the Full Adaptive Reuse Alternative would alter important character defining features of Stages 2/3/4 and 7/8/9 and could cause them to no longer convey their significance as Sound Stages. However, historical resource impacts would be less than the Project which would remove Stages 2/3/4 and 7/8/9, and it is assumed that impacts under the Full Adaptive Reuse Alternative would be less than significant. This alternative would however result in a greater impact to historical resources than the Full Preservation Alternative (Alternative 4).

### **Archaeological/Tribal Resources**

No known archaeological resources (historic or prehistoric) have been recorded within or immediately adjacent to the Project Site according to an SLF database search conducted through the NAHC, and no known tribal cultural resources were identified within the Project Site or vicinity during the AB 52 Native American consultations. However, five prehistoric archaeological resources and one historic archaeological resource were noted within a one-half mile radius of the Project Site in the database survey. Both the Full Adaptive Reuse Alternative and the Project would include excavations and other ground disturbing activities that could potentially encounter buried archaeological resources. This would represent a less than significant impact with mitigation incorporated under both projects. However, the Full Adaptive Reuse Alternative would include less development and associated ground disturbing activities than the Project, and thus would have less of a potential to affect buried archaeological resources, if present.

### **Paleontological Resources**

No known paleontological resources have been recorded on or within the immediate vicinity of the Project Site. However, the Project Site is located within the western Los Angeles basin which is known to contain paleontological resources, and a Phase I Archaeological/ Paleontological Resources Survey determined that the Project Site is located with an area with medium sensitivity for paleontological resources. Both the Full Adaptive Reuse Alternative and the Project would include excavations into native soils that could potentially encounter buried paleontological resources, should such resources be present. This would represent a less than significant impact with mitigation incorporated under both projects. However, the Full Adaptive Reuse Alternative

would include less development and associated ground disturbing activities than the Project, and thus would have less of a potential to affect buried paleontological resources, if present.

## ***Geology and Soils***

### **Seismic Hazards**

The Project Site is not subject to fault rupture, and thus neither the Full Adaptive Reuse Alternative nor the Project would expose people or structures to a fault rupture hazard. However, the Project Site is subject to strong seismic ground shaking and liquefaction, and both the Full Adaptive Reuse Alternative and the Project would include new development that could expose people and structures to these hazards. While these hazards would be less than significant with mitigation incorporated under both projects, the Full Adaptive Reuse Alternative would include less development (especially less media/office development that has a higher employee per sf population than stages and support uses), and would expose fewer people to these hazards. On the other hand, this alternative would retain Stages 2/3/4 and 7/8/9 for digital media/office use which would otherwise be replaced with new buildings under the Project constructed to the latest building codes and that would potentially better able to withstand seismic groundshaking. Because of these competing factors, and because impacts would be less than significant with mitigation incorporated under both projects, the seismic hazards impacts of the Full Adaptive Reuse Alternative and the Project are considered here to be generally equivalent.

### **Geotechnical Hazards**

The Project Site is subject to potential subsidence, collapse, lateral spreading, and liquefaction, and both the Full Adaptive Reuse Alternative and the Project would include new development that could expose people and structures to these hazards. While compliance with existing regulations (CBC, etc.) would avoid substantial subsidence and collapse hazards, and while the lateral spreading and liquefaction impacts would be less than significant with mitigation incorporated under both Projects, the Full Adaptive Reuse Alternative would include less development and expose fewer people to these hazards. On the other hand, this alternative would retain Stages 2/3/4 and 7/8/9 for digital media/office use which would otherwise be replaced with new buildings under the Project constructed to the latest building codes that would potentially better able to withstand geotechnical hazards. Because of these competing factors, and because impacts would be less than significant with mitigation incorporated under both projects, the geotechnical hazards impacts of the Full Adaptive Reuse Alternative and the Project are considered here to be generally equivalent.

### **Soils/Erosion**

The Project Site does not have corrosive soils. Therefore, neither the Full Adaptive Reuse Alternative nor the Project would expose structures to potential damage from corrosive soils. However, the Project Site is subject to expansive soils and soil erosion. Both the Full Adaptive Reuse Alternative and the Project would include ground-disturbing activities during construction that could result in soil erosion, and would include new development that could expose people and structures to an expansive soils hazard. Compliance with existing regulations (for example, CBC, SCAQMD Rule 403, and SWPPP requirements) would substantially reduce the potential for expansive soils and soil erosion under both projects, and any residual impacts would be less than significant with mitigation incorporated. While the Full Adaptive Reuse Alternative would

include less development and fewer people than the Project and thus expose less development and fewer people to any residual expansive soils hazards that may remain after mitigation, it would retain the stages for digital media uses which would be replaced with new buildings constructed to the latest building codes that would potentially better be able to withstand expansive soils. On the other hand, this alternative would include less development and grading activities and expose less soil during construction, thereby potentially resulting in less erosion potential during the construction period. Because of these competing factors, and because impacts would be less than significant with mitigation incorporated under both projects with compliance with existing regulations, the soil/erosion impacts of the Full Adaptive Reuse Alternative and the Project are considered here to be generally equivalent.

## **Greenhouse Gas Emissions**

### **GHG Emissions**

Both the Full Adaptive Reuse Alternative and the Project would include the construction and operation of new studio uses that would generate GHG emissions. The Project would generate a net increase of 7,464 metric tons of CO<sub>2</sub>e per year (includes both operational GHG emissions and construction GHG emissions amortized over the 30-year life of the Project). The Full Adaptive Reuse Alternative would be expected to generate somewhat less GHG emissions than the Project given that less development would occur under this alternative. Both projects would be consistent with relevant goals and actions to reduce Project emissions as much as feasibly possible, as well as consistent with the HSC Division 25.5 goals and CARB guidelines for assessing GHG emissions. Project operational emissions would also represent a 25.7 percent reduction as compared to business as usual (BAU) due to the infill nature of the Project, access to nearby transit, and the proposed green and GHG-reducing PDFs, and the Full Adaptive Reuse Alternative would be expected to have a similar BAU reduction for the same reasons. Hence, GHG emissions impacts would be less than significant under both projects. However, as the Full Adaptive Reuse Alternative would include less development and generate less construction- and operations-related GHG emissions than the Project, GHG emissions impacts would be less under this alternative.

### **GHG Plan Consistency**

Both the Full Adaptive Reuse Alternative and the Project would comply with the City's Green Building Code and Solar Photovoltaic requirements, LEED certification standards, and the CALGreen Code, to reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. These measures are consistent with the City's GHG reduction strategies for sustainability and smart-growth goals of improving energy and water efficiency in buildings, decreasing per-capita water use, and using energy efficient appliances and equipment. Both projects would also be consistent with Executive Orders S-3-05 and B-30-15 to reduce GHG emissions. As both projects would be consistency with applicable GHG plans, both projects would result in less than significant GHG Plan consistency impacts, and the GHG plan consistency impacts of the two projects would be generally equivalent.

## **Hazards and Hazardous Materials**

### **Hazardous Materials Management**

Both the Full Adaptive Reuse Alternative and the Project would include the demolition of several existing on-site buildings, and both the construction and operation of additional studio uses, with routine transport, use, storage and disposal of hazardous materials associated with each of these activities. Because hazardous materials management under both projects would occur in accordance with applicable regulations (Cal-OSHA, CFR Section 1910, CCR Title 8, CUPA, etc.) which have been formulated to provide for the safe use of these materials, the hazardous materials management impacts of both projects would be less than significant. Furthermore, less hazardous materials would be expected to be used during operation of the Studio under both projects than currently occurs at the Project Site due to the transition under both projects to modern digital production methods in place of physical set construction. Still, because the Full Adaptive Reuse Alternative would include less net new development than the Project, on-site hazardous materials use and thus potential hazardous materials management impacts would be less under this alternative.

### **Upset/Accident Conditions and Hazardous Materials Database Listings**

According to the Phase I/II ESA prepared for the Project Site in 2013 by GRS Group, the Project Site is listed in 10 regulatory agency hazardous materials databases; however, none of these listings represent RECs at the Project Site.<sup>43</sup> Therefore, neither the Full Adaptive Reuse Alternative nor the Project would result in upset/accident conditions involving listed hazardous materials sites.

Due to the age of the on-site buildings, the majority of the on-site buildings may contain ACM and/or LBP. Furthermore, although not referenced in the Phase I ESA, public concern was expressed during the CEQA review and approval process for CPA No. 6 regarding vectors (e.g., specifically rodents) at the Project Site. Both projects would include the demolition and relocation of multiple existing on-site buildings which may contain ACMs and/or LBPs, and would include both demolition and construction activities which could potentially result in vector issues. However, ACM and LBP impacts would be less than significant under both projects with adherence to applicable regulations (e.g., SCAQMD Rule 1403, Cal/OSHA, DTSC, Culver City Building Code, ACM and LBP O&M Program, etc.) for the proper identification, remediation, removal and disposal of ACM and LBP, while vector impacts would be less than significant under both projects with implementation of a vector/pest control abatement plan.

Lastly, the groundwater underlying the Project Site was previously documented with concentrations of dichloroethane and trichloroethane above applicable action levels such that the LACDPW has required that groundwater from ongoing dewatering operations at the Project Site be treated. It is anticipated that dewatering would be required for the additional subterranean structures proposed under both the Full Adaptive Reuse Alternative and the Project. However, with implementation of PDF-HAZ-2 requiring that any additional dewatered groundwater be treated, and PDF-WW-1 requiring that any additional treated dewatered groundwater be used as

<sup>43</sup> Global Realty Services Group, Phase I Environmental Site Assessment - Culver City Studios, December 16, 2013.

on-site landscape irrigation, the groundwater contamination impact under both projects would be less than significant.

Because the Full Adaptive Reuse Alternative would include less demolition and construction activities than the Project, it would have less of a potential to disturb any undocumented hazardous materials (including ACMs and LBPs) that may occur at the Project Site and/or in existing on-site buildings. Therefore, upset/accident condition and hazardous materials database listing impacts would be less under this alternative than under the Project.

### **Hazardous Emissions Near Schools**

There are two schools located within a one-quarter mile radius of the Project Site: Lynwood Howe Elementary School, at 4100 Irving Place, approximately 60 feet west (across Van Buren Place); and Park Century School, at 3939 Landmark Street, approximately 0.25 miles to the northeast. Both the Full Adaptive Reuse Alternative and the Project would include the demolition of buildings that may contain ACM and/or LBP, and the use of hazardous materials during construction and operation typical of construction and studio production activities, and these could potentially result in hazardous materials emissions within one-quarter mile of a school. However, ACM and LBP identification and removal would occur in accordance with applicable regulations (e.g., SCAQMD Rule 1403, etc.), while the use of hazardous materials during construction and operation would occur in accordance with both applicable regulations and manufacturer instruction, and these regulations and instructions have been formulated to ensure the safe removal of ACM and LBP and the safe use of hazardous materials. Furthermore, according to the refined Health Risk Assessment (HRA) performed in support of the toxic air contaminants (TACs) analysis in Section 4.2, Air Quality, of this Draft EIR, Project construction activities would not generate DPM or other TAC emissions that would result in significant health effects to nearby sensitive receptors (including to the students at the two schools). It can be reasonably assumed that this conclusion applies to the Full Adaptive Reuse Alternative as well. Therefore, hazardous emissions impacts would be less than significant under both projects. Still, because the Full Adaptive Reuse Alternative would demolish fewer on-site buildings which may contain ACM/LBP, and result in less construction and operational activities and thus less construction and operational emissions than the Project, hazardous emissions impacts would be less under this alternative.

### **Emergency Response Plan Consistency**

Both the Full Adaptive Reuse Alternative and the Project would include construction activities which would generate temporary construction traffic and potentially require temporary lane closures along surrounding streets, including potentially along Ince, Washington and/or Culver Boulevards which are of secondary arterial status or higher and thus may act as evacuation routes during an emergency. However, the generation of construction traffic would be offset by the elimination of operational studio traffic during the construction period, no streets would be fully closed during the construction period, and a Construction Management Plan would be implemented during construction by both projects (under PDF-TRAF-1) to, among other things, ensure that emergency access is maintained during construction. During operation, neither project would include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemical plant) or include the closure of public streets. Furthermore, while

operations under both projects would generate increased traffic along the aforementioned streets which could potentially slow emergency response: (1) the streets would still be available for emergency response; (2) multiple alternative routes are available to emergency vehicles; and (3) no policy or procedural changes would be required to an existing risk management plan, emergency response plan, or evacuation plan. Lastly, during an unanticipated disaster event, the City would implement operational plans, programs and protocols to facilitate emergency response and/or evacuation, which would consider traffic conditions at the time of the emergency, and in such instances, traffic would be routed along the City's numerous disaster routes, as determined appropriate, by the applicable responding City agencies to maximize effectiveness. Thus, construction and operational impacts on emergency response plan consistency would be less than significant under both projects. Still, because the Full Adaptive Reuse Alternative would result in less development and thus less construction- and operations-related traffic than the Project, and because this alternative would generate a smaller on-site population potentially requiring evacuation during an emergency, emergency response plan consistency impacts would be less under this alternative.

## ***Hydrology and Water Quality***

### **Hydrology (Drainage)**

Neither the Full Adaptive Reuse Alternative nor the Project would change the course of a stream or river, or increase the rate or amount of surface runoff from the Project Site in a manner, that could lead to flooding. Both projects would include construction activities that could temporarily alter drainage conditions at the Project Site, but these construction activities would be subject to NPDES, SWPPP and City grading permit requirements which require that stormwater runoff during construction be controlled and routed to avoid flooding (a less than significant impact). The Project would increase on-site impervious surfaces to approximately 90 percent of the Project Site which would increase stormwater runoff, but the Project would include 13 on-site EPIC stormwater treatment areas totaling 0.56 acres (under PDF-H/WQ-1) to retain the SWQDv on-site through capture and reuse such that existing peak stormwater runoff flows from the Project Site would decrease to 17.44 cfs, and this runoff would be safely conveyed to the off-site storm drain in Ince Boulevard via existing and proposed new on-site storm drains approved by the City. This would result in a net benefit to the conveyance capacity of the Ince storm drain, a less than significant impact.<sup>44</sup> It can be reasonably assumed that the Full Adaptive Reuse Alternative would result in a similar percentage of the Project Site in impervious surfaces and generate a similar decrease in stormwater discharges from the Project with implementation of PDF-H/WQ-1, and would similarly result in a beneficial and less than significant impact. Both projects would result in a similar amount of stormwater runoff, would handle this runoff in the same fashion, and would have similar less than significant hydrology impacts. Therefore, hydrology impacts would be generally equivalent between the two projects.

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<sup>44</sup> While the hydrology (drainage) and water quality impacts of the Project are identified as "less than significant" in this EIR, the Project would result in beneficial impacts in both categories. Beneficial impacts are not identified as a significance conclusion in this EIR consistency with the Appendix G (CEQA Checklist) which includes no such category.

## Surface Water Quality

Both the Full Adaptive Reuse Alternative and the Project would include construction activities that could result in sediment and pollutant loading of stormwater runoff from the Project Site, but would implement the required SWPPP, SUSMP and Wet Weather Erosion Control Plan to minimize such loading such that the impact would be less than significant. Both projects would also include new on-site development that would increase operational activities at the Project Site which could introduce pollutants, such as nutrients, pesticides, organic compounds, sediments, oil and grease, suspended solids, metals, gasoline, pathogens, trash, and debris into stormwater runoff from the site, and in turn drain to the municipal storm drain system and ultimately to protected receiving waters. However, both projects would implement the required SUSMP and LID measures throughout their operational lives to comply with the Upper Los Angeles Watershed EWMP, MS4 Permit, LID Ordinance, and other applicable plans and regulations to, among other things, help achieve the TMDLs for the Ballona Creek Estuary, Dockweiler Beach, and Santa Monica Bay, and both projects would provide the 13 on-site EPIC stormwater treatment areas under PDF-H/WQ-1 to retain the SWQDv on-site through capture and reuse. Therefore, surface water quality impacts would be beneficial and less than significant under both projects.<sup>45</sup> Furthermore, while the Full Adaptive Reuse Alternative would include less development, generate less traffic, and thus potentially generate less pollutants in stormwater runoff from the Project Site than the Project, most vehicular circulation and parking at the Project Site would be undergrounded and away from the elements such that associated pollutants would likely not be washed into receiving water by stormwater runoff. Based on the above, surface water quality impacts would be generally equivalent between the two projects.

## Land Use and Planning

Both the Full Adaptive Reuse Alternative and the Project would include the construction and operation of additional on-site studio development, with a net increase of 206,607 sf under this alternative and 413,127 sf under the Project (not including parking structures). Under, both projects, a new CPA (CPA No. 7) would be approved for the Project Site superseding all previous CPAs for the site. According to Section 4.8, Land Use and Planning, of this Draft EIR:

*CPA No. 7 would incorporate Development Standards to ensure that the proposed New Digital Media buildings, stages, and support uses are in compliance with Section 17.250.15 (Studio (S) District Requirements), which establishes permitted uses and height limits within the S Zoning District. The Development Standards allow for modifications to respond to market conditions and tenant needs provided that the total amount of new building area does not exceed 413,127 sf, parking is provided in accordance with the requirements of the Culver City Municipal Code, and the total amount of traffic generated by the Project does not exceed the total amount projected in the Final EIR. (See Section 4.11, Transportation and Traffic, for a description of Project-generated traffic.) CPA No. 7 includes comprehensive development standards regarding the architecture of the new buildings, access and circulation, parking, landscaping,*

<sup>45</sup> While the hydrology (drainage) and water quality impacts of the Project are identified as “less than significant” in this EIR, the Project would result in beneficial impacts in both categories. Beneficial impacts are not identified as a significance conclusion in this EIR consistency with the Appendix G (CEQA Checklist) which includes no such category.

*setbacks, fencing, and infrastructure, and sustainability. These standards would ensure comprehensive development of the Studio Campus, while permitting the technological updated and expansion of its facilities within the existing Studio Campus footprint.*

With the approval of CPA No. 7 (with CPA No. 7 being modified, as required, for the Full Adaptive Reuse Alternative), both projects would be consistent with applicable land use plans, policies, guidance, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Therefore, both projects would result in less than significant land use and planning impacts, and as both projects would be consistent with applicable land use plans, land use planning impacts would be generally equivalent between the two alternatives.

## **Noise**

### **Construction Noise**

Both the Full Adaptive Reuse Alternative and the Project would include construction activities that would generate associated construction noise. Both projects would increase noise levels at existing off-site noise-sensitive receptors in the Project area in excess of the applicable thresholds. However, construction activities would be restricted to the times of day when construction activities may occur (generally, daytime hours) as prescribed in Chapter 9.07 of the CCMC. Furthermore, this increase in construction noise during the times of day when construction may occur would be less than significant under both project with adherence to the City's standard conditions of approval (e.g., use of muffling in construction equipment, etc.) and implementation of both the mitigation measures and PDFs identified in Section 4.9, Noise, of this Draft EIR. Both projects would also include off-site construction traffic during the construction period which would increase noise levels at noise-sensitive uses along the proposed construction haul route, but this noise would similarly be restricted to the hours prescribed by the CCMC, and would not increase by the barely perceivable level of 3 dBA or more, such that the off-site construction noise impacts under both projects would also be less than significant. However, because the Full Adaptive Reuse Alternative would include less net new development (206,607 sf) than the Project (413,127 sf), and would avoid the demolition of Stages 2/3/4 and 7/8/9 that would occur under the Project, less construction activities and therefore less construction noise would be generated under this alternative.

### **Operational Noise**

The Full Adaptive Reuse Alternative and the Project would each increase operational traffic noise at off-site noise-sensitive uses in the Project area. This traffic noise would be below both the perceivable level of 3 dBA and the threshold under the Project, and because the Full Historic Preservation Alternative would include less net new development (206,607 sf) than the Project (413,127 sf), this alternative would generate less traffic and thus less traffic noise than the Project. Therefore, operational traffic noise impacts under both projects would be less than significant. Both projects would also increase operational stationary source noise at the off-site noise-sensitive associated with fixed mechanical equipment, human activity in open space areas (including special events), parking structures, and loading docks. Under both project, this noise, when taken both individually and in composite (e.g., as a combination of the traffic and stationary noise sources) would also be less than significant with implementation of the PDFs proposed in

Section 4.9, Noise, of this Draft EIR. While operational noise would be less than significant under both projects, such noise would be less under the Full Adaptive Reuse Alternative owing to less net new development and associated traffic under this alternative.

### **Construction Vibration**

Neither the Full Adaptive Reuse Alternative nor the Project would include high-impact construction activities (e.g., pile driving, blasting, etc.) that could generate high levels of ground-borne vibration. However, both projects would include other construction activities, specifically the operation of heavy construction equipment of 600 horsepower or more, that could generate lower-intensity short-term ground-borne vibration. Under the Project, construction-related vibration levels above applicable thresholds could occur at on-site historic buildings within 20 ft of such activities and at off-site residential uses within 45 ft of such activities, even with adherence to the City's limitations concerning when construction activities. However, any such vibration impacts would be less than significant with implementation of the mitigation prescribed in Section 4.9, Noise, of this Draft EIR.<sup>46</sup> Because the Full Adaptive Reuse Alternative would include less net new development (206,607 sf) than the Project (413,127 sf), less construction-related vibration would be expected under this alternative, and it can thus be assumed that with implementation of the mitigation prescribed for the Project, construction vibration impacts would similarly be less than significant under this alternative. While construction-related vibration would be less than significant under both projects with mitigation incorporated, such impacts would be less under the Full Adaptive Reuse Alternative owing to less new development under this alternative.

### **Operational Vibration**

Both the Full Adaptive Reuse Alternative and the Project would include increase operations, including operational activities often associated with ground-born vibration (e.g., traffic and the operation of commercial-grade stationary equipment such as HVACs, condenser units and exhaust fans). These would generate ground-borne vibration below the significance threshold for perceptibility under both projects, and thus the impact would be less than significant. However, operational vibration impacts would be less under the Full Adaptive Reuse Alternative owing to less new net development and thus traffic and stationary equipment under this alternative.

## **Public Services**

### **Fire Protection**

During construction, the Full Adaptive Reuse Alternative and the Project could result in occasional exposure of combustible materials that would temporarily obstruct emergency access and increase the demand for fire protection and emergency medical services. During operation, both projects would increase traffic on surrounding roadways and increases in on-site studio operations and employees which could slow emergency response times and increase the demand for fire protection/EMS service and fire flow. As discussed in Section 4.10.1, Fire Protection, with adherence to CBC and City Fire Code requirements covering building design, fire safety features, emergency safety provisions, CCFD access, construction measures, fire flow, and site plan review, and with implementation of the proposed PDFs (e.g., Construction Management

<sup>46</sup> Linwood E. Howe Elementary School is located too far away from the Project Site to be significant impacted.

Plan, use of fire proof/retardant materials, sprinklering of buildings, etc.), Project construction and operation would not require new or expanded fire protection facilities, and impacts would be less than significant under both projects. Because the Full Adaptive Reuse Alternative would include less development than the Project and be required to adhere to the same regulatory requirements as the Project, the impacts of this alternative would similarly be less than significant. Fire protection impacts would be less under the Full Adaptive Reuse Alternative owing to less new net new development, traffic, and service demand under this alternative.

### **Police Protection**

Both the Full Adaptive Reuse Alternative and the Project would include construction and increased operational activities. During construction, both projects could temporarily: expose the construction site to trespassing, theft, vandalism and graffiti which would increase service demand; block emergency access; and generate construction traffic and/or temporarily close travel lanes that slows emergency response. During operation, both projects would increase in on-site studio operations, employees and traffic, and could increase in on-site special events, which could increase service demand and slow emergency response. However, as discussed in Section 4.10.2, Police Protection, CCPD's police station is located only 2½ blocks south of the Project Site, and with adherence to CBC and CCMC requirements (covering building design, security provisions, CCPD access, etc.) and implementation of the proposed PDFs (e.g., construction fencing, Construction Management Plan, security lighting, provision of private on-site security personnel, etc.), Project construction and operation would not require new or expanded police protection facilities. Therefore, the impact would be less than significant. Because the Full Adaptive Reuse Alternative would be required to adhere to the same regulatory requirements as, and would include less development and therefore generate less traffic and service demand than, the Project, it too would result in a less than significant impact with implementation of the PDFs. However, because the Full Adaptive Reuse Alternative would include less net new development and associated employee population requiring police protection than the Project, police protection impacts would be less under this alternative.

### ***Transportation and Circulation***

#### **Construction Traffic/Parking**

Both the Full Adaptive Reuse Alternative and the Project would include construction activity that would generate truck/construction worker traffic and associated traffic congestion, construction worker parking demand, and potentially lane closures and reductions in access, during the construction period. However, with implementation of the mitigation specified in Section 4.11, Transportation and Traffic (e.g. restricting construction truck staging on-site or within reserved off-site lots, provision of flagmen, restricting deliveries/picks-ups and lane closures to off-peak hours, preserving emergency access, etc.) and the proposed PDFs (e.g., Construction Management Plan, provision of construction worker parking on-site or in reserved off-site lots, etc.), Project construction traffic/parking impacts would be less than significant with mitigation incorporated, with the exception of construction-related intersection level of service impacts which would be significant unavoidable. The Full Adaptive Reuse Alternative would include less net new development (206,607 sf) than the Project (413,127 sf), and thus would be expected to generate less construction traffic and construction parking demand than the Project, with the impact similarly less than significant with implementation of the specified mitigation and PDFs,

with the exception of construction-related intersection level of service impacts which would be significant unavoidable. However, because the Full Adaptive Reuse Alternative would include less net new development and thus generate less construction traffic and parking demand than the Project, construction traffic/parking impacts would be less under this alternative.

### **Intersection Service Levels**

The Project would include approximately 413,127 net sf of new development at the Project Site (not including parking structures) that would generate associated operational traffic. Although this traffic would not result in the exceedance of signal warrants at the two unsignalized intersections analyzed, it would result in significant unavoidable intersection level of service impacts at eight intersections under Future (2021) With Project Conditions (10 if optional Mitigation Measures TRAF-9 and TRAF-10 were implemented. Under the Full Adaptive Reuse Alternative, less net new development (206,607 sf) would be developed at the Project Site than under the Project. As a result, trip generation would be reduced by 191 vehicles in the AM peak hour and 184 vehicles in the AM peak from those that would be generated under the Project. The resulting reduced trip generation would result in significant unavoidable intersection level of service impacts at the following three of eight intersections significantly and unavoidably impacted under the Project (see Appendix E of the Traffic Study):

- 13. Robertson Blvd/Exposition Blvd & Venice Blvd
- 33. Overland Ave/Venice Blvd
- 38. Robertson Blvd/National Blvd

If optional Mitigation Measures TRAF-9 and TRAF-10 were implemented, it is possible, but unlikely due to less traffic under this alternative, that five instead of three intersections could be significantly and unavoidably impacted under this alternative (see the list of significant unavoidable impacts at the beginning of this chapter for listing of the potential additional intersections that could be impacted).

Furthermore, it can be reasonably assumed that this alternate, like the Project, would not exceed signal warrants. Therefore, while this alternative would result in significant unavoidable intersection level of service impacts at three intersections, impacts would be less under this alternative than under the Project.

### **Intersection Queuing**

Both the Full Adaptive Reuse Alternative and the Project would generate traffic and associated intersection queuing distance impacts. As indicated in Section 4.11, Transportation and Traffic, of this Draft EIR, the Project would result in significant queuing impacts at two intersections (with mitigation not specified because, per the MOU, the intersection queuing distance analysis in the Draft EIR is provided for information purposes only, and these inadequacies would not necessarily be caused by the Project alone). Under the Full Adaptive Reuse Alternative, less net new development (206,607 sf) would be developed at the Project Site than under the Project such that it can be reasonably assumed that, while this alternative would potentially result in significant intersection queuing distance impacts at the same two intersections as the Project,

these impacts would likely be less than under the Project owing to the reduced amount of net new development and associated operational traffic under this alternative.

### **Public Transit**

Both the Full Adaptive Reuse Alternative and the Project would generate a demand for public transit. According to the analysis in Section 4.11, Transportation and Traffic, of this Draft EIR, the Project would generate an increase in transit demand of 121 persons during the weekday AM peak hour and 116 during the weekday PM peak hour, or approximately 2.8 percent of the combined capacity of the transit lines, but that it is anticipated that adequate capacity exists in the public transit system to serve the Project. Because the Full Adaptive Reuse Alternative would include less net new development (206,607 sf) than the Project, this alternative would generate less transit demand than the Project such that adequate transit capacity would similarly be available to serve this alternative. Furthermore, both projects would be consistent with applicable plans, policies and programs supporting alternative transportation by representing infill development, concentrating development along established transit routes and bikeways, implementing TDM measures (required for the alternative by conditions of approval and for the Project by mitigation), providing on-site bicycle facilities, etc. Therefore, public transit impacts would be less than significant under both projects. Still, as the Full Adaptive Reuse Alternative would result in less net new development and thus less transit demand than the Project, public transit impacts would be less under this alternative.

### **Access and Circulation**

Both the Full Adaptive Reuse Alternative and the Project would include vehicular access via studio gates along Ince and Washington Boulevards, increase the number of gate entries, and include a Culver/Main Tunnel connection from Culver Boulevard to the Rear Lawn Parking Structure. All gates, driveways, on-site roadways, sidewalks, etc. under both projects would be designed and constructed in accordance with Culver City standards and would be reviewed and approved by the City during the Site Plan Review process to provide safe travel (including pedestrian travel by school children), required emergency access, and avoid impedance of traffic movements on City streets. Also, both projects would be developed along existing pedestrian routes and bicycle paths, both would include on-site bicycle parking, both would largely maintain the existing network of off-site roadways, travel lanes, public sidewalks and pedestrian crosswalks, both would avoid the need to removal or relocate existing bus stops, and both would avoid substantial neighborhood cut-through traffic. Furthermore, both projects would include several features to improve pedestrian and bicycle safety, including providing the Culver/Main Tunnel Connection and restricting the Studio entry along Washington Boulevard to pedestrian/bicycle traffic, both of which would help separate vehicular and pedestrian/bicycle traffic and improve pedestrian/bicycle safety. Therefore, both projects result in less than significant access and circulation impacts, with the level of impact generally equivalent between the two projects.

### **Parking**

*Note: Under SB 743, as an infill project located within an urban transit priority area, the Project is not required to evaluate parking impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to parking.*

The Full Adaptive Reuse Alternative and the Project would result in net increases in studio development at the Project Site of 206,607 sf and 413,127 sf, respectively, which would generate a demand for parking. As indicated in Section 4.11, Transportation and Traffic, of this Draft EIR, the Project would provide a total of 2,370 on-site vehicle parking spaces versus the number required by the CCMC of 1,960 spaces. Thus, the Project would provide more than the number of vehicle parking spaces required to meet Code. Similarly, while the Full Adaptive Reuse Alternative would include less net new development and thus generate less demand for parking than the Project, it too would meet or exceed CCMC parking space requirements. Furthermore, both projects would provide the number of on-site bicycle parking spaces required by Code. As both projects would provide the required number of parking spaces to meet Code, parking impacts would be generally equivalent between the two projects.

### ***Utilities and Service Systems***

#### **Wastewater**

Both the Full Adaptive Reuse Alternative and the Project would include additional development at the Project Site and generate additional wastewater requiring collection and conveyance by the local sewer system. The Project would include a net increase in on-site studio development of 413,127 sf which would generate wastewater requiring collection and conveyance by the existing 8- to 10-inch Ince and 6-inch Western sewer mains. This increase would exceed the half flow capacity of the Ince sewer main during operation, resulting in a less than significant impact with mitigation incorporated (the mitigation being upsizing of the Ince sewer main from 10 to 12 inches between Hubbard St. Lucerne Ave.). The Full Adaptive Reuse Alternative, by comparison, would include a net increase in on-site studio development of 206,607 sf which would generate less sewage and therefore less demand for off-site sewer collection and conveyance capacity than the Project. Therefore, wastewater collection and conveyance impacts under this alternative would similarly be less than significant with mitigation incorporated. As the Full Adaptive Reuse Alternative would generate less sewage, wastewater collection and conveyance impacts would be less under this alternative than under the Project (including, potentially, avoiding the need to upsize the Ince sewer main).

With respect to wastewater treatment, both projects would generate additional wastewater requiring treatment at the HTP. The existing treatment capacity of HTP) is 450 million gpd, with the remaining available treatment capacity in 2020 projected to be 15 million gpd. Because the wastewater generated by the Project would represent only about 0.6 percent of the HTP's projected remaining available treatment capacity in 2020, the HTP would have adequate treatment capacity to serve the Project. Similarly, because the Full Adaptive Reuse Alternative would generate even less wastewater than the Project, owing to the smaller net increase in development under this alternative, the HTP would also have adequate treatment capacity to serve the Full Adaptive Reuse Alternative. Thus, wastewater treatment capacity impacts would be less than significant under both projects. As the Full Adaptive Reuse Alternative would generate less wastewater and require less treatment capacity at the HTP than the Project, wastewater treatment capacity impacts would be less under this alternative.

## Water

The Full Adaptive Reuse Alternative and the Project would each increase domestic and fire flow water demand at the Project Site compared to existing conditions and result in an associated increase in demand for water infrastructure conveyance capacity. According to the Water Infrastructure and Demand Analysis prepared for the Project, the water mains in the surrounding streets (e.g., 12-inch mains in Ince and Washington Boulevards, and an 8-inch main in Van Buren Pl.) have adequate domestic and fire flow capacity to serve the Project.<sup>47</sup> Given this, and with development of the proposed on-site water line improvements, compliance with applicable domestic water/fire flow requirements, and implementation of the proposed water conservation and fire protection infrastructure PDFs, the water conveyance infrastructure impacts of the Project would be less than significant. The same would be true of the Full Adaptive Reuse Alternative which would be subject to the same requirements and implement the same improvements and PDFs as the Project, but would include less development (e.g., 206,607 sf vs. 413,127 sf under the Project) and thus generate less water demand than the Project. Because the Full Adaptive Reuse Alternative would generate less water demand than the Project, water conveyance infrastructure impacts would be less under this alternative.

With respect to water supply, both projects would include new development and increase the on-site demand for domestic water from GSWC. According to the WSA for the Project, the Project would not add any increments of demand in excess of those that were anticipated at the time the 2015 UWMP was published.<sup>48</sup> In addition, the Project would comply with State Title 24 and 20 water efficiency standards, and PDFs are proposed to provide for additional water conservation. As such, the Project's water demand would fall within the GSWC's projected increases in Citywide water demands through at least 2040, sufficient water supplies would be available to serve the Project, and the water demand and supply impact of the Project would be less than significant. Similarly, because the Full Adaptive Reuse Alternative would include less development and thus less water demand than the Project, the GSWC would also have adequate water supplies to serve the Full Adaptive Reuse Alternative. Thus, water demand and supply impacts would be less than significant under both projects, with water supply impacts being less under the Full Adaptive Reuse Alternative owing to less water demand under this alternative.

## Solid Waste

Under both the Full Adaptive Reuse Alternative and the Project, construction activities would generate non-hazardous construction/demolition debris and excavated soil requiring disposal at C&D landfills, while increased operational activities would generate non-hazardous municipal solid waste requiring disposal at Class III landfills. Both projects would be subject to the waste diversion and recycling requirements of AB 939, AB 341 and other application regulations (including diverting at least 65 percent of C&D waste and 50 percent of Class III solid waste by 2020, and diverting at least 75 percent of both C&D and Class III solid waste thereafter), and both would implement proposed PDFs designed to reduce solid waste generation (e.g., LEED certification, implement a Demolition Debris Recycling Plan for Construction, etc.). Furthermore, as adequate capacity exists at the applicable Los Angeles County and Ventura County C&D and

<sup>47</sup> Water Infrastructure and Demand Analysis for the Culver Studios Innovation Plan, KPFF, June 2017.

<sup>48</sup> Golden State Water Company, Water Supply Assessment for Culver Studios Innovation Plan, April 26, 2017, page 11, include in Appendix M-1 of this EIR.

Class III landfills to serve the construction and operational waste disposal needs of the Project, adequate capacity would also exist to serve the Full Adaptive Reuse Alternative which would include less development and thus generate less construction- and operations-related solid waste than the Project. Thus, the solid waste impacts of both projects would be less than significant, with the solid waste impacts of this alternative being less than under the Project.

### **Relationship of the Alternative to Project Objectives**

The Full Adaptive Reuse Alternative would retain Stages 2/3/4 and 7/8/9 for digital media/office use instead of replacing these stages with a greater amount of new digital media/office space as proposed under the Project. The Full Adaptive Reuse Alternative would achieve some of the Project objectives, including: upgrading and rehabilitating the Mansion in a manner that protects its eligibility as a historical resource; reducing production vehicle use of directly adjacent streets; providing improved access; and providing inviting/collaborative landscaped open areas. However, because this alternative would not include nearly as much new digital media/office space as the Project, it would not fully achieve other Project objectives including: creating start-of-the-art studio facilities to ensure the Studio's competitiveness and continued position at the cutting edge of innovation essential to the invention and production of entertainment; fostering content creation, digital media, creative technologies and virtual reality; promoting environmental sustainability through updated and expanded facilities to reduce vehicle trips; supporting the continued economic viability of the Studio and its ability to respond to changing industry needs; and providing a Studio Campus which meets Green Building Program requirements.

## 5.6.8 Alternative 8: Adaptive Reuse – Retain Stages 2/3/4 for Digital media

### **Description of the Alternative**

Under Alternative 8, Stages 2/3/4 (32,400 sf) would be adaptively reused to balance historic preservation with the need for efficient digital media production space. Proposed Building K (170,800 sf), all of which would be digital media space under the Project, would not be constructed. Although Stages 2/3/4 would provide 32,400 sf of digital media space, this is a net reduction of 138,400 sf of digital media space compared to what would be provided with the development of Building K under the proposed Project. Other than these changes and associated reductions in parking spaces, other aspects of the Project would not change. **Table 5-10, *Alternative 8: Adaptive Reuse – Retain Stages 2/3/4 for Digital Media***, provides a development summary for this alternative.

**TABLE 5-10**  
**ALTERNATIVE 8: ADAPTIVE REUSE – RETAIN STAGES 2/3/4 FOR DIGITAL MEDIA**

Use	Development (sf) <sup>a</sup>			Net New	Total Net (Existing + Net New)
	Existing	Demolition	New		
Digital Media/Office	117,872	(87,788)	471,020	383,232	501,104
Stage	155,480	(47,480)	7,600	(39,880)	115,600
Support	74,197	(68,625)	0	(68,625)	5,572
<b>Total</b>	<b>347,549</b>	<b>(203,893)</b>	<b>478,620</b>	<b>274,727</b>	<b>622,276</b>

<sup>a</sup> Excludes parking structure square footage.

Source: ESA PCR, September 2017

## Environmental Impacts

### ***Aesthetics***

*Note: Under SB 743, as an infill project located within an urban transit priority area, the Project is not required to evaluate aesthetic impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to visual quality, views, light, glare, and shading.*

### **Aesthetic Character**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in less impact than the Project (no significance determination – informational item).

### **Aesthetics Plan Consistency**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), impacts would be less than significant and generally equivalent to the Project. This alternative would result in an equivalent impact to the Project (no significance determination – informational item).

### **Light/Glare**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in less impact than the Project (no significance determination – informational item).

### **Shading**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in less impact than the Project (no significance determination – informational item).

## ***Air Quality***

### **Construction Emissions**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), although there would be somewhat more construction emissions associated with adaptive reuse rather than preservation of the Sound Stages. This alternative would result in a less than significant impact, and less impact than the Project.

### **Operational Emissions**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), although there would be somewhat greater emissions due to a comparative increase in digital media space and associated mobile source emissions. This alternative would result in a less than significant impact, and less impact than the Project.

### **Carbon Monoxide Hotspots**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), except there would be somewhat greater impacts due to comparative increases in digital media space and associated mobile source emissions. This alternative would result in a less than significant impact, and less impact than the Project.

### **Toxic Air Contaminants**

The impacts of this alternative would be similar to those of Alternative 7 (Full Adaptive Reuse Alternative), except there would be somewhat greater impacts due to comparative increases in digital media space. This alternative would result in a less than significant impact, and less impact than the Project,

### **AQMP Consistency**

The impacts of this alternative would be similar to those of Alternative 7 (Full Adaptive Reuse Alternative). This alternative would result in a less than significant impact, and less impact than the Project.

## ***Cultural Resources***

### **Historical Resources**

Under Alternative 8, Stages 2/3/4 (32,400 sf) would be adaptively reused to balance historic preservation with the need for efficient digital media production space. As described in more detail under Alternative 7, the changes to both the interiors and exteriors of the building which would have an adverse impact that could affect the integrity and eligibility of the Stages as historical resources. Although Stages 2/3/4 would be adaptively reused under this alternative, which could retain their eligibility as historical resources, and reduce or eliminate the significant unavoidable impact to the resource under the Project, Alternative 8, like the Project, would still have a significant unavoidable impact on historical resources due to the demolition of Stages 7/8/9, which appear eligible for listing in the National, California and Local Registers. Thus Alternative 8 would result in a greater impact to historical resources than the Full Preservation Alternative (Alternative 4) but less than the Project.

**Archaeological/Tribal Resources**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, and less impact than the Project.

**Paleontological Resources**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, and less impact than the Project.

**Geology and Soils****Seismic Hazards**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, and an equivalent impact to the Project.

**Geotechnical Hazards**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, and an equivalent impact to the Project.

**Soils/Erosion**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, and an equivalent impact to the Project.

**Greenhouse Gas Emissions****GHG Emissions**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), except there would be somewhat greater emissions due to a comparative increase in digital media space and associated increases in mobile source emissions. This alternative would result in a less than significant impact, and less impact than the Project.

**GHG Plan Consistency**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact, and an equivalent impact to the Project.

**Hazards and Hazardous Materials****Hazardous Materials Management**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

### **Upset/Accident Conditions and Hazardous Materials Database Listings**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

### **Hazardous Emissions Near Schools**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), although emissions would be slightly greater due to a comparative increase in digital media development. This alternative would result in a less than significant impact, and less impact than the Project.

### **Emergency Response Plan Consistency**

The impacts of this alternative would be similar to Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

### ***Hydrology and Water Quality***

#### **Hydrology (Drainage)**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

#### **Surface Water Quality**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact, and an equivalent impact to the Project.

### **Land Use and Planning**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact, and an equivalent impact to the Project.

### **Noise**

#### **Construction Noise**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, and less impact than the Project.

#### **Operational Noise**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), although with somewhat increased mobile source noise due to increases in digital media space and associated vehicle trips. This alternative would result in a less than significant impact, and less impact than the Project.

**Construction Vibration**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), with somewhat greater vibration effects due to adaptive reuse rather than full preservation of the Sound Stages. This alternative would result in a less than significant impact with mitigation incorporated, and less impact than the Project.

**Operational Vibration**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

**Public Services****Fire Protection**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

**Police Protection**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

**Transportation and Circulation****Construction Traffic/Parking**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, with the exception of construction-related intersection level of service impacts which would be significant unavoidable, and less impact than the Project.

**Intersection Service Levels**

The Project would include approximately 413,127 net sf of new development at the Project Site (not including parking structures) that would generate associated operational traffic. Although this traffic would not result in the exceedance of signal warrants at the two unsignalized intersections analyzed, it would result in significant unavoidable intersection level of service impacts at eight intersections under Future (2021) With Project Conditions (10 if optional Mitigation Measures TRAF-9 and TRAF-10 were implemented). Under Alternative 8 (Adaptive Reuse – Retain Stages 2/3/4 for Digital Media), less net new development (274,727 sf) would be developed at the Project Site than under the Project. As a result, trip generation would be reduced by 138 vehicles in the AM peak hour and 133 vehicles in the PM peak from those that would be generated under the Project. The resulting reduced trip generation would result in significant unavoidable intersection level of service impacts at the following four of the eight intersections to be significantly and unavoidably impacted under the Project (see Appendix E of the Traffic Study):

8. Washington Boulevard & Culver Boulevard

- 13. Robertson Blvd/Exposition Blvd & Venice Blvd
- 33. Overland Ave/Venice Blvd
- 38. Robertson Blvd/National Blvd

If optional Mitigation Measures TRAF-9 and TRAF-10 were implemented, it is possible, but unlikely due to less traffic under this alternative, that six instead of four intersections could be significantly and unavoidably impacted under this alternative (see the list of significant unavoidable impacts at the beginning of this chapter for listing of the potential additional intersections that could be impacted).

Furthermore, it can be reasonably assumed that this alternative, like the Project, would not exceed signal warrants. Therefore, while this alternative would result in significant unavoidable intersection level of service impacts at four intersections, impacts would be less under this alternative than under the Project.

### **Public Transit**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

### **Access and Circulation**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages). This impact would result in a less than significant impact, and an equivalent impact to the Project.

### **Parking**

*Note: Under SB 743, as an infill project located within an urban transit oriented area, the Project is not required to evaluate parking impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to parking.*

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), with somewhat greater parking demand that would be served by parking provided to meet or exceed Code requirements. This alternative would result in an equivalent impact to the Project (no significance determination – informational item).

### **Utilities and Service Systems**

#### **Wastewater**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), with some increase in wastewater generation due to increased digital media space. This alternative would result in a less than significant impact with

mitigation incorporated, and less impact than the Project, with respect to wastewater collection, and a less than significant impact, and less than the Project, with respect to wastewater treatment.

### **Water**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), with some increase in water demand due to increased digital media space. This alternative would result in a less than significant impact, and less impact than the Project, with respect to both water conveyance and water supply.

### **Solid Waste**

The impacts of this alternative would be similar to those of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), with some increase in waste generation due to increased digital media. This alternative would result in a less than significant impact, and less impact than the Project.

## **Relationship of the Alternative to Project Objectives**

The relationship of this alternative to the Project objectives would be similar to that of Alternative 5 (Historic Preservation - Retain Stages 2/3/4 as Sound Stages), with somewhat greater fulfillment of objectives tied to increased digital media space such as the objectives focused on creating start-of-the-art studio facilities to ensure the Studio's competitiveness and continued position at the cutting edge of innovation essential to the invention and production of entertainment; fostering content creation, digital media, creative technologies and virtual reality; promoting environmental sustainability through updated and expanded facilities to reduce vehicle trips; supporting the continued economic viability of the Studio and its ability to respond to changing industry needs; and providing a Studio Campus which meets Green Building Program requirements.

### 5.6.9 Alternative 9: Adaptive Reuse – Retain Stages 7/8/9 for Digital media

#### **Description of the Alternative**

Under Alternative 9, Stages 7/8/9 (16,800 sf) would be adaptively reused to balance historic preservation with the need for efficient digital media production space. Proposed Building M would not be constructed. Overall, this alternative would result in 345,007 sf of net new development versus 413,127 sf under the Project. Other than these changes and associated reductions in parking spaces, other aspects of the Project would not change. **Table 5-11, *Alternative 9: Adaptive Reuse – Retain Stages 7, 8, 9 for Digital Media***, provides a development summary for this alternative.

**TABLE 5-11**  
**ALTERNATIVE 9: ADAPTIVE REUSE – RETAIN STAGES 7/8/9 FOR DIGITAL MEDIA**

Use	Development (sf) <sup>a</sup>			Net New	Total Net (Existing + Net New)
	Existing	Demolition	New		
	Digital Media/Office	117,872	(87,788)		
Stage	155,480	(63,080)	4,000	(59,080)	96,400
Support	74,197	(68,625)	0	(68,625)	5,572
<b>Total</b>	<b>347,549</b>	<b>(219,493)</b>	<b>564,500</b>	<b>345,007</b>	<b>692,556</b>

<sup>a</sup> Excludes parking structure square footage.

Source: ESA PCR, September 2017.

## Environmental Impacts

### Aesthetics

*Note: Under SB 743, as an infill project located within an urban transit priority area, the Project is not required to evaluate aesthetic impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to visual quality, views, light, glare, and shading.*

### Aesthetic Character

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in less impact than the Project (no significance determination – informational item).

### Aesthetics Plan Consistency

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in an equivalent impact to the Project (no significance determination – informational item).

### Light/Glare

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), although with slightly greater potential for light and glare effects due to adaptive reuse of the Sound Stages. This alternative would result in less impact than the Project (no significance determination – informational item).

### Shading

The impacts of this alternative would be the same as 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in less impact than the Project (no significance determination – informational item).

## ***Air Quality***

### **Construction Emissions**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), except there would be slightly greater emissions due to adaptive reuse rather than full preservation of the Stages. This alternative would result in a less than significant impact, and less impact than the Project.

### **Operational Emissions**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), although there would be somewhat greater emissions due to a comparative increase in digital media space and associated mobile source emissions. This alternative would result in a less than significant impact, and less impact than the Project.

### **Carbon Monoxide Hotspots**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), although there would be somewhat greater emissions due to a comparative increase in digital media space and associated mobile source emissions. This alternative would result in a less than significant impact, and less impact than the Project.

### **Toxic Air Contaminants**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), although there would be somewhat greater emissions due to a comparative increase in digital media space. This alternative would result in a less than significant impact, and less impact than the Project.

### **AQMP Consistency**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

## ***Cultural Resources***

### **Historical Resources**

Under Alternative 9, Stages 7/8/9 (16,800 sf) would be adaptively reused to balance historic preservation with the need for efficient digital media production space. As described in more detail under Alternative 7, and similar to Alternative 8, the changes to both the interiors and exteriors of the building which would have an adverse impact that could affect the integrity and eligibility of the Stages as historical resources. Although Stages 7/8/9 would be adaptively reused under this alternative, which could retain their eligibility as historical resources, and reduce or eliminate the significant unavoidable impact to the resource under the Project, Alternative 9, like the Project, would still have a significant unavoidable impact on historical resources due to the demolition of Stages 2/3/4, which appear eligible for listing in the National, California and Local Registers. Thus Alternative 9 would result in a greater impact to historical resources than the Full Preservation Alternative (Alternative 4) but less than the Project. This alternative would result in a significant unavoidable impact, and less impact than the Project.

**Archaeological/Tribal Resources**

The impacts of this alternative would be similar to Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, and less impact than the Project.

**Paleontological Resources**

The impacts of this alternative would be similar to Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, and less impact than the Project.

**Geology and Soils****Seismic Hazards**

The impacts of this alternative would be similar to Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant with mitigation incorporated, and an equivalent impact to the Project.

**Geotechnical Hazards**

The impacts of this alternative would be similar to Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, and an equivalent impact to the Project.

**Soils/Erosion**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, and an equivalent impact to the Project.

**Greenhouse Gas Emissions****GHG Emissions**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), except there would be somewhat greater emissions due to a comparative increase in digital media space and associated increases in mobile source emissions. This alternative would result in a less than significant impact, and less impact than the Project.

**GHG Plan Consistency**

The impacts of this alternative would be similar to Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and an equivalent impact to the Project.

**Hazards and Hazardous Materials****Hazardous Materials Management**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

**Upset/Accident Conditions and Hazardous Materials Database Listings**

The impacts of this alternative would be similar to Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

**Hazardous Emissions Near Schools**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

**Emergency Response Plan Consistency**

The impacts of this alternative would be similar to Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

***Hydrology and Water Quality*****Hydrology (Drainage)**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

**Surface Water Quality**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and an equivalent impact to the Project.

***Land Use and Planning***

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and an equivalent impact to the Project.

***Noise*****Construction Noise**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), with somewhat increased noise due to adaptive reuse of the Stages for digital media versus their continued use as more traditional Studio space. This alternative would result in a less than significant impact with mitigation incorporated, and less impact than the Project.

**Operational Noise**

The impacts of this alternative would be similar to Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), although there would be somewhat greater noise due to a comparative increase in digital media space and associated vehicular trips. This alternative would result in a less than significant impact, and less impact than the Project.

### **Construction Vibration**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, and less impact than the Project.

### **Operational Vibration**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

### **Public Services**

#### **Fire Protection**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

#### **Police Protection**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

### **Transportation and Circulation**

#### **Construction Traffic/Parking**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact with mitigation incorporated, with the exception of construction-related intersection level of service impacts which would be significant unavoidable, and less impact than the Project.

#### **Intersection Service Levels**

The Project would include approximately 413,127 net sf of new development at the Project Site (not including parking structures) that would generate associated operational traffic. Although this traffic would not result in the exceedance of signal warrants at the two unsignalized intersections analyzed, it would result in significant unavoidable intersection level of service impacts at eight intersections under Future (2021) With Project Conditions (10 if optional Mitigation Measures TRAF-9 and TRAF-10 were implemented). Under Alternative 9 (Adaptive Reuse – Retain States 7/8/9 for Digital Media), less net new development (345,007 sf) would be developed at the Project Site than under the Project. As a result, trip generation would be reduced by 54 vehicles in the AM peak hour and 52 vehicles in the PM peak from those that would be generated under the Project. The resulting reduced trip generation would result in significant unavoidable intersection level of service impacts at the following seven of eight intersections significantly and unavoidably impacted under the Project (see Appendix E of the Traffic Study):

3. Duquesne Ave/Lucerne Ave
8. Washington Blvd/Culver Boulevard

- 13. Robertson Blvd//Exposition Blvd & Venice Boulevard
- 14. National Blvd/Washington Blvd
- 33. Overland Ave/Venice Blvd
- 38. Robertson Blvd/National Blvd
- 42. Duquesne Ave/Braddock Dr

If optional Mitigation Measures TRAF-9 and TRAF-10 were implemented, it is possible, but unlikely due to less traffic under this alternative, that nine instead of seven intersections could be significantly and unavoidably impacted under this alternative (see the list of significant unavoidable impacts at the beginning of this chapter for listing of the potential additional intersections that could be impacted).

Furthermore, it can be reasonably assumed that this alternate, like the Project, would not exceed signal warrants. Therefore, while this alternative would result in significant unavoidable intersection level of service impacts at seven intersections, impacts would be less under this alternative than the Project.

### **Intersection Queuing**

Under Alternative 9, impacts would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), though traffic would be increased. This alternative would result in less impact than the Project (no significance determination – informational item).

### **Public Transit**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and less impact than the Project.

### **Access and Circulation**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages). This alternative would result in a less than significant impact, and an equivalent impact to the Project.

### **Parking**

*Note: Under SB 743, as an infill project located within an urban transit priority area, the Project is not required to evaluate parking impacts in an EIR pursuant to CEQA. Nonetheless, for disclosure purposes only, information based on City thresholds is provided relative to parking.*

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages) and as with the Project parking would be provided to meet and exceed Code requirements. This alternative would result in an equivalent impact to the Project (no significance determination – informational item).

## **Utilities and Service Systems**

### **Wastewater**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), except there would be somewhat greater wastewater generation due to the increase in digital media space. This alternative would result in a less than significant impact with mitigation incorporated, and less impact than the Project, with respect to wastewater collection, and a less than significant impact, and less impact than the Project, with respect to wastewater treatment.

### **Water**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), except there would be somewhat greater water demand due to the increase in digital media. This alternative would result in a less than significant impact, and less impact than the Project, with respect to both water conveyance and water supply.

### **Solid Waste**

The impacts of this alternative would be similar to those of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), except there would be somewhat greater waste generation due to the increased digital media space. This alternative would result in a less than significant impact, and less impact than the Project.

## **Relationship of the Alternative to Project Objectives**

The relationship of this alternative to the Project objectives would be similar to that of Alternative 6 (Historic Preservation - Retain Stages 7/8/9 as Sound Stages), with somewhat greater fulfillment of objectives tied to increased digital media space such as the objectives focused on creating start-of-the-art studio facilities to ensure the Studio's competitiveness and continued position at the cutting edge of innovation essential to the invention and production of entertainment; fostering content creation, digital media, creative technologies and virtual reality; promoting environmental sustainability through updated and expanded facilities to reduce vehicle trips; supporting the continued economic viability of the Studio and its ability to respond to changing industry needs; and providing a Studio Campus which meets Green Building Program requirements..

## **5.7 Environmentally Superior Alternative**

California CEQA Guidelines Section 15126.6 require the identification of an environmentally superior alternative to the proposed Project and, if the environmentally superior alternative is the "No Project Alternative," the identification of an environmentally superior alternative should be identified from among the remaining alternatives. Selection of an environmentally superior alternative is based on an evaluation of the extent to which the alternatives would reduce or eliminate the significant impacts associated with the Project while achieving most of the basic objectives of the Project. The comparative impacts of the Project and Alternatives 1 through 9 are summarized in **Table 5-12**, *Comparison of the Impacts of the Project and Alternatives*.

Of the alternatives analyzed in this Draft EIR, the No Project/No Build Alternative would be considered the Environmentally Superior Alternative. As indicated in Table 5-12, it would avoid all of the Project's significant unavoidable historic resources and traffic (intersection level of service and construction) impacts, as well as all of the of the Project's less than significant (LTS) and less than significant with mitigation incorporated (LTSMI) impacts. However, this alternative would not result in the beneficial hydrology (drainage) and operational surface water quality impacts of the Project because it would not reduce existing stormwater discharges to the off-site storm drain system associated with the 13 EPIC stormwater treatment areas proposed under the Project or process the stormwater through structural BMPs before discharge, and would not achieve the underlying purpose of the Project or any of the Project objectives. Furthermore, as this alternative is the No Project/No Build Alternative, the selection of another alternative is required under CEQA as the Environmentally Superior Alternative.

The No Project/CPA No. 6 Buildout Alternative (Alternative 1) would avoid or reduce all of the Project's significant unavoidable historical resources and traffic (intersection level of service and construction) impacts (although not all to below a significant level). Furthermore, as indicated in the "Total" row at the bottom of Table 5-12, the No Project/CPA No. 6 Buildout Alternative would result in less impacts than the Project in 37 of the 41 environmental issue areas evaluated in the Draft EIR (inclusive of the above significant unavoidable impacts), with greater impacts than the Project in only two environmental issue areas (e.g., hydrology and surface water quality where, because the 13 on-site EPIC stormwater treatment areas proposed under the Project would not be constructed, there would be net increases rather than net decreases in stormwater runoff from the Project Site and the amount of pollutants in this runoff). Therefore, the environmental impacts of the No Project/CPA No. 6 Buildout Alternative would be substantially less than those of the Project (owing to substantially less new development, avoiding removal of on-site historical resources, and avoiding significant unavoidable operational intersection level of service impacts at seven of the eight intersections that would be significantly and unavoidably impacted under the Project). At the same time, the No Project/CPA No. 6 Buildout Alternative (Alternative 2) would achieve some of the Project objectives, although to a lesser degree than would the Project, this alternative would not fully achieve the underlying purpose of the Project to sustain The Culver Studio's prominent role as a dynamic, independent studio in the entertainment, digital media, and creative industries, through expansion and modernization of the Studio Campus. This is because the changes to the Studio Campus under this alternative (for example, the amount of new digital media space) would be limited and incremental rather than transformative.

The Reduced Density Alternative (Alternative 3), although not reducing or avoiding the Project's significant unavoidable historical resources impacts, would avoid the significant unavoidable operational traffic (intersection level of service) impacts of the Project at four study and likely reduce but not avoid the significant unavoidable construction traffic impacts and the operational impacts at the other four intersections to be significantly and unavoidably impacted by the Project. As indicated in the "Total" row at the bottom of Table 5-12, the Reduced Density Alternative would result in less impacts than the Project in 29 of the 41 environmental issue areas evaluated in the Draft EIR (inclusive of the above impacts). Furthermore, this alternative would achieve some of the Project objectives, albeit to a lesser degree than would the Project, but would not fully achieve the underlying purpose of the Project to sustain The Culver Studio's prominent

role as a dynamic, independent studio in the entertainment, digital media, and creative industries, through expansion and modernization of the Studio Campus.

The Full Historic Preservation Alternative (Alternative 4) would avoid the Project's significant unavoidable historical resources impacts, would avoid the Project's significant unavoidable operational traffic (level of service) impacts at six intersections, and would likely reduce the Project's significant unavoidable construction traffic and the operational traffic (level of service) impacts at the other two intersections that would be significantly impacted by the Project. Furthermore, as indicated in the "Total" row at the bottom of Table 5-12, the Full Historic Preservation Alternative would result in less impacts than the Project in 30 of the 41 environmental issue areas evaluated in the Draft EIR (inclusive of the above significant unavoidable impacts), with the balance of the impacts equivalent between the two projects except for in hazardous materials management where, because the existing stages uses would be retained instead of converted to digital media/office uses, more of the associated existing use of hazardous materials at the Project Site associated with set construction, etc., would be retained under this alternative. Therefore, the environmental impacts of the Full Historic Preservation Alternative would be less than those of the Project (owing to less development under this alternative and preservation of Stages 2/3/4 and 7/8/9 which are historic resource). Furthermore, this alternative would achieve the underlying purpose of the Project to sustain The Culver Studio's prominent role as a dynamic, independent studio in the entertainment, digital media, and creative industries, through expansion and modernization of the Studio Campus, again albeit to a lesser degree than would the Project. The above also applies to the partial Historic Preservation Alternatives (Alternative 5 and 6), with the exception of: (1) impacts to historic resources which would be greater under the partial Historic Preservation Alternatives owing to preservation of only half as many historical stages, but still less than under the proposed Project; (2) operational intersection level of service impacts which would be greater under the Partial Historic Preservation Alternatives owing to more net new development, but still less than under the Project.

Like the Full Historic Preservation Alternative (Alternative 4), the Full Adaptive Reuse Alternative (Alternative 7) would avoid the Project's significant unavoidable historical resources impacts, would avoid the Project's significant unavoidable operational traffic (level of service) impacts at five intersections, and would likely reduce the Project's significant unavoidable construction traffic and the operational traffic (level of service) impacts at the other three intersections that would be significantly impacted by the Project. Furthermore, as indicated in the "Total" row at the bottom of Table 5-12, the Full Historic Preservation Alternative would result in less impacts than the Project in 31 of the 41 environmental issue areas evaluated in the Draft, with the balance of the impacts generally equivalent between the two projects. Therefore, the environmental impacts of the Full Adaptive Reuse Alternative would be less than those of the Project (owing to less development under this alternative and preservation of Stages 2/3/4 and 7/8/9 which are historic resource). Furthermore, this alternative would achieve the underlying purpose of the Project to sustain The Culver Studio's prominent role as a dynamic, independent studio in the entertainment, digital media, and creative industries, through expansion and modernization of the Studio Campus, again albeit to a lesser degree than would the Project. The above also applies to the partial Adaptive Reuse Alternatives (Alternative 8 and 9), with the exception of: (1) impacts to historic resources which would be greater under the partial Adaptive

Reuse Alternatives owing to preservation of only half as many historical stages, but still less than under the proposed Project; and (2) operational intersection level of service impacts which would be greater under the partial Adaptive Reuse Alternatives owing to more net new development, but still less than under the Project.

Based on the above analysis and Table 5-12, all of the Project alternatives analyzed would result in less environmental impacts than the Project. In order from least to most impacting on a purely quantitative basis (e.g., number of environmental issues for which environmental impacts would be less than under the Project) would be the: No Project/No Building Alternative (Alternative 1); No Project/CPA No. 6 Buildout Alternative (Alternative 2); Adaptive Reuse Alternatives (Alternatives 7-9); Historic Preservation Alternatives (Alternative 4-6); and Reduced Density Alternative (Alternative 3). However, in accordance with CEQA, while the No Project/No Build Alternative would be the least impacting alternative, followed by the No Project/CPA No. 6 Alternative, the identification of an environmentally superior alternative should be identified from among the remaining alternatives.<sup>49</sup>

Among the remaining alternatives, the Full Historic Preservation Alternative (Alternative 4) is identified as the Environmentally Superior Alternative. It would be less impacting than the Project in 30 of the 41 environmental issues analyzed, would avoid the significant unavoidable historical resource impacts on Stages 2/3/4 and 7/8/9 and six of the significant unavoidable traffic (intersection level of service) impacts of the Project. While the Full Historic Preservation Alternative would substantially reduce the amount of digital media space proposed by the Project, which is fundamental to the objective of responding to changing industry needs and market conditions through a plan that technologically updates and expands Campus facilities, it would still achieve the underlying purpose of the Project.

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<sup>49</sup> Both Alternatives 1 (No Project/No Build) and Alternative 2 (No Project/CPA No. 6) would avoid the significant unavoidable historical resources and traffic impacts of the Project.

**TABLE 5-12  
COMPARISON OF IMPACTS ASSOCIATED WITH THE PROJECT AND THE ALTERNATIVES**

	<b>Proposed Project</b>	<b>Alternative 1: No Project/ No Build</b>	<b>Alternative 2: No Project/ CPA No. 6 Buildout</b>	<b>Alternative 3: Reduced Density</b>	<b>Alternative 4: Full Historic Preservation - Retain Stages 2/3/4 and 7/8/9, as Sound Stages</b>	<b>Alternative 5: Historic Preservation - Retain Stages 2/3/4 as Sound States</b>	<b>Alternative 6: Historic Preservation - Retain Stages 7/8/9 as Sound Stages</b>	<b>Alternative 7 - Full Adaptive Reuse - Retain Stages 2/3/4 and 7/8/9 for Digital Media</b>	<b>Alternative 8 Adaptive Reuse - Retain Stages 2/3/4 for Digital Media</b>	<b>Alternative 9: Adaptive Reuse - Retain Stages 7/8/9 for Digital Media</b>
<b>4.1 Aesthetics</b>										
Aesthetic Character	N/A <sup>a</sup>	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )
Aesthetics Plan Consistency	N/A <sup>a</sup>	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Equiv. (N/A <sup>a</sup> )	Equiv. (N/A <sup>a</sup> )	Equiv. (N/A <sup>a</sup> )	Equiv. (N/A <sup>a</sup> )	Equiv. (N/A <sup>a</sup> )	Equiv. (N/A <sup>a</sup> )	Equiv. (N/A <sup>a</sup> )
Light/Glare	N/A <sup>a</sup>	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )
Shading	N/A <sup>a</sup>	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )
<b>4.2. Air Quality</b>										
Construction Emissions	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Operational Emissions	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Carbon Monoxide Hotspots	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Toxic Air Contaminants	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
AQMP Consistency	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
<b>4.3 Cultural Resources</b>										
Historical Resources	SU	Less (NI)	Less (LTSMI)	Equiv. (SU)	Less (LTS)	Less (SU)	Less (SU)	Less (LTS)	Less (SU)	Less (SU)
Archaeological/Tribal Resources	LTSMI	Less (NI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)
Paleontological Resources	LTSMI	Less (NI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)
<b>4.4 Geology and Soils</b>										

	Proposed Project	Alternative 1: No Project/ No Build	Alternative 2: No Project/ CPA No. 6 Buildout	Alternative 3: Reduced Density	Alternative 4: Full Historic Preservation - Retain Stages 2/3/4 and 7/8/9, as Sound Stages	Alternative 5: Historic Preservation - Retain Stages 2/3/4 as Sound States	Alternative 6: Historic Preservation - Retain Stages 7/8/9 as Sound States	Alternative 7 – Full Adaptive Reuse – Retain Stages 2/3/4 and 7/8/9 for Digital Media	Alternative 8 Adaptive Reuse – Retain Stages 2/3/4 for Digital Media	Alternative 9: Adaptive Reuse – Retain Stages 7/8/9 for Digital Media
Seismic Hazards	LTSMI	Less (NI)	Less (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)
Geotechnical Hazards	LTSMI	Less (NI)	Less (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)
Soils/Erosion	LTSMI	Less (NI)	Less (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)	Equiv. (LTSMI)
<b>4.5 Greenhouse Gas Emissions</b>										
GHG Emissions	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
GHG Plan Consistency	LTS	Less (NI)	Less (NI)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)
<b>4.6 Hazards and Hazardous Materials</b>										
Hazardous Materials Management	LTS	Less (NI)	Less (LTS)	Less (LTS)	Greater (LTS)	Greater (LTS)	Greater (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Upset/Accident Conditions and Hazardous Materials Database Listings	LTS	Less (NI)	Less (LTS)	Equiv. (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Hazardous Emissions Near Schools	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Emergency Response Plan Consistency	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
<b>4.7 Hydrology and Water Quality</b>										
Hydrology (Drainage)	LTS <sup>b</sup>	Greater (NI)	Greater (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)
Surface Water Quality	LTS <sup>b</sup>	Greater (NI)	Greater (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)
<b>4.8 Land Use and Planning</b>										
Land Use and Planning	LTS	Less (NI)	Less (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)

	Proposed Project	Alternative 1: No Project/ No Build	Alternative 2: No Project/ CPA No. 6 Buildout	Alternative 3: Reduced Density	Alternative 4: Full Historic Preservation - Retain Stages 2/3/4 and 7/8/9, as Sound Stages	Alternative 5: Historic Preservation - Retain Stages 2/3/4 as Sound States	Alternative 6: Historic Preservation - Retain Stages 7/8/9 as Sound States	Alternative 7 - Full Adaptive Reuse - Retain Stages 2/3/4 and 7/8/9 for Digital Media	Alternative 8 Adaptive Reuse - Retain Stages 2/3/4 for Digital Media	Alternative 9: Adaptive Reuse - Retain Stages 7/8/9 for Digital Media
<b>4.9 Noise</b>										
Construction Noise	LTSMI	Less (NI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)
Operational Noise	LTS	Less (NI)	Less (LTSMI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Construction Vibration	LTSMI	Less (NI)	Less (LTS)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)
Operational Vibration	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
<b>4.10 Public Services</b>										
Fire Protection	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Police Protection	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
<b>4.11 Transportation and Traffic</b>										
Construction Traffic/Parking	SU	Less (NI)	Less (SU)	Less (SU)	Less (SU)	Less (SU)	Less (SU)	Less (SU)	Less (SU)	Less (SU)
Intersection Level of Service	SU	Less (NI)	Less (LTSMI)	Less (SU)	Less (SU)	Less (SU)	Less (SU)	Less (SU)	Less (SU)	Less (SU)
Intersection Queuing	N/A <sup>a</sup>	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )	Less (N/A <sup>a</sup> )
Public Transit	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Access and Circulation	LTS	Less (NI)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)
Parking	LTS	Less (NI)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)	Equiv. (LTS)
<b>4.12 Utilities and Service Systems</b>										
<b>Wastewater</b>										
Collection Infrastructure Capacity	LTSMI	Less (NI)	Less (LTS)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)	Less (LTSMI)
Treatment Capacity	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
<b>Water</b>										
Conveyance Infrastructure Capacity	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Supply	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)
Solid Waste	LTS	Less (NI)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)	Less (LTS)

	<b>Proposed Project</b>	<b>Alternative 1: No Project/ No Build</b>	<b>Alternative 2: No Project/ CPA No. 6 Buildout</b>	<b>Alternative 3: Reduced Density</b>	<b>Alternative 4: Full Historic Preservation - Retain Stages 2/3/4 and 7/8/9, as Sound Stages</b>	<b>Alternative 5: Historic Preservation - Retain Stages 2/3/4 as Sound States</b>	<b>Alternative 6: Historic Preservation - Retain Stages 7/8/9 as Sound Stages</b>	<b>Alternative 7 – Full Adaptive Reuse – Retain Stages 2/3/4 and 7/8/9 for Digital Media</b>	<b>Alternative 8 Adaptive Reuse – Retain Stages 2/3/4 for Digital Media</b>	<b>Alternative 9: Adaptive Reuse – Retain Stages 7/8/9 for Digital Media</b>
<b>TOTAL (relative to Project)</b>	--	<b>Less = 40 Greater = 1 Equiv. = 0</b>	<b>Less = 37 Greater = 2 Equiv. = 2</b>	<b>Less = 29 Greater = 0 Equiv. = 12</b>	<b>Less = 30 Greater = 1 Equiv. = 10</b>	<b>Less = 30 Greater = 1 Equiv. = 10</b>	<b>Less = 30 Greater = 1 Equiv. = 10</b>	<b>Less = 31 Greater = 0 Equiv. = 10</b>	<b>Less = 31 Greater = 0 Equiv. = 10</b>	<b>Less = 31 Greater = 0 Equiv. = 10</b>

Notes:

NI = no impact, LTS = less than significant impact, LTSMI = less than significant with mitigated incorporated, SU = significant unavoidable, Equiv. = equivalent.

<sup>a</sup> Analysis provided in the Draft EIR for informational purposes only (no significance determination provided).

<sup>b</sup> While the hydrology (drainage) and water quality impacts of the Project are identified as “less than significant” in this EIR, the Project would result in beneficial impacts in both categories. Beneficial impacts are not identified as a significance conclusion in this EIR consistency with the Appendix G (CEQA Checklist) which includes no such category.

Source: ESA PCR, September 2017.

# CHAPTER 6

## Other CEQA Considerations

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This section summarizes the findings of the Draft EIR with respect to: irreversible environmental changes; significant unavoidable environmental impacts; reasons why the Project is being proposed, notwithstanding significant unavoidable impacts; potential secondary effects related to Project mitigation; growth inducing impacts; energy conservation, and effects found to be less than significant.

### 6.1 Irreversible Environmental Changes

According to Sections 15126(c) and 15126.2(c) of the State CEQA Guidelines, an EIR is required to address any significant irreversible environmental changes that would occur should the proposed Project be implemented. As stated in CEQA Guidelines Section 15126.2(c) indicates:

*Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

The Project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the Project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project Site. Project construction would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and diesel would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site.

Project operation would continue to expend nonrenewable resources that are currently consumed within the City. These include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the

primary energy source associated with both construction and ongoing operation of the Project, and the existing, finite supplies of these natural resources would be incrementally reduced.

The Project would incorporate Project Design Features (PDFs) that would reduce construction and operational emissions and target sustainable site development, water savings, energy efficiency, green-oriented materials selection, and improved indoor environmental quality. At a minimum, the Project would meet criteria equivalent to LEED Certification, other City Green Building Program requirements, as well as achieving consistency with CALGreen Building Standards.

Furthermore, the Project would not affect access to existing resources, nor interfere with the production or delivery of such resources. The Project Site contains no known energy resources that would be precluded from future use through Project implementation. The Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant.

## 6.2 Significant Unavoidable Impacts

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. Following is a summary of the impacts associated with the proposed Project that were concluded to be significant and unavoidable in Chapter 4.0, Environmental Impact Analysis, of this Draft EIR.

### 6.2.1 Cultural Resources – Historical

Following implementation of the mitigation measures recommended in Section 4.3, Cultural Resources – Historical Resources, of this Draft EIR, the Project would still result in a significant unavoidable impacts to potentially eligible historical resources due to the demolition of Stage 2/3/4 and Stage 7/8/9. However, the Project would result in a better overall understanding of the Studio's historical significance and contributions to the motion picture industry through the interpretive program set forth under MM-HIST-3. Furthermore, the Project would retain two sound stages from the period of significance - Stage 11/12/14 (1927) and Stage 15/16 (1940). Stage 11/12/14 was constructed around the same time as the two stages being removed by the Project and shares the same potential significance for its association with RKO Pictures and the Studio's transition into sound films. Nonetheless, after completion of the Project, impacts to historical resources would remain significant and unavoidable due to the demolition of the two eligible historical resources.

### 6.2.2 Transportation and Traffic

As indicated in Section 4.11, Transportation and Traffic, of this Draft EIR, the Project would result in significant operational level of service impacts after mitigation at the following eight study intersections during the AM and/or PM peak hours:

3. Duquesne Ave/Lucerne Ave (Culver City, AM peak hour)

8. Washington Blvd/Culver Blvd (Culver City, AM peak hour)
13. Robertson Blvd/Exposition Blvd/Venice Blvd (City of LA, AM & PM peak hours)
14. National Blvd/Washington Blvd (Culver City, AM peak hour)
19. Overland Ave/Culver Blvd (Culver City, AM peak hour)
33. Overland Ave/Venice Blvd (City of Los Angeles, AM peak hours)
38. Robertson Blvd/National Blvd (City of Los Angeles, AM & PM peak hours)
42. Duquesne Ave/Braddock Dr (Culver City, AM & PM peak hours)

If optional Mitigation Measures TRAF-9 and TRAF-10 were implemented in order to address queuing issues at Intersection 10 and other mobility considerations, requiring a left turn prohibition from westbound Ince Boulevard to southbound Washington Boulevard at Intersection 10 (Ince Blvd/Washington Blvd), and reconfiguring the westbound approach at Intersection 11 (Canfield Ave/Washington Blvd/ & Culver Blvd) to include an exclusive westbound left-only lane, a shared left/through lane, and a shared through/right turn lane, traffic would be shifted such that new significant unavoidable impacts would occur at the following four intersections:

11. Canfield Ave/Washington Blvd & Culver Blvd
22. National Blvd/Venice Blvd
29. La Cienega Blvd/Venice Blvd
10. Ince Blvd/Washington Blvd

At the same time, the following two intersections, which would be significantly and unavoidably impacted by the Project, would no longer be significantly impacted with implementation of optional Mitigation Measures TRAF-9 and TRAF-10:

14. National Blvd/Washington Blvd
15. Higuera St/Washington Blvd

Under the Micro-Simulation analysis, the Project would, in addition to the above listed intersections, result in significant operational level of service impacts after mitigation at the following four study intersections during the AM and/or PM peak hours:

6. Duquesne Ave/Lucerne Ave (Culver City, AM and PM peak hours)
10. Ince Blvd/Washington Blvd (Culver City, PM peak hour)
15. Higuera St/Washington Blvd (Culver City, AM and PM peak hours)
37. Lafayette Pl/Culver Blvd (Culver City, PM peak hour)

In addition, although the impacts would be temporary, during construction it is assumed that substantial delays and disruption of existing traffic flow would occur based on the operational thresholds at intersections during peak hours. Even with mitigation measures, and implementation of a Construction Management Plan that would involve coordination with other downtown Projects under concurrent construction, this impact would be significant and unavoidable.

Lastly, there could be some temporary incompatibilities between existing motor vehicle traffic and Project construction traffic during the construction period.

### **6.3 Reasons Why the Project Is Being Proposed, Notwithstanding Its Significant Unavoidable Impacts**

In addition to identification of the Project's significant unavoidable impacts, Section 15126.2(b) of the State CEQA Guidelines requires a description of the reasons why a Project is being proposed, notwithstanding significant unavoidable impacts associated with the Project.

The Project is being proposed notwithstanding its contribution to significant and unavoidable historical resources and traffic impacts in order to sustain The Culver Studio's prominent role as a dynamic, independent studio while capitalizing on and strengthening the City's historic and future identity as the "Heart of Screenland" and home to Sony Pictures, National Public Radio West, the NFL Network studios, and other entertainment uses. The Project would enable a state-of-the-art Studio Campus of media and digital content stages, as well as traditional film and television production and support facilities that would ensure the Studio's resilience and continued position at the cutting edge of innovation essential to the invention and production of entertainment and digital media for future generations.

The Project's new and upgraded facilities would foster content creation, and support the continued economic viability of the Studio and its ability to respond to changing industry needs and market conditions. The Project would provide for technological updates and expanded Campus facilities while allowing flexibility in the application of development standards. Neighborhood interfaces would be sensitively treated, and access would be redesigned and improved. The Project would provide sustainable new media space and adaptive reuse and reinvigoration of existing prominent buildings. The Project would upgrade and rehabilitate the Mansion to protect its eligibility as a historical resource under the City's Historic Preservation Ordinance while allowing for interior alterations to accommodate future uses and bring the building up to current standards. The Project would promote compatible neighborhood interfaces and a high level of visual quality through new and expanded landscaping and linear open space, redesigned gate entries, articulation of building massing, privacy screening, increased setbacks, and accommodation of production vehicles within the Studio Campus rather than on surface streets.

The Project's circulation plan would move vehicles as efficiently as possible onto the Studio Campus from the surrounding street network with a minimum of queuing or delays. The circulation plan would reduce production vehicle use of directly adjacent streets and would ensure that vehicles access all buildings through below-grade loading facilities. In addition, the circulation plan would minimize truck/passenger vehicle and truck/emergency vehicle and fire lane conflicts. The circulation plan results in freeing up at-grade areas thus providing for more attractive and usable outdoor open space.

The Project's enhanced Studio Campus would further the pedestrian-friendly environment with direct access to downtown Culver City and clear linkages to regional and local transportation systems. Within walking distance of the Metro Station, the Project would promote alternate modes of transit, as well as implement transportation demand management measures, and promote the use of bicycles. The Project would also contribute to the visioning and development of the Culver City Transit Oriented Development District. The Project would provide high quality state-of-the-art design that would meet or exceed Culver City's Green Building Program requirements. The Project would use renewable, recycled and low VOC materials; and would incorporate high efficiency HVAC systems, water conservation features, stormwater filtration systems, photovoltaics and passive solar design, and electric vehicle (EV)-ready parking.

## 6.4 Growth-Inducing Impacts

Section 15126.2(d) of the State CEQA Guidelines requires an EIR to discuss the ways a proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

The Project would increase potential floor area and uses within the approximately 14-acre Culver Studio Campus from the existing 347,599 square feet (sf), which includes 117,872 sf of digital media floor area, 155,480 sf of stage floor area, and 74,197 sf of support uses. A total of 649,420 sf of new development would be constructed, including 609,420 sf of digital media space and 40,000 sf of stage area, and no floor area for support uses. With the demolition of stage and support use floor area, the net increase in floor area would be 413,127 sf. The Project is an expansion and updating of the existing Culver Studios Campus and, as such, represents the infill and intensification of an existing urban land use. As an infill project, the Studio Campus would utilize existing transportation and utility infrastructure to serve the Project Site. Therefore, the Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure.

The Project would not include residential uses and therefore would not directly increase population. It would however generate indirect growth associated with construction employment and up to 524 new employees. According to the Southern California Association of Governments (SCAG), Culver City has a forecast population, household, and employment growth of 1,600 persons, 700 households, and 8,900 jobs is predicted between 2012 and 2040, respectively. As such, the estimated 524 new employees generated by the Project are within SCAG's employment growth assumptions for Culver City. There would be some potential for these new employees to relocate to the area, in the event they do not already reside in the City or proximate areas, although the number of any such employees that would move into the City is expected to be limited and not at a level that would alone generate the need for new housing or associated upgrades to infrastructure. Therefore, 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.

The Project would concentrate employment growth in an area served by the Culver City Metro Station and Metro Expo Line, regional and local bus lines, and bicycle facilities. As such, the Project would be consistent with SCAG's 2016 RTP/SCS policies for the concentration of growth in proximity to transit.

Therefore, 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.

## **6.5 Potential Secondary Effects Related to Project Mitigation Measures**

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires mitigation measures to be discussed in less detail than the significant effects of the proposed Project if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the Project as proposed. With regard to this section of the CEQA Guidelines, the recommended mitigation measures for the Project were evaluated to determine if potential impacts would occur. The following provides a discussion of the subject areas in which mitigation measures are required, as well as any potential secondary effects that could occur as a result of the implementation of the mitigation measures. For the reasons stated below, it is concluded that the Project's mitigation measures would not result in significant secondary impacts.

### **6.5.1 Cultural – Historical Resources**

Mitigation Measures MM-HIST-1 through MM-HIST-7 address impacts associated with removal of Stages 2/3/4 and Stages 7/8/9, while also helping to mitigate other impacts associated with the Bungalow relocation, changes to the Front Lawn landscape, interior rehabilitation of the Mansion, and changes to the historic setting. Mitigation measure include a combination of recordation, salvage, interpretive programs, relocation, materials conservation and preservation plans. Where feasible, the measures ensure that historical resources would be treated consistent with State *CEQA Guidelines* and regulatory provisions for the protection of such resources. Reconstruction and relocation associated with the Project were evaluated as part of the impacts of the Project in Chapter 4 of this Draft EIR. No secondary impacts on the environment are anticipated from the implementation of the mitigation measures associated with historical resources.

### **6.5.2 Cultural – Archaeologic and Tribal Resources**

Mitigation Measures MM-ARCH-1 through MM-ARCH-45 establish protections for archaeological resources, tribal resources and human remains through monitoring plans to identify such resources and human remains should they be uncovered during construction at the Project Site. These measures also include treatment and reporting of resources should they be encountered. The mitigation measures ensure that resources would be treated consistent with

State *CEQA Guidelines* and regulatory provisions for the protection of these resources. Monitoring and treatment would not require additional disturbance on the Project Site and, therefore, would not result in secondary impacts on the environment.

### 6.5.3 Cultural - Paleontological Resources

Mitigation Measures MM-PALEO-1 through MM-PALEO-3 establish protections for paleontological resources through identification, treatment, and preservation of such resources should they be discovered on the Project Site. These measures include treatment and reporting of resources should they be encountered. The mitigation measures ensure that resources would be treated consistent with State *CEQA Guidelines* and regulatory provisions for the protection of these resources. Monitoring, treatment, and reporting would not require additional disturbance on the Project Site and, therefore, would not result in secondary impacts on the environment.

### 6.5.4 Geology and Soils

Mitigation Measures MM-GEO-1 through MM-GEO-3 are required to address liquefaction, lateral spreading, expansive soils, and shallow groundwater impacts. These measures include implementation of detailed geotechnical evaluations under CBC Section 1803, and may include deep pile or mat foundations and dewatering during construction or operation. The Project's geology and soils impacts, and hydrology and water quality impacts associated with dewatering, were evaluated as part of the Project impacts in Chapter 4 of this Draft EIR. No further secondary impacts on the environment as a result of implementation of these mitigation measures are anticipated.

### 6.5.5 Noise

Mitigation Measures MM-NOISE-1 through MM-NOISE-4 are required to reduce noise and vibration impacts during Project construction. These mitigation measures may require the temporary installation of a 20-foot-tall construction fence to achieve sound level reductions, and set controls on the number and types of construction equipment that can be operated so as to minimize construction-related noise and vibration. Construction fencing is considered to have a potential impact on visual character. However, because of the Project's status regarding SB 743 and exemption from the consideration of aesthetic impacts, any such impact is considered to be less than significant.

### 6.5.6 Transportation and Traffic

Mitigation Measures MM-TRAF-1 through MM-TRAF-5 set controls on haul truck staging, truck deliveries/pick-ups, and temporary lane closures during the construction period, and require flag persons to provide for the safe movement of vehicles, pedestrians and bicyclists around the Project Site during construction. These mitigation measures would not result in adverse physical impacts on the environment.

Mitigation Measures MM-TRAF-6 through MM-TRAF-8 are recommended to reduce the operations-related intersection level of service impacts of the Project. These mitigation measures require the implementation of a Transportation Demand Management (TDM) Program to reduce Project trip generation and encourage the use of alternative forms of transportation, and restriping of Intersections 10 (Ince Blvd/Washington Blvd) and 11 (Canfield Ave/Washington Blvd) to improve operations at these intersections under the Project.

The implementation of the TDM Program under Mitigation Measure MM-TRAF-6 would include not only programmatic (non-physical) measures to reduce Project traffic (e.g., ridesharing, contributing to bike share program, unbundled parking, etc.), but also site design improvements on and around the perimeter of the Project Site (e.g., construction of wide sidewalks, a pedestrian plaza/paseo, provision of street trees and bicycle parking, and improved bus shelters, lighting and landscaping) to encourage pedestrian and bicycle modes of transportation. The impacts of the on-site physical improvements discussed above have been evaluated as part of the impacts of the Project in Chapter 4 of this Draft EIR. The off-site intersection restriping and physical improvements discussed above would occur within the existing roadway rights-of-way, construction of these improvements would not impact areas outside of the roadways, and the construction impacts associated with these improvements would be intermittent and temporary in nature. Therefore, overall secondary impacts resulting from implementation of Mitigation Measures MM-TRAF-6 through MM-TRAF-8 would be less than significant.

### 6.5.7 Wastewater

Mitigation Measures MM-WW-1 is required to provide for adequate wastewater conveyance infrastructure to serve the Project. This mitigation measure requires the upsizing of the existing 10-inch Ince sewer main with a 12-inch line from Hubbard Street to Lucerne Avenue (approximately 700 linear feet). As part of the construction program, this mitigation measure requires provision of a temporary 15-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 20 dBA between the work area and the surrounding residences. The construction of this improvement (estimated to take between one and two months) would result in less than significant construction-related noise and vibration impacts as further described in Appendix I, Noise and Vibration Technical Report, of this Draft EIR.

#### **Construction Noise**

Construction activities would be required to comply with the City's allowable hours and would be temporary in nature. Therefore, construction activities would comply with the City's noise standard.

Policy 2.A of the Noise Element requires noise reduction techniques to ensure that the noise impacts associated with construction activities would be minimized to the maximum extent feasible. Implementation of the Project Design Features and mitigation measures identified in Section 4.9, Noise and Vibration, of this Draft EIR would reduce Project noise impacts during construction.

Implementation of MM-NOISE-2, MM-NOISE-4, PDF-NOISE-8, and PDF-AES-2 would reduce construction noise by at least 10 dBA at the noise sensitive receptor locations. Therefore, with implementation of MM-WW-1, MM-NOISE-2, PDF-NOISE-8 and PDF-AES-2, the maximum construction noise levels of up to 94 dBA would be reduced to 64 dBA ( $94 - 20 - 10 = 64$ ) at the noise sensitive receptor locations along Ince Boulevard and Lucerne Avenue. Therefore, the ambient noise level of 66 dBA and 67 dBA at the noise sensitive receptor locations along Ince Boulevard and Lucerne Avenue would not be increased substantially. As such, construction noise impacts would be reduced by a level that is technically feasible as set forth in mitigation measures and Project Design Features and would be consistent with Policy 2.A of the City General Plan Noise Element. Accordingly, the implementation of the sewer line required under MM-WW-1 would not result in a secondary effect.

### ***Construction Vibration***

Construction activities associated with the Ince sewer main improvement would have the potential to generate low levels of groundborne vibration as the operation of heavy equipment (i.e., paver, tractor/loader/backhoe, and haul trucks, etc.) generates vibrations that propagate through the ground and diminish in intensity with distance from the source. The nearest off-site sensitive buildings to the Project Site are residential buildings located approximately 15 feet from the Ince sewer improvement. Groundborne vibrations from construction activities very rarely reach the levels that can damage structures, but they may be perceived in buildings very close to a construction site. Vibration velocities could range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity.

At a distance of 15 feet from the nearest residential buildings, the maximum vibration level would be up to approximately 0.19 in/sec PPV for a large bulldozer, which would be below the significance threshold of 0.2 in/sec PPV. All other structures are located farther away and vibration velocities would be substantially lower at these more distant structures. Therefore, secondary effects relative to vibration impacts would be less than significant for structural damage.

With respect to human annoyance, the nearest residential uses located at 15 feet and 30 feet from the Project Site would be exposed to vibration levels exceeding 94 VdB and 85 VdB, respectively. Under the FTA's vibration annoyance potential criteria, vibration levels exceeding 80 VdB would be considered distinctly perceptible for residential uses. Therefore, residential uses located along Ince Boulevard and Lucerne Avenue would experience potentially significant vibration impacts from the Ince sewer improvement. Mitigation measures prescribed in Section 4.9 of this Draft EIR to reduce construction vibration impacts to this sensitive vibration receptor would be implemented during the installation of the upgraded sewer line.

With implementation of Mitigation Measure NOISE-3, the use of smaller bulldozers (less than 300 horsepower) would result in vibration levels of 0.0065 inch-per second PPV at residential buildings located within 15 feet from the Project Site and of 64 VdB at residential uses within 15 feet from the Project, which would not exceed the 0.2 inch-per second PPV building damage and 80 VdB perception threshold, respectively. Therefore, secondary effects would not result.

## 6.6 Effects Found Not To Be Significant In the Initial Study

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a Project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and is included in Appendix A-1 of the Draft EIR. The analysis in the Initial Study determined that the Project would result in less than significant impacts related to Aesthetics (scenic vistas); Agriculture and Forestry Resources (all subtopics); Biological Resources (all subtopics); Geology and Soils (soils incapable of supporting septic systems); Hazards and Hazardous Materials (projects in proximity to airports/ airstrips and wildfires); Hydrology and Water Quality (groundwater depletion, flooding from 100-year floods, risk of flooding from the failure of a levee or dam, inundation by a seiche or tsunami); Land Use and Planning (physical division of an established community and conservation plan); Mineral Resources (all subtopics); Noise (airport noise), Population and Housing (all subtopics); Public Services (schools, parks and other public facilities, such as libraries); Recreation (all subtopics); and Utilities (compliance with federal, state, and local statutes and regulations). As such, the Initial Study concluded that these issues would not be evaluated further in the Draft EIR in accordance with CEQA Guidelines Section 15063(c)(3)(A). For further discussion of these issues and more detailed evaluation of potential impacts, refer to the Initial Study provided in Appendix A-1 of this Draft EIR.

### 6.6.1 Energy

Section 21100(b) of the State CEQA Guidelines requires that an EIR include a detailed statement setting forth mitigation measures proposed to minimize a project's significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Appendix F of the State CEQA Guidelines states that, in order to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project. Appendix F further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the Project Description, Environmental Setting and Impact Analysis portions of technical sections, as well as through mitigation measures and alternatives.

In accordance with the intent of Appendix F of the State CEQA Guidelines, which requires an EIR to include a discussion of the potential energy impacts of a proposed project with an emphasis on avoiding of reducing inefficient, wasteful, and unnecessary consumption of energy, this Draft EIR includes relevant information and analyses that address the energy impacts of the Project. This Energy subsection represents a summary of the Project's anticipated energy needs, impacts, and conservation measures. As previously stated, Project Design Features that would increase building energy efficiency, reduce energy and water consumption, and increase recycling efforts have been incorporated into the Project. Information found herein, as well as other aspects of the Project's energy implications, are discussed in greater detail elsewhere in this Draft EIR, including in Chapter 2, Project Description, and Sections 4.5, Greenhouse Gas Emissions, and

#### 4.11, Transportation and Traffic.

### **Construction-Related Energy Consumption**

#### ***Estimated Energy Consumption***

The Project would be constructed over a period of approximately 2.5 years and is estimated to begin the first quarter of 2018 and to be completed by the third quarter of 2020. Construction energy consumption would result primarily from transportation fuels (e.g., diesel and gasoline) used for haul trucks, heavy-duty construction equipment, and construction workers traveling to and from the Project Site. This analysis provides the estimated maximum construction energy consumption for the purposes of evaluating the associated impacts on energy resources.

Based on the proposed development program and engineering estimates that form the basis of the Project's construction-related impact analyses, a maximum of approximately 39,065 one-way truck trips would be required to haul the demolition and excavation material from the Project Site to off-site reuse and disposal facilities over the 2.5-year construction period. A maximum of approximately 15,291 one-way vendor truck trips would be required to deliver building materials and supplies to the site over the 2.5-year construction period. Based on the CARB on-road vehicle emissions model, EMFAC2014(EMFAC), heavy-duty trucks would have an estimated fuel economy of approximately 6.4 miles per gallon averaged over the 2.5-year construction period.<sup>1</sup> Based on the information described above, construction of the Project would use a total of approximately 150,912 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 58,493 gallons of diesel fuel per year during the 2.5-year construction period.

Heavy-duty construction equipment associated with Project demolition, excavation, grading, utilities, and building construction would include equipment such as excavators, graders, tractors/loaders/backhoes, dozers, cranes, forklifts, generators, and welders. The majority of the equipment would likely be diesel-fueled; however, smaller equipment, such as welders and pumps may be electric-, gasoline-, or natural gas-fueled, and tower cranes would likely be electric-fueled. However, this Project energy assessment assumes all equipment would be diesel-fueled, due to the speculative nature of specifying the amounts and types of non-diesel equipment that might be used, and the difficulties in calculating the energy which would be consumed by this non-diesel equipment. The use of diesel fuel for all equipment also represents the most conservative scenario for maximum potential energy use during construction. Based on the number and type of construction equipment that would be used during Project construction, and based on the estimated duration of construction activities, the Project would use approximately 265,580 gallons of diesel fuel for heavy-duty construction equipment.<sup>2</sup> On an annual average basis, heavy-duty construction equipment would use approximately 102,938 gallons of diesel fuel per year.

<sup>1</sup> In order to provide a conservative assessment, 2017 was used as the analysis year (first year of construction).

<sup>2</sup> Fuel consumption is estimated based on fuel consumption factors in the OFFROAD2011 emissions model and the equipment horsepower and load factors in CalEEMod.

The number of construction workers that would be required would vary based on the phase of construction and activity taking place. The transportation fuel required by construction workers to travel to and from the Project site would depend on the total number of worker trips estimated for the duration of construction activity. According to EMFAC, passenger vehicles operating in the South Coast Air Basin (Basin) would have a fuel economy of approximately 23.1 miles per gallon over the 2.5-year construction period.<sup>3</sup> Assuming construction worker automobiles have an average fuel economy consistent with EMFAC, and given the total vehicle miles traveled for construction workers, based on engineering estimates provided in the CalEEMod software used in the Project air quality and GHG emissions assessment, workers would travel a total of approximately 2.31 million miles and use approximately 99,936 gallons of fuel (primarily gasoline) for construction worker trips. On an annual average basis, construction workers would use approximately 38,735 gallons of fuel (primarily gasoline) per year.

In summary, construction of the Project would use a total of approximately 99,936 gallons of gasoline and 428,268 gallons of diesel over the 2.5-year construction period, assuming worker automobiles are primarily gasoline-fueled, and heavy-duty construction equipment and trucks are primarily diesel-fueled. For comparison, EMFAC was used to estimate annual fuel consumption for worker, vendor, and haul truck vehicles classes in the Basin.<sup>4</sup> Based on EMFAC, approximately 4.7 billion gallons of gasoline and 978 million gallons would be consumed in 2017. A comparison of the Project's estimated annual fuel usage and the Basin's annual fuel usage is provided in **Table 6-1, Estimated Project Construction Fuel Consumption**.

**TABLE 6-1  
ESTIMATED PROJECT CONSTRUCTION FUEL CONSUMPTION**

Source	Fuel Type	Project	South Coast Air Basin 2017	Percent of South Coast Air Basin
Workers	Gasoline	38,735	4,715,655,418	0.008
Vendors	Diesel	6,324	955,737,693	0.0007
Haul Trucks	Diesel	52,169	22,264,363	0.23

Source: ESA PCR, September 2017.

Electricity from the power grid would be used during Project construction to provide temporary power for lighting, electronic equipment (e.g., computers, etc.), and to power electrical construction equipment; however, the electrical usage during Project construction would generally be assumed minimal since construction would occur during daytime hours, most construction equipment uses diesel fuel, and electronics draw minimal electricity. Thus, Project construction would not result in a substantial temporary increase in on-site electricity use. Therefore, it is expected that Project construction electricity use would generally be considered as negligible over the long-term.

<sup>3</sup> For a conservative estimate, fuel economy was based on 2017 values, the first year of construction.

<sup>4</sup> EMFAC2011 Vehicle Categories, Worker: LDA, LDT1, LDT2; Haul Trucks: T7 Single Construction; EMFAC2007 Vehicle Categories, Vendor: HHDT, MHDT.

### **Energy Conservation: Regulatory Compliance and Project Design Features**

The Project construction contractors would comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy duty diesel on- and off-road equipment. As discussed in Section 4.2, Air Quality, of this Draft EIR, CARB adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling time in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. CARB approved the Truck and Bus regulation to reduce NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from existing diesel vehicles operating in California. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models.

While intended to reduce construction criteria pollutant emissions, compliance with the above anti-idling and emissions regulations would also result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. PDF-AIR-1 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. According to the CARB staff report that was prepared at the time the anti-idling ATCM was being proposed for adoption in late 2004/early 2005, the regulation was estimated to reduce non-essential idling and associated emissions of diesel particulate matter and nitrogen oxide (NO<sub>x</sub>) emissions by 64 and 78 percent respectively in analysis year 2009.<sup>5</sup>

These reductions in emissions are directly attributable to overall reduced idling times and fuel combustion as a result of compliance with the regulation. Project compliance with CARB regulations would result in energy savings of approximately 10,175 gallons of diesel fuel, assuming a fuel reduction equivalent to the percent reduction of PM or NO<sub>x</sub> as estimated by CARB for 2009 (the lesser value, i.e., 64 percent, is used as a conservative assumption). The Project's compliance with regulatory measures would result in estimated annual fuel savings of approximately 3,944 gallons of diesel per year of construction. The estimated reductions represent a 2009 project scenario, the Project at hand would occur in 2018. Heavy-duty engines continue to become more efficient and reduction amounts may lessen in the future due to this. Although the energy savings cannot be accurately quantified for 2018, the Project would still reduce consumption of diesel fuel under the anti-idling measure.

With respect to solid waste, the Project would recycle and/or salvage 65 percent of nonhazardous construction and demolition debris in accordance with CALGreen Building Standards. The Project would achieve a high waste recycling and reuse rate for construction and demolition debris, and minimize wasteful or unnecessary consumption of energy for the production of virgin raw materials.

<sup>5</sup> California Air Resources Board, Proposed Regulation Order: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, Appendix A, 2004. Available at <https://www.arb.ca.gov/regact/idling/isorappf.pdf> Accessed July 2017.

## **Conclusion**

Project construction would use the necessary energy for on-site construction activities and the transport of materials, soil, and debris to and from the Project Site. The amount of energy used would not represent a substantial fraction of the available energy supply in terms of equipment and transportation fuels. Furthermore, compliance with the previously discussed anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and diverting waste would result in less fuel combustion and energy consumption. Therefore, construction of the Project would not result in wasteful, inefficient, and unnecessary consumption of energy, and would not preempt opportunities for future energy conservation.

## **Operation and Maintenance Energy Consumption**

### ***Anticipated Energy Consumption***

Operational energy consumption would occur from the Project building energy needs and from transportation fuels (e.g., diesel and gasoline) used for vehicles traveling to and from the Project Site. This analysis provides the estimated maximum operational energy consumption for the purposes of evaluating the associated impacts on energy resources.

The Project must comply with the applicable portions of the Title 24 Building Standards Code, and CALGreen Code. The Project would incorporate Project Design Features to achieve the reductions in energy and water usage, as well as encourage recycling and waste diversion. The Project would be designed to meet the requirements to be LEED Certified. Physical and operational Project characteristics, for which sufficient data are available to quantify the reductions from building energy and resource consumption, have been included in this quantitative analysis, and include, but are not limited to, the components discussed in PDF-AIR-2 and PDF-AIR-3.

The daily operation of the Project would generate demand for electricity, natural gas, and water supply, as well as generating wastewater, requiring conveyance, treatment, and disposal off-site, and solid waste, requiring disposal off-site. Based on engineering estimates used as the basis for GHG emissions calculations, the Project would have an annual electricity demand of approximately 10.7 million kilowatt-hours (kWh). To put this number into perspective, the value is compared to SCE network demand, which is the utility provider for the Project. For the 2016 fiscal year, SCE had an annual electric sale to customers of approximately 85,977 million kWh.<sup>6</sup> The Project represents approximately 0.012 percent of the SCE network sales for 2016.

Based on engineering estimates used as the basis for GHG emissions calculations, the initial operational year of the Project would have a natural gas demand of approximately 6.1 million kilo British thermal units (kBtu) per year. For comparison, the Southern California Gas Company network, which is a regional utility provider for much of Southern California, including the City,

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<sup>6</sup> SCE, 2016 Annual Report. Available at <https://www.edison.com/content/dam/eix/documents/investors/corporate-governance/2016-annual-report.pdf>. Accessed July 2017.

had a natural gas demand in 2015 of approximately 305 billion kBTU.<sup>7</sup> The Project represents approximately 0.002 percent of the Southern California Gas Company network demand for the 2016.

As discussed in Section 4.5, Greenhouse Gas Emissions, of this Draft EIR, Executive Orders S-3-05 and B-30-15 are aimed at reducing Statewide GHG emissions. These Executive Orders establish the 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. However, in order 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. Although the State has yet to identify specific technologies and measures, in particular for meeting the 2050 target, it is reasonable to conclude that the Project's post-2020 emissions trajectory, and associated energy use, is expected to follow a declining trend, consistent with Statewide efforts to meet these future year targets.

### **Alternative Energy Considerations**

The use of energy provided by alternative (i.e., renewable) resources, on-and off-site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by SCE, and limitations on the availability or feasibility of on-site energy generation. The existing Project Site consists of a fully operational television and movie studio and does not have on-site alternative energy or electric vehicle supply equipment.

SCE is required to commit to the use of renewable energy sources for compliance with the Renewables Portfolio Standard. SCE is required to meet the requirement to procure at least 33 percent of its energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. SB 350 (Chapter 547, Statutes of 2015) further increased the Renewables Portfolio Standard to 50 percent by 2030, with interim targets of 40 percent by 2024, and 45 percent by 2027. Eligible renewable resources are defined in the Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (i.e., 30 megawatts [MW] or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and other renewables that may be defined later. In 2015, 24.3 percent of the energy that was delivered to SCE's customers was from renewable energy.<sup>8</sup> According to the California Public Utilities Commission, SCE is under contract to have 41.4 percent of energy delivered to customers from renewable energy.

<sup>7</sup> Sempra Energy, 2016 Annual Report. Available at [http://www.sempra.com/pdf/financial-reports/2016\\_annualreport.pdf](http://www.sempra.com/pdf/financial-reports/2016_annualreport.pdf). Accessed July 2017.

<sup>8</sup> SCE, Corporate Responsibility Report 2015. Available at <http://www.edison.com/content/dam/eix/documents/aboutus/citizenship/2015-eix-corporate-responsibility-report.pdf>. Accessed May 2017.

With respect to on-site renewable energy sources, because of the Project's location, there are no local on-site sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, geothermal energy, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels.

Solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired (or other non-renewable fuel) energy power generation, since reliability of energy availability and transmission is necessary to meet demand, which is constant.

Wind-powered energy is not feasible on the Project site due to the lack of sufficient wind in the Los Angeles Basin. The California Energy Commission (CEC) studied the State's high wind resource potential. Based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. Wind resource areas with winds above 12 mph within Los Angeles County are located in relatively remote areas in the northwestern portion of the County.

The City's Green Building Program requires new developments greater than 10,000 sf to install 1kW of solar photovoltaic systems per 10,000 sf of floor area. The Project would consist of approximately 650,000 sf of new construction and would install a solar photovoltaic system that meets both the requirements of LEED and the City. The California Emissions Estimator Model (CalEEMod) (Version 2016.3.1) was used to estimate annual electricity demand for the Project. Based on this, in order to be consistent with City and LEED requirements, the Project would need to install a solar photovoltaic system capable of generating approximately 106,860 kwh annually.

### ***Energy Conservation: Regulatory Compliance***

As previously discussed in Section 4.5, Greenhouse Gas Emissions, the purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code establishes mandatory measures for new residential and non-residential buildings, which includes requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential as well as nonresidential uses. The new measures took effect on January 1, 2017.

The Project would comply with or exceed the applicable provisions of Title 24 and the CALGreen Code in affect at the time of building permit issuance. According to CEC, Title 24 (2016) standards use five percent less energy for nonresidential lighting, heating, cooling, ventilation, and water heating compared to the Title 24 (2013) standards. Therefore, it is anticipated that future updates to the Title 24 standards would result in increased energy efficiency. However, it is not possible to accurately predict the increased level of energy efficiency associated with future updates to the Title 24 standards.

With respect to solid waste, the Project is required to comply with applicable regulations, including those pertaining to waste reduction and recycling. In addition, the Project would expand the on-site recycling program, and install dedicated facilities for recycling stage sets and production waste. In addition, waste haulers serving the Project Site would divert Project-generated municipal waste in accordance with applicable ordinances, as well as future updates to the ordinances in effect at the time of Project construction and operation.

### ***Operational Transportation Energy Consumption***

Project operation would result in transportation energy use. Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Based on EMFAC estimates for 2020, the Basin would consume a total of 4.4 billion gallons of gasoline and 22.9 million gallons of diesel fuel. Vehicles would require a fraction of a percent of the Basin's transportation fuel consumption. According to EMFAC, the 2020 vehicle fleet average fuel economy for light-duty autos and trucks in the Basin is predicted to be 25.2 miles per gallon for gasoline vehicles and 36.2 miles per gallon for diesel vehicles, with gasoline vehicles accounting for 97.8 percent of the total VMT, and diesel vehicles accounting for 0.7 percent of the total VMT. Electric vehicles are predicted to account for 1.5 percent of the total VMT.

Based on the Project's maximum estimated VMT of 12.9 million miles per year, passenger vehicles would use approximately 499,490 gallons of gasoline and 2,440 gallons of diesel fuel in a year. This would represent approximately 0.01 percent of the Basin's gasoline consumption and approximately 0.01 percent of the Basin's diesel consumption.

Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by passengers, would reduce the Project's consumption of gasoline and diesel fuel; however, the effect may be minimal in the current vehicle market. According to EMFAC, electric vehicles are predicted to account for 1.5 percent of the vehicle fleet total VMT in 2020 for the Basin. Based on the estimate above, this would translate to a fuel savings of up to approximately 7,780 gallons of fuel (primarily gasoline, assuming electric vehicles replace gasoline-fueled passenger vehicles) per year. **Table 6-2, *Estimated Project Operational Energy Usage***, shows a summary of the Project's operational estimated energy usage.

### ***Energy Conservation: Land Use Characteristics and Project Design Features***

The Project would represent an urban infill development, since it would be undertaken on a currently developed property, and would be located near existing public transit stops. Public transit stops include multiple bus routes provided by the City of Culver City, Los Angeles Metro, and Los Angeles Department of Transportation, as well as the Culver City Expo Line. The Project is also within a reasonable walking distance to Downtown Culver City. The Project Traffic Study includes a transit credit from public transit stops in the form of 15 percent reduced trips compared to default trips rates in the Institute of Transportation Engineers, *Trip Generation*,

9<sup>th</sup> Edition.<sup>9</sup> An additional 10 percent reduction was applied to new net Project trips for the implementation of a Traffic Demand Management (TDM) Program.<sup>10</sup>

**TABLE 6-2  
ESTIMATED PROJECT OPERATIONAL ENERGY USAGE**

<b>Source</b>	<b>Natural Gas Per Year (million kBtu)</b>	<b>Electricity Per Year (million kWh)</b>	<b>Gallons of Diesel Fuel Per Year</b>	<b>Gallons of Gasoline Fuel Per Year</b>
Project	6.1	10.7	2,439	499,490
SoCal Gas/ SCE	305,000	85,977	—	—
Percent of SoCal Gas/ SCE	0.002%	0.012%	—	—
South Coast Air Basin (Transportation Sector)	—	—	22,907,846	4,438,766,655
Percentage of South Coast Air Basin (Transportation Sector)	—	—	0.01%	0.01%
Estimated Project Energy Savings from Operational Land Use Characteristics and Project Design Features (Annual)	0.31	0.64	913	186,970

SOURCE: ESA 2017.

The Project would encourage utilization of alternative modes of transportation through public transit and onsite bicycle parking. The increased transit accessibility would reduce vehicle trips and VMT, encourage walking and non-automotive forms of transportation, and result in corresponding reductions in transportation-related emissions and fuel consumption.

In addition, the Project incorporates project design features (PDFs) that would reduce operational emissions and target sustainable site development, water savings, energy efficiency, green-oriented materials selection, and improved indoor environmental quality. Building features would include installation of heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; use of materials and finishes that emit low quantities of VOCs; use of high efficiency fixtures and appliances, water conservation features; and recycling of solid wastes. The PDFs for the Project are listed below and to the extent they can be quantified, these features have been assumed in the impacts calculations, but all of these measures are considered in the consistency analysis:

**PDF-AIR-1 (Construction Features):** Construction equipment operating at the Project Site would 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 equipment greater than 50 horsepower (hp) used for this Project to meet USEPA Tier 4 off-road emission standards.

<sup>9</sup> Fehr & Peers, Traffic Study for The Culver Studios Modified Comprehensive Plan Update #7, 2017.

<sup>10</sup> The TDM Program is mitigation measure (MM) TRAF-6 and further details can be found in Section 4.11 Transportation and Traffic of this EIR.

Welders would also meet USEPA Tier 4 off-road emission standards or will be electric-powered. All equipment shall be outfitted with Best Available Control Technology (BACT) devices including a California Air Resources Board (CARB)-certified Level 3 Diesel Particulate Filter or equivalent. This PDF would allow for a reduction in diesel particulate matter and NOx emissions during construction activities.

- Consistent with CPA No. 6, the Project shall utilize low-VOC coatings during construction activities to avoid excessive VOC emissions.
- Consistent with CPA No. 6 Condition of Approval #140, trucks and other vehicles in loading and unloading queues shall be parked with engines off to reduce vehicle 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 use water efficient landscaping and native drought tolerant plants.
- 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 USEPA WaterSense specifications.
- The parking structures shall be designed with occupancy-sensor controlled lighting that would place lighting fixtures in a low power state in unoccupied zones.<sup>11</sup>

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

- The Project design would meet criteria for the LEED Certification level.
- The Project shall install 100 bicycle parking spaces.
- The Project shall install infrastructure for future gray water uses.
- 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 kW of solar photovoltaics per 10,000 sf of new development.

<sup>11</sup> A demonstration project by the United States Department of Energy indicated that the use of occupancy-sensor controlled lighting achieved a reduction of greater than 50 percent in lighting energy use compared to a similarly lighted parking structure without occupancy-sensor controls. For the purposes of this assessment, compliance with this feature is assumed to achieve a minimum 50 percent reduction in the energy required for the parking structures. United States Department of Energy, Building Technologies Office, SSL Demonstration: Parking Garage Lighting, Washington DC, June 2013. Available at [https://www1.eere.energy.gov/buildings/publications/pdfs/ssl/deptoflabor\\_brief.pdf](https://www1.eere.energy.gov/buildings/publications/pdfs/ssl/deptoflabor_brief.pdf). Accessed May 2017.

### **Conclusion**

Upon occupancy of the Project, the studio operations would demand energy for on-site activities and off-site transportation associated with vehicles traveling to and from the Project Site. The amount of energy used would not represent a substantial percentage of the available energy supply in terms of equipment and transportation fuels. Furthermore, the Project has PDFs that promote energy efficiency, such as, green building measures, consistent with state, regional, and local energy efficiency goals. Therefore, operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and would not preempt opportunities for future energy conservation.

# CHAPTER 7

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# CHAPTER 8

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## List of EIR Preparers and Organizations and Persons and Organizations Contacted

### 8.1 Lead Agency

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- Sol Blumenfeld, Community Development Director
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### 8.2 Project Applicant and Applicant Team

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- Ryan Smith, Managing Director

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- Jim Suhr, Owner

## 8.3 Environmental Impact Report Preparation

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- Anne Collins-Doehne, Associate Principal
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- Margaret Shekell, Managing Associate
- Robert Hilman, Senior Associate
- Jessie Fan, Senior Associate
- Lorena Christman, Senior Technical Associate
- Heidi Rouse, Director - Air Quality, Climate & Acoustics
- Alan Sako, Senior Managing Associate
- Kyle Garcia, Senior Archaeologist
- Kyle Kim, Senior Associate
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### Transportation and Traffic

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## **8.4 Agencies Consulted**

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# CHAPTER 9

## Standard Terms, Acronyms and Abbreviations

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### Standard Terms

**Administration Buildings:** Buildings D, E, H, and I are located adjacent to the Mansion in the Front Lawn area and were constructed between 1919 and 1925. These building are currently used for administration/office activities.

**Applicant:** The Applicant is Culver Studios, LLC or the Studio.

**Central Area:** The Central Area occupies the majority of the Studio Campus south of the Mansion and Front Lawn Area and contains 14 sound stages, production support facilities, offices, and a commissary housed in 13 buildings, plus a central plant. The spine of the Studio Campus accommodates production vehicle circulation and parking and outdoor production support functions in an internal courtyard.

**Central Parking Structure:** The two level below-grade Central Parking Structure would be located south of the Mansion and existing Rear Lawn Parking Structure, within the existing Central Area of the Studio Campus and would include a lower (B2) level for passenger vehicles as well as a high-bay upper (B1) level for production vehicles, service trucks, and visitor and employee parking. Loading bays/cores would be provided beneath each building, with numerous truck maneuvering areas between those bays to allow passing, turnaround, and egress. This parking structure would contain 836 spaces and would accommodate Studio employee, VIP, and visitor parking in addition to production staging and service zones.

**Central Plant:** The entire Studio Campus's heating, ventilation, and air conditioning and other energy needs are presently supplied from a single central plant (Building N) located west of Stage 5 along the western property boundary. The Central Plant is proposed for replacement with decentralized controls for individual buildings to accommodate separate tenants.

**Comprehensive Plan Amendment (CPA) No. 6:** Development on Project Site is governed by a Comprehensive Plan pursuant to Section 17.250 the Culver City Zoning Code. CPA No. 6 proposed the demolition of seven buildings and structures encompassing 66,703 square feet of office, stage, and support area. These included existing Buildings L, O, X, Y, and Z; the Commissary; Stage 10; and the existing parking structure near Van Buren Place. CPA No. 6 proposed the construction of three new production office buildings totaling 138,997 net new square feet, as well as a new 1,109 space, multi-level parking structure (Van Buren Parking Structure). CPA No. 6 also proposed the relocation to an area south of the Mansion of four historically significant bungalows.

**Comprehensive Plan Amendment (CPA) No. 7:** CPA No. 7 is an entitlement subject to the provisions of Section 17.560 of the Culver City Zoning Code and represents the amendment to the existing CPA No. 6 to permit the development of the Project. CPA No. 7 includes some of the improvements proposed under CPA No. 6, including demolition of Buildings L, O, X, Y, and Z, the Commissary, and Stage 10; and the construction of Buildings O and Y and the Van Buren Parking Structure. CPA No. 7 is a separate document that includes over 200 pages of detailed plans for The Culver Studios Innovation Plan. CPA No. 7 would replace CPA No. 6 upon its approval. See also the Culver Studios Innovation Plan.

**Digital Media Space/Buildings:** The Project would include the construction of six new Digital Media buildings which would house a flexible mix of creative space, production space, and digital media stages, and would replace six existing buildings housing offices and support services (Buildings L, O, X, Y, Z, and the Commissary) and four existing buildings housing sound stages. The Digital Media Space would provide flexible facilities and services that accommodate small independent productions as well as major motion pictures, green screen/motion capture, music videos, video games, virtual reality, still photography, podcasts, and many other nontraditional production activities that are continually introduced. The Digital Media Space would meet a demand for a highly adaptable, flexible, and controllable creative environment that combines office, sound stage and support facilities for single tenants and allows for adaptive reuse of a given space on a daily, weekly, lease-duration, or other short-term basis.

**Front Lawn:** The Front Lawn is set back from its Washington Boulevard frontage behind a low brick and lattice fence and secured pedestrian gate and is lined around its perimeter by low clipped hedges. The Front Lawn is currently used for a variety of special events including filming, screenings and concerts, weddings, picnics, and “pop-up” events, educational events, and community events.

**Mansion:** The Mansion, or Building C, a prominent and historically significant American Colonial Revival Style Mansion, was the first building constructed on the Studio Campus in 1918. The Mansion faces Washington Boulevard and is currently used for administration/office activities.

**Mansion and Front Lawn Area:** The Mansion and Front Lawn Area, located at the northernmost portion of the Studio Campus, contains the public face of the Studio along Washington Boulevard. The Mansion and Front Lawn Area includes the Mansion, set back from Washington Boulevard behind a deep, fenced, Front Lawn, associated administrative buildings designed in the same style and arrayed on either side of the lawn; and a sweeping internal driveway paved with asphalt.

**Parcel B and Town Plaza Expansion:** Parcel B is located to the north of the Project Site across the vacated portion of Washington Boulevard and is currently a surface parking lot. Parcel B and Town Plaza Expansion (within the vacated portion of Washington Boulevard) is approved for development as a mixed-use project that includes 74,000 square feet of office, 21,700 square feet of retail, and 21,700 square feet of restaurant uses with subterranean parking.

**Project:** See The Culver Studios Innovation Plan or Comprehensive Plan Amendment (CPA) No. 7.

**Project Site:** The approximately 14-acre digital media studios campus bounded by the vacated street portion of Washington Boulevard to the north, Ince Boulevard to the east, residential land uses and Van Buren Place to the west, and residential land uses and Lucerne Avenue to the south.

**Production and Media Area:** The existing portion of The Culver Studios Campus encompassing all of the area south of the Mansion and its rear yard, but excluding the existing Bungalow Area on the western edge of the campus, fronting on Lucerne Avenue (see Bungalow Area).

**Rear Lawn/Yard:** The Rear Lawn or Rear Yard is located immediately south of the Mansion and contains a smaller lawn, trees, and hardscape that comprise an internal courtyard for the use of Studio employees and visitors, and the recently relocated bungalows. The Rear Lawn has sometimes used for a variety of special events including filming, screenings and concerts, weddings, picnics, and “pop-up” events, educational events, and community events.

**Rear Lawn Parking Structure:** The existing below-grade Rear Lawn Parking Structure is located south of the Mansion and beneath the Rear Lawn. The Rear Lawn Parking Structure currently provides 419 spaces, which would be reduced to 411 spaces to accommodate a new connection to the Central Parking Structure. The Rear Lawn Parking Structure would also connect with the Culver/Main Tunnel, and Parcel B and Town Plaza. Together these ramps would provide direct access from Culver Boulevard.

**Relocated Bungalow Area:** The area immediately south of the Mansion and adjacent to its rear yard and lawn where the four historically significant bungalows, Buildings S, T, U, and V, have recently been moved from their previous locations on the western edge of the Studio campus fronting on Van Buren Place (see Western Area). The bungalows have been arrayed in a configuration that retains their existing relationships and orientations to one another and the cardinal directions, within a landscaped courtyard.

**Stages:** The sound stages are used for the production of feature-length films, television shows, short-term shoots, commercials, green screen/motion capture, video games, and music videos. There are currently 14 stages housed in six buildings. As a component of the Project, nine of the existing stages housed in four building would be demolished and eight new digital media stages would be provided within the Central Area of the Studio Campus.

**Studio Campus (or Studio):** The Studio Campus is a narrow, wedge-shaped, relatively flat site parcel and is generally divided into three distinct subareas: the Mansion and Front Lawn Area, the Central Area, and the Western Area.

**Support Facilities:** Support facilities traditionally include but are not limited to machine shops, carpentry shops and planning mills, paint shops, electrical/grips/props, cameras, film processing and cutting rooms, dressing rooms, wardrobe, hair and makeup, the commissary, first aid, storage, and the provision of a range of other services.

**The Culver Studios Innovation Plan:** The Innovation Plan encompasses the entire Project Site and would involve minor upgrades to the Mansion and Front Lawn, the construction of six Digital Media buildings, and the construction of the Van Buren Parking Structure and Central Parking Structures. The Project would also result in the demolition of existing buildings housing offices, support services, and sound stages. Buildings to be demolished would total approximately 236,293 square feet and new construction at Project buildout would total approximately 649,420 square feet, for a net new square footage total of approximately 413,127 square feet.

**Van Buren Place Linear Open Space:** The Van Buren Place Linear Open Space would be located adjacent to the Van Buren Parking Structure and would include a linear open space, at a minimum of 15-feet in depth and approximately 410 linear feet along Van Buren Place. This linear open space would provide a landscape amenity to the community, complete with seating, pedestrian level lighting, and stormwater treatment.

**Van Buren Parking Structure:** The Van Buren Parking Structure would be constructed on the western edge of the Studio Campus on the site of an existing above-grade parking structure and existing surface parking. The existing parking structure (three above-grade levels), which currently provides 200 spaces would be demolished. The Van Buren Parking Structure would include two below-grade, one at-grade, and five above-grade levels and would provide 1,109 striped spaces. The parking structure would accommodate existing and future Studio tenant employees and visitors, live studio audiences, and fleet vehicles. The ground floor of the garage would be dedicated to production vehicles. The parking structure would be constructed with a solid concrete wall free of gaps or penetrations surrounding the at-grade level, to reduce off-site noise, air quality, and lighting impacts from operations. An articulated screen would run the length of its Van Buren Place façade and provide visual interest, screening from potential light and noise sources, and a trellis to support a vertical garden.

**Western Area:** The Western Area, which forms the property boundary along Van Buren Place, is primarily occupied by parking, including a parking structure with below-grade and above-grade parking levels, and surface parking. Until recently, the area contained bungalow Buildings S, T, U, and V, which have been relocated to the area south of the Mansion.

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<b>Acronym/Abbreviation</b>	<b>Definition</b>
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## Acronyms and Abbreviations

<b>Acronym/Abbreviation</b>	<b>Definition</b>
AB	Assembly Bill
ACMs	asbestos-containing materials
ADWF	average dry weather flow
AF	acre feet
AFY	acre feet per year
Air Basin	South Coast Air Basin
ANSI	American National Standard Institute
APPP	Art in Public Places Program
AQMP	Air Quality Management Plan
ASCE	American Society of Civil Engineers
AST	above-ground storage tank
ASTM	American Society for Testing and Materials
ATCM	Airborne Toxic Control Measure
ATCS	Adaptive Traffic Control System
ATSCA	Automated Traffic Surveillance and Control
ATSP	Active Transportation Strategic Plan
AVO	average vehicle occupancy
BACT	Best Available Control Technology
BAU	business-as-usual
bgs	below ground surface
BMPs	Best Management Practices
BPMP	Culver City Bicycle & Pedestrian Master Plan
BUG	backlight, up light, glare
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
California Register	California Register of Historical Resources
Cal/OSHA	California Division of Occupational Safety and Health Administration

<b>Acronym/Abbreviation</b>	<b>Definition</b>
CalRecycle	California Department of Resources, Recycling and Recovery
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCFD	Culver City Fire Department
CCMC	Culver City Municipal Code
CCPD	Culver City Police Department
CCR	California Code of Regulations
CCSA	Culver City Service Area
CCTV	closed-circuit television
C&D	construction and demolition
CEC	California Energy Code
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERS	California Environmental Reporting System
CEUS	California Commercial End Use Survey
CFC	California Fire Code
CFR	Code of Federal Regulations
cfs	cubic feet per second
CGS	California Geological Survey
CH <sub>4</sub>	methane
CIDH	cast-in-drilled hole
CIP	Adaptive Capital Improvement Program
CIWMB	California Integrated Waste Management Board
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalents

<b>Acronym/Abbreviation</b>	<b>Definition</b>
CoIWMP	Los Angeles County Integrated Waste Management Plan
CPA No. 6	The Culver Studios Comprehensive Plan Amendment No. 6
CPA No. 7	The Culver Studios Comprehensive Plan Amendment No. 7
CPTs	cone penetration tests
CPUC	California Public Utilities Commission
CRA	Colorado River Aqueduct
CRECs	Controlled Recognized Environmental Conditions
CSE	Countywide Siting Element
CUPA	Certified Unified Program Agency
CVP	Central Valley Project
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
DNL	day-night average noise level
DOGGR	State of California, Department of Conservation, Division of Oil, Gas and Geothermal Resources
DPM	diesel exhaust particulate matter
DPR	California Department of Parks and Recreation
Draft EIR	Draft Environmental Impact Report
DTSC	Department of Toxic Substances Control
DTWRP	Donald Tillman Water Reclamation Plant
DWR	California Department of Water Resources
EFZ	State of California Alquist-Priolo Earthquake Fault Zone
EIR	Environmental Impact Report
EMFAC	EMission FACtors
EMS	emergency medical service
EPIC	Environmental Passive Integrated Chamber
EPO	Culver City Environmental Programs and Operations Division
ERF	effective response force
FHWA	Federal Highway Administration
FMZs	fire management zones

<b>Acronym/Abbreviation</b>	<b>Definition</b>
FTA	Federal Transit Administration
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GSF	gross square feet
GSWC	Golden State Water Company
GWP	Global Warming Potential
HABS	Historic American Building Survey
HABS/HAER	Level II Historic American Building Survey/Historic American Engineering Record
HAPs	hazardous air pollutants
HCM	Highway Capacity Manual
HFCs	hydrofluorocarbons
HHWE	Household Hazardous Waste Element
HQTA	High Quality Transit Area
HRECs	Historical Recognized Environmental Conditions
HTP	Hyperion Treatment Plant
HVAC	heating, ventilation, and air conditioning
HWCL	California Hazardous Waste Control Law
Hz	hertz
ICU	Intersection Capacity Utilization
IESNA	Illuminating Engineering Society of North America
IPCC	Intergovernmental Panel on Climate Change
IRP	City of Los Angeles Integrated Resources Plan
ITE	Institute of Transportation Engineers
kWh	kilowatt-hours
LACDPW	Los Angeles County Department of Public Works
LACFD	Los Angeles County Flood Control District
LADOT	Los Angeles Department of Transportation
LADPW	Los Angeles Department of Public Works
LAGWRP	Los Angeles-Glendale Water Reclamation Plant
LARWQCB	Los Angeles Regional Water Quality Control Board
LBP	lead-based paint

<b>Acronym/Abbreviation</b>	<b>Definition</b>
LCFS	Low Carbon Fuel Standard
LEED	Leadership in Energy and Environmental Design
L <sub>eq</sub>	Equivalent Sound Level
LID	Low Impact Development
L <sub>max</sub>	Maximum Noise Level
LOS	Level of Service
LQGs	Large Quantity Generators
LST	localized significance threshold
MATES IV	Multiple Air Toxics Exposure Study
MCEG	Maximum Considered Earthquake Geometric Mean
MCE <sub>R</sub>	Maximum Considered Earthquake
MEP	maximum extent practicable
Metro	Los Angeles County Metropolitan Transportation Authority
mgd	million gallons per day
M <sub>max</sub>	maximum moment magnitude
MMT	million metric tons
MMTCO <sub>2e</sub>	million metric tons of CO <sub>2e</sub>
MOU	memorandum of understanding
mpg	miles per gallon
MS4	Municipal Separate Storm Sewer Systems
msl	mean sea level
MUTCD	California Manual on Uniform Traffic Control Devices
MW	megawatts
MWD	Metropolitan Water District of Southern California
MWh	Megawatt-hour
N <sub>2</sub> O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NDFE	Nondisposal Facility Element
NESHAPs	National Emission Standards for Hazardous Air Pollutants
NHMLAC	Natural History Museum of Los Angeles County
NHPA	National Historic Preservation Act
NO	nitric oxide

<b>Acronym/Abbreviation</b>	<b>Definition</b>
N <sub>2</sub> O	nitrous oxide
NO <sub>2</sub>	nitrogen dioxide
NOC	Notice of Completion
NOI	Notice of Intent
NOP	Notice of Preparation
NOT	Notice of Termination
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NPDES General Permit	NPDES General Permit, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction Activities (Order No. 2009-009DWQ, NPDES Permit No. CAS000002)
O <sub>3</sub>	ozone
OEHHA	California Environmental Protection Agency Office of Environmental Health Hazard Assessment
OEM	Office of Emergency Management
OES	The Governor's Office of Emergency Services
OHP	The State Office of Historic Preservation
O&M	Operations and Maintenance
OPR	The Governor's Office of Planning and Research
OSHA	Federal Office of Safety and Health Administration
Pb	lead
PCB	polychlorinated biphenyls
PDF	Project Design Feature
PDT	Pacific Daylight Time
PFCs	perfluorocarbons
PGA	peak ground acceleration
PM <sub>10</sub>	particulate matter with an aerodynamic diameter equal to or less than 10 microns
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter equal to or less than 2.5 microns
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code

<b>Acronym/Abbreviation</b>	<b>Definition</b>
PRC	Culver City Public Review Committee
psi	pounds per square inch
PST	Pacific Standard Time
PWD	Culver City Public Works Department
QSA	Quantification Settlement Agreement
RCP	Regional Comprehensive Plan
RCP	reinforced concrete pipe
RCRA	Resource Conservation and Recovery Act
RECs	Recognized Environmental Conditions
RKO	Radio-Keith-Orpheum
RMCLs	recommended maximum contamination levels
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/ Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCS	Sustainable Communities Strategy
SDWA	Safe Drinking Water Act
SF	square feet
SF <sub>6</sub>	sulfur hexafluoride
SHPO	The State Historic Preservation Officer
SIP	State Implementation Plan
SLF	Sacred Lands File
SLM	Sound Level Meter
SO <sub>2</sub>	sulfur dioxide
SO <sub>4</sub>	sulfates
SQGs	Small Quantity Generators
SRRE	Source Reduction and Recycling Element
Standards	Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings

<b>Acronym/Abbreviation</b>	<b>Definition</b>
STIP	Statewide Transportation Improvement Program
SUSMP	Standard Urban Storm Water Mitigation Plan
SVP	The Society of Vertebrate Paleontology
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWQDv	Stormwater Quality Design Volume
SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
TCS	The Culver Studios
TDM	Transportation Demand Management
TeNS	Caltrans Technical Noise Supplement
The Big Eight	MGM, Fox, Paramount, United Artists, Universal Studios, Warner Brothers, Columbia, and RKO
TMDL	Total Maximum Daily Load
TOD	Culver City Transit Oriented Development
tpd	tons per day
TSCA	Toxic Substances Control Act
TTP	Terminal Island Treatment Plant
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
USEPA	United States Environmental Protection Agency
USGBC	United States Green Building Council
USGS	United States Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	volume-to-capacity
VMT	vehicle miles traveled
VOCs	volatile organic compounds
WBMWD	West Basin Municipal Water District
WSA	Water Supply Assessment
WSAP	Water Supply Allocation Plan
WSCP	water shortage contingency plan
WSDM	Water Surplus and Drought Management Plan