

Appendix J

Land Use Plans and Policies: Project Consistency Tables



1. Regional Plans

**TABLE LU-1
COMPARISON OF THE PROJECT TO APPLICABLE STRATEGIES OF THE 2020–2045 REGIONAL TRANSPORTATION
PLAN/SUSTAINABLE COMMUNITIES STRATEGY INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT**

Strategy	Would the Project Conflict?
Goals	
Encourage regional economic prosperity and global competitiveness.	No Conflict. This goal pertains to SCAG funding and policies. The Project would not adversely affect the capacity to encourage regional economic prosperity and global competitiveness. The Project would provide a total of 536,000 sf of new office floor area. 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 high-quality transit area (HQTA), the Project would support SCAG choices regarding this goal.
Improve mobility, accessibility, reliability, and travel safety for people and goods.	No Conflict. The Project would provide a high-density office use in an infill area near other goods and services and well-served by local and regional bus lines and Metro “E” Line Culver City Station as well as provide bicycle lanes in the adjacent Venice, National, and Washington Boulevards, which would all serve to improve mobility, accessibility, reliability, and travel safety for people and goods in support of this goal.
Enhance the preservation, security, and resilience of the regional transportation system.	No Conflict. The proximity of the Project Site to transit, including regional and local bus lines as well as the Metro “E” Line Culver City Station, would support the region’s transportation investment and the sustainability of the regional transportation system.
Increase person and goods movement and travel choices within the transportation system.	No Conflict. The Project, which is located in an HQTA, would provide a high-density office use in an area served by local and regional bus lines and the Metro “E” Line Culver City Station as well as provide bicycle lanes in the three adjacent streets. These characteristics would support an increase in person and goods movement and increase the available travel choices within the transportation system. The Project also provides at least 175 bicycle parking spaces and lockers and showers to accommodate bicycle use.
Reduce greenhouse gas emissions and improve air quality.	No Conflict. The Project Site is located within a SCAG-defined HQTA and City of Los Angeles-defined Transit Priority Area (TPA), which is defined by the Public Resources Code as an area within 0.5 miles of an existing or planned major transit stop. SCAG encourages redevelopment and growth with TPA areas. The Project would provide 175 bicycle parking spaces for employees and visitors. The Project Site, which is also located adjacent to high-density residential development, and retail uses, would include sidewalk widening and improvements and pedestrian-oriented landscaping and lighting that would encourage pedestrian activity. The Project would be served by an existing fixed-route intercampus shuttle drop-off/pick-up on National Boulevard into the Project design. The support of cycling and pedestrian access, the provision of shuttle services, and proximity to public transit would reduce vehicle miles traveled and, thus, both criteria pollutants and greenhouse gas emission. In addition, the Project would be designed to achieve the USGBC Leadership in Energy and Environmental Design (LEED) Gold equivalent efficiency standards (refer to Project Design Feature GHG-PDF-1), inclusive of environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code, Culver City’s mandatory Green Building Program requirements, and California Green Building Standards (CALGreen) Building Code. The Project’s sustainability features such as EV charging, EV capable, and EV ready spaces would serve to reduce greenhouse gas emissions and improve air quality.
Support healthy and equitable communities.	No Conflict. As noted above, the Project would implement design features to reduce air quality impacts, including compliance with the CALGreen Building Code and Los Angeles Green Building Code (refer to Sections 4.2, <i>Air Quality</i> , and 4.4, <i>Greenhouse Gas Emissions</i> , of this Draft EIR). Development of the Project would be along a mixed-use corridor that would provide access to and opportunities for pedestrian and bicycle transportation. The Project would also include at least 175 bicycle parking spaces for use by employees and visitors.

TABLE LU-1
COMPARISON OF THE PROJECT TO APPLICABLE STRATEGIES OF THE 2020–2045 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Strategy	Would the Project Conflict?
Adapt to changing climate and support an integrated regional development pattern and transportation network.	No Conflict. The Project, which is located in an HQT, would provide a high-density office use in an area served by local and regional bus lines and the Metro “E” Line Culver City Station, as well as bicycle lanes in the adjacent Venice, National, and Washington Boulevards. The Project would also include at least 175 bicycle parking spaces for use by employees and visitors, and would provide enhanced pedestrian facilities. The Project’s accessibility to multiple transportation features and facilities would support an integrated regional development pattern and transportation network which would in turn serve to reduce GHG emissions.
Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	No Conflict. This goal pertains to SCAG leveraging new transportation technologies and data-driven solutions that result in more efficient travel. The Project would not adversely affect SCAG’s ability to develop more efficient travel consistent with this goal.
Encourage development of diverse housing types in areas that are supported by multiple transportation options.	No Conflict. This goal pertains to SCAG encouraging development of a diverse housing types in areas that are support by multiple transportation options. While the Project does not include the development of residential uses, the Project would not preclude SCAG from implementing this goal and does not include the removal of existing residential uses.
Promote conservation of natural and agricultural lands and restoration of habitats.	No Conflict. As detailed in the Initial Study, provided in Appendix A of this Draft EIR, the Project Site does not contain agricultural uses or related operations, nor is the Project Site located within a designated riparian habitat or support suitable habitat for candidate, sensitive, or special status species; as such, the development of the Project would not conflict with this goal to promote conservation of natural agricultural lands and restoration of habitats.
Focus Growth Near Destinations and Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	No Conflict. The Project represents an intensification of development in proximity to a public transit station and as such, would not conflict with strategy that emphasize land use patterns facilitating multi-modal access to work and other destinations. The Project Site is within walking distance of the Metro “E” Line Culver City Station, located 600 feet to the southwest of the Project Site. In addition to the Metro “E” Line Culver City Station, the Project is served by a variety of public transit options along Venice, National, and Washington Boulevards provided by Metro, the Los Angeles Department of Transportation (LADOT), and Culver City Department of Transportation. Transit operations in the vicinity of the site include Metro Bus Lines 33 and 617, Dash Commuter Express 437A, Culver CityBus 1, 5, and 7, and Big Blue Bus line 17. The Metro “E” Line Culver City Station and bus line 33, and Culver CityBus 1 all operate frequently with headways of less than 15 minutes throughout the day. The Project Site is also a designated TPA. Therefore, the Project would emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.
Plan for growth near transit investments and support implementation of first/last mile strategies.	No Conflict. The Project would not conflict with strategies that plan for growth near transit investments and support implementation of first/last mile strategies. The Project Site, which is located 600 feet to the Metro “E” Line Culver City Station, is also a designated Los Angeles TPA. The 2020–2045 RTP/SCS recommends an increase in the number of trips accomplished by walking, bicycling, and the use of micro-mobility devices to reduce automobile vehicle miles traveled (VMT) (2020–2045 RTP/SCS, page 69). These strategies include building physical infrastructure such as local and regional bikeways, sidewalk improvements, and first-last mile connections to transit. According to the 2020–2045 RTP/SCS, these strategies would also improve air quality and public health by reducing emissions and increasing levels of physical activity. Because of its proximity to transit, the Project would encourage walking between the transit corridor the Project Site. In addition, with public sidewalk improvements and right-turn only vehicle egress at all driveways (reducing pedestrian/vehicle conflicts), and proximity to high density housing and services in the adjacent commercial area, the Project would encourage walking (a first mile/last mile strategy) between the Project Site and the surrounding neighborhoods. The Project would not conflict with the 2020–2045 RTP/SCS

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Strategy	Would the Project Conflict?
	strategy to reduce automobile vehicle miles, reduce air emissions, and improve public health through first/last mile strategies. Therefore, the Project would not conflict with policies that encourage growth near transit investments and support implementation of first/last mile strategies.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	No Conflict. The Project would not conflict with policies that prioritize infill redevelopment to accommodate new growth, increase amenities and connectivity in existing neighborhoods. The Project would represent an infill development within a HQTAs that would increase amenities, including public amenities, and connectivity in the existing area. As an infill use, it would not result in urban sprawl or other effects that would conflict with the objectives of the 2020–2045 RTP/SCS to reduce vehicle miles and improve air quality. Therefore, the Project would not conflict with policies that prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	No Conflict. The Project would not conflict with strategies that encourage design and transportation options that reduce the reliance on, and number of, solo car trips. The Project would implement a transportation demand management (TDM) Program to reduce the Project's single occupant vehicle trips and increase the trips arriving via alternative modes of transportation (e.g., walking, bicycle, carpool, vanpool, and transit). The TDM Program (refer to Project Design Feature TRAF-PDF-2) would include: TDM Support Services to tailor trip planning assistance for all employees; Marketing and Communications with a comprehensive website detailing alternative transportation options; Public Transit in which the Project would be served by an existing fixed-route intercampus shuttle system; Rideshare that matches riders with drivers originating from similar locales; Bicycling by providing bicycle parking and showers; Walking in which the Project will provide enhanced access points to the site; Pre-tax Commuter Benefit to employees for commute-related expenses; and Commuter Club as an opt-in program that offers email updates to employees. Additional components of the TDM Program include a Commute Expert Program with a "mentor" to answer questions; Guaranteed Ride Home Program in the event of an unexpected situation or emergency; Intercampus Shuttles for fixed routes between other buildings occupied by the Applicant; Campus Bike Share Program; and On-site Services such as full-service cafeteria, coffee bars, and shower facilities to limit the number of vehicle trips employees will need to take off-site during the day. Therefore, the Project would not conflict with policies that encourage design and transportation options that reduce the reliance on and number of solo car trips.
Support Implementation of Sustainability Policies	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	No Conflict. The Project would meet the USGBC LEED Gold equivalent efficiency standards (refer to Project Design Feature GHG-PDF-1), inclusive of environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code, Culver City's mandatory Green Building Program requirements, and CALGreen Building Code. Sustainability features would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable, and EV ready spaces; and bicycle facilities that would meet or exceed the respective city codes; Energy Star-labeled appliances, where possible; energy-efficient and water conserving HVAC systems; active indoor/outdoor air circulation, and adequate daylight. These features would reduce energy and water usage and hydrological hazards. Therefore, the Project would support local climate adaptation and hazard mitigation plans, as well as implement policies that improve community resiliency to climate change and natural hazards.

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Strategy	Would the Project Conflict?
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	No Conflict. The Project would incorporate canopy street trees, including a double row of Chinese elm trees along the Venice Boulevard frontage, as well as additional Chinese elms along the National Boulevard frontage. Southern magnolia trees would be located at the Venice and National Boulevard entrances. The Project design would include full height glazing defined by horizontal projections overhanging each of the stories. Exterior walls would feature sections of horizontal slatted screens, varied visual effect, while also contributing to the passive cooling of the interior. The horizontal projections may function as outdoor terraces on the interior courtyard to allow for indoor/outdoor use and fresh air circulation in the buildings. and reducing artificial heating and cooling demand. The Project's green roof terraces and shade trees would reduce the urban heat island effect. All of the Project's landscaping would use water-saving native plantings. contribute to passive cooling strategies and enhanced biodiversity, and reduce the urban heat island . Therefore, the Project's landscaping and building design would not conflict with policies for renewable energy and reduction of heat islands and carbon sequestration. For parts of Building 1 within Culver City, the Applicant would also comply with CCMC Chapter 15.02.1005 by either installing a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code or paying an in-lieu fee in an amount equal to the cost of a solar photovoltaic system consistent with Section 117.2 Exceptions of the California Building Code.
Promote more resource efficient development focused on conservation, recycling and reclamation.	No Conflict. The proposed building would comply with Title 24, the City of Los Angeles Green Building Code and Culver City's Green Building Program requirements. The Project would meet LEED Gold equivalent efficiency standards (refer to Project Design Feature GHG-PDF-1). Sustainability features would include water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use. With the implementation of these features, the Project would not conflict with policies that support resource efficient development focused on conservation, recycling, and reclamation.
Preserve, enhance and restore regional wildlife connectivity	No Conflict. The Project is located within a developed, urban area. Wildlife in the surrounding area is limited to migrating species, such as birds, which do not access the area through ground-level corridors. Although the Project would not block or divert any existing wildlife ground corridors, the Project would provide more habitat (trees and shrubs) than under existing conditions and could accommodate migrating bird species that frequent the region. Therefore, the Project would not conflict with strategies to enhance and restore regional wildlife connectivity.
Reduce consumption of resource areas, including agricultural land	No Conflict. The Project is located within an existing developed site, surrounded by existing urban development. Therefore, the Project would not consume natural areas or agricultural land and would not conflict with the policy to reduce consumption of resource areas, including agricultural land.
Identify ways to improve access to public park space	No Conflict. The Project would incorporate a 7,120-square-foot (sf) landscaped amenity area available for public use. The publicly accessible, privately maintained amenity area would provide 3,327 sf of landscaping, in addition to seating, kiosks, and other flexible uses depending on public interest. The Project operator would maintain the amenity area's hardscape and landscape, as well as manage any vendors using the amenity area. With the incorporation of an outdoor amenity area for public use, the Project would not conflict with programs to Identify ways to improve access to public park space.
SOURCE: ESA, 2022	

2. City of Culver City Plans

TABLE LU-2
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY GENERAL PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Land Use Element^a	
<p>Objective 6. Commercial Corridors.^a Revitalize the physical character and economic well-being of the City's commercial corridors.</p> <ul style="list-style-type: none"> • Policy 6.H. Encourage high trip- generating uses near transportation corridors to maximize transit use by patrons and employees. • Policy 6.I. Plan for streetscape improvements (street trees, landscaping, street furniture, special lighting, decorative paving, screening walls) and façade improvements along commercial corridors that complement each focus area and improve the physical environment. 	<p>No Conflict. The Project would develop new, high-quality architecture office buildings within the infill Project Site. The Project would introduce new employees to the area, who would have proximity to and support of surrounding retail uses and services and, thus would support the well-being of the Commercial Corridor.</p> <ul style="list-style-type: none"> • Policy 6.H: No Conflict. The proposed office use would generate up to 2,400 employees and a potentially high number of peak hour vehicle trips. The proximity of the Project to the Metro "E" Line Culver City Station, 600 feet to the west of the Project Site, adjacent bus lines, and shuttle pick-up and drop-off at Venice Boulevard, as well as the inclusion of bicycle parking in proximity to bike paths in Washington, National, and Venice Boulevards, would strongly support and maximize transit use by Project visitors and employees. • Policy 6.I: No Conflict. The Project would incorporate improvements within the right-of-way and along the edges of the proposed buildings that would improve the access and aesthetic appearance of the public sidewalks. The Venice Boulevard frontage would be widened to approximately 28 feet, and would be planted with a double row of canopy trees. The right-of-way will include an 8-foot planted parkway, a 5-foot sidewalk, a 7-foot landscape planter and a second sidewalk measuring 8 feet in width. The National Boulevard sidewalk along the Project Site would also be improved. The Project would widen the National Boulevard sidewalk from 7 feet to 8 feet and add a 7-foot landscaped parkway. Pedestrian experience would be improved by the addition of security and wayfinding lighting. In addition, the Project would provide a 7,120 sf publicly accessible, privately maintained amenity area with seating and landscaping, and programmed uses that could include a coffee kiosk or bicycle co-op. Therefore, the Project would not conflict with policies to plan for streetscape and façade improvements along commercial corridors that complement each focus area and improve the physical environment.
<p>Objective 7. Commercial Centers.^b Maintain Commercial Centers that serve the community as well as regional markets.</p> <ul style="list-style-type: none"> • Policy 7.A Allow for the development of new regional commercial centers that contribute to the economic health of the City and adequately mitigate impacts to nearby residential neighborhoods and Policy 7.B Allow existing regional and community centers to upgrade and expand in response to changing market demands, to maintain their economic vitality, with adequate mitigation of impacts to nearby residential neighborhoods. • Policy 7.C. Address parking as well as traffic ingress and egress as part of a shared parking and circulation system in areas designated as Commercial Centers and Policy 7.D. Allow reduced parking requirements for individual uses that share parking elements. 	<p>No Conflict. The Project would serve as corporate offices for an established company that serves regional markets. As such, the Project would increase the commercial use of the Project Site in a manner that would extend beyond Culver City. In addition, the Project is estimated to generate up 2,400 new employees, who would support and strengthen the City's economic base and markets for traditional existing businesses. Therefore, the Project would not conflict with policies to maintain Commercial Centers that serve the community as well as regional markets.</p> <ul style="list-style-type: none"> • Policy 7.A: No Conflict. The Project would upgrade the existing use of the Project Site with a substantial increase in commercial office floor area, sidewalk improvements, landscape, and publicly accessible, privately maintained amenity area. The Project would increase the economic health and vitality of the City by increasing commercial activity and increasing employment opportunities. With the exception of residential/ commercial mixed development in the nearby Access Culver City and Ivy Station projects, located to the south of Washington Boulevard and west of National Boulevard, respectively, the Project would not interface with any established residential neighborhoods. As discussed in Sections 4.2, <i>Air Quality</i>; 4.10, <i>Noise</i>, and 4.12, <i>Transportation</i>, of this Draft EIR, the Project would not have adverse air quality, noise (with mitigation), traffic, or other impacts on the City's residential neighborhoods. Therefore, the Project would not conflict with policies to upgrade and expand commercial uses while protecting the City's residential neighborhoods. • Policy 7.C: No Conflict. The Project would provide all parking in a subterranean structure. Because the Project does not include mixed use, shared parking would not be feasible. The Project would provide one driveway at the western edge of the Project Site on National Boulevard,

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Policies	Would the Project Conflict?
	<p>and one on the eastern edge of the Project Site accessed via Venice Boulevard to the alleyway. Both driveways would provide right-turn only ingress and right-turn only egress. A third, secondary (service) driveway would be accessed via Washington Boulevard to the alleyway and provide right-turn ingress. The focus of primary Project traffic to provide right-turn-only driveways would reduce pedestrian/vehicle conflicts. Therefore, the Project would not conflict with policies to address parking as well as traffic ingress and egress.</p>
<p>Goal: An Open Space, Urban Forest, Urban Design Network that Links Neighborhoods and Businesses, and Instill Civic Pride</p>	
<p>Objective 10. Visual Open Space. Extend the City's parklike qualities into neighborhoods and business districts through streetscape and urban design improvements.</p>	<p>No Conflict. The Project would provide for widening and landscaping of existing sidewalks on National and Venice Boulevards, including the provision of double sidewalks and a double row (colonnade) of street trees along Venice Boulevard. Sidewalks on Venice Boulevard, currently consisting of a 5-foot curb-adjacent sidewalk and planting and turf varying from 9 feet to 14 feet in width, would be improved to an 8-foot landscaped parkway, 13-feet of sidewalk, and a 7-foot landscaped planter). National Boulevard would be improved from the existing 4-foot sidewalk and 3-foot landscaped parkway to 8-foot sidewalk and 7-foot landscaped parkway. Streetscape improvements would also include pedestrian-oriented planting beds; placement of broad, recessed building entrances within a single entry on each street front; and landscaped terraces and full height glazing of exterior building walls that would allow visual access into common area building interiors. The full height glazing would allow for an open appearance and engage the adjacent sidewalks, while open and transparent as viewed from a distance. In addition, the Project would provide 7,120 sf of publicly accessible, privately maintained amenity area, 3,327 sf of which would be landscaped. This amenity area would be located off Washington Boulevard in the southeast corner of the Project Site and would enhance the visual character of Washington Boulevard between the Helms Bakery Complex and the 8777 Washington office building. The Project would also include 51,600 sf internal courtyard (available to Project employees and visitors), of which 39,000 sf would be landscaped. Therefore, the Project would not conflict with policies to extend the City's parklike qualities into neighborhoods and business districts through streetscape and urban design improvements.</p>
<p>Objective 11. Urban Forest. Create a sustainable urban forest that enhances Culver City's image and quality of life.</p>	<p>No Conflict. The Project would incorporate 28 Chinese elm street trees along the City of Los Angeles street frontages (Venice Boulevard and a portion of National Boulevard) and six Chinese elm street trees on the Culver City street frontage (a portion of National Boulevard). All trees would be planted with the same distances between trees (spaced on center). Accent trees (Southern Magnolia) would be planted at building entrances. In addition, the publicly accessible, privately maintained amenity area and internal courtyard would be planted with decorative beds and shrubbery.</p>
<p>Objective 12. Urban Design. 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>No Conflict. The Project would redevelop two underutilized parcels currently occupied by repurposed warehouses, with two integrated, high-quality architecture office buildings. Buildings 1 and 2 would feature full height glazing defined by horizontal architectural projections overhanging each of the stories. The first story of the buildings would be buffered from the sidewalks by landscaped planters while the Project's full height glazing would allow for an open appearance and engage the adjacent sidewalks, while open and transparent as viewed from a distance. The strong horizontal definition of the overhangs would create a story-by-story articulation of the four- and five-story Building 2 and the four-story Building 1. The first stories of the buildings would be separated from the sidewalks by landscape planters; however, the Project's full height glazing would allow for an open appearance and engagement with the sidewalk and as façade transparency as viewed from a distance. The main entrances into the two buildings would be at street level, recessed back from the sidewalk, and feature full height glazing. Building 2 would have a single broad entryway with a length of 144 feet, (parallel to the sidewalk) and depth of 32 feet on Venice Boulevard. Building 1 would have a single broad entryway with a length of 40 feet (parallel the sidewalk) and a depth varying from 34 to 45 on National Boulevard. In addition to full height glazing defined by horizontal architectural projections overhanging each of the stories.</p>

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Policies	Would the Project Conflict?
	<p>The first story of the buildings would be buffered from the sidewalks by landscaped planters while the Project's full height glazing would allow for an open appearance and engage the adjacent sidewalks, while open and transparent as viewed from a distance. The slats have a horizontal effect, which further define the horizontality of the buildings create a varied visual effect, and further break up the buildings' sense of mass. The overhangs and horizontal slats would provide for shading and cooling of the buildings' common area interiors, as well as contributing to the visual character of the Project. With the careful design and site layout, the Project would not conflict with objectives that support the highest quality of architectural and site design in new construction and streetscapes.</p>
Goal: A Community that Provides Recreational, Historical and Cultural Opportunities	
<p>Objective 13. Open Space Protection and Acquisition. Protect and expand Culver City's open space resources through aggressively pursuing land acquisition and encouraging private contributions.</p>	<p>No Conflict. As discussed under Land Use Element Objective 5, above, the Project would provide 7,120 sf of publicly accessible, privately maintained amenity area with landscaping, seating, and a flexible combination of coffee kiosk, bicycle co-op or other programmed activities. The Project is located on an existing developed site, which is not an open space resource and would not be suitable as preserved open space. With the provision of an amenity area for public use, the Project would not conflict with policies to protect and expand Culver City's open space resources through acquisition and private contributions.</p>
<p>Objective 14. Historic Preservation. Promote the City's architectural and cultural heritage by preserving buildings and sites that reflect Culver City's varied history and development.</p>	<p>No Conflict. The existing buildings on the Project Site consist of repurposed warehouses and as demonstrated in the Historic Resources Assessment Report (Appendix J of this Draft EIR), were found ineligible as historical resources due to a lack of significant historic associations and substantial alterations over time. Although the Project would have no direct impact on historical resources, the historically important Helms Bakery Complex is located approximately 55 feet to the east of the Project Site. The Helms Bakery Complex is known for its Art Deco architecture and association with the region's commercial history. As discussed in Section 4.3, <i>Cultural Resources</i>, of this Draft EIR, the Project's commercial use and scale would not conflict with the use or scaled the Helms Bakery Complex. The Project would not physically impact or materially impair the Helms Bakery Building and therefore would have no impact to its integrity of location, design, workmanship or materials. In addition, the Project would not demolish any existing buildings in the surrounding setting of the Helms Bakery Complex other than those on the Project Site, which are ineligible as historic resources. Therefore, the Project would not affect the Helms Bakery Building's integrity of setting, feeling or association. In addition, the design and materials of the new construction would be distinctive from, yet compatible with, the Helms Bakery Building. The Project would increase the building setback along Venice Boulevard compared to existing conditions. At present, the on-site building at the corner of the alley and Venice Boulevard (directly across from the Helms Bakery Building) is set back approximately 20 feet. With the demolition of this building and the increased setback of 28 feet from the street under the Project, the Helms Bakery Building's Venice Boulevard frontage would be more visible from eastbound Venice Boulevard. In addition, with the demolition of the on-site building on Washington Boulevard and the conversion of this location to a permanent amenity area, the Helms Bakery Building's Washington Boulevard frontage would also become more visible from eastbound Washington Boulevard. The Helms Bakery Building would remain visible within the built environment in the same way it currently is, and the new construction would detract only minimally from its visibility or prominence within the built environment. Therefore, the Project would not conflict with policies that promote the City's architectural and cultural heritage by preserving buildings and sites that reflect Culver City's varied history and development.</p>

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Policies	Would the Project Conflict?
Eastern Sub-Area	
<p>Objective 23. Project and enhance residential and business uses within the Eastern Sub-Area (includes reference to instructions on Figure LU-15, which show the intersection of Venice and National Boulevards within a designated "Gateway."</p> <ul style="list-style-type: none"> • Policy 23.F: Improve the Eastern Sub-Area's identity as part of Culver City by assigning high-priority to signage, gateway, and street improvements for this Sub-Area. 	<p>No Conflict. The Project would replace the existing single-story, repurposed warehouses on the Project Site with two modern office buildings characterized by high-quality architecture. The four- and five-story buildings would be oriented toward Venice and National Boulevard, have prominent, landscaped entrances. Driveways would be located at the south and east edges of the Project Site, removed as far as possible from the intersection. Signage would include building identification signs (company name and addresses). Buildings 1 and 2 would feature full height glazing defined by horizontal architectural projections overhanging each of the stories. The first story of the buildings would be buffered from the sidewalks by landscaped planters while the Project's full height glazing would allow for an open appearance and engage the adjacent sidewalks, while open and transparent as viewed from a distance. The finished overhangs, which would provide a strong horizontal definition of each story. Sidewalks on Venice and National Boulevards would be widened and landscaped, with a double row (colonnade) of Chinese elms along Venice Boulevard. The buildings' prominent entrances on each street would feature Southern magnolia accent trees. Building 2's street walls facing Venice and National Boulevards would feature landscaped terraces further contributing to the green character of the buildings. The highly aesthetic, landmark make-up of the Project would contribute to the "gateway" character of the intersection of Venice and National Boulevards and, as such, the Project would not conflict with policies to improve the Eastern Sub-Area's identity as part of Culver City gateway and street improvements for this Sub-Area</p>
Open Space Element	
<p>Objective 3. Passive Recreation. Provide passive recreational open space within walking distance of all City neighborhoods.</p>	<p>No Conflict. As discussed under Land Use Element Objective 5, above, the Project would provide 7,120 sf of publicly accessible, privately maintained amenity area with landscaping, seating, and a flexible combination of coffee kiosk, bicycle co-op or other programed activities. From Washington Boulevard, the amenity area would serve residents in the Access Culver City mixed use project to the south of Washington Boulevard and other nearby residential neighborhoods. Therefore, the Project would not conflict with policies to provide passive recreational open space within walking distance of residential neighborhoods.</p>
Noise Element	
Goal: A Community that Minimizes Noise Disturbance	
<p>Objective 1. Land Use Compatibility. Ensure that compatibility of land uses with regard to noise sources and receptors.</p>	<p>No Conflict. The Project would consist of office uses, a central internal courtyard, and a 7,120 sf publicly accessible, privately maintained amenity area. The proposed office uses would not include entertainment venues, restaurants, manufacturing, or other uses that could potentially generate high noise levels. Adjacent uses include the 8777 Washington, four-story office building, directly to the south of the Project Site and the Helms Bakery Building located 55 feet east of the Project Site, east of the alley at the Project Site's east boundary. Mixed residential/commercial uses are located to the south of the Project Site to the south of Washington Boulevard; the Ivy Station mixed use and Metro "E" Line Culver City Station is located to the west of the Project Site, west of National Boulevard; and strip commercial offices and retail uses are located to the north of the Project Site, north of Venice Boulevard. The most noise sensitive receptors would be the residential occupants of the Access Culver City and the Ivy Station mixed use projects. In terms of noise generation, the proposed office buildings would not be fully occupied in the late evening or at night. In addition, the nature of office uses is generally quiet. As further discussed in Section 4.10, <i>Noise</i>, of this Draft EIR, the operation of the Project would not increase noise levels that would exceed the City's noise standards at any sensitive receptor site. Therefore, the Project would not conflict with policies to ensure compatibility of land uses with regard to noise sources and receptors.</p>

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COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY GENERAL PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Objective 2. Stationary Noise Sources. Protect those areas that are or may be subject to unacceptable noise from stationary noise sources.	No Conflict. As discussed in Section 4.10, <i>Noise</i> , of this Draft EIR, operation of the Project, including all stationary noise sources, would result in noise levels at nearby noise sensitive receptors that would be below applicable significant impact thresholds and within acceptable City noise limits. Operation of the Project would comply with all applicable noise regulations established by both City of Los Angeles and City of Culver City.
Objective 3. Transportation-Related Noise Sources. Protect those areas that are or may be subject to noise from transportation noise sources.	No Conflict. Vehicle traffic generated by the Project could result in an increase in ambient noise levels. However, as discussed in Section 4.10, <i>Noise</i> , of this Draft EIR, noise levels from these mobile sources would not increase ambient noise levels that would exceed the significance impact thresholds at any of the receptor sites. Therefore, the Project would not conflict with policies to protect sensitive receptors from transportation noise sources.

NOTES:

- ^a The Culver City Parcel is shown as "Commercial General Corridor" on the General Plan Land Use Element Map at: <https://www.culvercity.org/files/assets/public/documents/information-technology/maps/general-plan-land-use-map.pdf>
- ^b The Culver City Parcel is shown as "Community Serving Center" in the Land Use Element, Figure LU-9 at <https://www.culvercity.org/files/assets/public/documents/community-development/advance-planning/general-plan/landuseelement.pdf>

SOURCE: ESA, 2022

TABLE LU-3
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY BICYCLE & PEDESTRIAN ACTION PLAN
INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Goal 1 – Access and Connectivity	
Objective AC-1. Increase access and connectivity to jobs, education, retail, parks and libraries, schools, recreation centers, transit, and other neighborhood destinations.	No Conflict. The Project would be located adjacent to existing bike paths in Washington and National Boulevards. These routes would provide access to the Project's office uses, and for future occupants to the region's retail uses, services, and residential neighborhoods. The Project would include 175 bicycle parking spaces and showers to accommodate cyclists. The Project would also widen and landscape existing planters abutting the sidewalks on National and Venice Boulevards, including the provision of double sidewalks and a double row (colonnade) of street trees along Venice Boulevard. Sidewalks on Venice Boulevard, currently consisting of a 5-foot curb-adjacent sidewalk and planting and turf varying from 9 feet to 14 feet in width, would be improved to an 8-foot landscaped parkway, 13 feet of sidewalk, and 7-foot landscaped planter. National Boulevard would be improved from the existing 4-foot sidewalk and 3-foot landscaped parkway to an 8-foot sidewalk and a 7-foot landscaped parkway. The improvements of the sidewalks would improve pedestrian access between the Project Site and the Metro "E" Line Culver City Station and between the Helms Bakery Complex and Ivy Station, as well as general pedestrian circulation in the area. Because the Project would accommodate cyclists and would improve pedestrian routes in the area, it would not conflict with policies to increase access retail, parks and libraries, schools, recreation centers, transit, and other neighborhood destinations.
Objective AC-2. Support public transit service.	No Conflict. The Project intensifies development and occupancy by generating up to 2,400 employees within 600 feet of the Metro "E" Line Culver City Station and adjacent to a range of alternative transit opportunities, with bus stops along the Project's three (Venice, National, and Washington Boulevards) street frontages. Sidewalk improvements, including widening and landscaping, and the provision of landscaped, publicly accessible, privately maintained amenity area on Washington Boulevard to enhance pedestrian comfort, as well as the higher density and transit opportunity near or adjacent to the Project Site, the Project would not conflict with policies to support public transit service.
Goal 2 – Health and Safety	
Objective HS-1. Reduce collisions involving bicyclists and pedestrians through safe and comfortable bicycle and pedestrian facilities.	No Conflict. The Project proposes two driveways that would be part of existing driveways and curb cuts along National and Washington Boulevards and the construction of one new driveway and curb cut adjacent to the existing Helms alley driveway along Venice Boulevard. All driveways would be right-turn only, which would reduce potential conflicts between motor vehicles and bicycles and pedestrians. With all parking located within subterranean structures, all surface parking would be removed, and the potential for conflicts between cyclists, pedestrians, and motor vehicles would also be reduced. The Project's wider sidewalks would also reduce potential pedestrian and bicycle conflicts. Therefore, the Project would not conflict with policies to Reduce collisions involving bicyclists and pedestrians through safe and comfortable bicycle and pedestrian facilities.
Objective HS-3. Use infrastructure and programs to promote an active lifestyle that includes bicycling and walking.	No Conflict. The Project would provide bicycle parking and showers that would support active bicycle use by on-site employees. The Project's wider, landscaped sidewalks and proximity to a range of transit options, as well as convenient walking distance to the Helms Bakery Complex, the Access Culver City mixed-use, the Ivy Station mixed use, and other retail uses and services and residential neighborhoods in the area would encourage pedestrian activity. Therefore, the Project would not conflict with policies that use infrastructure and programs to promote an active lifestyle that includes bicycling and walking.

TABLE LU-3
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CULVER CITY BICYCLE & PEDESTRIAN ACTION PLAN
INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
<p>Objective HS-4. Reduce air pollution, asthma rates, and greenhouse gas emissions.</p>	<p>No Conflict. The Project would intensify development and occupancy, resulting in up to 2,400 employees in proximity to the Metro "E" Line Culver City Station and a range of exiting bus routes, as well as a variety of transit options including cycling and walking. With the proximity to transit options, the Project would reduce the need for automobile use and would reduce per capita vehicle miles travelled (see Section 4.12, <i>Transportation</i>, of this Draft EIR). The Project would be served by an existing fixed-route intercampus shuttle service to further reduce vehicle miles. With the potential for the reduction in automobile use, the Project would not conflict with policies to reduce air pollution, asthma rates, and greenhouse gas emissions.</p>
Goal 3 – Affordability	
<p>Objective A-1. Reduce long-term transportation costs by reducing the need for vehicle ownership or for parking in new developments.</p>	<p>No Conflict. The Project would provide for on-site bicycle parking for employees. In addition, employees would have access to a range of transportation options within walking distance, including the Metro "E" Line Culver City Station, a range of adjacent bus routes and bike paths in Washington, Venice, and National Boulevards. The area is also well-served by retail uses, mixed use development, and services within walking distance. Because employees could commute via the range of transit options in the area, the Project would not conflict with the policy to reduce long-term transportation costs by reducing the need for vehicle ownership or for parking in new developments</p>
SOURCE: ESA, 2022	

TABLE LU-4
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE REDEVELOPMENT PLAN FOR THE CULVER CITY
REDEVELOPMENT PROJECT INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Component Area 4	
<p>Section 210. Consistency with City's General Plan. All uses proposed in this Plan, or other plans that may be adopted by the Agency, shall be consistent with the City's General Plan as it now exists or may be hereafter amended.</p>	<p>No Conflict. The Project would be consistent with the Community Commercial land use designation of the General Plan and the existing IG zone and -EW overlay which allow for office uses, including creative offices and multimedia production.</p>
<p>Section 241. Public Street Layout, Rights of Way and Easements. The public rights-of-way (ROW), easements, and principal streets proposed or existing in the Component Area may be widened, altered, realigned, abandoned, vacated, or closed by the Agency and the City as necessary for proper development of this Project. Additional public streets, alleys, and easements may be created by the Agency and the City in the Component Area as needed for proper circulation.</p> <p>The public rights-of-way shall be used for vehicular and pedestrian traffic as well as for public improvements, public and private utilities, and activities typically found in public rights-of-way.</p> <p>In addition, all necessary easements for public uses, public facilities, and public utilities may be retained and created.</p>	<p>No Conflict. The Project would provide for widening and landscaping of existing sidewalks on National and Venice Boulevards, including the provision of double sidewalks and a double row (colonnade) of street trees along Venice Boulevard. Sidewalks on Venice Boulevard, currently consisting of a 5-foot curb-adjacent sidewalk and planting and turf varying from 9 feet to 14 feet in width, would be improved to an 8-foot landscaped parkway, 5-foot sidewalk, 7-foot landscaped planter, and 8-foot sidewalk (two sidewalks). National Boulevard would be improved from the existing 4-foot sidewalk and 3-foot landscaped parkway to 8-foot sidewalk and 7-foot landscaped parkway. Therefore, the Project would not conflict with policies related to the improvements and dedications of public streets and public right-of-way.</p>
<p>Section 363. Design for Development. Within the limits, restrictions, and controls established in the Plan, the Agency is authorized to establish restrictions on heights of buildings, land coverage, setback requirements, design criteria, traffic circulation, traffic access, and other development and design controls necessary for proper development of both private and public areas within the Component Area. Such controls may not relax the requirements of the Culver City Planning and Zoning Ordinance, or any applicable specific plan.</p>	<p>No Conflict. The Redevelopment Plan's design for development requires consistency with applicable Land Use Element, Circulation Element, Open Space Element, and Noise Element of the General Plan. As discussed in the comparison of applicable policies of the General Plan in Table LU-7, above, the Project would not conflict with the General Plan's Land Use, Open Space, and Noise Element. As further discussed in Section 4.10, <i>Transportation</i>, of this Draft EIR the Project would be consistent with the applicable policies of the General Plan Circulation Element. The Project would also be consistent with the General Plan's maximum height requirement of 56 feet in the Culver City parcel, as well as lot coverage, traffic access, setbacks, and other standards of the General Plan. Therefore, the Project would not conflict with any established restrictions on development of the Project Site.</p>
<p>Section 409. Other. All construction shall comply with all applicable State and local laws in effect at the time, including without limitations the City Building, Electrical, Heating and Ventilating, Housing and Plumbing Codes, and the City Zoning and Subdivision Sections of the Municipal Code.</p> <p>All outdoor storage of materials or equipment shall be enclosed or screened by walls, landscaping, or other enclosure to the extent and in the manner required by the Agency.</p>	<p>No Conflict. The Project, through the Department of Building and Safety's Plan Check and site inspection process, would be required to comply with all applicable Codes, including without limitations the City Building, Electrical, Heating and Ventilation and Plumbing Codes, and the Culver City Zoning and Subdivision Sections of the Municipal Code. The applicable zoning is described in Subsection 2.8, <i>Anticipated Project Permits</i>, contained in Chapter 2, <i>Project Description</i>, of this Draft EIR.</p> <p>All outdoor materials and equipment such as elevator bulkhead and equipment would be screened as shown in the conceptual Project elevation renderings in Figures 2-4 and 2-5, contained in Chapter 2 of this Draft EIR. Trash collection areas would be interior to the Project and would not be visible.</p>
SOURCE: ESA, 2022	

TABLE LU-5
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE EXPOSITION LIGHT RAIL TRANSIT AND STATION DESIGN
FOR DEVELOPMENT INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies ^a	Would the Project Conflict?
V1. Development Standards B through N	
<p>B. Development Intensity. Appropriate development intensities shall be provided to encourage pedestrian walkability and transit ridership. A gradient of land use intensities shall exist within the walking radius of the Light Rail Transit (LRT) station, with the highest intensity of uses located nearest the transit facility.</p> <p>Commercial development in the Design for Development (DFD) area will benefit from a high volume of transit passengers. As such, higher intensity land uses around the proposed station area will be convenient to passengers and create a critical mass to help stimulate development.</p>	<p>No Conflict. The Project would redevelop currently underutilized parcels within 600 feet of the Metro "E" Line Culver City Station. With the removal of existing warehouse/retail/office uses, the Project would result in a net increase of 430,953 sf of office floor area. Development of the Culver City parcel, the new use would consist of one office building with 167,000 sf of floor area and result in a net increase of 148,179 sf of office floor area. The Project would generate approximately 2,400 new employees to the site and, thus, meet the policy to increase intensity of development within a walking radius of the Metro "E" Line Culver City Station. Therefore, the Project would not conflict with policies to increase intensity of development that locates higher intensity land uses near transit stations and create a critical mass to further stimulate development.</p>
<p>C. Building Heights. Structures in the DFD area shall be built to appropriate heights, subject to applicable requirements of the City Zoning ordinances and requirements.</p>	<p>No Conflict. Building 1, located within Culver City would be four stories and 56 feet in accordance with the Culver City General Plan and the Culver City Redevelopment Plan for Component Area 4, as well as existing height constraints set forth in CCMC Section 17.240 for Planned Development (PD) Districts. Therefore, the Project would not conflict with policies that require structures in the DFD area to be built to appropriate heights, subject to applicable requirements of the City Zoning ordinances and requirements.</p>
<p>D. Building and Development Setbacks. Building and development setbacks shall be subject to the applicable setback requirements of the City Zoning ordinance, except to assure varied and note-worthy (as opposed to flat and uniform) building configurations and a more interesting, inviting, and attractive streetscape. The Agency may require articulated building setbacks that help to make the buildings appealing and accessible at the street level and thereby create a comfortable and welcoming pedestrian environment that will encourage street level uses where pedestrians can be drawn to the street with a feeling of intimacy and enclosure. Buildings and development in the DFD area shall relate to how people move around the edges of structures and spaces, defining both the scale and direction of movement. Buildings shall be situated, when and where appropriate, to provide areas for pedestrian queuing and gathering. The intersection of Washington, National, and Exposition Boulevards will be a pedestrian activity center and will provide an opportunity for informal pedestrian gathering places adjacent to surrounding buildings. The corners of this intersection shall be modified by any applicant if determined necessary by the Community Development Director and the Public Works Director/City Engineer, to maximize the space available for pedestrians to gather on these corners while waiting to cross Washington or National Boulevards</p>	<p>No Conflict. The Culver City portion of the Project Site is currently zoned IL (Light Industrial), which would not be applicable to the proposed office uses, and -EW (East Washington Overlay). For IG parcels, including IG parcels located within the East Washington Overlay (-EW) zone, the setback requirements of the IG Zone provided in CCMC Section 17.230.020 Table 2-9 (Industrial District Development Standards) of 5 feet at the front yard with no side yard setbacks would apply. The upper-level facades of Building 1 facing National would be set back an average of 15-feet, with overhangs extending over the 8-foot sidewalk to provide natural shade for pedestrians. National Boulevard would be improved from the existing 4-foot sidewalk and 3-foot landscaped parkway to 8-foot sidewalk and 7-foot landscaped parkway. Sidewalk improvements include additional Chinese elm street trees on National Boulevard. Southern magnolia trees would be located as accent trees at the Project's entrance on National Boulevard). Improvements also include pedestrian lighting and the Project's full height glazing of exterior walls, defined by horizontal architectural projections overhanging each of the stories. The first story of the buildings would be buffered from the sidewalks by landscaped planters while the Project's full height glazing would allow for an open appearance and engage the adjacent sidewalks, while open and transparent as viewed from a distance. Building 1 would have a single broad entry alcove with a length of 40 feet (parallel the sidewalk) and a varying depth of 34 to 45 feet on National Boulevard. This deep recessed area would add articulation and visual interest to the building street-facing facades. In addition, the Project would provide 7,120 sf of landscaped, publicly accessible, privately maintained amenity area with seating that would be directly accessed from Washington Boulevard and would meet the objective of this policy to create an opportunity for informal pedestrian gathering places adjacent to surrounding buildings at the Washington and National Boulevard intersection. Thus, the Project would not conflict with building and development setback requirements that create an interesting, inviting, and attractive streetscape.</p>
<p>E. Public Open Space. The streets and public rights-of-way shall be established as the primary element of the open space system as connections to activity centers, such as the Helms District, Downtown Culver City, the Hayden Tract and the larger community, and as continuous recreational paths.</p> <p>These rights-of-way and other smaller limited use areas shall be landscaped (where appropriate) and designed as Urban Open Space to enhance,</p>	<p>No Conflict. The Project would provide 7,120 sf of publicly accessible, privately maintained amenity area, 3,327 sf of which would be landscaped. The publicly accessible, privately maintained amenity area would be located in the southeast corner of the Project Site and would be accessed from Washington Boulevard. In addition to landscaping, the purpose of the publicly accessible, privately maintained amenity area is to provide a small park-like setting with seating, or a flexible combination of coffee kiosk, bicycle co-op or programed activities. The Project's amenity area would serve as a link between the Helms Bakery Complex to the east of the Project Site and the Ivy</p>

TABLE LU-5
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE EXPOSITION LIGHT RAIL TRANSIT AND STATION DESIGN FOR DEVELOPMENT INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies ^a	Would the Project Conflict?
<p>complement, and protect adjacent commercial and residential areas. As used herein, "Urban Open Space" shall mean all graded surfaces outside of building exterior wall lines that are open to the sky and not used for vehicular parking and circulation use. The public streets, the existing pocket park at the Washington and National Boulevards, and EXPO ROW shall be established as the primary open space to provide connectivity to activity centers and the larger community.</p>	<p>Station development (including the Metro "E" Line Culver City Station) to the west of the Project Site. The Project would also provide substantial landscaping within the public right-of-way, as discussed under Policy V.D, above. Therefore, the Project would not conflict with Policy V.E to create open space connections between the area's activity centers.</p>
G. Paving (Not applicable)	
H. Architectural Design.	
<p>1. General Parameters. This DFD aims to create an architecture that is permanent, functional, pleasant, and pedestrian and transit user friendly.</p> <p>2. Building Exteriors. All structures (buildings and station related facilities) shall be oriented primarily towards the pedestrian and first consideration shall be given to users who arrive on foot.</p> <p>3. Signage. Formulation of a master sign program by the "developer" as an integral part of the overall development concept shall be required. Notwithstanding specific CCMC provisions having citywide application, the Agency intends to allow only signing essential and appropriate to the scale and character of a quality transit oriented development, having an emphasis on pedestrian readability. Within this general framework, the Agency is receptive to innovative and imaginative signing techniques and proposals.</p> <p>4. Green Building Standards. Green Building Standards shall be strongly encouraged and required, when and if the City adopts them into the Municipal Code.</p>	<p>No Conflict. The Project's building entrances would be oriented to the sidewalks and at sidewalk level, within deep landscaped setbacks that would enhance the experience of pedestrians on Venice and National Boulevards. Building 1 would have a single broad entryway with a length of 40 feet (parallel the sidewalk) and a varying depth 34 to 45 feet on National Boulevard. The recessed entrance area would add articulation and interest along the adjacent sidewalks for arriving pedestrians, as well as the general public. The Project would feature full height glazing of exterior walls defined by horizontal architectural projections overhanging each of the stories. The first story of the buildings would be buffered from the sidewalks by landscaped planters while the Project's full height glazing would allow for an open appearance and engage the adjacent sidewalks, while open and transparent as viewed from a distance. Signs would consist only of building identification signs (company name and street address) and wayfinding signage for pedestrians. The Project would be designed to LEED Gold equivalent efficiency standards (refer to Project Design Feature GHG-PDF-1), inclusive of environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code, Culver City's mandatory Green Building Program requirements, and CALGreen Building Code. Therefore, the Project would not conflict with policies related to architectural design, including pedestrian-oriented building exteriors, signage, and green building standards.</p>
<p>I. Lighting. Both the ROW and the development parcels shall have adequate lighting for all modes of use: lighting that considers the needs and security of pedestrians, bicyclists, those with special needs, or those traveling by vehicle. Lighting should respond to the way activities vary in terms of their intensity, location, time of occurrence and duration.</p> <p>Lighting should not be allowed to adversely affect adjacent uses. It should also respond to the form of the space, the different activities that are likely to occur there, the people who are likely to use it and the patterns of movement that emanate from it. Pedestrian spaces, paths and promenades should be illuminated to a level that will facilitate safe and satisfactory use.</p> <p>Creative, energy efficient, low-maintenance lighting solutions shall be encouraged for private and public development.</p>	<p>No Conflict. Pedestrian lighting along National and Venice Boulevard would accommodate the movement of cyclists in the adjacent National, Washington, and Venice Boulevard bike paths as well as pedestrians entering and exiting the Project Site and pedestrians walking between the area's centers, including the Helms Bakery Complex to the east and the Ivy Station development (including the Metro "E" Line Culver City Station) to the west of the Project Site. The Project Site is not located adjacent to residential neighborhoods and, further, all exterior lighting would be directed onto the sidewalks and not toward any off-site residential uses per CCMC Section 17.300.040.A.2, which requires that all exterior lighting be energy efficient and shielded or recessed so that direct glare and reflections are confined to the maximum extent feasible within the boundaries of the site, and directed downward and away from adjoining properties and public rights-of-way. Therefore, the Project would not conflict with policies to provide efficient and non-intrusive right-of-way lighting.</p>

TABLE LU-5
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE EXPOSITION LIGHT RAIL TRANSIT AND STATION DESIGN FOR DEVELOPMENT INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies ^a	Would the Project Conflict?
<p>J. Sound Attenuation. Noise mitigation measures including sound walls, earth berms, and sound absorbing materials and surfaces shall be designed and installed to mitigate adverse impacts as directed and approved by the City's Public Works Director and Community Development Director.</p> <p>The use or addition of double-paned windows on properties adjacent to development is not acceptable as a sole noise mitigation measure, unless approved by the Agency's Executive Director or Assistant Executive Director.</p> <p>All uses within the DFD area shall comply to Culver City Municipal Code noise regulations (Chapter 9.07), and related standards of the General Plan Noise Element. Public utilities or agencies operating under the authority of the Public Utilities Commission are not exempt from provisions of the City's noise regulations or the noise standards of the General Plan Noise Element. All uses within the DFD area shall also comply to Section 9.07.055 of the CCMC regarding Amplified Sounds, which states that it shall be prohibited for any persons to operate a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions or providing entertainment which is audible at a distance of fifty (50) feet or beyond the subject's property line without first filing an application and obtaining a permit as set forth in Chapter 9.07 Noise Regulations.</p>	<p>No Conflict. As discussed in Section 4.10, Noise, of this Draft EIR, with mitigation, the Project's construction would not exceed the significance thresholds at any sensitive receptor. Operational noise levels, including composite noise, would not exceed significance thresholds at any sensitive receptors (residential, hospital, school, etc.). Other than Mitigation Measures NOI-MM-1 and NOI-MM-2, no additional sound attenuation, such as sound walls, berms, or sound absorbing materials would be required. Therefore, the Project would not conflict with policies related to sound attenuation.</p>
<p>K. Public Art. All private and public development activities shall comply with the requirements established in the City's Art in Public Places Ordinance.</p>	<p>No Conflict. The Project would pay in lieu fees to provide public art to the Culver City in accordance with the City's Art in Public Places Ordinance. Therefore, the Project would not conflict with policies to incorporate public art in the proposed development. All public art would be consistent with requirements established in the City's Art in Public Places Ordinance.</p>
<p>L. Parking Design and Development. 1. Design and Development Parking shall encourage pedestrian activity, disperse impacts, and leverage efficient and cost-effective use of the facility via mixed or joint use. Off-street parking may be provided on surface, in above-grade and/or subterranean facilities. It shall be designed to minimize impacts on the community. This can be accomplished by locating parking above or below grade, (except if surface parking is needed to meet accessibility requirements). Parking below grade is preferable and highly encouraged.</p>	<p>No Conflict. All on-site vehicle parking, which would meet the total Project demand for employees and visitors, would be located within subterranean structures. Off-site or surface parking would not be required. Because the Project is not mixed-use, a shared parking program would not be feasible. However, the absence of surface parking lots, in which employees and visitors would not need to cross or enter any active vehicle movement areas, as well as right-turn-only into the Project's driveways, would minimize potential impacts on pedestrians and encourage pedestrian activity by reducing pedestrian/vehicle conflicts. Adequate on-site parking would also minimize impacts on the community by reducing on-street vehicle movements near pedestrian crossings and sidewalks. Therefore, the Project would not conflict with policies that encourage pedestrian activity and on-site, below grade parking.</p>
<p>M. Protection of Adjacent Residential Neighborhoods. It is one objective of this DFD to establish development standards to provide that residential neighborhoods and businesses adjacent to all public and private improvements and/or development in the DFD area shall not be adversely affected by those improvements and/or developments. To help meet this objective, any agency, group, or organization interested in designing, installing, and maintaining any improvements within the DFD area shall consult with, and obtain the advice of adjacent residents, property owners, and businesses and respond diligently and in good faith to their concerns with respect to planning, design, construction, and operation.</p>	<p>No Conflict. The Project Site is not located adjacent to any residential uses. The nearest residential uses are the Access Culver City mixed-use project to the south of Washington Boulevard and the Ivy Station project to the west of National Boulevard. The separation of the Project Site by broad boulevards from these residential uses would reduce any potential conflicts related to planning, design, and operation, of the proposed office uses with the off-site mixed-use residential land uses. With respect to construction, the Project would implement a Construction Management Plan, including a plan for construction employee parking, that would reduce the impact of construction activities on surrounding residential land uses. The Construction Management Plan would be applicable to the construction of the proposed office buildings, subterranean parking, and all improvements within the public right-of-way. Please refer to Section 4.12, <i>Transportation</i>, for a detailed discussion of the Construction Management Plan (refer to Project Design Feature TRAF-PDF-1). Therefore, the Project would not conflict with policies related to adjacent residential neighborhoods.</p>

**TABLE LU-5
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE EXPOSITION LIGHT RAIL TRANSIT AND STATION DESIGN
FOR DEVELOPMENT INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT**

Policies ^a	Would the Project Conflict?
<p>N. Vibration. Vibration mitigation measures shall be designed and included into development plans so as to mitigate adverse impacts as directed and approved by the City's Public Works and Community Development Directors.</p>	<p>No Conflict. As evaluated in Section 4.10, <i>Noise</i>, of this Draft EIR the greatest risk of vibration would occur during excavation activities for the subterranean garage. The adjacent historical Helms Bakery Complex is the most sensitive receptor in proximity to the Project Site that could be impacted by higher vibration levels. As discussed in Section 4.10, the implementation of mitigation measures would reduce vibration impacts to a level of less than significant and as such, the Project would not conflict with policies to provide vibration mitigation measures to mitigate adverse impacts.</p>
<p>VII. Fire Safety</p>	
<p>Fire Safety. Access shall be provided for Fire Department emergency vehicles and equipment to all structures and facilities subject to the approval of the Fire Marshal. Standard pre-fire floor plans as required by the Fire Marshal shall be submitted and approved prior to the issuance of any certificate of occupancy. Automatic sprinkler, alarm, smoke detector and/or other suppression systems may be required. Modification to water supply systems serving the area and/or site(s) may be required for new developments or rehabilitation projects in order to ensure sufficient water supply for appropriate fire protection as determined by the Fire Marshal.</p>	<p>No Conflict. Access for all Fire Department emergency vehicles would be available along the adjacent National, Venice, and Washington Boulevard rights-of-way and via a fire access road in the existing alleyway at the east edge of the Project Site. Floor plans would be submitted to the Fire Marshal prior to the issuance of any certificate of occupancy. The Project would also comply with the City's Section 9.02.040 Amendment of Chapter 9 of the California Fire Code, which under Section 901.4.1.1 requires that an automatic fire-extinguishing (sprinkler) system be installed in every new building in the City, regardless of area separation or type of construction. The Project would also implement any improvements to the existing water delivery system to meet fire flow requirements that would ensure sufficient water supply as determined by the Fire Marshal. Therefore, the Project would not conflict with policies to ensure fire safety and access.</p>
<p>^a Note that the Design for Development (DFD) Section IV, Development Standards, A (Special Controls), is based on the General Plan Land Use, Circulation, Noise, and Open Space Elements of the General Plan as they currently exist or are amended in the future. See Table LU-7, Consistency of the Project with Applicable Policies of the Culver City General Plan Intended to Avoid or Mitigate and Environmental Effect, regarding consistency of the Project with applicable policies of the General Plan's Land Use, Open Space, and Noise Elements. Also see Section 4.12, Transportation, of this Draft EIR for an evaluation of the applicable policies of the General Plan Circulation Element. In addition, the Development Standards A are based on certain regulatory constraints of the Redevelopment Plan, described in Table LU-8, Consistency of the Project with Applicable Policies of the Redevelopment Plan for the Culver City Redevelopment Project Intended to Avoid or Mitigate and Environmental Effect, above.</p>	
<p>SOURCE: ESA, 2022</p>	

TABLE LU-6
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE REDEVELOPMENT PLAN FOR THE CULVER CITY TOD
VISIONING PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
<p>Pedestrians. To improve walkability, improve pedestrian safety, and encourage circulation on foot.</p>	<p>No Conflict. The Project is within walking distance of the Metro “E” Line Culver City Station, located 600 feet to the southwest of the Project Site. The Project would widen and provide for pedestrian-oriented landscaping and lighting along Venice and National Boulevard, and include a landscaped, publicly accessible, privately maintained amenity area adjacent to Washington Boulevard. All three of these streets provide pedestrian linkage between the Helms Bakery Complex (a commercial/retail center), the Metro “E” Line Culver City Station and the Ivy Station mixed use development. Improvements that would encourage pedestrian activity a double sidewalk and double row (colonnade) of street trees (Chinese elms) along Venice Boulevard; additional street trees (Chinese elms) along National Boulevard; pedestrian-oriented planting beds; broad recessed main entrances at sidewalk level into the Project from both Venice and National Boulevards; windows along the Project’s exterior walls that would provide visual access into common area building interiors from the sidewalk; and lighting for pedestrian security and wayfinding along the Project’s street edges. Therefore, the Project would not conflict with policies to improve walkability, improve pedestrian safety, and encourage circulation on foot.</p>
<p>Transit. To improve the efficiency and convenience of transit as a mobility option.</p>	<p>No Conflict. The Project would intensify the use of the existing Project Site, currently occupied by repurposed warehouses/retail buildings totaling 105,047 sf (82,226 sf of which are on the Los Angeles Parcel), by developing high quality new buildings totaling 536,000 sf and providing job opportunities for approximately 2,400 employees within 600 feet of the Metro “E” Line Culver City Station. In addition to the Metro “E” Line Culver City Station, the Project is served by a variety of public transit options along Venice, National, and Washington Boulevards provided by Metro, LADOT, and Culver City Department of Transportation. Transit operations in the vicinity of the site include Metro Bus Lines 33 and 617, Dash Commuter Express 437A, Culver City Bus 1, 5, and 7, and Big Blue Bus line 17. The Expo Light Rail and bus line 33, and Culver CityBus 1 all operate frequently with headways of less than 15 minutes throughout the day. The Los Angeles portion of the Project Site is also located with a designated City of Los Angeles TPA. The increase in development and employee density in proximity to the Metro “E” Line Culver City Station and a range of other transit options would improve the efficiency and convenience of transit as a mobility option and, as such, the Project would not conflict with TOD policy.</p>
<p>Bikes. To improve convenience, safety, and efficiency of a cycling infrastructure and encourage biking as an alternative mobility option.</p>	<p>No Conflict. The Project would provide a total of 175 bicycle parking spaces, including 51 spaces in Building 1 and 124 bicycle parking spaces in Building 2. The Project proposes two driveways that would be part of existing driveways and curb cuts along National and Washington Boulevards and the construction of one new driveway and curb cut adjacent to the existing Helms alley driveway along Venice Boulevard. All driveways would be right-turn only and would reduce potential bicycle/motor vehicle conflicts within the existing bike paths in National, Washington, and Venice Boulevards along the Project’s frontage. Therefore, the Project would not conflict with policies to improve convenience, safety, and efficiency of a cycling infrastructure and encourage biking as an alternative mobility option.</p>
<p>Traffic. To improve mobility for pedestrians, transit and bikes, as well as to relieve certain traffic congestion conditions on local streets.</p>	<p>No Conflict. The introduction of a higher density project in proximity to Expo Light Rail and bus transit and existing bike paths, the incorporation of bicycle parking, the widening and landscaping of sidewalks, the orientation of main entrances to the sidewalks, and the addition of pedestrian lighting for security and wayfinding would encourage pedestrian activity and cycling activity for Project visitors and employees, as well as reduce vehicle miles traveled. Further, the Project would implement a TDM Program, required under Project Design Feature TRAF-PDF-2, to reduce the Project’s single occupant vehicle trips and increase the trips arriving via alternative modes of transportation includes TDM Support Services to tailor trip planning assistance for all employees; Marketing and Communications with a comprehensive website detailing alternative transportation options; Public Transit in which the Project would be served by an existing fixed-route intercampus shuttle system: Rideshare that matches riders with drivers originating from similar locales;</p>

TABLE LU-6
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE REDEVELOPMENT PLAN FOR THE CULVER CITY TOD
VISIONING PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
	Bicycling by providing bicycle parking and showers; Walking in which the Project will provide enhanced access points to the site; Pre-tax Commuter Benefit to employees for commute-related expenses; and Commuter Club as an opt-in program that offers email updates to employees. Additional components of the TDM Program include a Commute Expert Program with a "mentor" to answers questions; Guaranteed Ride Home Program in the event of an unexpected situation or emergency; Intercampus Shuttles for fixed routes between other buildings occupied by the Applicant; Campus Bike Share Program; and On-site Services such as full-service cafeteria, coffee bars, shower facilities, and produce deliveries to limit the number of vehicle trips employees will need to take off-site during the day. (Therefore, the TDM Program would support increased mobility for pedestrians, transit and bikes, and also reduce Project traffic conditions on local streets.
Washington Boulevard. To establish Washington Boulevard, from Downtown to its crossing at Ballona Creek, as the principal spine of the TOD area.	No Conflict. The south boundary of the Project Site borders this the section of Washington Boulevard, just to the east of National Boulevard. Along the Washington Boulevard frontage, the Project anticipates the development of a 7,120-sf landscaped, publicly accessible, privately maintained amenity area, with seating and other amenities. The proposed amenity area, which would be privately maintained, would be directly accessed from the Washington Boulevard sidewalk. The Project's publicly accessible, privately maintained amenity area would enhance the pedestrian link between the Helms Bakery Complex (a commercial/retail center) and the Ivy Station development and the Metro "E" Line Culver City Station within the Ivy Station development. With the inclusion of this amenity area, the Project would contribute to Washington Boulevard as a principal spine of the TOD area. As such, the Project would not conflict with this policy.
Transit-Oriented Development (TOD) District Policies. To guide development within the TOD area, to define and design certain improvements that address mobility, and to clarify and document the City's expectations regarding conditions for new Development.	No Conflict. The Project would increase the intensity of land use and occupancy (with approximately 2,400 new employees) in proximity to the Metro "E" Line Culver City Station. The Project would provide for high quality architecture and pedestrian-oriented improvements, such as sidewalk widening, additional canopy street trees along National and Venice Boulevards (including a double row, or colonnade, of trees on Venice Boulevard), and pedestrian lighting. The proposed buildings would feature full height glazing of exterior walls defined by horizontal architectural projections overhanging each of the stories. The first story of the buildings would be buffered from the sidewalks by landscaped planters while the Project's full height glazing would allow for an open appearance and engage the adjacent sidewalks, while open and transparent as viewed from a distance. The main entrances on each street (National and Venice Boulevard) would be located within deep, pedestrian-oriented, landscaped setbacks along the two street frontages (National and Venice Boulevards). These entrances would enhance and welcome pedestrians directly from the adjacent sidewalks. The Project Site, which would incorporate 175 bicycle parking spaces is also located adjacent to bike paths in National and Venice Boulevards and would be located adjacent to several bus routes, all of which would contribute to alternative transportation options. Therefore, the new development would not conflict with policies to guide development within the TOD area, to define and design certain improvements that address mobility.
Transportation Demand Management (TDM) Policies. To encourage, facilitate and promote the use of alternative mobility modes.	No Conflict. The Project would incorporate a TDM Program, as discussed in detail in Section 4.12, <i>Transportation</i> , of this Draft EIR, that would include to ride-share and other programs to reduce vehicle trips during operation. In addition, the Project includes a shuttle drop-off and pick-up at the Venice Boulevard main entrance, which would reduce vehicle to and from the Project. Therefore, the Project would not conflict with policies to facilitate and promote the use of alternative mobility modes.
SOURCE: ESA, 2022	

3. City of Los Angeles Plans

TABLE LU-7

COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CITY OF LOS ANGELES GENERAL PLAN FRAMEWORK ELEMENT INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Goal, Objective, or Policy	Would the Project Conflict?
Land Use Chapter	
<p>Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.</p>	<p>No Conflict. The Project would replace existing repurposed warehouses/retail buildings totaling 101,047 sf (82,226 sf of which are on the Los Angeles Parcel) by developing high quality new buildings totaling 536,000 sf and providing job opportunities for approximately 2,400 employees that would contribute to the City's long-term economic viability. The Project is not located within an economically depressed area and because the Project is not located within or adjacent to an existing residential neighborhood, it would not cause the removal of any existing residential units or encroach into established residential neighborhoods.</p> <p>The Project would not create a high demand on public resources such as parks and schools and, thus, would not result in a non-equitable distribution of public resources.</p> <p>The Project would conserve natural resources by meeting LEED Gold equivalent efficiency standards (refer to Project Design Feature GHG-PDF-1). The sustainability features to be incorporated into the Project would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces and bicycle facilities that would meet or exceed the respective city codes; Energy Star-labeled appliances, where possible; energy-efficient and water conserving HVAC systems; active fresh circulation and adequate daylight.</p> <p>The Project would be served by adequate infrastructure and public services, would widen and landscaping adjacent sidewalks needed for public access and would install or upgrade as necessary all necessary utility lines serving the Project Site.</p> <p>The Project would be located in a TPA and 600 feet from the Metro "E" Line Culver City Station, which would reduce the need for vehicle use and reduce traffic congestion.</p> <p>The Project would enhance recreation and open space opportunities by providing public access to a landscaped, 7,120-sf open space area off Washington Boulevard.</p> <p>The Project would not cause adverse air quality, traffic, operational noise, or other impacts on the surrounding area and would not result in environmental justice or unhealthful living impacts to the surrounding uses or to the City of Los Angeles. As such, the Project would not conflict with policies to improve air quality, enhance open space opportunities, assure environmental justice and a healthful living environment for a more livable city.</p>
<p>Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.</p>	<p>No Conflict. The Project would accommodate a diversity of uses by providing new office buildings in an area that is predominately mixed retail/residential (e.g., Ivy Station, Access Culver City, and the Helms Bakery Complex (a commercial/retail center). This use would increase floor area, activity, and utilization of the Project Site and would, thus, support the needs of the City's existing and future residents, businesses, and visitors.</p>
<p>Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses with the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.</p>	<p>No Conflict. While this policy refers to the citywide provision of public infrastructure, as discussed in Section 4.11.1, Public Services—Fire Protection and Section 4.11.2, Public Services—Police Protection; agencies providing public services to the Project would have capacity to serve the Project.</p>
<p>Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.</p>	<p>No Conflict. The Project Site is a 4.46-acre property within an urbanized area. The Project Site is located within a SCAG-defined HQTAs and City of Los Angeles-defined TPA. The Project would provide 175 bicycle parking spaces for employees and visitors. The Project Site, which is also located adjacent to high-density residential development, and retail uses, would include sidewalk widening and improvements and pedestrian-oriented landscaping and lighting that would encourage pedestrian activity. The Project would incorporate a shuttle drop-off/pick-up on National and Venice Boulevards into the Project design. The support of cycling and pedestrian access, the provision of shuttle services, and proximity to public transit would reduce</p>

TABLE LU-7
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CITY OF LOS ANGELES GENERAL PLAN FRAMEWORK ELEMENT
INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Goal, Objective, or Policy	Would the Project Conflict?
	vehicle miles traveled and, thus, both criteria pollutants and greenhouse gas emissions that could lead to climate change. Therefore, the Project would not conflict with policies that provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations	No Conflict. The Project is located on an infill property in urban Los Angeles and Culver City. Numerous regional and local bus lines are located near the Project area. The Project Site is within walking distance of the Metro "E" Line Culver City Station, located 600 feet to the southwest of the Project Site. In addition to the Metro "E" Line Culver City Station, the Project is served by a variety of public transit options along Venice, National, and Washington Boulevards provided by Metro, the Los Angeles Department of Transportation (LADOT), and Culver City Department of Transportation. Transit operations in the vicinity of the site include Metro Bus Lines 33 and 617, Dash Commuter Express 437A, Culver CityBus 1, 5, and 7, and Big Blue Bus line 17. The Metro "E" Line and bus line 33, and Culver CityBus 1 all operate frequently with headways of less than 15 minutes throughout the day. The Project Site is also within a designated Los Angeles TPA, defined by the Public Resources Code as an area within 0.5 miles of an existing or planned major transit stop. The Project would provide 175 bicycle parking spaces for employees and visitors. With sidewalk and pedestrian landscaping improvements, the Project location in an area served by public transit would promote pedestrian access. The Project would incorporate bicycle parking facilities and, thus, facilitate bicycle use and access to the Project Site. Therefore, the Project would not conflict with policies that provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	No Conflict. The Project Site, which is located within an existing developed area in urban City of Los Angeles and Culver City, is currently occupied by warehouse buildings and surface parking lots. The Project fronts on SR-187 (Venice Boulevard), a major highway. The Project's four- and five-story buildings would be compatible with the six- to seven-story Ivy Station mixed-use project (across National Boulevard from the Project Site); the adjacent, four-story 8777 Washington office building and the five-story Access Culver City mixed use to the south of the Project Site at the south side of Washington Boulevard. The Project would not encroach into any existing residential neighborhoods and is zoned and designated by the Community Plan for commercial uses. The Project's architectural design and varying building heights and sidewalk landscaping would enhance the character of the Project Site and surrounding commercial/industrial/mixed use area. Therefore, the Project would not conflict with policies that provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts
Objective 3.3: Accommodate projected population and employment growth in accordance with the Framework Citywide Long-Range Land Use Diagram and forecasts in Table 2-2, using these in the formulation of the community plans and as the basis for the planning for and the implementation of infrastructure improvements and public services.	No Conflict. As detailed in the Initial Study prepared for the Project, which is included in Appendix A-1 of this Draft EIR, the Project's employment growth would be well within SCAG's projections for the Subregion, which serve as the basis for the Framework Element's demographics projections and planned provisions of transportation and utility infrastructure and public services. Since the Project does not propose a housing component, it would not directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site. As discussed in Objective 3.2 above, the Project would be located in an area well-served by public transit. In addition, as discussed in Policy 3.1.2 above, agencies providing public services and utilities to the Project Site would have capacity to serve the Project, which is derived from the Framework Element.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	No Conflict. The Project includes creative office space that would be compatible with existing and proposed uses within the surrounding area. As discussed for Objective 3.2, the Project Site and vicinity are well served by transit. Refer to Policy 3.2.4 for further discussion of the Project's compatibility, in terms of both land use and design, with the surrounding area. Overall, the Project would not conflict with this objective.

TABLE LU-7

**COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CITY OF LOS ANGELES GENERAL PLAN FRAMEWORK ELEMENT
INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT**

Goal, Objective, or Policy	Would the Project Conflict?
<p>Policy 3.8.4: Enhance pedestrian activity by the design and siting of structures in accordance with the Urban Form and Neighborhood Design policies of this Element and Pedestrian-Oriented District Policies 3.16 through 3.16.3.</p>	<p>No Conflict. While the Project is not located in a Pedestrian-Oriented District, it would not conflict with policies 3.16 through 3.16.3 regarding the siting and configuration of buildings. The Project would be oriented to the sidewalk with clear full height glazing of exterior walls and visible interiors and at grade, street-facing entrances; to locate parking in a subterranean structure; and to promote pedestrian activity. Pedestrian activity would be promoted by the unique double row (colonnade) of shade trees along Venice Boulevard as well as pedestrian-oriented planters, and widened sidewalk. As such, the Project would not conflict with Policy 3.8.4</p>
<p>Policy 3.9.7: Provide for the development of public streetscape improvement, where appropriate.</p>	<p>No conflict. The Project would widen sidewalks along Venice and National Boulevards, provide for pedestrian-oriented planters, and increase street trees. In addition, the Project would provide a 7,120 sf publicly accessible, privately maintained amenity area at street grade along Washington Boulevard, which would be landscaped and provide seating and other streetscape improvements. As such, the Project would not conflict with the policy to provide for public streetscape improvement.</p>
<p>Objective 3.15: Focus mixed commercial /residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.</p>	<p>No Conflict. The Project Site is within 600 feet of the Expo Culver City Rail Station and is located within a designated Commercial Center. The Project's two office buildings would be surrounded by the 4-7-story Ivy Station development to the west, the 4-5 story Access Culver City mixed use and a 4-story office building to the south, and the Helms Bakery Complex to the east, including the Helms Bakery Building directly adjacent to the Project Site. The Project Site is separated by Venice Boulevard, a divided highway (SR 187) from industrial and commercial uses along Venice Boulevard to the north. The Project would not encroach into any of the surrounding low-density neighborhoods. The Project type and location would not conflict with policies to locate new development around urban transit stations and to preserve low density neighborhoods.</p>
Urban Form and Neighborhood Design Chapter	
<p>Policy 5.9.1: Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.</p>	<p>No Conflict. The Project provides a publicly accessible amenity area, adequate lighting for security and wayfinding, and a clearly defined interior courtyard within the center of the Project Site. The substantial fenestration in the Project design would enhance visual connections between the Project's offices and the public sidewalk and driveways. The Project would improve safety and surveillance by providing lighting along walkways, in the parking garages, and in entrance areas. CCTV cameras and on-site security staff would monitor the Project Site. During operation of the Project, gated entries would control access to the parking structure. The Project would not conflict with policies that facilitate observation and natural surveillance through a central common area, sidewalk-oriented windows, adequate lighting, and a clearly defined outdoor space.</p>
Open Space and Conservation Chapter	
<p>Goal 6A: An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.</p>	<p>No Conflict. While this is a citywide/regional goal, the Project Site is located within an existing developed commercial and industrial area and is not in proximity to any natural settings. Development of the Project Site would remove existing warehousing and surface parking lots and, as such, would not impact any natural resources or settings. Existing trees within the public right-of-way would be replaced at a ratio of 2:1 in accordance with City of Los Angeles and Culver City requirements. The landscape design is tailored for the landscaped amenity area and internal courtyard with a compatible plant palette used throughout the Project Site. Landscaping would emphasize native, Mediterranean, and drought tolerant plants that would contribute to the sustainability of the region. Therefore, the Project would not conflict this goal and objective</p>
<p>Objective 6.1: Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.</p>	
Economic Development Chapter	
<p>Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality</p>	<p>No Conflict. The Project would generate new employment opportunities and support the commercial needs of existing and future residents, businesses, and visitors in and around the area. The Project also would encourage new pedestrian activity along et surrounding the Project Site through the introduction of the paseo, new sidewalks and access points, and landscaping and streetscaping. The Project's location would also encourage site employees to patronize f local businesses located nearby in addition, the Project is located within 600 feet of the Metro "E" Line Culver City Station. Several bus transit lines are located along Venice and National Boulevards. The Project's two</p>

**TABLE LU-7
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CITY OF LOS ANGELES GENERAL PLAN FRAMEWORK ELEMENT
INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT**

Goal, Objective, or Policy	Would the Project Conflict?
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	office buildings would intensify development in proximity to rail and bus transit facilities and, as such, the Project would not conflict with policies to locate new development around urban transit stations to encourage new development in proximity to rail and bus transit corridors and stations.
Public Facilities and Infrastructure Chapter	
Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.	No Conflict. The Project would minimize flood hazards and protect water quality through capturing and reusing surface water runoff. Water would be filtered and implemented in on-site landscaping and released into the City’s stormwater system in Venice Boulevard in accordance with the Los Angeles LID Ordinance. Therefore, the Project would not conflict with policies that minimize flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	No Conflict. Wastewater generated by the Project would be typical of office uses, and would not include industrial grade discharge containing hazardous substances. As described in Section 4.7, Hazards and Hazardous Materials, of this Draft EIR, the Project would use typical but potentially hazardous materials, including those used for building and ground maintenance, cleaning solvents, and pesticides for landscaping. Activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements. In addition, as discussed in Section 4.8. Hydrology and Water Quality, of this Draft EIR, the Project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface water quality. Furthermore, as discussed in Section 4.14.1, <i>Utilities and Service Systems—Water Supply</i> , of this Draft EIR, the Project would include water conservation features to reduce water usage which would in turn reduce wastewater flows. Therefore, the Project would not conflict with this policy.
Objective 9.5: Ensure that all properties are protected from flood hazards in accordance with applicable standards and that existing drainage systems are adequately maintained.	No Conflict. The Project is not located within a flood hazard zone. In addition, the Project’s stormwater collection system would reduce surface runoff compared to existing conditions. In addition, the Project would maintain adjacent stormwater drainage systems and reduce any potential flood hazard to adjoining properties and in the area. Therefore, the Project would not conflict with policies that ensure the protection of all properties from flood hazards in accordance with applicable standards and through the maintenance of existing drainage systems.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	No Conflict. The Project would implement BMPs to minimize the discharge of pollutants in stormwater runoff during construction. During operation, the Project would implement LID strategies to manage stormwater runoff in accordance with the current LID Ordinance requirements. Under the Project, all stormwater runoff would be collected at the Project Site, retained, and filtered. Compared to existing conditions, collection and retention would reduce the rate of existing stormwater runoff from the existing impermeable Project Site. Therefore, the Project would not conflict with policies to pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.
Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	No Conflict. Project lighting would incorporate low-level exterior lights on the buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all applicable regulatory requirements. All new street and pedestrian lighting within the public right-of-way would comply with applicable City of Los Angeles and Culver City regulations to ensure appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties. Therefore, the Project would not conflict with this goal.

SOURCE: ESA, 2022

TABLE LU-8
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE CONSERVATION ELEMENT OF THE GENERAL PLAN
INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Section 3, Archaeological and Paleontological Resources	
Objective: Protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes.	No Conflict. As analyzed in Sections 4.3, <i>Cultural Resources</i> , and 4.5, <i>Geology and Soils</i> , of this Draft EIR, Mitigation Measures CUL-MM-1, CUL-MM-2, CUL-MM-3, Geo MM-1, GEO MM-2 and GEO-MM-3 would protect any archaeological or paleontological discoveries on the Project Site. Therefore, the Project would not conflict with policies that protect archaeological and paleontological resources for historical, cultural, research and/or educational purposes.
Policy: Continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification.	No Conflict. As discussed above, Mitigation Measures CUL-MM-1, CUL-MM-2, CUL-MM-3, Geo MM-1, GEO MM-2 and GEO-MM-3 would protect any archaeological or paleontological discoveries on the Project Site. Therefore, the Project would not conflict with policies that continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition, or property modification.
Section 8, Erosion	
Objective: Protect the coastline and watershed from erosion and inappropriate sedimentation that may or has resulted from human actions.	No Conflict. The Project would implement storm water pollution prevention plan (SWPPP) with best management practices (BMPs) during construction to reduce erosion during construction. During operation, the Project's LID system would collect, filter, and store stormwater runoff from the Project Site. The Project would install building roof drain downspouts, catch basins, and planter drains to collect roof and site runoff and direct stormwater via a series of underground storm drainpipes to two underground cisterns. Water captured in the cisterns would be stored and used to irrigate the on-site landscaping. This storm water capture and use would be consistent with the Basin Plan and the LID Ordinance by using storm water for landscaping irrigation instead of using the municipal water supply, as is done now. The Project would reduce surface water runoff and erosion during high storm events through the implementation of LID requirements and improve the quality of water compared to existing conditions. Therefore, the Project would not conflict with this objective .
Section 15, Landform and Scenic Vistas Section	
Objective: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.	No Conflict. The Project Site is flat and, as such, provides limited view vantage points across the Project Site. Existing development within the Project Site blocks views across the Project Site from surrounding and adjacent streets. However, because natural scenic vistas across the Project Site are not available, the development of the Project would not conflict with policies to protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.
Policy: Continue to encourage and/or require property owners to develop their properties in a manner that will, to the greatest extent practical, retain significant existing landforms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public view or other access to unique features or scenic views.	No Conflict. The Project Site is flat and does not contain would not alter any significant existing landforms (e.g., ridge lines, bluffs, unique geologic features) or unique scenic features (historic, ocean, mountains, unique natural features)), nor are there any views of unique scenic features, such as scenic skylines or historic features across the Project Site. The historic Helms Bakery Complex, located to the east of the Project Site and fronting on Venice and Washington Boulevards is visible from these adjacent streets, but is not currently visible across the existing, developed Project Site. Development of the Project would provide a 28-foot landscaped setback and sidewalk along Venice Boulevard and an open "amenity space" along Washington Boulevard, which would improve views of the Helms Bakery Complex from the eastbound streets and sidewalks. As such, the Project provide generous expanded views and not block any existing views of the historic building from streets and roadways. Therefore, the Project would not conflict with policies that continue to encourage development that would retain existing landforms and any unique scenic features, including historic features.
SOURCE: ESA, 2022	

TABLE LU-9
COMPARISON OF THE PROJECT TO APPLICABLE DEVELOPMENT STANDARDS OF THE WEST ADAMS–BALDWIN HILLS–LEIMERT
COMMUNITY PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
Commercial Center and Transit-Oriented Community District	
<p>Goal LU14: A community that conserves, enhances and regenerates its distinctive “main street” character by promoting continued pedestrian orientation of commercial areas.</p>	<p>No Conflict. The Project would include sidewalk widening and improvements, street trees, pedestrian-oriented planters, broad main entrances, windows that provide visual access into common area building interiors, and lighting for pedestrian security and wayfinding along the Project street edges. Sidewalks on Venice Boulevard, currently consist of a 5-foot curb-adjacent sidewalk and planting and turf varying from 9 feet to 14 feet in width, would be improved to an 8-foot landscaped parkway, 13 feet of sidewalk, and a 7-foot landscaped planter. National Boulevard would be improved in both the Los Angeles section and the Culver City section from the existing 4-foot sidewalk and 3-foot landscaped parkway to 8-foot sidewalk and 7-foot landscaped parkway. The Project would improve the pedestrian link between the retail uses in the Helms Bakery Complex and the Ivy Station development and, thus, enhance the “main street” character of Venice Boulevard. Therefore, the Project would not conflict with policies that support a community that conserves, enhances and regenerates its distinctive “main street” character by promoting continued pedestrian orientation of commercial areas.</p>
<p>Goals LU 16 and 33: A competitive commercial sector that is strengthened to best serve the needs of the community while preserving and conserving the enduring, often historic and cultural character of distinct commercial areas.</p>	<p>No Conflict. The new development proposed under the Project would strengthen the City’s commercial component. Existing low-rise warehouses, converted into retail, office, and surface and enclosed parking lots, currently occupy the Project Site. As discussed in the Project’s Historic Resources Assessment Report, existing buildings known as LA-1, CC-1, and CC-2, as shown in Figure 4.3-1, <i>Existing Buildings on Project Site</i>, in Section 4.3, <i>Cultural Resources</i>, of the Draft EIR, do not qualify as historical resources due to a lack of significant historic associations and substantial alterations over time. Therefore, the proposed demolition of existing Buildings LA-1, CC-1, and CC-2 would have no adverse impact since the historical or cultural character of the Project Site.</p> <p>. In addition, with the demolition of the on-site building on Washington Boulevard and the conversion of this location to permanent amenity area, the Helms Bakery Building’s Washington Boulevard frontage would also become more visible from eastbound Washington Boulevard. As evaluated in the Project’s Historic Resources Assessment Report, the Project would not affect the Helms Bakery Building’s integrity of setting, feeling or association. The design and materials of the new construction would be distinctive from, yet compatible with, the Helms Bakery Building such that the existing Helms Bakery Building would remain visible within the existing built environment. The Project would increase the building setback along Venice Boulevard to approximately 28 feet compared to existing conditions. At present, the on-site building at the corner of the alley and Venice Boulevard (directly across from the Helms Bakery Building) is set back approximately 20 feet. With the demolition of this building and the increased setback of 28 feet, the Helms Bakery Building’s Venice Boulevard frontage would be more visible from eastbound Venice Boulevard. In addition, with the demolition of the on-site building on Washington Boulevard and the conversion of this location to permanent amenity area, the Helms Bakery Building’s Washington Boulevard frontage would also become more visible from eastbound Washington Boulevard. As such, the Project would not detract from Helm’s Building historic and cultural character. Therefore, the Project’s newer and larger buildings would not conflict with policies that strengthen the competitive commercial use of the area while preserving and conserving the historic and cultural character of the distinct commercial area.</p>
<p>Goals LU34 and LU41: A community where certain uses identified as detrimental to health and welfare due to nuisance, proliferation or reliance on a standardized development typology often dominated by excessive automobile orientation, are effectively addressed.</p>	<p>No Conflict. The Project, which consists of new, modern office buildings, would not include land uses that are detrimental to health and community welfare. The location of the Project in proximity to transit and the provision of alternative transit opportunities, including shuttle services and bicycle parking and showers, would reduce reliance on automobile use. All parking would be located on-site and would be subterranean which would reduce the physical and visual presence of automobiles in and around the Project Site. Therefore, the Project would not conflict with policies that effectively address certain uses identified as detrimental to health and welfare due to nuisance, proliferation or reliance on a standardized development typology often dominated by excessive automobile orientation.</p>
<p>Goals LU35 and LU46: A community that maintains and increases the commercial employment base for community residents whenever possible.</p>	<p>No Conflict: The Project would provide a total of 536,000 sf of office floor area on the Project Site and, therefore, contribute to the City’s commercial employment base. The Project is estimated accommodate up 2,400 new employees and would provide jobs available to residents of the City of Los Angeles and Culver City. Therefore, the Project would not conflict with policies that support an increase in the commercial employment base for community residents whenever possible.</p>

TABLE LU-9
COMPARISON OF THE PROJECT TO APPLICABLE DEVELOPMENT STANDARDS OF THE WEST ADAMS–BALDWIN HILLS–LEIMERT
COMMUNITY PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT

Policies	Would the Project Conflict?
<p>Goal LU37: A community that conserves, enhances and regenerates its distinctive “main street” character by promoting continued pedestrian orientation along commercial and mixed-use boulevards.</p> <p>Policy LU37-1 Pedestrian Activity. Promote developments that enhance existing pedestrian activity within the public realm. (P12, P23, P58, P192)</p> <p>Policy LU37-2 Off-street Parking at the Rear.</p>	<p>No Conflict: The Project would provide substantial streetscape improvements, including a double row (colonnade) of trees along the Venice Boulevard frontage, replacement of all existing street trees at a 2:1 ratio, deep, landscaped setbacks at the Project’s Venice Boulevard and National Boulevard entrances, pedestrian-oriented planters, and a landscaped, publicly accessible, privately maintained amenity area off Washington Boulevard. The Project features windows at the street level and all stories that would allow visual access between the sidewalk and building interiors, thus reducing the sense of mass of the street wall. The Project’s proximity to the Expo Light Rail and other nearby transit and services would enhance pedestrian activity on surrounding sidewalks. The limited driveways on each street front would reduce vehicle pedestrian conflicts, and all parking would be subterranean. Therefore, the Project’s sidewalk improvements, open character of the building design, and enhanced landscaping in the public right-of-way would regenerate the “main street” character of the Project Site and would not conflict with policies that enhance existing pedestrian activity within the public realm.</p>
<p>Goal LU38: A community that promotes context sensitive projects, including mixed-use projects along commercial corridors.</p> <p>Policy LU38-1 Prioritize new development close to Transit. Prioritize new infill development at locations well served by or in close proximity to major bus centers and mass transit stations. (P14)</p> <p>Policy LU38-2 Activate First Floor Frontages. Require that the first floor street frontage of structures, including mixed-use projects and parking structures, located along commercial corridors incorporate retail or other active public uses. (P20, P12, P287)</p>	<p>No Conflict: The Project represents an infill development providing a net increase of 536,000 sf of net new floor area and approximately 2,400 new employees within 600 feet of the Metro “E” Line Culver City Station. In addition to the Metro “E” Culver City Station, the Project is served by a variety of public transit options along Venice, National, and Washington Boulevards provided by Metro, the Los Angeles Department of Transportation (LADOT), and Culver City Department of Transportation. Transit operations in the vicinity of the site include Metro Bus Lines 33 and 617, Dash Commuter Express 437A, Culver CityBus 1, 5, and 7, and Big Blue Bus line 17. The Project features broad windows on all exterior walls and at the street level that allow visual access between the sidewalk and building interior, thus reducing the sense of mass of the street wall and activating the pedestrian experience. The Project would provide deep, landscaped building entrances along Venice Boulevard and National Boulevard, as well as a double row (colonnade) of trees along the Venice Boulevard frontage that would enhance pedestrian experience. Furthermore, the Project would incorporate a publicly accessible, privately maintained amenity area that would include seating, landscaping, a commercial kiosk or similar use at the street level off Washington Boulevard. Therefore, the Project would not conflict with policies that promote context sensitive projects; prioritize new development close to transit; and require that the first-floor street frontage of structures along commercial corridors incorporate retail or other active public uses.</p>
<p>Goals LU5, LU12, LU29, LU39 LU47, and LU58: A community that promotes an ecologically sustainable future by encouraging adherence to accepted principles of “green” development</p>	<p>No Conflict: The Project’s buildings will be designed to meet LEED equivalent standards (refer to Project Design Feature GHG-PDF-1), including the use of overhangs and horizontal slats that maintain cool exterior walls and contribute to interior cooling. The Project would comply with Title 24, the CALGreen Building Code, the City’s Green Building Code and with the City’s Electric Vehicle Parking requirements. The Project would provide short and long-term bicycle parking and showers. The Project would incorporate water conservation and rainwater management strategies such as low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, and irrigation system efficiency. Other building features would include such items as installation of energy-efficient heating, ventilation, and HVAC systems that utilize ozone-friendly refrigerants; and provide dedicated on-site recycling areas. The Project will also incorporate indoor air quality best practices to provide clean ventilation for improved breathing. Therefore, the Project would not conflict with policies that promote an ecologically sustainable future by encouraging adherence to accepted principles of “green” development in the community.</p>
<p>Goal LU40: A community where the economic vitality of commercial nodes, centers and transit-oriented development areas is increased by encouraging contextual new development that maximizes access to transit, jobs, goods and services, and conserves desirable community character.</p> <p>Policy LU40-1 Encourage New Development in Established Commercial Centers. New commercial uses shall be encouraged to locate in existing, established community commercial nodes, centers and transit-oriented development areas and reuse existing</p>	<p>No Conflict: The Project would intensify development and employment opportunities on an infill urban site within a commercial node and designated transit-oriented district. The Project’s proximity to regional and local transit (600 feet) from the Metro “E” Line Culver City Station); architectural design; publicly accessible, privately maintained amenity area; proximity to services; and landscaping program—including a double row of trees along Venice Boulevard—and replacement of existing street trees to be removed at a 2:1 ratio, would support the economic vitality of the area and maximize the use of transit. As such, the Project would not conflict with goals that encourage new development in established commercial centers and transit-oriented development.</p>

**TABLE LU-9
COMPARISON OF THE PROJECT TO APPLICABLE DEVELOPMENT STANDARDS OF THE WEST ADAMS–BALDWIN HILLS–LEIMERT
COMMUNITY PLAN INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT**

Policies	Would the Project Conflict?
structures that reinforce desirable neighborhood character.	
Goal LU45: A community that enhances the appearance and safety of community commercial nodes, centers and transit-oriented development areas	No Conflict: The Project would be located within 600 feet of the Metro “E” Line Culver City Station and would incorporate high-quality architectural design. The Project would limit driveways to reduce pedestrian/vehicle conflicts; provide pedestrian lighting for security and wayfinding; improve and widen sidewalks; enhance landscaping along the sidewalks with canopy street trees and pedestrian-oriented planters (existing street trees would be replaced at a 2:1 ratio) and include 7,120 sf of publicly accessible, privately maintained amenity area. The amenity area, accessed via Washington Boulevard would include 3,327 sf of landscaping, seating, and flexible uses, such as kiosks, for public use. The Project features broad glazing from the first to the top floors to allow visual access between the common area building interiors and the sidewalks and beyond. Therefore, the Project, which would enhance the appearance and safety of a transit-oriented development area, would not conflict with policies that enhance the appearance and safety of community commercial nodes, centers, and transit-oriented development areas.

SOURCE: ESA, 2022

TABLE LU-10
COMPARISON OF THE PROJECT TO APPLICABLE PURPOSES OF THE WEST ADAMS–BALDWIN HILLS–LEIMERT
COMMUNITY PLAN IMPLEMENTATION OVERLAY (CPIO) DISTRICT INTENDED TO AVOID OR
MITIGATE AN ENVIRONMENTAL EFFECT

Purpose	Would the Project Conflict?
<p>A. To provide supplemental development regulations tailored to the Community Plan Area to ensure that development enhances the unique architectural, environmental, and cultural qualities of the Community Plan Area, integrates improvements and enhancements to the public rights-of-way, and maintains compatible land uses, and appropriate development scale, intensity, and density.</p>	<p>No Conflict. The Project would provide a commercial complex designed with a high level of architectural articulation and complexity, widen existing sidewalks and landscaped parkways (including a unique colonnade (double row) of canopy trees on Venice Boulevard, would be located in a commercial land use designation surrounded by other commercial uses, and would be consistent in building height and density with the newer, seven-story Ivy Station mixed-use, directly across National Boulevard from the Project Site. As such, the Project would not conflict with the purpose of the CPIO to ensure that development enhances the unique architectural, environmental, and cultural qualities of the Community Plan Area, integrates improvements and enhancements to the public rights-of-way, and maintains compatible land uses, and appropriate development scale, intensity, and density.</p>
<p>B. To create approval processes, including a ministerial administrative clearance process, which enables infill development that will positively impact communities in conformance with these regulations.</p>	<p>No Conflict. The Project would be an infill development that would provide publicly accessible, landscaped amenity area; a high-quality landscaping program (sidewalk parkways and in planters along the building foundation; improved, wider sidewalks; and high-quality design including full height glazing that would allow for an open appearance and engage the adjacent sidewalks, while as open and transparent as viewed from a distance. It is very likely that the Project would not conflict with the purpose of the CPIO to positively impact the community under future administrative clearance.</p>
<p>C. To foster revitalization of properties along the commercial corridors and at major intersection nodes throughout the Community Plan Area.</p>	<p>No Conflict. The Project is located along a commercial corridor at two major intersections (Venice Boulevard/National Boulevard and Washington Boulevard/National Boulevard). The Project would replace an existing converted warehouse use with a modern creative office complex and include a publicly accessible, privately maintained amenity area and widened and landscaped adjacent streets that would revitalize a currently underutilized site. Therefore, the Project would not conflict with the purpose of the CPIO to revitalize properties along the commercial corridors and at major intersection nodes</p>
<p>D. To promote and facilitate revitalization of properties that can capitalize upon close proximity to the La Brea, Farmdale, La Cienega and Culver City stations along the MidCity Exposition Light Rail Transit Corridor (Expo Line).</p>	<p>No Conflict. The Project would be located less than 600 feet from the Metro “E” Line Culver City Station. Therefore, the Project would not conflict with the purpose of the CPIO to promote and facilitate revitalization of properties that can capitalize upon close proximity transit.</p>
<p>F. To promote the overall health and sustainability of the community that reside, work, and recreate in the Community Plan Area.</p>	<p>No Conflict. The Project would be located less than 600 feet from the Metro “E” Line Culver City Station. The Project would widen sidewalks with landscaping and trees and would further encourage pedestrian activity with a publicly accessible, privately maintained amenity area that would be landscaped and could include a coffee kiosk or other amenity along Washington Boulevard. The proximity to transit would encourage walking and use of transit that would reduce vehicle miles and emissions. The Project would implement a sustainability program that includes achieving US Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold equivalent, inclusive of environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code, Culver City’s mandatory Green Building Program requirements, and CALGreen Building Code. Sustainability features to be incorporated into the Project would include, but would not be limited to, water-efficient landscape design, rainwater management systems, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; EV charging, EV capable and EV ready spaces; bicycle facilities that would meet or exceed the respective City codes; Energy Star–labeled appliances, where possible; energy-efficient and water conserving HVAC systems; passive solar shading features; and active circulation. With the incorporation of these features, the Project would not conflict with the purpose of the CPIO promote the overall health and sustainability of the community that reside, work, and recreate in the Community Plan Area.</p>

TABLE LU-10
COMPARISON OF THE PROJECT TO APPLICABLE PURPOSES OF THE WEST ADAMS–BALDWIN HILLS–LEIMERT
COMMUNITY PLAN IMPLEMENTATION OVERLAY (CPIO) DISTRICT INTENDED TO AVOID OR
MITIGATE AN ENVIRONMENTAL EFFECT

Purpose	Would the Project Conflict?
<p>G. To encourage a vibrant mix of uses that increases access to a greater variety of goods and services within close proximity to surrounding established residential neighborhoods, commercial corridors, and industrial employment areas.</p>	<p>No Conflict. The Project would be surrounded by high-intensity retail, residential, offices, and industrial neighborhoods and would contribute to the mix of uses by providing 536,000 sf of new creative office floor area. As such, the Project would not conflict with policies that encourage a vibrant mix of uses that increases access to a greater variety of goods and services in proximity to surrounding established residential neighborhoods, commercial corridors, and industrial employment areas. Therefore, the Project would not conflict with the purpose of the CPIO to encourage a vibrant mix of uses that increases access to a greater variety of goods and services within close proximity to surrounding established residential neighborhoods, commercial corridors, and industrial employment areas.</p>
<p>H. To enhance access to both passive and active open and green space amenities and encourage physical activity by all segments of the community, particularly youth and the elderly.</p>	<p>No Conflict. The Project would be located less than 600 feet from the Expo Culver City Station. The Project would widen sidewalks with landscaping and tree-lined sidewalks (including a colonnade of canopy trees along Venice Boulevard. The Project would also provide a 7,120 sf publicly accessible, privately maintained amenity area, 3,326 sf of which would be landscaped along Washington Boulevard. The proximity to transit and sidewalk improvements would encourage walking. As such, the Project would not conflict with purposes of the CPIO to enhance access to both passive and active open and green space amenities and encourage physical activity by all segments of the community, particularly youth and the elderly</p>
<p>I. To encourage the creation of pedestrian-friendly, multi-modal transit villages where jobs, housing, goods and services, as well as access to open space, are all located within walking distance of the station area.</p>	<p>No Conflict. The Project would be located within a multi-modal transit neighborhood, with the Expo Culver City station less than 600 feet from the Project Site and designated bike paths in the three adjacent streets, and would provide a publicly accessible, landscaped and privately maintained amenity area. The Project would incorporate a TDM program to reduce daily vehicle trips and provide 175 bicycle parking spaces for employees and visitors. The Project would also widen the sidewalks and include pedestrian amenities, such as shade trees, that would enhance and encourage greater pedestrian use. As such, the Project would not conflict with the purpose of the CPIO to encourage the creation of pedestrian-friendly, multi-modal transit villages where jobs, housing, goods and services, as well as access to open space, are all located within walking distance of the station area.</p>
<p>J. To improve the quality of life and the built environment by reducing the necessity for automobile dependence through better pedestrian orientation and conservation of prevailing neighborhood character.</p>	<p>No Conflict. The Project would be located less than 600 feet from the Metro “E” Line Culver City Station and would widen and landscape sidewalks with canopy trees and planters. In addition, the Project would provide an amenity space off Washington Boulevard that would facilitate pedestrian activity and improve the enjoyment of walking in the area. The Project would incorporate a TDM program to reduce daily vehicle trips and provide 175 bicycle parking spaces for employees and visitors. The Project would also widen the sidewalks and include pedestrian amenities, such as shade trees, that would enhance and encourage greater pedestrian use. As such, the Project would not conflict with the purpose of the CPIO to reduce the necessity for automobile dependence through better pedestrian orientation and conservation of prevailing neighborhood character.</p>
<p>K. To improve the quality of life for all those who live, work, and recreate in the Community Plan Area by promoting safe pedestrian activity, bicycle use, and better vehicular accessibility through pedestrian orientation of structures, enhanced streetscapes and urban design, as well as conservation of the neighborhood character.</p>	<p>No Conflict. The Project would locate a new office complex with bicycle parking on a property served by bicycle lanes on all three frontage streets (Venice Boulevard, National Boulevard, and Washington Boulevard). It would also widen sidewalks and improve streetscape, including a colonnade of canopy trees along Venice Boulevard. The Project would not conflict in scale or design with the character of the neighborhood. The sidewalk and parkway improvements, provision of bicycle facilities, and full height glazing that would allow for an open appearance and engage the adjacent sidewalks would improve the quality of life for the people accessing the Project Site and pedestrians from the surrounding neighborhood. As such, the Project would not conflict with the purpose of the CPIO to improve the quality of life for all those who live, work, and</p>

TABLE LU-10
COMPARISON OF THE PROJECT TO APPLICABLE PURPOSES OF THE WEST ADAMS–BALDWIN HILLS–LEIMERT
COMMUNITY PLAN IMPLEMENTATION OVERLAY (CPIO) DISTRICT INTENDED TO AVOID OR
MITIGATE AN ENVIRONMENTAL EFFECT

Purpose	Would the Project Conflict?
	recreate in the Community Plan Area by promoting safe pedestrian activity, bicycle use, and better vehicular accessibility through pedestrian orientation of structures, enhanced streetscapes and urban design, as well as conservation of the neighborhood character.
L. To improve the health and welfare of the community by limiting certain uses, including those that are over concentrated or rely on a standardized development typology dominated by excessive automobile orientation.	No Conflict. The Project would remove existing surface parking lots and locate all vehicles in subterranean structures. The Project would be located less than 600 feet from the Metro “E” Line Culver City Station and would improve sidewalks and landscaping between the Project Site and the station. The Project would also adjoin bike paths in Venice and Washington Boulevards and National Boulevard. The Project would provide 175 secure bicycle parking spaces, including spaces for employees and visitors, short- and long-term spaces. The Project will provide secure bike lockers as well as showers. The Project’s proximity to transit and accommodation and encouragement of bicycle use would not conflict with the purpose of the CPIO to improve the health and welfare of the community by limiting certain uses, including those that are over concentrated or rely on a standardized development typology dominated by excessive automobile orientation.
M. To promote context sensitive pedestrian-oriented and transit-oriented projects, especially on greyfield and brownfield sites and other underutilized major intersection sites. I. J. K. L. M. N.	No Conflict. The Project’s design, sidewalk orientation, sidewalk improvements and landscaping program would be context sensitive within an underutilized converted warehouse property at a major intersection. The Project location would be conducive to walking, biking, and taking transit. As such, the Project would not conflict with the purpose of the CPIO to promote pedestrian-oriented and transit-oriented projects on underutilized major intersection sites.
N. To encourage new infill development that promotes and enhances existing neighborhood character and is not dominated by excessive automobile orientation.	No Conflict. As discussed under Purpose L, above, the Project would remove existing surface parking lots and locate all vehicles in subterranean structures. The Project would also adjoin bike paths in adjacent streets and would provide bicycle parking spaces and showers. The Project would be located less than 600 feet from the Expo Station and would improve sidewalks and landscaping between the Project Site and the station that would facilitate and encourage use of transit. The scale and design of the Project would be consistent with new development in the area as well as sidewalk oriented. The Project’s height and mass would be well-articulated and consistent with the height and mass of newer development in the surrounding area, including the Ivy Station mixed use, which has buildings up to seven stories; the four- and five-story Access Culver City mixed use; and the four-story 8777 Washington office building. With these features, the Project would not conflict with the purpose of the CPIO to encourage new infill development that promotes and enhances existing neighborhood character and is not dominated by excessive automobile orientation.
P. To protect existing residential properties from incompatible development and uses.	No Conflict. The Project is located within commercial (City of Los Angeles) and industrial (Culver City) zones within a commercial land use designation under both the West Adams-Baldwin Hills-Leimert Community Plan (City of Los Angeles) and Culver City General Plan. The Project Site is surrounded by commercial and industrial uses and newer mixed use and office uses. The Project would not abut a residential neighborhood or be located adjacent to a residential zone. As such, the Project would not conflict with the purpose of the CPIO to protect existing residential properties from incompatible development and uses.
Q. To preserve and protect neighborhood identity, including protecting both designated and undesignated historic resources, and distinctive character defining elements of the existing development.	No Conflict. The scale, design and character of the Project would not be incompatible with the Art Deco design of the adjacent Helms Bakery Complex, a designated historic resource. The historic building is located 35 feet from the Project Site. The Project would increase the Project’s building setback on Venice Boulevard to 9 feet, 6 inches, which would open views of the Helm Bakery Complex’s north frontage. The Project’s double colonnade of trees along Venice Boulevard and articulated building heights of Building 2 (the nearest to the Helms Bakery Complex) would enhance the setting and character of the Helms Bakery Building. As such, the Project would not conflict with the purpose of the CPIO to preserve and protect neighborhood

**TABLE LU-10
COMPARISON OF THE PROJECT TO APPLICABLE PURPOSES OF THE WEST ADAMS–BALDWIN HILLS–LEIMERT
COMMUNITY PLAN IMPLEMENTATION OVERLAY (CPIO) DISTRICT INTENDED TO AVOID OR
MITIGATE AN ENVIRONMENTAL EFFECT**

Purpose	Would the Project Conflict?
	identity, including protecting both designated and undesignated historic resources, and distinctive character defining elements of the existing development.
R. To preserve viable industrial land for the emergence of innovative new “clean-tech,” “information technology,” and other “high-tech” uses.	No Conflict. The Project Site is designated in the West Adams-Baldwin Hills Leimert Community Plan as “Community Center” and in the Culver City General Plan as “General Corridor Commercial.” Because the Project Site is planned as a commercial use, the proposed creative office development would not conflict with the purpose of the CPIO to preserve viable industrial land for the emergence of innovative new “clean-tech,” “information technology,” and other “high-tech” uses.
S. To support transit-oriented business districts outside of the City Center where emerging and innovative commercial, office, and “clean-tech” uses can locate within contextually appropriate medium intensity transit hubs.	No Conflict. The Project Site is located less than 600 feet of the Expo Station. The Project, which is designed to improve pedestrian access between the Project Site and the transit station, is consistent with the categorization of innovative commercial office within a contextually appropriate transit hub. As such, the Project would not conflict with the purpose of the CPIO to support transit-oriented business districts where emerging and innovative commercial, office, and “clean-tech” uses can locate within contextually appropriate medium intensity transit hubs.
T. To facilitate through land use incentives and standards, the generation of high wage jobs and training for the community, especially within the growing “clean-tech” and “greentech” sectors.	No Conflict. The Project would represent the high-wage, “clean-tech,” green-tech, sector. Because it represents a type of land use encouraged under the CPIO, the Project would not conflict with the purpose of the CPIO to facilitate through land use incentives and standards, the generation of high wage jobs and training for the community, especially within the growing “clean-tech” and “greentech” sectors.

SOURCE: ESA. 2022.

**TABLE LU-11
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE EXPOSITION CORRIDOR TRANSIT NEIGHBORHOOD PLAN
INTENDED TO AVOID OR MITIGATE AN ENVIRONMENTAL EFFECT^a**

Policies	Would the Project Conflict?
Purpose of the Specific Plan	
<p>A. Direct growth and accommodate new residential, mixed-use, commercial, and industrial development near transit stations</p> <p>I. Implement the policies of the General Plan Framework, which include conserving stable single-family neighborhoods and directing growth toward transit corridors.</p>	<p>No Conflict. The Project would add new commercial uses near the Metro “E” Line Culver City Station. and would not encroach into any single-family neighborhood. Therefore, the Project would not conflict with these purposes.</p>
<p>F. Implement the West Adams–Baldwin Hills–Leimert, Palms–Mar Vista–Del Rey, and West Los Angeles Community Plans.</p>	<p>No Conflict. The Project would be consistent with the Community Commercial land use designation of the West Adams–Baldwin Hills–Leimert Community Plan. Therefore, the Project would not conflict with this purpose.</p>
<p>J. Reduce greenhouse gas emissions by facilitating alternative modes of transportation and decreasing automobile dependence</p>	<p>No Conflict. The Project would reduce greenhouse emissions and facilitate alternative modes of transportation by locating higher intensity commercial office uses within 600 feet of the Metro “E” Line Culver City Station and by providing 175 bicycle parking spaces for employees and visitors. Therefore, the Project would not conflict with this purpose.</p>
<p>K. Promote transit ridership on the Exposition Light Rail Line and other transit systems; encourage</p> <p>M. Encourage walking and bicycling as a means to safely and conveniently circulate within and between neighborhoods and to access transit ‘</p> <p>N. Improve pedestrian connections to transit stations, especially where there are freeway overpasses or other physical barriers, including along National Boulevard between Robertson Boulevard and the Culver City station.</p>	<p>No Conflict. The Project would introduce higher intensity uses in proximity to the Metro “E” Line Culver City Station as well as implement sidewalk and landscape improvements that would promote pedestrian activity. Improvements include a double row (colonnade) of canopy trees and additional landscaped parkway along the Venice Boulevard frontage. Since the Venice Boulevard sidewalk is a primary access route to the Metro “E” Line Culver City Station, including between the Helms Bakery Complex and the Metro “E” Line Culver City Station, the sidewalk and landscape improvements would encourage walking by Project occupants and the community. In addition, the Project would provide 175 bicycle parking spaces, including short-term and long-term spaces for employees and visitors. Therefore, the Project would not conflict with these purposes.</p>
<p>O. Ensure new development is pedestrian-oriented, acknowledges the transit stations, and is compatible with surrounding neighborhoods through building design and site planning .</p> <p>P. Provide a network of active street frontages, publicly accessible open spaces, and other community facilities for socializing, placemaking, and community building.</p>	<p>No Conflict. The Project’s four- and five-story buildings would not conflict with the low- and mid-rise character of the surrounding community, including the adjacent 8777 Washington four-story office building and the Access Culver City five-story mixed use residential building at the south side of Washington Boulevard, and the six- to seven-story Ivy Station mixed-use project to the west across National Boulevard. The Project would feature full height glazing of exterior walls defined by horizontal architectural projections overhanging each of the stories. The first story of the buildings would be buffered from the sidewalks by landscaped planters while the Project’s full height glazing would allow for an open appearance and engage the adjacent sidewalks, while open and transparent as viewed from a distance. The Project would widen sidewalks and provide for canopy trees and landscaping, which would also be pedestrian-oriented and would facilitate pedestrian access between the Project Site and nearby transit stations. Building entrances would be oriented to the sidewalks and at sidewalk level, within landscaped setbacks that would enhance the experience of pedestrians on Venice and National Boulevards and encourage pedestrian access to the Project Site. The Project would also provide 7,120 sf of landscaped, publicly accessible, privately maintained amenity area with seating off Washington Boulevard that would encourage pedestrian access to the Project Site. Therefore, the Project would not conflict with these purposes.</p>

^a NOTE: As listed under Chapter 2, Subsection 2.8, *Anticipated Project Approvals*, the Applicant is seeking a boundary change to remove Los Angeles Parcel from the Expo Corridor Transit Neighborhood Plan.

SOURCE: ESA, 2022

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