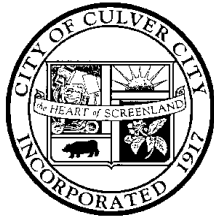


Appendix A

Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and NOP Comments



A-1 Notice of Preparation



Culver CITY

CURRENT PLANNING DIVISION

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND COMMUNITY MEETING / EIR SCOPING MEETING

PROJECT CROSSINGS

NOTICE IS HEREBY GIVEN to all responsible agencies and interested parties that the City of Culver City (City), as the Lead Agency, will be preparing an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15082. This Notice of Preparation (NOP) has been prepared to describe the Project and identify the scope of environmental issues recommended to be addressed in the EIR, and to seek your comments on what environmental effects and alternatives the EIR should study. You are being notified of the City's intent, as Lead Agency, to prepare an EIR for this Project, as it is in an area of interest to you and/or the organization or agency you represent. The EIR will be prepared by consultants under direction of the City and submitted to the Planning Division for independent review and certification.

PROJECT TITLE: Project Crossings

APPLICANT/OWNER: Culver Crossings Properties, LLC

PROJECT ADDRESS: 8825 National Boulevard and 8771 Washington in Culver City, California, 90232 (Culver City Parcel); and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in Los Angeles, California, 90232 (Los Angeles Parcel).

DUE DATE FOR PUBLIC COMMENTS ON THE NOP: 5:30 PM on Monday, December 20, 2021

COMMUNITY MEETING/EIR SCOPING MEETING: 6 PM–8 PM on Monday, December 6, 2021

PROJECT LOCATION: The Project Site is bounded by Venice Boulevard to the north, Washington Boulevard to the south, National Boulevard to the west, and existing commercial uses to the east. The Project Site is comprised of two properties, one located in the City of Culver City (Culver City Parcel) and one located in the City of Los Angeles (Los Angeles Parcel). See attached figure.

PROJECT DESCRIPTION: The Project Site is currently improved with low-rise warehouses that have been converted into retail and office uses as well as surface and enclosed parking lots serving the existing uses on the Project Site. The Project would demolish the existing buildings on the Project Site and construct two four-to five-story buildings that would provide a total of 536,000 sf of new office floor area, which is intended to be occupied by Apple, Inc. The two buildings would have the ability to be connected via a shared wall. The Project would provide a total of 1,215 vehicular parking spaces within two separate three-level subterranean garages under each proposed building. The Project would also provide 162 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes. The proposed office buildings would be designed to accommodate creative office uses and could include associated production spaces for multimedia content creation and capture as well as amenities for building tenants including a cafeteria, coffee stations, employee shuttle service, and other ancillary uses typical of an integrated office complex development. The Project would also include pedestrian-facing landscaping at the ground floor on National Boulevard and Venice Boulevard, as well as an internal courtyard for the use of employees and occasional private tenant events.

ENVIRONMENTAL ISSUES TO BE ADDRESSED IN THE EIR: The Culver City Current Planning Division has determined based on an Initial Study that an EIR will be required to analyze the environmental effects of the Project. Environmental issues identified as having the potential to result in significant impacts that require further evaluation in the EIR include: Air Quality (all but odors), Cultural Resources (historic and

archaeological resources), Energy, Geology and Soils (all but landslides, septic tanks), Greenhouse Gas Emissions, Hazards and Hazardous Materials (all but airport hazards and wildland fires), Hydrology and Water Quality (all but inundation), Land Use and Planning (consistency with plans and policies), Noise (all but aircraft noise), Public Services (fire protection and police protection), Transportation, Tribal Cultural Resources, and Utilities and Service Systems (water, wastewater, and electric power). The Initial Study is available for review on the Culver City Planning Division website (<https://www.culvercity.org/City-Projects/G-Planning-Projects>), or at City Hall, the Current Planning Division 2nd floor, and the Culver City Julian Dixon Library.

PUBLIC COMMENT PERIOD FOR NOP: The Current Planning Division welcomes and will consider all comments regarding the potential environmental impacts of the Project and issues and alternatives to be addressed in the EIR. All comments will be considered in preparation of the EIR. The comment period for the NOP begins on **Thursday, November 4, 2021, and ends on Monday, December 20, 2021**. Written comments should be received on or before **Monday, December 20, 2021, at 5:30 PM**. Written comments should refer to the Project by name and be addressed to:

Jeff Anderson, Contract Interim Current Planning Manager
City of Culver City Current Planning Division, 2ND floor
9770 Culver Boulevard, Culver City, CA 90232
Phone: (310) 253-5727 E-mail: jeff.anderson@culvercity.org

COMMUNITY MEETING / EIR SCOPING MEETING: A virtual Community Meeting and EIR Scoping Meeting will be held on **Monday, December 6, 2021**. In accordance with the City of Culver City Community Meeting Guidelines, the purpose of the 2nd Official Community Meeting is for the Applicant to present the Project, solicit the community's comments on the Project, and receive feedback on the Project prior to submitting entitlement applications to the City. In accordance with CEQA, the purpose of the EIR Scoping Meeting is for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the EIR.

The meetings will be held in an online format using Zoom to share information regarding the Project and the environmental review process. You may join, view, and participate in the meeting by using the Zoom application, by your web browser, or by phone. Register for the virtual meeting by visiting: <https://bit.ly/ProjectCrossings>. This will provide you with a confirmation and join link, as well as call-in numbers. City staff, environmental consultants, and Project representatives will be available during these meetings, with the Community Meeting being held first, followed by the EIR Scoping Meeting. Each meeting will each begin with a presentation and be followed by a question-and-answer session. The meetings will be open to the public and all stakeholders. Questions may be submitted via email in advance of the meeting at Jeff.Anderson@culvercity.org, however there will also be opportunities for verbal questions taken at the meetings. A separate more detailed instructions page is included in this communication.

The Community Meeting will begin at 6 PM and end at approximately 7 PM and will be followed by the EIR Scoping Meeting at approximately 7 PM to 8 PM

Copies of the documentation can be reviewed online using the above link, or by requesting copies from the Current Planning Division Office, City Hall, Second Floor, 9770 Culver Boulevard, Culver City, CA 90232-0507 (handicapped accessible location). City Hall business hours are 7:30 AM. – 5:30 PM, Monday through Friday, except alternate Fridays. Please telephone in advance to assure staff availability at (310) 253-5710.


Jeff Anderson, Contract Interim Current Planning Manager

November 2, 2021
Date



SOURCE: Nearmap, 2021

Project Crossings

Project Crossings Community Meeting/EIR Scoping Meeting

Virtual Meeting Instructions

A virtual Community Meeting/EIR Scoping Meeting will be held on the proposed Project and the scope of environmental documentation on **Monday, December 6, 2021**. In accordance with the City of Culver City Community Meeting Guidelines, the purpose of the 2nd Official Community Meeting is for the Applicant to present the Project, solicit the community's comments on the Project, and receive feedback on the Project prior to submitting entitlement applications to the City. In accordance with CEQA, the purpose of the EIR Scoping Meeting is for the City to solicit input and written comments from agencies and the public on environmental issues or alternatives they believe should be addressed in the EIR.

The meetings will be held in an online format using Zoom to share information regarding the Project and the environmental review process. City staff, environmental consultants, and project representatives will be available during these meetings, which will each begin with a presentation and be followed by a question-and-answer session. The meetings will be open to the public and all stakeholders. **Questions may be submitted via email in advance of the meeting at Jeff.Anderson@culvercity.org, however there will also be opportunities for verbal questions.**

The Community Meeting will be from 6:00–7:00 PM and will be followed by the Scoping Meeting between approximately 7:00–8:00 PM.

How to Participate

Joining, viewing, and participating in the virtual meeting can be done a few different ways. Below are instructions on joining using the Zoom application, by your web browser or by phone. Instructions about providing oral comment during the meeting, as well as how to receive tech support prior to and during the virtual meeting, are also outlined.

Register for the virtual meeting through Zoom by visiting: <https://bit.ly/ProjectCrossings>. This will provide you with a confirmation and join link as well as call-in numbers.

Joining the EIR Scoping Meeting

Zoom Application (Preferred Method)

- For the best experience we recommend downloading and installing Zoom on your computer before the meeting begins. You can download the Zoom software in advance or at the time you join the meeting for free at: <https://zoom.us/download>.

Zoom Through Web Browser

- You do NOT need to install Zoom software on your computer to participate and provide comments. When you click on the meeting link provided at registration a new browser tab or window will open (depending on your browser settings). To join the meeting, click the link near the bottom of the window that states “start from your browser”. We recommend Google Chrome, Safari or Firefox.

Join by Phone

- **Dial:** +1 (877) 853-5247
- **Webinar ID:** 898 6476 5637
- **Phone Shortcuts:**
 - *6 to mute and unmute yourself
 - *9 to raise your hand
- Note: if you are calling into the meeting, you will not be able to see the visual content presented, but you can listen and participate. Copies of the presentation will be provided on the City's website after the meeting.

Providing Oral Comments

As you enter the Zoom meeting you will be automatically put on mute. To speak during the session, you will need to virtually raise your hand and a moderator will unmute you. Here's how to raise your hand and speak during the meeting:

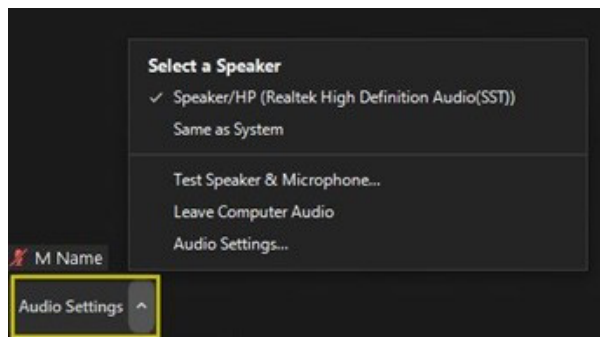
1. Mouse over the bottom of the **Zoom** application and locate the **hand icon**.
2. Select the **hand icon** to virtually raise your hand or **dial *9** if you are joining by phone.
3. A moderator will call your name and unmute you to speak.

Once you have been called on your hand will be lowered and if you would like to speak again you will need to press the **hand icon or press *9** to be placed back in the queue.



Audio Check

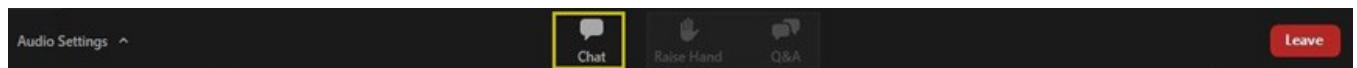
You are encouraged to test your audio connection prior to joining the meeting. Click the “Audio Settings” on the lower left and make sure the microphone and speaker are assigned to the correct device. You also can do your audio check while you are waiting for the meeting to start.



Tech Support

To provide a seamless experience for all users there will be tech support prior to the virtual meeting as well as during. If you are having issues before and would like assistance, please contact meetingsupport@esassoc.com.

During the virtual meeting there will be support on hand to assist in a technical issue that may arise. To contact support during the meeting you can utilize the chat function and message to the support team where someone will contact you separately to resolve the issue.



A-2 Initial Study



(310) 253-5710
FAX (310) 253-5721

PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

INITIAL STUDY

Project Title: Project Crossings

Project Record Number: P2021-0272-CP/ZCMA/EIR

Project Location: The 4.46-acre (194,334 square foot [sf]) Project Site is comprised of two properties: one 1.63 acre (71,016 sf) parcel is located in the City of Culver City (Culver City Parcel) while the second 2.83 acre (123,318 sf) parcel is located in the City of Los Angeles (Los Angeles Parcel) (collectively referred to herein as the Project Site). The Project Site is bounded by Venice Boulevard to the north, Washington Boulevard to the south, National Boulevard to the west, and existing commercial uses to the east. The Project Site is located at 8825 National Boulevard and 8771 Washington in Culver City, California, 90232 (Culver City Parcel); and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in Los Angeles, California, 90232 (Los Angeles Parcel).

Project Sponsor: Culver Crossings Properties, LLC

Project Description: The Project would remove the three existing buildings on the Project Site, totaling 105,047 sf, and construct two, four- to five-story buildings that would provide a total of 536,000 sf of new office floor area, which is intended to be occupied by Apple, Inc. The two buildings would have the ability to be connected via a shared wall. The Project provides a total of 1,215 vehicular parking spaces within two separate three-level subterranean garages under each proposed building. The Project would provide 162 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes. The Project would also include pedestrian-facing landscaping at the ground floor on National Boulevard and Venice Boulevard, as well as an internal courtyard for the use of employees and occasional private tenant events.

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

- ☐ The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- ☒ The Initial Study identified potentially significant effects, and an ENVIRONMENTAL IMPACT REPORT is required.

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

**City of Culver City, Current Planning Division, 2nd Floor
9770 Culver Boulevard, Culver City, CA 90232**

www.culvercity.org

Contact: Jeff Anderson, Contract Interim Planning Manager
City of Culver City, Current Planning Division 2nd Floor
9770 Culver Blvd, Culver City, CA 90232
(310) 253-5710 (Tel)
jeff.anderson@culvercity.org

The public is invited to comment on the INITIAL STUDY during the review period, which ends
December 20, 2021, at 5:30 PM



Table of Contents

ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL DETERMINATION	EC-1
ATTACHMENT A: PROJECT DESCRIPTION	A-1
A. Introduction	A-1
B. Project Location and Surrounding Uses	A-1
C. Existing Conditions	A-4
D. Existing and Proposed Planning and Zoning	A-4
E. Description of Proposed Project	A-5
F. Necessary Approvals.....	A-9
ATTACHMENT B: EXPLANATION OF CHECKLIST DETERMINATIONS.....	B-1
I. Aesthetics.....	B-1
II. Agriculture and Forestry Resources	B-3
III. Air Quality.....	B-4
IV. Biological Resources	B-6
V. Cultural Resources.....	B-9
VI. Energy.....	B-10
VII. Geology and Soils	B-11
VIII. Greenhouse Gas Emissions	B-14
IX. Hazards and Hazardous Materials.....	B-14
X. Hydrology and Water Quality	B-16
XI. Land Use and Planning	B-19
XII. Mineral Resources	B-20
XIII. Noise.....	B-21
XIV. Population and Housing	B-22
XV. Public Services.....	B-23
XVI. Recreation.....	B-25
XVII. Transportation	B-25
XVIII. Tribal Cultural Resources	B-27
XIX. Utilities and Service Systems	B-27
XX. Wildfire	B-31
XXI. Mandatory Findings of Significance	B-32

List of Figures

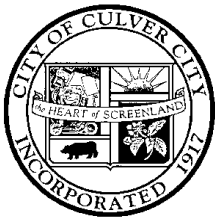
A-1 Regional and Project Vicinity LocationsA-2
A-2 Proejct Location - Aerial Photograph.....A-3
A-3 Conceptual Site Plan.....A-6

List of Tables

A-1 Existing and Proposed Floor Area.....A-5
B-1 Projected Solid Waste Generated During OperationB-30

Appendix

A. Street Tree Report



(310) 253-5710
FAX (310) 253-5721

PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title:	Project Crossings		
Lead Agency Name & Address:	City of Culver City, Current Planning Division, 2 nd Floor 9770 Culver Boulevard, Culver City, CA 90232		
Contact Person, Phone No. & E-mail Address:	Jeff Anderson, Contract Interim Planning Manager (310) 253-5727 (Tel); e-mail: jeff.anderson@culvercity.org		
Project Location/Address:	The 4.46-acre (194,334 square foot [sf]) Project Site is comprised of two properties: one 1.63 acre (71,016 sf) parcel is located in the City of Culver City (Culver City Parcel) while the second 2.83 acre (123,318 sf) parcel is located in the City of Los Angeles (Los Angeles Parcel) (collectively referred to herein as the Project Site). The Project Site is bounded by Venice Boulevard to the north, Washington Boulevard to the south, National Boulevard to the west, and existing commercial uses to the east. The Project Site is located at 8825 National Boulevard and 8771 Washington in Culver City, California, 90232 (Culver City Parcel); and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in Los Angeles, California, 90232 (Los Angeles Parcel).		
Nearest Cross Street:	Venice Boulevard and National Boulevard	APN:	4312-015-005 4312-015-006
Project Sponsor's Name & Address:	Culver Crossings Properties, LLC Gabriel Hungerford 2221 Rosecrans Avenue, Suite 200 El Segundo, CA 90245 GHungerford@trammellcrow.com (310) 363-4715		
General Plan Designation:	Culver City Parcel: General Corridor Los Angeles Parcel: Community Commercial	Zoning:	Culver City Parcel: Industrial General (IG) and East Washington Overlay (-EW) Los Angeles Parcel: C2-2D-CPIO (Commercial, Height District 2, Community Plan Implementation Overlay)
Overlay Zone/Special District:	Culver City Parcel: (1) East Washington Overlay (-EW) Zone; (2) Washington/National Transit Oriented District ("Washington National TOD"); (3) the Washington/National Transit Oriented District Streetscape Plan area ("TOD Streetscape"), (3) Redevelopment Component Area 4 ("Redevelopment Component Area 4") and the Culver City Exposition Light Rail Station Design for Development (DFD). Los Angeles Parcel: (1) Exposition Corridor Transit Neighborhood Plan (2) West Adams-Baldwin Hills-Lemert Community Plan Implementation Overlay (CPIO)		

Project Description and Requested Action: The Project would remove the three existing buildings and a surface parking on the Project Site, totaling 105,047 sf, and construct two, four- to five-story buildings that would provide a total of 536,000 sf of new office floor area, which is intended to be occupied by Apple, Inc. The two buildings would have the ability to be connected via a shared wall. The Project provides a total of 1,215 vehicular parking spaces within two separate three-level subterranean garages under each proposed building. The Project would provide 162 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes. The Project would also include pedestrian-facing landscaping at the ground floor on National Boulevard and Venice Boulevard, as well as an internal courtyard for the use of employees and occasional private tenant events.

Requested entitlements would include: (1) Culver City Parcel - Planned Development ("PD") property rezoning and related Zoning Map Amendment; Approval of a Comprehensive Plan; Subdivision Map, as necessary; and ministerial permits including but not limited to demolition, grading, building, and engineering permits; and (2) Los Angeles Parcel: Exposition Corridor Transit Neighborhood Plan (TNP) Amendment to remove the Los Angeles Parcel from the TNP; Community Plan Implementation Overlay (CPIO) Amendment to amend the design standards in "Subarea A" to establish project-specific standards; Site Plan Review; Waiver of Dedication and Improvement (WDI) to reduce the dedication and provide an easement for a sidewalk along National Boulevard; Haul Route Approval; Street Tree Removal Permit; and other ministerial approvals including but not limited to demolition, grading, building, and engineering permits. Please refer to Attachment A, Project Description, for a detailed discussion of the Project.

Existing Conditions of the Project Site: The Project Site is divided by the jurisdictional boundaries of the City of Culver City and the City of Los Angeles and is comprised of two parcels (Culver City Parcel and Los Angeles Parcel). The Culver City Parcel (APN 4312-015-006) is currently developed with two warehouse buildings totaling 18,821 sf. The 9,739 sf building is currently used for storage and the 9,082 sf building is currently vacant. The balance of the Culver City Parcel consists of surface parking and vehicular access that supports the existing uses on the Project Site. The Los Angeles Parcel (APN 4312-015-005) is currently improved with a single warehouse building that has been partitioned into six separate spaces consisting of an aggregate 51,500 sf of office and an aggregate 34,726 sf of retail for a total of 86,226 sf of floor area. There are 70 spaces of enclosed vehicular parking on the Los Angeles Parcel.

Surrounding Land Uses and Setting: The Culver City Parcel is located to the east of the Downtown District of Culver City. The Los Angeles Parcel is located in the West Adams - Baldwin Hills - Leimert Community Plan area of Los Angeles. The area surrounding the Project Site is developed primarily with a mix of commercial uses such as office, retail, restaurants, and mixed-use residential developments. Land uses located adjacent to the Project Site include: a two-story office building to the north (across Venice Boulevard), the Helms Bakery single-story warehouse and retail building to the east, the 8777 Washington four-story office building and the Access Culver City five-story mixed-use residential building to the south (across Washington Boulevard), and the six to seven-story Ivy Station mixed-use project consisting of office, residential, hotel, and retail uses to the west across National Boulevard.

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

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

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

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | |
|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Noise |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Population / Housing |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Energy | <input checked="" type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Geology / Soils | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Utilities / Service Systems |
| <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Wildfire |
| <input checked="" type="checkbox"/> Hydrology / Water Quality | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input checked="" type="checkbox"/> Land Use / Planning | |

ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

- ☐ I find that the proposed project **COULD NOT** have a significant effect on the environment; and a **NEGATIVE DECLARATION** will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☒ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


Interim Current Planning Manager, City of Culver City

November 2, 2021
Date

PURPOSE OF THE INITIAL STUDY:

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

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

- “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- “Less than Significant Impact with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The mitigation measures must be described, along with a brief explanation of how they reduce the effect to a less than significant level.
- “Less than Significant Impact” applies where the project creates no significant impacts, or only Less Than Significant impacts. An impact may be considered “less than significant” if “project design features” would be implemented by the project or if compliance with applicable regulatory requirements or standard conditions of approval would ensure impacts are less than significant.
- “No Impact” applies where a project does not create an impact in that category. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one proposed (e.g., the project would not displace existing residences). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to toxic pollutants, based on a project-specific screening analysis).

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<u>I. AESTHETICS</u> – Except as provided in Public Resource Code Section 21099, would the Project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Would the Project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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VIII. GREENHOUSE GAS EMISSIONS – Would the Project:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the Project:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

X. HYDROLOGY AND WATER QUALITY – Would the Project:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XI. LAND USE AND PLANNING – Would the Project:

- | | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

XII. MINERAL RESOURCES – Would the Project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XIII. NOISE – Would the Project result in:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Generation of a substantial temporary or permanent increase in ambient noise level in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Generation of excessive groundborne vibration or groundborne noise levels? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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XVIII. TRIBAL CULTURAL RESOURCES

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

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

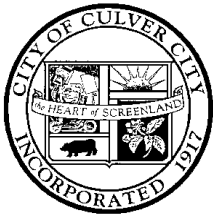
XIX. UTILITIES AND SERVICE SYSTEMS – Would the Project:

- | | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Issues:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



ATTACHMENT A PROJECT DESCRIPTION

A. INTRODUCTION

Culver Crossings Properties, LLC, the Applicant, proposes to develop an office project (Project) on an approximately 4.46-acre (194,334 square foot [sf]) site comprised of two properties: one 1.63 acre (71,016 sf) parcel is located in the City of Culver City (Culver City Parcel) while the second 2.83 acre (123,318 sf) parcel is located in the City of Los Angeles (Los Angeles Parcel) (collectively referred to herein as the Project Site). The Project Site is bounded by Venice Boulevard to the north, Washington Boulevard to the south, National Boulevard to the west, and existing commercial uses to the east. The Project Site is located at 8825 National Boulevard and 8771 Washington in Culver City, California, 90232 (Culver City Parcel); and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in Los Angeles, California, 90232 (Los Angeles Parcel). The Project would construct two four- to five-story buildings that would provide a total of 536,000 sf of new office floor area, which is intended to be occupied by Apple, Inc. The two buildings would have the ability to be connected via a shared wall. The Project would provide a total of 1,215 vehicular parking spaces within two separate three-level subterranean garages under each proposed building. The Project would also provide 162 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes. The proposed office buildings would be designed to accommodate creative office uses and could include associated production spaces for multimedia content creation and capture as well as amenities for building tenants including a cafeteria, coffee stations, employee shuttle service, and other ancillary uses typical of an integrated office complex development. The Project would also include pedestrian-facing landscaping at the ground floor on National Boulevard and Venice Boulevard, as well as an internal courtyard for the use of employees and occasional private tenant events.

B. PROJECT LOCATION AND SURROUNDING USES

The Culver City Parcel is located to the east of the Downtown District of Culver City. The Los Angeles Parcel is located in the West Adams - Baldwin Hills - Leimert Community Plan area of Los Angeles. Primary regional access is provided by the Santa Monica Freeway (I-10) and the San Diego Freeway (1-405), located approximately 630 feet north of and 2.09 miles west of the Project Site, respectively. See **Figure A-1, Regional and Project Vicinity Locations**, for the location of the Project Site. See **Figure A-2, Project Location – Aerial Photograph**, for an aerial image of the Project Site and surrounding development. As described in Section E.3, below, the Project Site is also served by multiple regional and local bus lines that run along Venice, National, and Washington Boulevards.

The area surrounding the Project Site is developed primarily with a mix of commercial and residential uses. Land uses located adjacent to the Project Site include: a two-story office building to the north (across Venice Boulevard), the Helms Bakery single-story warehouse and retail building to the east, the 8777 Washington four-story office building and the Access Culver City five-story mixed use residential building to the south (across Washington Boulevard), and the six to seven-story Ivy Station mixed-use project consisting of office, residential, hotel, and retail uses to the west across National Boulevard.



SOURCE: Open Street Map, 2021

Project Crossings

Figure A-1
Regional and Project Vicinity Locations



SOURCE: Nearmap, 2021

Project Crossings

Figure A-2
Project Location – Aerial Photograph

The uses surrounding the Project Site in Culver City have a General Plan land use designation of General Corridor. The uses surrounding the Project Site in the City of Los Angeles are designated by the West Adams – Baldwin Hills – Leimert Community Plan for Hybrid Industrial, Neighborhood Commercial, Limited Industrial, and Open Space land uses (i.e., Venice Boulevard landscaped median), and are within the CM-2D-CPIO (Commercial Manufacturing), C2-2D-CPIO (Commercial), and (Q)M1-2D and M1-1 (Limited Industrial) and OS-1XL (Open Space) zones.

C. EXISTING CONDITIONS

The Project Site is currently improved with low-rise warehouses that have been converted into retail, office, and surface and enclosed parking lots serving the existing uses on the Project Site. The Project Site is mostly flat with gradual sloping from north to south. Landscaping on the Project Site is limited to parking medians.

The Culver City Parcel is currently developed with two warehouse buildings: (1) a 9,739-sf building that is currently used for storage; and (2) a 9,082-sf building that is currently vacant. The two existing buildings total 18,821 sf of floor area. The balance of the Culver City Parcel consists of surface parking and vehicular access that supports the existing uses on the Project Site. Vehicular access to the Culver City Parcel is provided along National Boulevard. Pedestrian access to the Culver City Parcel is provided along National Boulevard and on Washington Boulevard at the southern edge of the Project Site.

The Los Angeles Parcel is currently improved with a single warehouse building that has been partitioned into six separate spaces consisting of an aggregate 51,500 sf of office and an aggregate 34,726 sf of retail for a total of 86,226 sf of floor area. In addition to the floor area, there are 70 spaces of enclosed vehicular parking. Vehicular access to the Los Angeles Parcel is provided via the Culver City Parcel from National Boulevard. Pedestrian access is provided along the western edge on National Boulevard and via the northern edge of the site along Venice Boulevard.

D. EXISTING PLANNING AND ZONING

The Culver City Parcel is zoned Industrial General (IG) and carries a General Plan designation of General Corridor. The Culver City Parcel is located within the boundary of the Washington/National Transit Oriented Development District (Washington/National TOD), the Washington/National TOD Streetscape Plan area (TOD Streetscape), as well as Culver City Redevelopment Component Area 4 (Redevelopment Component Area 4), which expires on November 23, 2029. The Culver City Parcel is also located within the Design for Development for Exposition Light Rail Transit and Station Area (Culver City Expo DFD) adopted by the City in 2005, which includes provisions for design, massing, and pedestrian orientation features for new development. The frontage of the Culver City Parcel on Washington Boulevard and a portion of the Project frontage on National Boulevard including the alley along the north side of the 8777 Washington office building is located within the East Washington Overlay (-EW) Zone. The East Washington Overlay Zone provides a more limited range of allowable uses relative to the underlying IG zone; however, office uses including creative office and multimedia production are allowed within the -EW and IG Zone.

The Los Angeles Parcel is zoned C2-2D-CPIO and is designated Community Commercial by the West Adams – Baldwin Hills – Leimert Community Plan (Community Plan), which is part of the General Plan Land Use Element. The C2 Zone permits a wide variety of commercial uses, including office uses and multimedia production. The “2D” designation following the C2 zone designates the Los Angeles Parcel as Height District 2 with a Development Limitation. The Los Angeles Parcel is subject to the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay (CPIO), which includes regulations on permitted uses, floor area, height, setbacks, parking, and landscape. The Los Angeles Parcel is located within the Venice/National Transit

Oriented District (TOD) subarea of the CPIO and is designated as Parcel Group A within that subarea. The Los Angeles Parcel is also located in the specific plan area of the Exposition Corridor Transit Neighborhood Plan (Expo TNP). The Expo TNP is intended to encourage new residential, mixed-use, commercial, and industrial growth near transit stations along the Metro E (Exposition) Line.

E. DESCRIPTION OF PROPOSED PROJECT

1. Proposed Land Uses

The Project would involve demolition of the three existing buildings on the Project Site, totaling 105,047 sf, to support the proposed integrated office complex. The Project would consist of two buildings, one on each of the two properties that comprise the Project Site. Building 1 (on the Culver City Parcel) involves demolition of existing surface parking and buildings totaling 18,821 sf and construction of a new 167,000-sf office building. Building 1 would be four stories, measuring up to 56 feet in height to the top of the roofline, with a three-level subterranean garage containing 477 vehicular parking spaces and 38 bicycle parking spaces. Building 2 (on the Los Angeles Parcel) involves demolition of the existing building totaling 86,226 sf and construction of a new 369,000-sf office building. Building 2 would be four to five stories, measuring 56 feet to 75 feet in height to the top of the roof, with a three-level subterranean garage containing 738 vehicular parking spaces and 124 bicycle parking spaces.

The Project would include office space suitable for approximately 2,400 occupants and could include associated production spaces for multimedia content creation and capture. Amenities for the building tenants would include an employee cafeteria, coffee stations, employee shuttle service, and other ancillary uses typical of an integrated office complex development. The total floor area for the Project at final build-out would be 536,000 sf, with a floor area ratio (FAR) of 2.76:1. The Project would also include pedestrian-facing landscaping at the ground floor on National Boulevard and Venice Boulevard, as well as an internal courtyard for the use of employees and occasional private tenant events. **Table A-1, Existing and Proposed Floor Area**, provides a summary of the proposed floor area. **Figure A-3, Conceptual Site Plan**, provides an illustration of the site plan for the Project.

Table A-1
Existing and Proposed Floor Area

Parcel	Existing Floor Area	Existing Floor Area to be Removed	Proposed New Floor Area	Net New Floor Area
Culver City Parcel	18,821 sf	18,821 sf	167,000 sf	148,179 sf
Los Angeles Parcel	86,226 sf	86,226 sf	369,000 sf	282,774 sf
Total	105,047 sf	105,047 sf	536,000 sf	430,953 sf

sf = square feet

SOURCE: 2021.

2. Open Space and Landscaping

Open space and landscaping would be provided in accordance with Culver City Municipal Code (CCMC) and the City of Los Angeles's CPIO, as amended. The Project would incorporate public-facing landscaping along National Boulevard and Venice Boulevard. Existing trees within the public right-of-way and on the Project Site that would be removed would be replaced in accordance with City requirements. The landscape design would be tailored for each of the landscaped open space areas with a compatible plant palette used throughout the Project Site. Landscaping would emphasize native, Mediterranean, and drought tolerant plants (e.g., Agave, Aloe, ornamental grasses, leafy groundcovers, colorful shrubs, and soft textured vegetation). The center of the Project would include an interior courtyard for building tenants. Additional open space areas for tenants would be located on one or more terraces at the upper levels interior to the Project Site.



SOURCE: Trammell Crow Company, 2021

Project Crossings

Figure A-3
Conceptual Site Plan

3. Height, FAR, and Setbacks

The Culver City Parcel is currently zoned Industrial General with a portion of the Project in the East Washington Overlay. Industrial General permits a building height up to 43 feet in height. The Project application includes a Zone Change request from IG and -EW to Planned Development (PD) Zone for the Culver City Parcel to allow the Culver City building to be built to 56 feet consistent with the newly constructed office building to the south (8777 Washington) which is also PD Zoned. As proposed, Building 1 would be 167,000 sf on a 71,016-sf parcel. The Culver City Parcel has a TOD District minimum required setback of 15 feet or as deemed appropriate by the Director on street-facing edges of the property, 2 feet for any portion of the Project Site facing an alleyway, and no required side or rear setbacks. Building 1 would comply with the setback requirements for the alley and rear portions of the property and the street-facing edge by providing a 15-foot setback for pedestrian and landscaped areas at grade. Above grade level, Building 1 would provide a 4' setback at the street-facing edge along National Boulevard. Further a dedication of land from the project site may be required to provide wider sidewalks along National Boulevard and Washington Boulevard.

The Los Angeles Parcel is zoned C2-2D-CPIO. This zoning designation regulates height, transitional height and FAR pursuant to the CPIO which allows a building height of up to 150 feet and an FAR of up to 3:1. As proposed, Building 2 would be up to 75 feet in height with 369,000 sf on a 123,318-sf parcel, or an FAR of 3:1. Setbacks on the Los Angeles Parcel are governed by both the CPIO and TNP, which contain conflicting and inconsistent requirements as they relate to the Project Site. An Expo TNP map amendment would be processed to remove the Los Angeles Parcel from the Expo TNP entirely to eliminate the conflicts and inconsistencies. The CPIO "Subarea A" regulations that govern the Los Angeles Parcel do not envision the development of both Parcels with an integrated project. These regulations, including height and setbacks, would be amended to create new, more tailored design regulations that better accommodate an integrated office complex.

A Waiver of Dedication and Improvement ("WDI") would be requested to provide a dedication of 4 feet in lieu of 14 feet at and above grade and a 0-foot dedication below grade along the portion of National Boulevard within the City of Los Angeles. In addition to the 4-foot dedication proposed at grade, the Project would include an easement for sidewalk purposes to provide at least a minimum 15-foot sidewalk as required at the ground floor level by the Los Angeles 2035 Mobility Plan.

4. Access, Circulation, and Parking

Vehicular and Pedestrian Access and Parking

Vehicular access to the new below-grade parking, as well as loading docks and trash areas, would be provided via two main driveways: one on National Boulevard serving the building on the Culver City Parcel, and one on Venice Boulevard serving the building on the Los Angeles Parcel. A third driveway from Washington Boulevard would provide ingress only to the Culver City and Los Angeles parcels. Pedestrian access would be provided from entrances located on the perimeter of the Project Site from National Boulevard and Venice Boulevard.

The Project would provide a total of 1,215 vehicular parking spaces within two separate garages on the Culver City Parcel and the Los Angeles Parcel, respectively, each containing three-level subterranean parking and electric vehicle (EV) spaces that would meet or exceed the respective City codes. The Project would also provide 162 bicycle parking spaces for employees and visitors, including short-term and long-term spaces, in compliance with respective City codes.

Public Transit

The Project Site is served by a variety of public transit options along Venice, National, and Washington Boulevards provided by the Los Angeles County Metropolitan Transportation Authority (Metro), the Los Angeles Department of Transportation (LADOT), and Culver City Department of Transportation. Most significantly, the Project Site is located one block east from the Culver City stop of the Metro E (Exposition) Line light rail. Other 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 (Exposition) Line and bus line 33, and Culver CityBus 1 all operate frequently with headways of less than 15 minutes throughout the day. Based on the Project Site's location in an area well served by public transportation, the Project Site is identified as being in a Transit Priority Area (TPA), as defined by Senate Bill (SB) 743 and City of Los Angeles Zoning Information File (ZI) 2452.

5. Lighting and Signage

Exterior 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 Project Site. Project lighting would be designed to minimize light trespass from the Project Site and would comply with CCMC and Los Angeles Municipal Code (LAMC) requirements. New street and pedestrian lighting within the public right-of-way would comply with applicable city regulations and would require approval from the jurisdiction having authority in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with the requirements of the CCMC and LAMC. Proposed signage would include identity signage, building and tenant signage, and general ground level and wayfinding pedestrian signage. No off premises or billboard advertising is proposed as part of the Project. The Project would not include signage with flashing, mechanical, or strobe lights. New signage would be architecturally integrated into the design of the proposed buildings and would establish appropriate identification for the proposed uses. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the CCMC and LAMC as measured at the property line of the nearest residentially zoned property.

6. Site Security

The Project would incorporate security measures for the safety of employees and visitors to the Project Site. During construction of the Project, the Project Site would be fenced and gated with surveillance cameras to monitor the site during off hours. During operation of the Project, access to the parking structure would be controlled through gated entries, and the entry areas would be well illuminated. Project Site security would include controlled keycard access to office spaces, security lighting within common areas and entryways, and closed circuit TV monitoring (CCTV).

7. Sustainability Features

The Project would be designed to 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. These standards are intended to reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to, 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 that would meet or exceed the respective city codes; solar photovoltaic power, Energy Star–labeled appliances; and water-efficient landscape design.

8. Construction Schedule/Activities

A preliminary Construction Management and Traffic Plan is required as part of entitlement processing phase of the Project and would be prepared which defines the scope and scheduling of planned construction activities as well as the Applicant's proposed construction site management responsibilities, to ensure minimal impacts to neighboring land uses and to avoid interruption of pedestrian, vehicle, and alternative transportation modes and public transit. The Construction Management and Traffic Plan would require regular oversight by the City of Culver City and City of Los Angeles and would facilitate communication and coordination with residents and others in the neighborhood. A final comprehensive Construction Traffic Management Plan would be subject to review and approval by the City of Culver City and City of Los Angeles prior to starting of any construction activity. The Construction Management and Traffic Plan would include but not necessarily be limited to: name and telephone number of a contact person regarding traffic complaints or emergency situations; community notification procedures; contact information for local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity; procedures for training the flag person(s) used in implementing the plan; the location, times, and estimated duration of any temporary lane closures; managing the approved haul route plan; and a construction parking management plan. The Project would comply with applicable allowable construction hours of the CCMC and/or LAMC, whichever is more restrictive. The Project would require excavation to accommodate subterranean parking, building foundations, utilities, and other improvements. Up to approximately 298,200 cubic yards of earthwork would be excavated and exported from the Project Site. The Project would excavate to a maximum depth of 50 feet below grade.

Project construction would occur in one phase and is anticipated to commence as early as the first quarter of 2023 and is expected to take approximately 34 months to complete. Full build-out is expected as early as the fourth quarter of 2025.

F. NECESSARY APPROVALS

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

1. Culver City Parcel

- Planned Development ("PD") property rezoning and related Zoning Map Amendment
- Approval of a Comprehensive Plan; and
- Subdivision Map, as necessary.

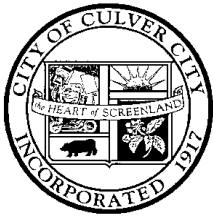
In addition, the Project would require ministerial permits including but not limited to demolition, grading, building, and engineering permits.

2. Los Angeles Parcel

- Expo TNP Amendment (to remove Los Angeles Parcel from the TNP);
- CPIO Amendment (to amend the design standards in "Subarea A" to establish project-specific standards);
- Site Plan Review;
- WDI to reduce the dedication and provide an easement for a sidewalk along National Boulevard;

- Haul Route Approval; and
- Street Tree Removal Permit.

In addition, the Project would require ministerial permits including but not limited to demolition, grading, building, and engineering permits.



ATTACHMENT B EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. As applicable to the Los Angeles Parcel specifically, the City of Los Angeles Department of City Planning Zoning Information (ZI) File No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City of Los Angeles’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”¹

PRC Section 21099 applies to the Project as it is an “employment center project” located on an infill site within a TPA. Therefore, the Project is exempt from aesthetic impacts. The discussion of aesthetics in this initial study (or in the EIR), is for **informational purposes only** and not for determining whether the Project would result in significant impacts to the environment. As such, nothing in the aesthetic impact discussion in this initial study (or the EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

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

Less Than Significant Impact. The Project Site is located in a highly urbanized area, with a mix of commercial and residential uses in the nearby vicinity. The topography surrounding the Project Site is relatively flat with no ocean, or notable mountain or other scenic vistas that would be affected by the Project. More specifically, the Pacific Ocean is approximately 6.21 miles to the west across flat topography with intervening development. In addition, the Project Site is not located in a scenic resource area or area with protected views designated by either of the City of Culver City or City of Los Angeles. Accordingly, the Project would not have a substantial adverse effect on scenic vistas. Furthermore, as the Project is an employment center project that would be

¹ City of Los Angeles Department of City Planning, Zoning Information (ZI) File No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA, 2016.

located on an infill site within a TPA, pursuant to SB 743 and City of Los Angeles ZI File No. 2452, the Project would have no impact to scenic vistas. Therefore, the impact conclusion for aesthetics is no impact.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, an EIR will include a discussion of the Project's potential effects on scenic vistas for informational purposes only.

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

No Impact. The Project Site is located in a highly urbanized area and is currently developed with three warehouse buildings, areas of asphalt-paved surface parking, and ornamental landscaping. The Project Site is not located in the vicinity of a City of Culver City, City of Los Angeles, or State-designated scenic highway. In addition, the Project Site does not contain any unique or locally recognized, natural (i.e., rock outcroppings and trees), features or designated historic buildings.^{2,3} Furthermore, as the Project is an employment center project that would be located on an infill site within a Transit Priority Area (TPA), pursuant to SB 743 and ZI File No. 2452, the Project would result in no impact to scenic resources. Therefore, the impact conclusion for aesthetics is no impact.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, an EIR will include a discussion of the Project's potential effects on scenic resources for informational purposes only.

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

No Impact. The Project Site is located in an urbanized area. The existing buildings and surface parking lots within the Project Site have low aesthetic value. The Project Site includes a sparsely landscaped open space. As the Project is an employment center project that would be located on an infill site within a Transit Priority Area (TPA), pursuant to SB 743 and ZI File No. 2452, the Project would result in no impact to zoning or other regulations related to scenic quality. Therefore, the impact conclusion for aesthetics is no impact.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, an EIR will include a discussion of the Project's potential to conflict with applicable zoning or other regulations governing scenic quality for informational purposes only.

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

No Impact. The Project Site is located within an urbanized area, characterized by medium to high ambient nighttime artificial light levels. During nighttime hours, the surrounding mix of uses generate moderate to high levels of interior and exterior lighting for way-finding, security, parking, signage, architectural highlighting, and landscaping purposes. Traffic on local streets and Santa Monica Freeway (I-10), located approximately 630 feet north of the Project Site, also contributes to overall ambient artificial light levels in the Project vicinity. The Project would introduce new sources of nighttime illumination for architectural highlighting. As stated in Attachment A, Project Description, of this Initial Study, Project lighting would be designed to minimize light trespass from the Project Site and would comply with Culver City Municipal Code (CCMC) and Los Angeles Municipal Code

² City of Culver City, Historic Preservation, <https://www.culvercity.org/Explore/Arts-Culture/Preservation#section-2>. Accessed October 5, 2021.

³ City of Los Angeles, Historic Places LA, <http://historicplacesla.org/map>. Accessed October 8, 2021.

(LAMC) requirements. Furthermore, as the Project is an employment center project that would be located on an infill site within a TPA, pursuant to SB 743 and City of Los Angeles ZI File No. 2452, the Project would result in no impact due to light or glare. Therefore, the impact conclusion for aesthetics is no impact.

Notwithstanding the above and the exemption of the Project from aesthetic impacts under SB 743, an EIR will include a discussion of the Project's potential effects due to light or glare for informational purposes only.

Shade and Shadow

Less Than Significant Impact. Shading impacts are influenced by the height and bulk of a building or structure, the time of year, the duration of shading during the day, and the proximity of shade-sensitive land uses or receptors. Uses that would be sensitive to shading impacts include "routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce.

The Project would remove some existing buildings and introduce new buildings of up to five stories or 56 feet in height that could shade off-site land uses during certain times of day and year, including residential development to the west. For this reason, further analysis of this topic is recommended in an EIR.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

No Impact. The Project Site is located in a highly urbanized area and is currently developed with three low-rise warehouse buildings, surface parking, and landscaping. The Project Site does not contain agricultural uses or related operations and is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.⁴ Furthermore, the General Plan does not identify the Project Site as an area designated for agriculture use. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impacts would occur, and this issue need not be evaluated further in an EIR.

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

No Impact. The Culver City Parcel is zoned Industrial General (IG) and East Washington Overlay (-EW) the Los Angeles Parcel is zoned C2-2D-CPIO. Per the CCMC and the LAMC, no portion of the Project Site or surrounding

⁴ State of California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/dlrp/ciff/>. Accessed October 4, 2021.

land uses are zoned for agriculture and no nearby lands are enrolled under the Williamson Act. As such, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract and no impact would occur. Therefore, this issue need not be evaluated further in an EIR.

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

No Impact. As discussed in Response II.b, the Project Site is currently developed and is zoned Industrial General (IG) (Culver City Parcel) and C2-2D-CPIO (Los Angeles Parcel). No forest land or timberland zoning is present on the Project Site or in the surrounding area. As such, the Project would not conflict with existing zoning for forest land or timberland, no impact would occur, and this issue need not be evaluated further in an EIR.

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

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

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

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

III. AIR QUALITY

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

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

Potentially Significant Impact. The Project Site is located within the 6,600-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) together with the Southern California Association of Governments (SCAG) is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current 2016 Air Quality Management Plan (AQMP) was adopted March 3, 2017 and outlines the air pollutions control measures needed to meet Federal particular matter (PM_{2.5}) and Ozone (O₃) standards. The AQMP also proposes policies and measures currently contemplated by responsible agencies to achieve Federal standards for healthful air quality in the Basin that are under SCAQMD jurisdiction. In addition, the current AQMP addresses several Federal planning requirements and incorporates updated emissions inventories, ambient measurements, meteorological data, and air quality modeling tools from earlier AQMPs. The Project would increase the amount of air emissions which could affect implementation of the AQMP due to increased traffic and energy consumption, including potential increases in the amounts of gas and electricity needed to support the Project. Pollutant emissions resulting from construction of the Project would also have the potential to affect implementation of the AQMP. Therefore, it is recommended that this topic be evaluated further in an EIR.

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

Potentially Significant Impact. The Project Site is located within the Basin, which is characterized by relatively poor air quality. According to the 2016 AQMP, the Basin is designated nonattainment for Federal and State ozone (O₃) standards, as well as the current particulate matter (PM₁₀ and PM_{2.5}) standards. The Los Angeles County portion of the Basin is also designated a nonattainment area for the Federal lead (Pb) standard on the basis of source-specific monitoring at two locations, as determined by the U.S. Environmental Protection Agency (USEPA) using 2007 through 2009 data. However, all other stations in the Basin, including the near-source monitoring in Los Angeles County, have remained below the lead National Ambient Air Quality Standards (NAAQS) for the 2012 through 2015 period. SCAQMD is therefore requesting that the USEPA re-designate the Los Angeles County portion of the basin as attainment for lead. The Project would result in increased air emissions (including the emission of criteria pollutants) from construction and operational traffic and energy consumption in the Basin, within an air quality management area currently in non-attainment of Federal and State air quality standards for O₃, PM₁₀, and PM_{2.5}. As such, implementation of the Project could potentially contribute to cumulatively air quality impacts, in combination with other existing and future emission sources in the Project area. Therefore, it is recommended that this topic be evaluated further in an EIR.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The Project Site is located at the intersection of Venice Boulevard/National Boulevard/Washington Boulevard along a commercial corridor which includes a low- to medium-density mix of uses. Sensitive residential uses are located north, west, and south of the Project Site. Construction activities and operation of the Project could increase localized air emissions, carbon monoxide (CO) concentrations, and toxic air contaminants (TACs) at these and other sensitive receptor locations in the area. Therefore, it is recommended that this topic be evaluated further in an EIR.

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

Less than Significant Impact. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 (Architectural Coatings) limits the amount of volatile organic compounds from architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. Odors from the combustion of diesel fuel would be minimized by complying with the CARB Air Toxics Control Measure (ATCM) that limits diesel-fueled commercial vehicle idling to five minutes at any given location, which was adopted in 2004. The Project would also comply with SCAQMD Rule 402 (Nuisance), which prohibits the emissions of nuisance air contaminants or odorous compounds. Through adherence with mandatory compliance with SCAQMD Rules and State measures, construction activities and materials would not result in other emissions that create objectionable odors. The nearest existing sensitive receptors are residences located in the Ivy Station mixed-use development less than 30 meters (100 feet) to the west of the Project Site, across National Boulevard. Construction of the Project is not expected to generate emissions leading to nuisance odors that would adversely affect nearby sensitive receptors.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project includes office uses and would not involve the types of uses associated with odor complaints. The Project would otherwise include proper housekeeping practices for trash receptacles and other components or activities such that adverse odor impacts would be

avoided similar to other commercial uses in the vicinity of the Project Site. Impacts with respect to odors would be less than significant, and this issue need not be evaluated further in an EIR.

IV. BIOLOGICAL RESOURCES

Would the Project:

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

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

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

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

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

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

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

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

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

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

Mitigation Measure

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

- 1) Vegetation removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds. This would ensure that no active nests are disturbed; or
- 2) If avoidance of the avian breeding season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) is not feasible, then:
 - a. A qualified biologist shall conduct a preconstruction nesting bird survey within 15 days and again within 72 hours prior to any ground disturbing activities (staging, grading, vegetation removal or clearing, grubbing, etc.). The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code are avoided. Survey areas shall include suitable nesting habitat within 200 feet (or up to 300 feet, depending on topography or other factors, and 500 feet for raptors) of construction site boundaries. This two-tiered survey method is intended to provide the Applicant with time to understand the potential issue and evaluate solutions if nests are present, prior to mobilizing resources. If active nests are not identified, no further action is necessary.
 - b. If active nests are identified during pre-construction surveys, an avoidance buffer shall be demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Given the high disturbance level, general avoidance buffers include a minimum 100-foot avoidance (for smaller birds more tolerant of human disturbance) to a 250-foot avoidance buffer for passerine and a 500-foot avoidance buffer from active raptor nests, or reduced buffer distances determined at the discretion of a qualified biologist familiar with local nesting birds and breeding bird behavior within the Project area.

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

that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the Culver City Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds. In addition, pre-construction surveys and/or construction monitoring shall also be submitted to the California Department of Fish and Wildlife (CDFW) within two months of the completion of the monitoring activities.

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

Less than Significant Impact. Project implementation would comply with the applicable provisions pertaining to the removal and replacement of street trees in the CCMC and LAMC, as applicable. A Street Tree Report was prepared for the Project and is included in Appendix A of this Initial Study. As stated therein, no native or heritage trees were observed during the tree survey. A total of nineteen (19) trees including three (3) jacaranda, seven (7) African sumac (*Searsia lancea*), six (6) desert museum palo verdes (*Parkinsonia* X 'Desert Museum'), and three (3) crape myrtles (*Lagerstroemia indica*) were recorded as part of the survey. Seven African sumac were observed along Venice Boulevard and all others were observed along National Boulevard. Of the nineteen trees observed, three are regulated by Culver City (all crape myrtles) and seven are regulated by the City of Los Angeles (all African sumac). The other nine trees occur beyond the sidewalk (on the Project Site) and parkway area along National Boulevard, and are not regulated by Culver City.

For any street tree removed in the City of Culver City, the Project would comply with the City's TOD Streetscape Plan and applicable provisions pertaining to the removal and replacement of street trees in the CCMC within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.220: Removal of Trees in Parkways Related to Private Improvement or Development Project. Per the City's requirements, the Project is required to plant two new Street Right-of-Way trees or Parkway trees for each tree that is removed from the site. The size and location of the replacement trees would be determined by the TOD Streetscape Plan and by the Department of Public Works based on what is appropriate for the particular Street Right-of-Way or Parkway. For any street tree removal in the City of Los Angeles, Project landscaping would comply with applicable LAMC and Urban Forestry Division requirements, which currently require street tree replacement on a 2:1 basis and approval by the Board of Public Works. In addition, during the final design phase of the Project, and prior to the start of the demolition/construction phase, the Project would submit a final landscape plan to the City of Los Angeles for approval by the City's Chief Forester and the Director of the Bureau of Street Services. The final landscape plan would include provisions to either protect in place the existing protected trees in or adjacent to the Project Site, per the requirements of the City of Los Angeles Tree Preservation Ordinance.

Through compliance with applicable street tree removal and replacement provisions of the CCMC and LAMC, impacts on street trees would be less than significant, and this issue need not be evaluated further in an EIR.

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

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

V. CULTURAL RESOURCES

Would the Project:

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

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

- (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code Section 5024.1, Title 14 CCR, Section 4850 et seq.).
- (2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code.
- (3) Any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, resources are considered historically significant if the resources are associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

While no designated historic buildings are known to be present on the Project Site, a historic resource assessment will be conducted to determine if the existing buildings on the Project Site qualify for listing in the National Register of Historic Places, California Register of Historical Resources, or locally in the City of Culver City and/or City of Los Angeles, and would therefore be considered historical resources under CEQA. The assessment and the analysis provided in the Draft EIR will document the construction history and ownership/occupancy for the three existing warehouse buildings, provide historical background research to develop the historic context for evaluation of the buildings, and evaluate whether they qualify as historical resources under CEQA. In the event the buildings are found to qualify as historical resources, impacts to the buildings will be assessed as well as any potential for the Project to result in indirect impacts to other historical resources in the surrounding area, including the adjacent Helms Bakery building. Therefore, this topic will be further analyzed in an EIR to determine potential impacts associated with historical resources.

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

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is currently developed with three existing buildings, surface parking and ornamental landscaping. However, because grading or excavation at the time of prior construction may have been limited, the potential existence of extant archaeological resources below grade is unknown, and as with other areas of the City of Culver City or the City of Los Angeles, archaeological resources

may be present. Project construction would require grading and excavation activities for building foundations and three levels of subterranean parking that could extend into native soils and could disturb existing but as yet undiscovered archaeological resources. Therefore, it is recommended that this topic be evaluated further in an EIR.

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

Less Than Significant Impact. As previously indicated, the Project Site is fully developed. Nevertheless, the Project would require excavation that could extend into native soils, with the potential to encounter previously unknown human remains. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code (PRC) Section 5097.98, and State CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event of the discovery of unrecorded human remains during construction, excavations shall be halted and the County Coroner shall be notified. If the human remains are determined to be Native American, the California Native American Heritage Commission (NAHC) would be notified within 24-hours and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory protocols would ensure that impacts on human remains would be less than significant, and this issue need not be evaluated further in an EIR.

VI. ENERGY

Would the Project:

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

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

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

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

VII. GEOLOGY AND SOILS

Would the Project:

- a. **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Potentially Significant Impact. The seismically active region of Southern California is crossed by numerous faults that are both active and inactive. Fault rupture is the displacement that occurs along the sides of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active if they have shown evidence of movement within the past 11,700 years (i.e., during the Holocene Epoch). The criteria for defining an active fault is based on standards developed by the CGS for the Alquist-Priolo Earthquake Fault Zoning Program.⁵ Faults that have not moved in the last 11,700 years are not considered active.

The Alquist-Priolo Earthquake Fault Zoning (AP) Act was passed into law following the destructive February 9, 1971 San Fernando earthquake, which was associated with extensive surface fault ruptures that damaged numerous homes, commercial buildings, and other structures. The AP Act provides a mechanism for reducing losses from surface fault rupture on a statewide basis. The intent of the AP Act is to ensure public safety by prohibiting the siting of structures for human occupancy (with the exception of some structures as defined in the PRC, Division 2, Chapter 7.5) across traces of active faults that constitute a potential hazard to structures from surface faulting. The AP Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The law requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. The CGS has established Earthquake Fault Zones to assist cities and counties in planning, zoning, and building regulation functions for faults that can have surface rupture. These zones, which extend from 200 to 500 feet on each side of a known active fault, identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures.

Since the Project Site is located within the seismically active Southern California region, the Project could expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. In order to adequately address these conditions, this topic will be analyzed further in an EIR to determine potential impacts associated with rupture of a known earthquake fault. A site-specific Preliminary Geotechnical Investigation is being prepared for the Project Site which will fully assess the potential for seismic-related impacts, including those from fault-rupture, caused by the Project or the Project's exacerbation of the existing environmental conditions. The findings of the Preliminary Geotechnical Investigation's analysis regarding fault-rupture will be included in an EIR.

ii. **Strong seismic ground shaking?**

Potentially Significant Impact. Seismicity is the geographic and historical distribution of earthquakes, including their frequency, intensity, and distribution. The level of ground shaking at a given location depends on many factors, including the size and type of earthquake, distance from the earthquake, and subsurface geologic

⁵ Bryant, W.A., and Hart, E.W., Fault-Rupture Hazard Zones in California – Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zones Maps: California Geological Survey Special Publication 42, page 42, 2017.

conditions. The type of construction also affects how particular structures and improvements perform during ground shaking. Because the Project Site is located in the seismically active Southern California region, it is subject to strong seismic ground shaking in the event of a seismic event. The proposed buildings are subject to the seismic design criteria of the California Building Code (CBC) and the Project-specific design requirements of a geotechnical report. The CBC contains seismic safety provisions with the aim of preventing building collapse during a design earthquake. Compliance with these regulations and requirements would minimize injury and loss of life due to building collapse during an earthquake. Conformance to the CBC would allow Project construction to be feasible from a geotechnical standpoint. However, due to the Project's proximity to active faults, it is recommended that the Project Site's soil characteristics and design be further evaluated. Therefore, it is recommended that this topic be further analyzed in an EIR based on the analyses included in the Preliminary Geotechnical Investigation.

iii. Seismic-related ground failure, including liquefaction?

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

According to the State of California Seismic Hazard Zone Map, the Project Site is located in an area mapped as potentially liquefiable.⁶ Because historic groundwater levels are currently unknown, it is recommended that the potential for, and significance of, seismic-related ground failure and liquefaction topic be further analyzed in an EIR and include the findings of a Preliminary Geotechnical Investigation.

iv. Landslides?

Less Than Significant Impact. The Project Site is relatively flat with elevations ranging from approximately 102 feet to 105 feet. According to the State of California Seismic Hazard Zone Map, the Project Site is located outside the areas identified as susceptible to earthquake-induced landslides.⁷ Based on this information, impacts from landslides would be less than significant, and this issue need not be evaluated further in an EIR.

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

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

The Project Site is located in a highly urbanized area and is currently developed with three existing warehouse buildings. Negligible, if any, native topsoil is likely to occur on the Project Site as it is currently developed with

⁶ California Department of Conservation, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed October 6, 2021.

⁷ California Department of Conservation, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed October 6, 2021.

paving and structures. Project construction would result in ground surface disruption during excavation, grading, and trenching that would create the potential for erosion to occur. It is recommended that the potential for soil erosion resulting from construction and operation be further analyzed in an EIR and include the findings of a Preliminary Geotechnical Investigation.

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

Potentially Significant Impact. Impacts related to liquefaction and landslides are discussed in Response VIII.a. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to the combination of gravity and earthquake shaking. Such movement can occur on slope gradients as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and structures. Lateral spreading during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place towards a free face and to lesser extent on ground surfaces with a very gentle slope. Because historic groundwater levels are currently unknown, with the Project Site subject to potentially high levels of seismic activity, it is recommended that the potential for lateral spreading, subsidence, liquefaction, and collapse be further analyzed in an EIR that summarizes the findings of a Preliminary Geotechnical Investigation.

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

Potentially Significant Impact. Soils with shrink-swell or expansive properties typically occur in fine-grained sediments and cause damage through volume changes as a result of a wetting and drying process. Structural damage may occur over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. Because the soil conditions on the Project Site are currently unknown, it is recommended that this topic be further analyzed in an EIR that summarizes the findings of a Preliminary Geotechnical Investigation.

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

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

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

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

VIII. GREENHOUSE GAS EMISSIONS

Would the Project:

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

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

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

Potentially Significant Impact. The Project would be required to comply with the Los Angeles Green Building Code, Culver City's mandatory Green Building Program requirements, and CALGreen Code. In conformance with these requirements, the Project would be designed to reduce GHG emissions through various energy and resource conservation measures. In addition, the Project would implement applicable energy and resource conservation measures to reduce GHG emissions such as those described in CARB's AB 32 Climate Change Scoping Plan and supporting documents, which describes the approaches the State will take to reduce GHG emissions to 1990 levels by 2020. CARB adopted the 2017 Climate Change Scoping Plan in response to Senate Bill (SB) 32 that outlines the State strategy for meeting the GHG reduction target for the State of 40 percent below 1990 levels by 2030. The analysis will also provide a consistency with the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS) Further evaluation in an EIR is required to determine if the Project would conflict with these plans, policies and regulations.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the Project:

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

Potentially Significant Impact. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, any emissions from the use of such materials would be minimal and localized to the Project Site. Project operations would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. As with construction emissions, any emissions from the use of such materials regarding the operation of the Project would be minimal and localized to the Project Site. However, it is recommended that this topic be further analyzed in an EIR based in part on the findings of a Phase I Environmental Site Assessment (ESA) and a subsurface investigation prepared for the Project Site.

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

Potentially Significant Impact. Construction of the Project could potentially produce hazardous wastes associated with the use of asphalt, paint, petroleum, and other solvents. All hazardous materials would be required to be utilized and transported according to regulations. Due to the ages of the buildings that may be affected during construction of the Project, there is likely to be potential for asbestos and lead-based paint to be encountered. Demolition would require remediation and abatement. A Phase I ESA at a minimum will be prepared to identify the presence, or likely presence, use, or release of hazardous substances. It is recommended that this topic be further analyzed in an EIR.

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

Potentially Significant Impact. There are two schools located within 0.25 miles of the Project Site. Park Century School, located at 3939 Landmark Street, Culver City, approximately 0.12 miles southwest of the Project Site; and Turning Point School, located at 8780 National Boulevard, Culver City, approximately 0.13 miles southwest of the Project Site. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. A Phase I ESA at a minimum will be prepared to identify the potential for creation of a significant hazard through release of hazardous materials into the environment within a quarter-mile of an existing school. It is recommended that this topic be further analyzed in an EIR based on the findings of a Phase I ESA.

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

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

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

No Impact. The Project Site is not located within the vicinity of a private airstrip, heliport, or helistop or within an airport land use plan or within 2 miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately 3.4 miles west and 5.2 miles southwest of the Project Site, respectively. Therefore, the Project is not located within an airport land use plan area and would not result in airport-related safety hazards or excessive noise for people residing or working in the Project area. No impacts would occur, and this issue need not be evaluated further in an EIR.

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

Potentially Significant Impact. The Project Site is located in an established urban area that is well served by a roadway network. While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. Project operation would generate traffic in the Project vicinity and would result in some modifications to existing driveways from the streets that surround the Project Site. It is recommended that this topic be further analyzed in an EIR.

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

No Impact. The Project Site is not located in an area of moderate or very high fire hazard.⁸ The nearest very high fire hazard severity zone is located in Baldwin Hills, approximately 0.6 miles south of the Project Site. In addition, the Project Site is not located in or near a State Responsibility Area.⁹ As the Project would involve redevelopment of an infill site within a highly urbanized area that is not proximate to wildlands or high fire hazard areas, no impacts would occur, and this issue need not be evaluated further in an EIR.

X. HYDROLOGY AND WATER QUALITY

Would the Project:

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

Potentially Significant Impact. The Project Site is currently developed with three low-rise warehouse buildings and associated asphalt-paved surface parking lot and landscaping. Violations of water quality standards or waste discharge requirements, or degradation of water quality can result in potentially significant impacts to water quality and result in environmental damage or sickness in people. Construction of the Project would require earthwork activities, including grading and excavation of the Project Site. During precipitation events, construction activities have the potential to result in minor soil erosion during grading and soil stockpiling, subsequent siltation, and conveyance of other pollutants into storm drains.

The Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) during construction in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit

⁸ Culver City Fire Department, Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012.

⁹ California Board of Forestry and Fire Prevention, State Responsibility Area Viewer, <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1>. Accessed October 5, 2021.

for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The SWPPP would include Best Management Practices (BMPs) to reduce pollutants in stormwater runoff from the Project Site. During operation, the Project would be required to comply with the applicable Low Impact Development (LID) requirements, which require the implementation of post-construction BMPs to preclude sediment and hazardous substances from entering stormwater flows. While these are expected to avoid significant impacts to water quality standards and waste discharge requirements, further analysis of water quality impacts will be provided in the EIR to evaluate potential impacts and identify appropriate design features and regulatory compliance mechanisms. A Hydrology and Water Quality Report will be prepared for the Project addressing water quality standards and surface and groundwater quality, the results of which will be included in an EIR.

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

Potentially Significant Impact. The Project would be developed with below-grade parking. Construction may require dewatering and water capture may reduce existing groundwater recharge. Therefore, additional analysis in an EIR is required to determine whether excavation or dewatering would have a potential to withdraw groundwater from the water table during the period of time that the Project would be constructed. An EIR will provide additional analysis to assess the Project's potential to result in hydrology and water quality impacts, including those that may be associated with the need for dewatering at the Project Site, based on a Hydrology and Water Quality Report prepared for the Project.

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

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

Potentially Significant Impact. Currently, the Project Site is almost completely developed with impermeable surfaces, however, there are small areas of exposed landscaped and disturbed soils. No streams or rivers occur on site. The Project, which would involve the replacement of the impermeable surfaces and small areas of exposed landscaped and disturbed soils, would not substantially change the amount of impervious surface area on the site given the proposed above- and below-grade structures/facilities. Therefore, there would be similar levels of runoff generation as under existing conditions. In addition, surface runoff would continue to flow into the storm drain system.

Since the Project Site is entirely developed, paved, or landscaped, the potential for erosion or siltation would be minimal. Project construction could temporarily alter the existing drainage pattern of the Project Site, particularly during excavation and grading activities. If a precipitation event were to occur during these activities, exposed sediments could be carried off-site and into the local storm drain system, thereby causing siltation. Changes in on-site drainage patterns can also result in limited soil erosion. Therefore, it is recommended that this topic be further analyzed in an EIR. A Hydrology and Water Quality Report will be prepared for the Project to evaluate the change in drainage patterns that would occur with Project implementation. The analysis will disclose potential impacts and identify mitigation measures if needed to address significant impacts. The results of the Hydrology and Water Quality Report will be included in an EIR.

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

Potentially Significant Impact. While the Project Site is under construction, the rate and amount of surface runoff generated at the Project Site would fluctuate because exposed soils could absorb rainfall that currently leaves the Project Site as surface flow. However, the construction period would be temporary and compliance with applicable regulations would preclude fluctuations that result in flooding. With respect to operations, the Project would implement best management practices in accordance with regulations to maintain the volume and water quality of first-flush stormwater flows from the Project Site. Nevertheless, the Project would alter drainage patterns on-site and is required to demonstrate that its design links site drainage to the local drainage network so as not to adversely affect flooding conditions. Therefore, as discussed in Response X.c.i, a Hydrology and Water Quality Report is being prepared to evaluate the changes in drainage patterns that would occur with Project implementation. The analysis will determine Project consistency with applicable drainage requirements. The analysis will further disclose any potential impacts and identify the appropriate mitigation measures that would be necessary to avoid any significant impacts. The results of the Hydrology and Water Quality Report will be included in an EIR.

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

Potentially Significant Impact. As discussed in Response X.c. i and ii, post-development runoff quantities would not increase measurably, and the Project would include appropriate on-site drainage improvements to accommodate anticipated stormwater flows. Similar to existing conditions, operation of the proposed uses would generate pollutant constituents commonly associated with urban uses to surface water runoff. Further evaluation is needed to determine the potential for, and significance of, Project impacts on water quality. Therefore, it is recommended that this topic be further analyzed in an EIR. As discussed in Response X.c, a Hydrology and Water Quality Report is being prepared for the Project to evaluate the change in drainage patterns that would occur with Project implementation. The analysis would include an evaluation of potential impacts to the stormwater drainage systems serving the site. The results of the Hydrology and Water Quality Report will be included in an EIR.

iv. Impede or redirect flood flows?

Potentially Significant Impact. The Project Site, which has an elevation change of approximately 3 feet, is designated by the Federal Emergency Management Agency (FEMA) as an Area of Minimal Flood Hazard and is not located within a mapped flood zone, including the 100-year flood zone.¹⁰ Nonetheless, while the Project Site is not in a designated flood zone and would not alter the course of a stream or river, construction activities could potentially alter on-site drainage patterns and the rate and amount of surface runoff from the Project Site. An EIR will evaluate surface runoff to determine if construction or operation of the Project would redirect runoff that would impact or redirect flood flows. As discussed above, a hydrology analysis is being prepared to evaluate the change in drainage patterns that would occur with Project implementation. The results of the hydrology analysis will be included in an EIR.

¹⁰ Federal Emergency Management Agency, Flood Insurance Rate Map, Map Number 06037C1595G, Map Revised: December 21, 2018.

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

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

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

According to the Tsunami Hazards Area Map, the Project Site is not located within mapped tsunami inundation boundaries.¹¹ Therefore, the Project would not be subject to flooding hazards associated with tsunamis.

As provided in the Culver City Natural Hazards – Fire and Flooding Map and the City of Los Angeles Safety Element, the Project Site is not within any inundation areas.^{12,13} Therefore, the Project would not be subject to flooding hazards associated with seiches.

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

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

Potentially Significant Impact. As the Project would require excavation of the Project Site and exposure of soils, the Project could potentially require dewatering during excavation for below-grade structures, and would potentially affect existing rate of groundwater recharge at the Project Site, further analysis of water quality impacts will be provided in an EIR to evaluate potential impacts and identify appropriate design features and regulatory compliance mechanisms. The analysis will include an assessment of the Project’s compliance with applicable water quality control plan(s) or sustainable groundwater management plan(s).

XI. LAND USE AND PLANNING

Would the Project:

a. Physically divide an established community?

Less than Significant Impact. The Project Site is currently developed with three warehouse buildings. The Project Site also currently includes associated surface parking and ornamental landscaping. The Project vicinity is highly urbanized and generally built out and is characterized by a mix of commercial and residential uses and includes a fully developed roadway system. As such, the Project would represent redevelopment and infill development of an already fully developed site. Furthermore, the Project would not close any public streets or otherwise notably alter established infrastructure in the area. The Project would encourage multiple modes of travel by providing bicycle access and bicycle parking spaces. For all these reasons, the Project would not

¹¹ California Department of Conservation, CGS Information Warehouse: Tsunami Hazard Area Map, https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm_source=cgs+active&utm_content=losangeles. Accessed October 6, 2021.

¹² City Culver City, Natural Hazards – Fire and Flooding, February 1, 2007.

¹³ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Adopted November 26, 1996.

physically divide an established community, the impact would be less than significant, and this issue need not be evaluated further in an EIR.

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

Potentially Significant Impact. The Project proposes a Zone Change (and corresponding Zoning Map Amendment) from Industrial General (IG) and East Washington Overlay (-EW) to Planned Development (PD) for the Culver City Parcel. A Comprehensive Plan is proposed as the overarching entitlement mechanism for the Culver City Parcel. For the Los Angeles Parcel, the Project proposes an amendment to remove the Los Angeles Parcel from the Exposition Corridor Transit Neighborhood Plan (Expo TNP), an amendment to the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay (CPIO) design standards for “Subarea A” to establish project-specific standards, and a Waiver of Dedication and Improvement to reduce the dedication and provide an easement for a sidewalk along National Boulevard, among others. Furthermore, as described in Attachment A, Project Description, the Project would demolish three low-rise warehouse buildings and develop 536,000 sf of office uses, of which 430,953 sf would be net new uses within two four- to five-story buildings measuring 56 feet to 75 feet in height. Therefore, the Project would increase the height, density, and configuration of development at the Project Site, which could potentially conflict with land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental effects. Therefore, it is recommended that this topic be evaluated further in an EIR.

XII. MINERAL RESOURCES

Would the Project:

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

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

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

The closest oil field to the Project Site is the Inglewood Oil Field (Oil Field), which is located within the City of Culver City and the unincorporated area of Los Angeles County known as Baldwin Hills. The current active Oil Field boundary is approximately 1,000 acres of which 100 acres are located within the City of Culver City. The Oil Field is located approximately 0.5 miles southwest of the Project Site. The Project Site is located in a highly urbanized area and is currently developed with three low-rise warehouse buildings and associated asphalt-paved surface parking lot and landscaping. As such, the potential of uncovering mineral resources during Project construction is considered low. The nearest oil well to the Project is located approximately 800 feet west of the Project Site and is plugged.¹⁴ Therefore, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents nor would it result in the loss of a known mineral resource delineated on a local general plan, specific plan, or other land use plan as there are no known mineral

¹⁴ California Department of Conservation, Geologic Energy Management Division's (CalGEM), Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.38745/34.02621/15>. Accessed October 4, 2021.

resources or mineral resource recovery sites on or near the Project Site. No impact would occur, and this issue need not be evaluated further in an EIR.

XIII. NOISE

Would the Project result in:

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

Potentially Significant Impact. Existing land uses in the Project vicinity include a mix of commercial and residential uses. Specifically, land uses adjacent to the Project Site include: a two-story office building to the north (across Venice Boulevard), the Helms Bakery single-story warehouse and retail building to the east, the 8777 Washington four-story office building and the Access Culver City five-story mixed-residential building to the south (across Washington Boulevard), and the six to seven-story Ivy Station mixed-use project consisting of office, residential, hotel, and retail uses to the west of the Project Site across National Boulevard. Construction of the Project could require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on a short-term basis. Operation of the Project may increase existing noise levels as a result of Project-related traffic, the operation of heating, ventilation, and air conditioning (HVAC) systems, loading and unloading of trucks, parking-related noise (e.g., car alarms, slamming of car doors, etc.), and the carrying out of outdoor activities. Therefore, construction and operation of the Project could generate a temporary or permanent increase in ambient noise levels in excess of applicable standards for nearby sensitive receptors, including those within the Ivy Station development located less than 30 meters (100 feet) to the west of the Project Site, across National Boulevard. Therefore, it is recommended that this issue be evaluated further in an EIR.

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

Potentially Significant Impact. Construction of the Project may generate groundborne vibration and groundborne noise due to Project Site grading, clearing activities, shoring, and haul truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and groundborne noise levels during short-term construction activities. Therefore, it is recommended that this topic, including potential for structural vibration effects on nearby historic buildings (including the adjacent Helms Bakery building) or due to human annoyance be further analyzed in an EIR.

Operation of the Project could potentially generate groundborne vibration or groundborne noise at levels beyond those which currently occur under existing conditions due to vehicular trips, outdoor activities or other factors. Therefore, it is recommended that this topic be evaluated further in an EIR.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip, heliport, or helistop or within an airport land use plan or within 2 miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and LAX, located approximately 3.37 miles west and 5.21 miles southwest of the Project Site, respectively. Therefore, the Project would not expose people to excessive noise levels from such uses and no impact would occur, and this issue need not be evaluated further in an EIR.

XIV. POPULATION AND HOUSING

Would the Project:

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

Less Than Significant Impact. The Project is located within the jurisdiction of the Southern California Association of Governments (SCAG), a Joint Powers Agency established under California Government Code Section 6502 et seq. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan (RCP), the RTP/SCS, and Regional Housing Needs Assessment (RHNA), in coordination with other State and local agencies. These documents provide guidelines for growth at the regional level, and include population, employment, and housing projections for the region and its subdivisions. On September 3, 2020, SCAG's Regional Council voted to approve and adopt the 2020-2045 RTP/SCS, which is an update to the previous 2016-2040 RTP/SCS. The 2020-2045 RTP/SCS reports demographic data for 2016, and projections for 2045.¹⁵ The 2020-2045 RTP/SCS forecasts represent the likely growth scenario for the Southern California region in the future, taking into account recent and past trends, reasonable key technical assumptions, and local or regional growth policies.¹⁶

The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the Project would utilize the existing transportation and utility infrastructure to serve the Project. Because no residential uses are proposed, the Project's direct effects would be associated with increased employment and not direct increases in population and housing. The Project would demolish three warehouse buildings with a total of 105,047 sf and construct 536,000 sf of office uses, resulting in 430,953 sf of net new floor area on the Project Site. The net new square footage could generate up to 2,400 new employees.¹⁷

According to SCAG, the City of Culver City's forecast population, household, and employment growth of 1,500 persons, 1,000 households, and 4,800 jobs is predicted between 2016 and 2045, respectively.¹⁸ In addition, the City of Los Angeles' forecast population, household, and employment growth of 837,500 persons, 426,000 households, and 287,600 jobs is predicted between 2016 and 2045, respectively.¹⁹ The estimate of up to 2,400 new employees generated by the Project would be within SCAG's employment growth assumptions for both the City of Culver City and City of Los Angeles. While the Project could result in indirect population growth associated with employees moving to the Project area, any such growth would represent a fraction of Culver City's and Los Angeles' projected household growth by SCAG, well within their projected growth for each City. Furthermore, the Project would be located in an area already served by existing infrastructure and contemplated within applicable Culver City and City of Los Angeles infrastructure plans (i.e., roadways, utility lines, etc.). As such, the Project would not induce substantial population growth in the area and impacts would be less than significant, and this issue need not be evaluated further in an EIR.

¹⁵ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy – Demographics and Growth Forecast, September 2020, page 21.

¹⁶ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy – Demographics and Growth Forecast, September 2020, page 1.

¹⁷ As provided by the Applicant.

¹⁸ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy – Demographics and Growth Forecast, September 2020, Table 14: Jurisdiction Level Growth Forecast – Culver City, page 34.

¹⁹ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy – Demographics and Growth Forecast, September 2020, Table 14: Jurisdiction Level Growth Forecast – Los Angeles city, page 35.

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

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

XV. PUBLIC SERVICES

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

i. Fire protection?

Potentially Significant Impact. Fire protection and emergency medical services for the Project Site would be provided by the Culver City Fire Department (CCFD) and/or the Los Angeles Fire Department (LAFD). Construction activities associated with the Project could temporarily increase the demand for fire protection and emergency medical services, and could potentially involve temporary lane closures and construction traffic that slows emergency response in the Project vicinity. Project operation would increase the density of development, resulting in an increase in on-site population that would increase the demand for fire protection and emergency medical services from CCFD and LAFD. Therefore, it is recommended that this topic be evaluated further in an EIR.

ii. Police Protection?

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

iii. Schools?

Less than Significant Impact. The Project would be served by either the Culver City Unified School District (CCUSD) or Los Angeles Unified School District (LAUSD). Project construction would create temporary construction jobs, but construction workers would be drawn from an existing work pool and would work at the Project Site for only short durations; therefore, there would be no direct increase in student population associated with Project construction. As the Project does not propose development of residential uses, no direct increase in student population due to new residential uses would occur. However, Project operation could indirectly increase demand for school services due to increased employment, as some employees with school age children that do not currently reside in the area may choose to move closer to work and enroll their children in nearby schools, and some employees who do not move may also choose to enroll their children in nearby schools due to their work location. For the anticipated net new 430,953 square feet of development, the Project is conservatively estimated to generate a total of approximately 273 students.²⁰

²⁰ Rates are taken from the 2020 Developer Fee Justification Study, LAUSD, March 2020 – the most recent data available. Based on the Corporate Commercial Office Use, it is assumed 0.633 students per 1,000 sf = 0.633 * 431 = 273 students.

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

iv. Parks?

Less than Significant Impact. At the state level, the Quimby Act, within the Subdivision Map Act, authorizes a city or county legislative body to require the dedication of land or to impose fees for park or recreational purposes as a condition of the approval of a tentative or parcel subdivision map, if specified requirements are met. In addition, the City of Culver City includes parkland dedication or fee requirements pursuant to Culver City's standard conditions of approval and pursuant to the Quimby Act and Title 15: Land Usage, Chapter 15.06: New Development Fees – Residential Development Park Dedication and In Lieu Parkland Fees, Section 15.06.310: Park Dedication or Payment of Fees, of the CCMC, as applicable. Furthermore, the City of Los Angeles includes a Parks Dedication and Fee Update ordinance (Ordinance 184,505) which requires most residential projects that create new dwelling units or joint living and work quarters to dedicate land or to pay a fee for the purpose of developing park and recreational facilities.

The Project does not include development of residential uses. As such, the Project would not result in new households with residents who would utilize nearby park facilities. However, a small percentage of new visitors and employees to the Project Site might choose to visit nearby public parks during lunch hours or outside of work hours which could generate some increase in demand for use of existing public recreational and park facilities. Open space and landscaping would be provided on the Project Site in accordance with the CCMC and the CPIO, as amended. Among other open space amenities, the Project includes an internal courtyard for the use of employees and occasional private tenant events, bicycle facilities, and other amenities typical of an integrated office complex. These facilities would reduce the Project's limited demand for use of existing public recreational and park facilities. As such, Project demand on recreational facilities would be offset. In addition, the limited demand for park facilities that might be generated by the Project's employees would not be substantial enough to create a need for new park facilities in order to maintain services ratios for parks maintained by the City of Culver City or the City of Los Angeles, the construction of which could cause significant environmental impacts. Accordingly, the Project would not have a have a significant physical impact upon parks and impacts would be less than significant, and this issue need not be evaluated further in an EIR.

v. Other public facilities?

Less than Significant Impact. The Los Angeles County Public Library (LACPL) provides library services to the City of Culver City and the Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. Because the Project would introduce new visitors and employees to the Project Site, demand on LACPL and/or LAPL library services could increase. The nearest LACPL library is LACPL Culver City Julian Dixon Branch Library, which is located at 4975 Overland Avenue, Culver City, approximately 1.5 miles southwest of the Project Site. The nearest LAPL library is the Baldwin Hills Branch Library, which is located at 2906 S. La Brea Avenue, Los Angeles, approximately 1.89 miles to the east of the Project Site. As the Project does not include residential uses, the only potential new library visitors, if any, would be visitors or employees to the Project Site. The addition of new employees to the Project Site would not materially change demand on local libraries thus requiring the need for new libraries, the construction of which could cause significant environmental impacts. Therefore, there would be a less-than-significant impact associated with library services.

During construction and operation of the Project, other governmental services, including roads, would continue to be utilized. Project employees and visitors would use the existing road network, without the need for new roadways to serve the Project Site. While the Project would increase the number of vehicle trips attributable to the Project Site, the additional use of roadways would not be excessive and would not necessitate the upkeep of such facilities beyond normal requirements. Any minor roadway improvements (e.g., street dedications), pursuant to City requirements (as modified by the requested Waiver of Dedication and Improvement), would be constructed concurrent with the Project and would be analyzed as needed throughout the EIR. Therefore, less than significant impacts to roads would occur.

Overall, impacts related to other public facilities would be less than significant, and this issue need not be evaluated further in an EIR.

XVI. RECREATION

- a. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b. Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less Than Significant Impact (a-b). As discussed in Response XV.d, the Project does not include residential development and as such any increase in demand for parks and other recreational facilities would be limited and associated with potential use of parks by visitors or employees. In addition, on-site open space areas provided by the Project would reduce the demand or use of nearby park facilities. Therefore, the Project would not increase the use of parks and recreational facilities at a level that would substantially deteriorate, or accelerate the deterioration of recreational facilities or resources. Impacts would be less than significant, and this issue need not be evaluated further in an EIR.

XVII. TRANSPORTATION

Would the Project:

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

Potentially Significant Impact. The Project Site is currently developed with three warehouse buildings, associated surface parking, and ornamental landscaping. The Project would replace development on the Project Site with a net increase of 430,953 sf of office uses, which would increase the on-site population and associated vehicular, bicycle, and pedestrian traffic, as well as transit demand. Project construction would also result in a temporary increase in traffic in the Project area as the result of construction-related truck trips and worker vehicle trips, and could necessitate temporary construction-related lane closures and impede vehicular, bicycle, and pedestrian access in the Project vicinity.

The Project Site is located in an area well served by public transportation, including the Los Angeles County Metropolitan Transportation Authority (Metro), the Los Angeles Department of Transportation (LADOT), and Culver City Department of Transportation, which provide an extensive system of bus lines in Culver City and City of Los Angeles, and links to the larger metropolitan area. Most significantly, the Project Site is located one block east from the Ivy Station stop of the Metro E (Exposition) Line light rail. Although the Project Site is well served by public transportation, and would also improve pedestrian access and include bicycle facilities and

improvements, it would have potential to impact vehicular, bicycle, pedestrian, and public transportation networks during construction and operation. Therefore, it is recommended that consistency with applicable programs, plans, ordinances, and policies, such as the Bicycle and Pedestrian Action Plan and the Culver City General Plan (for the Culver City Parcel) as well as Mobility Plan 2035 and LAMC (for the Los Angeles Parcel), addressing the circulation system be evaluated further in an EIR. The analysis provided within an EIR will be based on a Transportation Study, which will be prepared in accordance with the CEQA Guidelines, Culver City's Transportation Study Criteria and Guidelines (TSCG) adopted on July 13, 2020, and Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG) adopted in July 2020.

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

Potentially Significant Impact. As stated in Response XVII.a, development of the Project would generate additional traffic. Per CEQA Guidelines, Section 15064.3(b), the Project's transportation impacts will be evaluated in an EIR based on a vehicle miles traveled analysis. The analysis provided within an EIR will be based on a Transportation Study prepared for the Project in accordance with the CEQA Guidelines and the approved and applicable local guidelines (i.e., Culver City's TSCG and LADOT's TAG).

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

Potentially Significant Impact. The Project Site is located at the intersection of Venice Boulevard/National Boulevard/Washington Boulevard. While the Project design will meet applicable City of Culver City and City of Los Angeles code requirements and will be subject to review by CCFD and LAFD as applies to emergency access provisions, due to the level of traffic on the roadways surrounding the Project, and changes in access, there may be potential for the Project to increase hazards due to design features. Therefore, it is recommended that this topic be further analyzed in an EIR. The analysis provided within an EIR will be based on a Transportation Study, which will be prepared in accordance with the CEQA Guidelines and the approved and applicable local guidelines (i.e., Culver City's TSCG and LADOT's TAG).

d. Result in inadequate emergency access?

Potentially Significant Impact. Designated disaster routes in the vicinity of the Project Site include: Venice Boulevard,²¹ adjacent to and north of the Project Site, and Robertson Boulevard, 850 feet west of the Project Site.²² The Project would change emergency access by modifying the access points and circulation on the Project Site. Also, while it is expected that the majority of Project construction activities would occur on-site and the Project would be required to implement and Construction Traffic Management Plan, short-term construction activities may temporarily affect designated disaster routes on segments of adjacent streets during certain periods of the day. Therefore, it is recommended that the potential for Project impacts on emergency access related to construction activities and closures, proposed permanent changes in Project Site access and circulation, and Project-related increases in trip generation be evaluated further in an EIR. The analysis provided within an EIR will be based on a Transportation Study, which will be prepared in accordance with the CEQA Guidelines and the approved and applicable local guidelines (i.e., Culver City's TSCG and LADOT's TAG).

²¹ County of Los Angeles, Disaster Routes With Road Districts, September 24, 2021.

²² City of Los Angeles, Safety Element of the Los Angeles City General Plan, Adopted November 26, 1996.

XVIII. TRIBAL CULTURAL RESOURCES

- a. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
 - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) or**
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

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

XIX. UTILITIES AND SERVICE SYSTEMS

Would the Project:

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

Water

Potentially Significant Impact. The Project would have a net new increase in activity and occupation of the Project Site compared to existing conditions. Because of the Project's proposed increase in occupancy, and additional developed floor area on the Project Site, the potential of the Project to result in the construction of new or expanded water facilities will be analyzed further in an EIR. A Utilities Technical Report, which includes analyses of the water system and fire flows is being prepared to evaluate water availability with Project implementation. The results of this analysis will be included in an EIR.

Wastewater

Potentially Significant Impact. Construction and operation of the Project would increase wastewater generation compared to existing conditions on the Project Site and has the potential to require new wastewater conveyance and treatment facilities. The capacity of wastewater conveyance and treatment systems will be analyzed further in an EIR. A Utilities Technical Report is being prepared to evaluate sewer capacity with Project

implementation. This information will be used to evaluate the potential for significant impacts to water or wastewater treatment facilities in an EIR.

Stormwater Drainage

Potentially Significant Impact. Existing drainage flows on the Project Site are unknown and will be determined in a site-specific hydrology study. Project implementation would require grading, which could result in alterations to the drainage pattern at the Project Site. Existing stormwater conveyance systems would require verification related to available capacity in the municipal storm drain system. A Hydrology and Water Quality Report is being prepared for the Project, and results will be included in an EIR.

Electric Power

Potentially Significant Impact. As noted above, the Project would intensify development on the Project Site and therefore, increase energy consumption during construction and operation associated with electricity. The increase in energy consumption from Project implementation could result in impacts to electric power facilities. As such, the capacity of electric power facilities will be analyzed further in an EIR.

Natural Gas

Potentially Significant Impact. As noted above, the Project would intensify development on the Project Site and therefore, increase energy consumption during construction and operation associated with natural gas. The increase in energy consumption from Project implementation could result in impacts to natural gas facilities. As such, the capacity of the natural gas facilities will be analyzed further in an EIR.

Telecommunications

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

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

Potentially Significant Impact. The Project would increase water demand within the Project Site compared to existing conditions. The Project would meet the thresholds requiring preparation of a water supply assessment (WSA) pursuant to Senate Bill 610 (effective January 1, 2002 and codified in California Water Code Section 10910 et seq.). As the Project Site falls within the service area for two water purveyors, additional research and

coordination is needed to determine which purveyor, the Los Angeles Department of Water and Power (LADWP), or Golden State Water, or potentially both, will prepare the WSA required to support the EIR analysis of water supply. Given the demand for water supply associated with the Project, an EIR will consider this topic in detail, and analyze the adequacy of available water supplies and infrastructure to serve the Project. The Project's estimated water demand will be based on demand factors for the individual land use components, taking into account the water conservation measures proposed by the Project. An EIR analysis based on a WSA will evaluate overall water demand and discuss Project consistency with water supply projections.

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

Potentially Significant Impact. See the Wastewater Treatment Capacity analysis in Response XIX.a above. As indicated therein, the Project would increase wastewater generation over existing conditions. Therefore, this topic will be evaluated in an EIR to determine potential impacts associated with adequate capacity of the wastewater treatment provider to service the Project.

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

Less Than Significant Impact. Culver City's Public Works Environmental Programs and Operations Division collects municipal solid waste which includes, trash, recycling, organics, and construction and demolition debris from both the commercial and residential sectors. The City of Los Angeles, Department of Public Works, Bureau of Sanitation (BOS) collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City of Culver City and City of Los Angeles both do not own or operate any landfill facilities, and the majority of its solid waste is disposed of at in-County landfills.

Construction of the Project would result in generation of construction and demolition debris such as metal scrap, lumber, concrete which will be collected and diverted to a construction and demolition debris facility for materials to be recycled and/or discarded. It is anticipated that a large amount of the construction debris would be recycled. Residual wastes, such as trash packing materials, and plastics could require disposal at landfill. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations.

The remaining disposal capacity for the County's Class III landfills was estimated at approximately 148.40 million tons.²³ In addition to in-County landfills, out-of County disposal facilities may also be available to the City of Culver City or City of Los Angeles. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the Los Angeles County Integrated Waste Management Plan (ColWMP), the County anticipates that future Class III disposal needs can be adequately met through 2034 through a number of strategies that would be carried out in coming years. Such strategies include the following: (1) maximize waste reduction and recycling; (2) expand existing landfills; (3) study, promote, and develop alternative technologies; (4) expand transfer and processing infrastructure; and (5) promote out-of-county disposal (including waste-by-rail). It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

²³ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, page 32.

As illustrated in **Table B-1, Projected Solid Waste Generated During Operation**, and based on solid waste generation factors from the California Department of Resources and Recycling and Recovery (CalRecycle), the Project could generate a net of approximately 2,039 lbs/day of solid waste or 372 tons per year (tpy). The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 148.40 million tons of remaining disposal capacity for the County's Class III landfills. The Sunshine Canyon Landfill is the primary recipient of City's waste disposal. The maximum daily capacity for this landfill is 12,100 tons per day and the 2019 disposal rate was 6,919 tons per day, indicating an unused daily capacity of 5,181 tons.²⁴ If all the Project's waste were taken to Sunshine Canyon Landfill, the Project's additions to the daily disposal of 1.02 tons would be approximately 0.020 percent of the unused daily capacity of 5,181 tons per day.²⁵ Based on the above, the solid waste generated by the Project could be accommodated by the County's available regional landfills.

Table B-1
Projected Solid Waste Generated During Operation

Land Uses	Quantity	Factor ^a	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Existing Land Uses^b					
Office	51,500 sf	6 lbs/1,000 sf/day	309	0.15	56
Commercial	34,726 sf	2.5 lbs/100 sf/day	868	0.43	158
Total			1,177	0.59	215
Proposed Land Uses					
Office	536,000 sf	6 lbs/1,000 sf/day	3,216	1.61	587
Total			3,216	1.61	587
Net Increase (Proposed - Existing)			2,039	1.02	372

sf = square feet; lbs. = pounds

a Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed October 6, 2021.

b Note that two warehouse buildings on the Culver City Parcel are not included in the existing land uses provided herein as one warehouse building is used for storage and the other warehouse building is currently vacant.

Source: ESA, 2021.

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

²⁴ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

²⁵ The Project's addition to the daily disposal for the Sunshine Canyon Landfill is calculated by dividing 1.02 tons per day by the unused daily capacity of 5,181 tons, resulting in 0.01969 percent of the unused daily capacity (rounded to 0.020 percent).

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

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

XX. WILDFIRE

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

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?**
- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?**
- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**
- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

No Impact (a-d). The Project Site is not located in an area of moderate or very high fire hazard.²⁶ The nearest very high fire hazard severity zone is located in Baldwin Hills, approximately 0.62 miles south of the Project Site. In addition, the Project Site is not located in or near a State Responsibility Area.²⁷ The Project would not require the installation or maintenance of associated infrastructure that could exacerbate fire risk. The Project would be the redevelopment of an infill site within an urbanized area. Therefore, no impacts related to wildfires are anticipated, and this issue need not be evaluated further in an EIR.

²⁶ Culver City Fire Department, Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012.
²⁷ California Board of Forestry and Fire Prevention, State Responsibility Area Viewer, <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1>. Accessed October 5, 2021.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

Potentially Significant Impact. As discussed throughout this Initial Study, the Project would have the potential to degrade the quality of the environment in terms of the following environmental topics: Air Quality (all but odors), Cultural Resources (historic and archaeological resources), Energy, Geology and Soils (all but landslides, septic tanks), Greenhouse Gas Emissions, Hazards and Hazardous Materials (all but airport hazards and wildland fires), Hydrology and Water Quality (all but inundation), Land Use and Planning (consistency with plans and policies), Noise (all but aircraft noise), Public Services (fire protection and police protection), Transportation, Tribal Cultural Resources, and Utilities and Service Systems (water, wastewater, electric power, and natural gas). It is recommended that Project impacts for the above topics be evaluated further in an EIR.

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

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

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of a given Project are combined with the impacts of related projects in proximity to the Project Site that would create impacts that are greater than those of the Project alone. Related projects include past, current, and/or probable future projects whose development could contribute to potentially significant cumulative impacts in conjunction with a given project.

Each of the topics determined to have the potential for significant impacts in this Initial Study will be subject to further evaluation in the EIR, including evaluation of the potential for cumulatively significant impacts. Topics for which Initial Study determinations were "No Impact" or "Less Than Significant Impact" have been determined not to have the potential for significant cumulative impacts, as discussed below.

As analyzed above, the Project would not have a significant impact on aesthetic resources pursuant to PRC Section 21099(d)(1) and ZI No. 2452. In addition, related projects would be reviewed on a case-by-case basis by Culver City and City of Los Angeles to comply with the CCMC and LAMC requirements regarding building heights, setbacks, massing, and lighting, or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Therefore, the Project's contribution to aesthetics impacts would not be cumulatively considerable. Thus, cumulative impacts would be less than significant. Notwithstanding the above and the exemption of the Project from aesthetic impacts under

SB 743, an EIR will include a discussion of the Project's potential cumulative aesthetics impacts for informational purposes only.

As indicated in the analysis above, the Project Site is located in a highly urbanized area and is currently developed with warehouse buildings and paved surface parking. No agricultural or forestry uses are located on the Project Site. In addition, the Project Site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the Farmland Mapping and Monitoring Program, is not zoned for agriculture or forestry use, and is not under a Williamson Act contract. The same is likely true of related projects given their location within urbanized areas. However, even if some of the related projects are exceptions to the above, the Project would not convert farmland, forest land, or designated Farmland, would not conflict with existing zoning for agricultural or forestry use, and would not conflict with a Williamson Act contract. Therefore, the Project's contribution to agricultural and forestry resources would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

The Project would have a less than significant impact related to emissions of odors. It is anticipated that the related projects in the surrounding area would not be uses associated with major odor producing uses such as manufacturing, smelting, food packaging, and other industrial uses. Related projects would be subject to compliance with applicable SCAQMD regulations regarding odor control. Thus, with compliance to applicable regulatory requirements and site-specific mitigation, as necessary, the Project's contribution to odor impacts would not be cumulatively considerable. Thus, cumulative impacts would be less than significant.

With respect to Biological Resources, the Project would be consistent with the MBTA as stated under response to Checklist Question IV.d, which would ensure that potential impacts to nesting birds would be reduced to a less than significant level. Impacts to sensitive plant and animal species would not be cumulatively considerable, as no such habitat occurs on the Project Site. Biological resources are generally site-specific and need to be evaluated within the context of each individual project. Furthermore, related projects would be required to comply with existing regulatory requirements and the building permit review and approval process, which address these subjects. Thus, with compliance to these regulatory requirements and site-specific mitigation, as necessary, the Project's contribution to biological resources impacts would not be cumulatively considerable. Thus, cumulative impacts would be less than significant.

Impacts related to disturbance of human remains (as part of Cultural Resources) are site-specific and as such, are assessed on a site-by-site basis. As discussed previously, compliance with applicable regulatory protocols would ensure that impacts on human remains would be less than significant. It is anticipated that compliance with existing regulations would be incorporated into the approval of each related Project. Compliance with applicable regulatory requirements by the Project and related projects would ensure the Project does not contribute to cumulatively considerable impacts with regard to disturbance of human remains.

As analyzed above, the Project would result in less than significant impacts to geology and soils with regard to landslides and soils supporting septic tanks or alternative waste systems. The Project Site is not prone to landslide hazards. As such, the Project would not cumulatively contribute to liquefaction or landslide impacts. The Project and related project sites are located in a highly urbanized area and would connect to existing wastewater infrastructure. Thus, the Project and related projects would not need to use septic tanks or alternative waste disposal systems and, as such, cumulative impacts relative to waste disposal capacity would be nil.

Because the Project Site is not located within the vicinity of a private airstrip or an airport land use plan or within 2 miles of a public airport or public use area, the Project's contribution to cumulative impacts with regard to safety hazards or exposing people residing or working in the Project area to excessive noise levels would not be cumulatively considerable. Thus, cumulative impacts in this regard would be less than significant.

Due to their site-specific nature, impacts related to wildfire are typically assessed on a project-by-project basis for a particular localized area. As with the Project, related projects would address site-specific wildfire hazards through implementation of site-specific recommendations and/or mitigation measures. Related projects would also be subject to local and state regulations and standards for fire safety. Regardless, because the Project is not subject to wildland fire hazards, the Project's contribution to wildfire impacts would not be cumulatively considerable. Thus, cumulative impacts would be less than significant.

Related projects could potentially result in an increase in pollutants due to inundation in flood hazard areas, tsunami zones or seiche zones. However, as with the Project, related projects would be subject to applicable LID requirements and, for applicable projects, NPDES permit requirements, including development of SWPPPs for construction projects greater than 1 acre, compliance with LID requirements during operation, and compliance with other local requirements pertaining to surface water quality. It is anticipated that related projects would also be evaluated on an individual basis to determine appropriate BMPs and treatment measures to avoid significant impacts to surface water quality. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to impacts associated with increases in pollutants due to inundation in flood hazard areas and impacts would not be cumulatively considerable.

Impacts regarding physically dividing a community is site specific, and because the Project would have a less than significant impact on this topic, the Project's contribution would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

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

The increase in indirect population and direct employment resulting from the Project and the related projects would have a less than significant cumulative impact as these increases are anticipated to be well within SCAG, Culver City, and City of Los Angeles Subregion growth forecasts. The Project is consistent with the growth policies of the RTP/SCS in that it would provide new employment opportunities within a TOD. Related projects in combination with the Project would not result in a substantial cumulative loss or reduction of housing. Therefore, cumulative impacts with respect to population and housing are considered to be less than significant.

Pursuant to California Government Code Section 65995, the payment of developer fees under the provisions of SB 50 address the impacts of new development on school facilities serving that development. Compliance with the provisions of Section 65995 is deemed to provide full and complete mitigation of school facilities impacts. The related projects would be required to pay these fees as applicable. Therefore, the full payment of all applicable school fees would reduce potential cumulative impacts to schools to less than significant levels.

The Project would not generate a new residential population as no residential uses are proposed. As such, the Project would not generate an increase the use of parks and recreational facilities and impacts to recreational and parks facilities were determined to be less than significant. New related residential projects are anticipated to provide on-site open space and recreational amenities to meet the needs of projected residents. In addition to the provision of on-site recreational amenities for related residential uses of related projects, the implementation of required developer paid parks and recreational fees would allow for land purchase and expansion of existing facilities. As such, related projects are not anticipated to result in substantial physical deterioration or accelerated deterioration of recreational and parks facilities. Cumulative impacts to parks would be less than significant.

Related projects would cumulatively generate, in conjunction with the project, the need for additional library services. The related projects would generate revenue to the City's general funds that could be used to fund library expenditures as necessary to offset the cumulative incremental impact on library services. The related projects would pay applicable development fees based upon the projected population of the individual developments. The full payment of all applicable library fees would reduce potential cumulative impacts to libraries to less than significant levels.

Related projects' employees and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would be typical of that experienced for the highly urbanized project vicinity. Similar to the project, the related projects would need to pay applicable development impact fees of the City of Los Angeles or Culver City. The full payment of all applicable fees would reduce potential cumulative impacts to other governmental services/facilities to less than significant levels.

With regard to telecommunications infrastructure, cumulative construction impacts associated with the installation of telecommunications infrastructure would primarily involve minor trenching in order to place telecommunications lines below the surface and/or connections to existing infrastructure. This trenching, if any, and the associated installation of such infrastructure would typically occur within the already developed sites and/or within the adjacent right-of-way and would be limited in extent and temporary in nature. Prior to ground disturbance, Project contractors would coordinate with the respective City and utility company to identify the locations and depth of all lines and the City/utility company would be notified in advance of proposed ground disturbance activities to avoid other existing utility lines and disruption of utility service. Further, a Construction Traffic Management Plan for each related project would be prepared in order to minimize disruptions to traffic flow, which would consider any related project-related utility improvements, as necessary. Lastly, any impacts associated with the construction of such infrastructure would be accounted for in the impact analysis for the Project and related projects in other sections of their respective CEQA documents (e.g., Air Quality, Noise, Transportation, etc.). Thus, cumulative impacts would be less than significant.

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The remaining disposal capacity for the County's Class III landfills is estimated at approximately 148.40 million tons. The Sunshine Canyon Landfill is the primary recipient of City's waste disposal. The maximum daily capacity for this landfill is 12,100 tons per day and the 2019 disposal rate was 6,919 tons per day, indicating an unused daily capacity of 5,181 tons.²⁸ Thus, sufficient capacity would be available to meet the demand created by related projects at the County's Class III landfills, including the Sunshine Canyon Landfill. As discussed above, the project impacts on solid waste disposal would be less than significant. In addition, similar to the project, related

²⁸ County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan - 2019 Annual Report, September 2020, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to checklist items in the City's Green Building Code or other solid waste requirements, as applicable. As such, impacts to the solid waste system from cumulative development would be less than significant and thus, the Project would not contribute to a cumulatively significant solid waste impact.

Based on the above, Project implementation would not be expected to result in a considerable contribution to cumulatively significant impacts for the environmental topics discussed above. No further discussion of potential cumulative effects for these topics in the EIR is required.

Environmental topics for which the determination in this Initial Study is "Potentially Significant Impact" have been determined to have the potential for significant cumulative impacts as the Project could potentially contribute considerably to cumulative impacts in terms of these topics. These topics include: Air Quality (all but odors), Cultural Resources (historic and archaeological resources), Energy, Geology and Soils (all but landslides, septic tanks), Greenhouse Gas Emissions, Hazards and Hazardous Materials (all but airport hazards and wildland fires), Hydrology and Water Quality (all but inundation), Land Use and Planning (consistency with plans and policies), Noise (all but aircraft noise), Public Services (fire protection and police protection), Transportation, Tribal Cultural Resources, and Utilities and Service Systems (water, wastewater, electric power, and natural gas). It is recommended that the potential cumulative impacts of the Project related to these topics be evaluated further in an EIR.

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

Potentially Significant Impact. As discussed throughout this Initial Study, the Project could result in potentially significant environmental impacts in terms of the following environmental topics: Air Quality (all but odors), Cultural Resources (historic and archaeological resources), Energy, Geology and Soils (all but landslides, septic tanks), Greenhouse Gas Emissions, Hazards and Hazardous Materials (all but airport hazards and wildland fires), Hydrology and Water Quality (all but inundation), Land Use and Planning (consistency with plans and policies), Noise (all but aircraft noise), Public Services (fire protection and police protection), Transportation, Tribal Cultural Resources, and Utilities and Service Systems (water, wastewater, electric power, and natural gas). These impacts could have potentially adverse effects on human beings, and it is therefore recommended that these topics be evaluated further in an EIR.

Appendix A

Street Tree Report

PROJECT CROSSINGS PROJECT

Street Tree Report

Prepared for
Culver Crossings Properties, LLC
2221 Rosecrans Avenue, Suite 200
El Segundo, CA 90245

October 2021



PROJECT CROSSINGS PROJECT

Street Tree Report

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October 2021

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TABLE OF CONTENTS

Project Crossings Project Street Tree Report

	<u>Page</u>
Project Crossings project	1
Introduction	1
Background and Assignment.....	2
Project Description	2
Existing Conditions	2
Methodology.....	2
Physical Characteristics	4
Physical Condition	4
Rating	4
Results	5
Impacts	5
Required Replacement.....	5
Bibliography	7
Certification of Performance	8
Arborist Disclosure Statement.....	9

Appendices

Appendix A: Street Tree Inventory

Appendix B: Street Tree Photographs

List of Figures

Figure 1 Project Location and Regional Vicinity	3
Figure 2 Tree Plot Plan.....	6

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PROJECT CROSSINGS PROJECT

Street Tree Report

Introduction

The purpose of this Street Tree Report (Report) is to document street tree plantings located within the right-of-way (ROW) within the Project Crossings Project Site. The Project Site is located within Culver City and in the City of Los Angeles. Street trees are regulated by the following codes and policies:

- Culver City Municipal Code (CCMC) within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.220: Removal of Trees in Parkways Related to Private Improvement or Development Project. Based on the City’s requirements, the Project is required to plant two new Street Right-of-Way trees or Parkway trees for each tree that is removed from the Project Site. The size and location of the replacement trees would be determined by the Public Works Director based on what is appropriate for the particular Street Right-of-Way or Parkway
- City of Los Angeles Street trees are managed and regulated by the Bureau of Street Services, Urban Forestry Division (UFD), Department of Public Works. A City Tree Removal Permit (Permit Application) is required to remove any street tree planted in the public right-of-way prior to the start of construction. The Permit Application states that all trees proposed for removal shall be identified on the project plan. It also specifies that an individual photograph (5”x7”) of each tree will be taken and submitted with the Permit Application.
- The City Protected Tree and Shrub Ordinance (Ordinance No. 186873) regulates the relocation or removal of all Southern California native oak trees (*Quercus* sp.; excluding scrub oak), California black walnut trees (*Juglans californica*), western sycamore trees (*Platanus racemosa*), California bay trees (*Umbellularia californica*), Mexican elderberry (*Sambucus mexicana*), and toyon (*Heteromeles arbutifolia*) of at least four inches in diameter at breast height. These tree and shrub species are considered “protected” by the City of Los Angeles. Additionally, the City’s planning department considers any tree species with a trunk diameter of eight inches or greater located on private property as “Significant” trees. Note: none of the subject trees of this Report are considered regulated by this ordinance.

Background and Assignment

The proposed office project (Project) is located on an approximately 4.46-acre (194,334 square foot [sf]) site comprised of two properties: one 1.63 acre (71,016 sf) parcel is located in the City of Culver City (Culver City Parcel – APN 4312-015-006) while the second 2.83 acre (123,318 sf) parcel is located in the City of Los Angeles (Los Angeles Parcel – APN 4312-015-005) (collectively referred to herein as the Project Site) (See **Figure 1 – Project Location and Regional Vicinity**). The Project Site is bounded by Venice Boulevard to the north, Washington Boulevard to the south, National Boulevard to the west, and existing commercial uses to the east. The Project Site is located at 8825 National Boulevard and 8771 Washington in Culver City, California, 90232 (Culver City Parcel); and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in Los Angeles, California, 90232 (Los Angeles Parcel) (See **Figure 1**).

Project Description

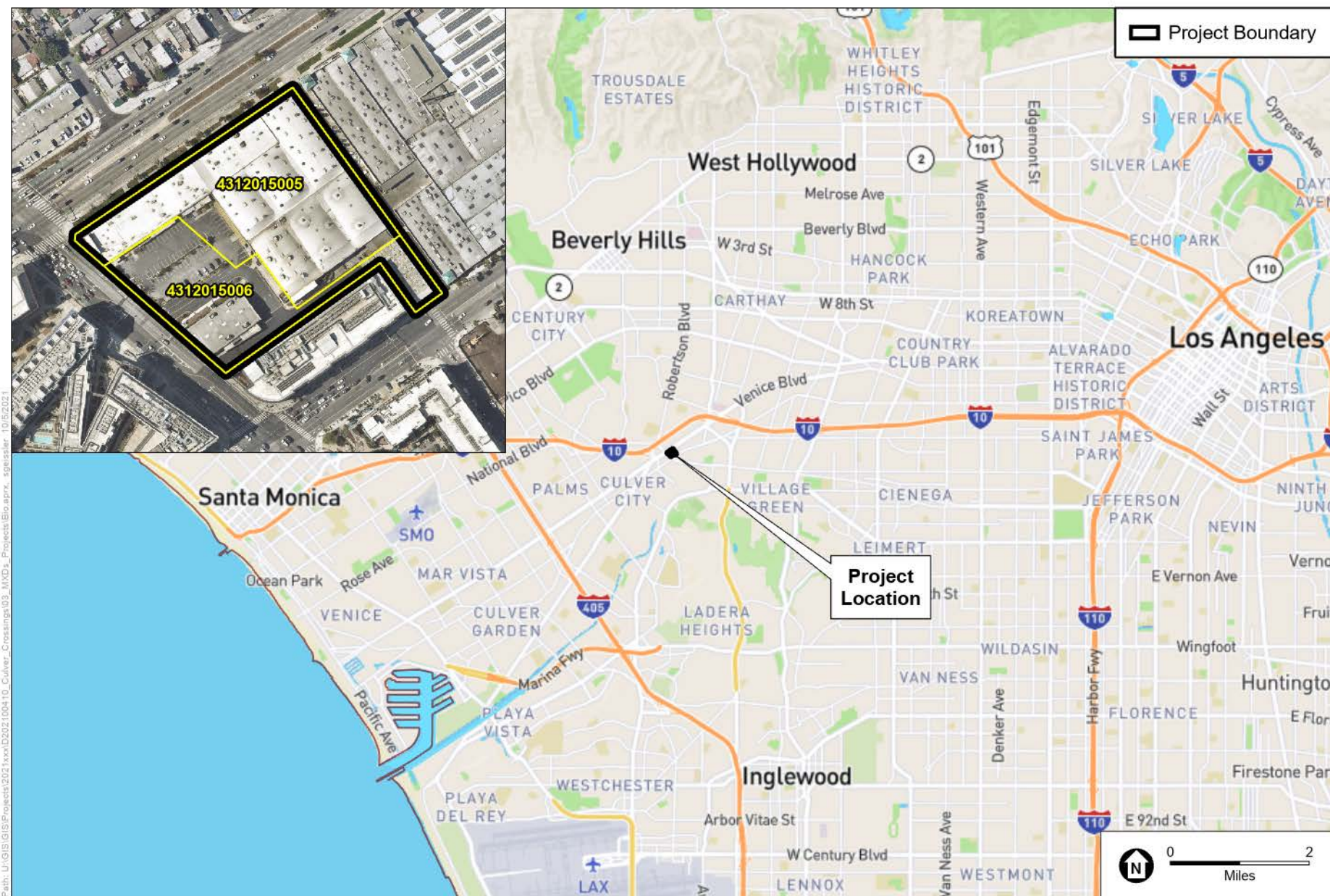
The proposed project would construct two four- to five-story buildings, that would provide a total of 536,000 sf of new office floor area. The two buildings would have the ability to be connected via a shared wall. The Project provides a total of 1,215 vehicular parking spaces within two separate three-level subterranean garages under each proposed building. The proposed office buildings would be designed to accommodate creative office uses and could include associated production spaces for multimedia content creation and capture as well as amenities for building tenants including a cafeteria, coffee stations, employee shuttle service, and other ancillary uses typical of an integrated office complex development. The Project would also include pedestrian-facing landscaping at the ground floor on National Boulevard and Venice Boulevard, as well as an internal courtyard for the use of employees and occasional private tenant events.

Existing Conditions

The entire Project Site is currently existing developed land surrounded by adjacent commercial buildings and a parking lot. Small planting areas within the parking lot contain various species of ornamental trees including pink trumpet (*Hadroanthus impetignosus*), jacaranda (*Jacaranda mimosifolia*), and Bradford pear (*Pyrus calleryana* ‘Bradford’) not included within this report.

Methodology

A general investigation of all street and protected trees was conducted on October 4, 2021 by ESA Arborist Douglas Gordon-Blackwood. All street trees along Venice Boulevard, National Boulevard, and Washington Boulevard surrounding the property were surveyed on October 4, 2021 by Mr. Gordon-Blackwood, who is an American Society of Consulting Arborists (ASCA) Registered Consulting Arborist (#689). Trees located within the parking lot which are not native or adjacent to the street were not recorded. For each tree, the trunk location was recorded with Collector for ArcGIS using an Arrow 100 Submeter GNSS Receiver and a smart phone.



SOURCE: Mapbox, 2021; ESA, 2021

Project Crossings

Figure 1
Project Location and Regional Vicinity

The following data was collected for each street tree:

Physical Characteristics

- DSH – Diameter at standard height (DSH; 4.5 feet) measured from the base of the tree using a forester’s diameter-equivalent tape.
- Crown spread – The crown spread from the trunk to the dripline in four (8) compass directions (N, NE, E, SE, S, SW, W, NW).
- Height – Measured with a Nikon Forestry Pro Laser Rangefinder/Hypsometer at an appropriate distance from the tree. For those trees obscured by vegetation or other trees, height was estimated.
- Balance and symmetry of the tree, based on the crown radius measurements and whether the tree leans or is otherwise unstable.

Physical Condition

- Identification of damage caused by pathogens or insect pests, by natural causes such as lightning, or by human activity.
- Evaluation of vigor based on such parameters as amount of new growth, leaf color, abnormal bark, dead wood, evidence of wilt, excessive necrosis or leaf chlorosis, thinning of crown, etc.
- Assessment of the overall health of the tree based on the evaluation of vigor, presence of damage, and comparison to the typical archetype tree of the same species.

Rating

For each tree, a subjective alphabetical rank of “A” through “F” was assigned for health, vigor, balance and aesthetic. Ranks were based on the criteria described below:

- “A” = Very Healthy/Excellent: A healthy and vigorous tree characteristic of its species and reasonably free of any visible signs of stress, disease, or pest infestation. With regards to balance and aesthetics, trunks are straight and canopies well balanced and the tree exemplifies the ideal archetype for the species.
- “B” = Healthy/Good: A healthy and vigorous tree with minor visible signs of stress, disease, and/or pest infestation. Some maintenance measures may need to be implemented, such as pruning of dead wood or broken branches. Tree may lean slightly, canopies may not be evenly balanced, or the tree may otherwise be marginally challenged aesthetically.
- “C” = Average Health/Fair: Although healthy in overall appearance, there is abnormal amount of stress or disease/insect infestation, and a substantial amount of maintenance may be needed. The trunk may be growing at a more substantial angle or the canopy may have “holes” or be further out of balance.
- “D” = Dying/Poor: A tree that may be exhibiting substantially more stress, disease, or insect damage than what is expected for the species. The tree may be in a state of rapid decline, and may show various signs of dieback, necrosis, or other symptoms caused by pathogens or insect pests. The tree may lean significantly and the canopy is far out of balance.

- “F” = Dead/Very Poor: This tree has no foliage and exhibits no sign of life or vigor. Tree may be prone on the ground or otherwise severely aesthetically compromised.

Survey data for each street tree is located in Appendix A – Street Tree Inventory as a separate table. Individual photographs of each street are located in Appendix B – Street Tree Photographs.

Results

No native or heritage trees were observed during the survey. A total of nineteen (19) trees including three (3) jacaranda, seven (7) African sumac (*Searsia lancea*), six (6) desert museum palo verdes (*Parkinsonia* X ‘Desert Museum’), and three (3) crape myrtles (*Lagerstroemia indica*) were recorded on the property. Seven African sumac were observed along Venice Boulevard and all others were observed along National Boulevard. Of the nineteen trees observed, three are regulated by Culver City (Trees 15, 16, and 17) and seven are regulated by the City of Los Angeles (Trees 8, 9, 10, 11, 12, 13, 14). Nine trees (Trees 1, 2, 3, 4, 5, 6, 7, 18, and 19) occur beyond the sidewalk and parkway area along National Boulevard, and are not regulated by Culver City.

The locations of the street trees are provided in **Figure 2 – Tree Plot Plan**. A summary of the street trees on the Project Site is provided in **Appendix A – Street Tree Inventory**. Representative photographs of each tree are provided in **Appendix B –Street Tree Photographs**.

Impacts

At the time of this street tree report, it is unknown what street trees will require removal to accommodate the proposed Project construction.

Required Replacement

A total of seven City of Los Angeles street trees may require removal to accommodate project implementation (Trees 8, 9, 10, 11, 12, 13, and 14). Currently, the UFD of Los Angeles requires a 2-to-1 street tree replacement ratio. In total, 14 replacement trees would be required to compensate for the 7 African sumac street trees proposed for removal.

A total of three Culver City street trees (Trees 15, 16, and 17) may be removed to accommodate project implementation. Currently, the UFD of Culver City requires a 2-to-1 street tree replacement ratio. All three crape myrtle trees are small in stature and trunk diameter and are suitable candidates for transplanting. As noted within Section 9.08.215 of Culver City Ordinance 2013-007§1;

“If the Public Works Director determines that transplanting the tree(s) is feasible, the tree(s) shall be relocated, at the sole cost and expense of the applicant, to a location specified by the Public Works Director. Applicant has the option of performing this work or paying to the City the cost to have the work performed by the City’s contractor.”



SOURCE: Nemap, 2021

Project Crossings

Figure 2
Tree Plot Plan

If trees cannot be transplanted;

“the applicant shall provide sufficient evidence, to be reviewed and considered by the Public Works Director, that the private improvement or development project cannot be reasonably redesigned to avoid the removal of the tree(s). If the Public Works Director determines that a project redesign is not feasible, then removal of the tree(s) may be approved, on the condition that the applicant shall plant two new street right-of-way trees or parkway trees for each tree that is removed. The size and location of the replacement trees shall be determined by the Public Works Director based on what is appropriate for the particular Street Right-of-Way or Parkway. Where feasible and appropriate for the location, the Public Works Director will require 36" box trees or larger for replacement”

If project implementation removes the three crape myrtle trees and they are not transplanted, six 36" box trees may be required as replacement. If the crape myrtle trees are proposed for transplanting, they may be suitable replacements for removed street trees and could potentially be transplanted elsewhere on site or offsite.

Bibliography

City of Culver City. 2018. Municipal Code. Accessed October 2021.

https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-70171.

City of Los Angeles. 2018. Standard Tree Removal Application Checklist. Accessed October 2021. https://streetsla.lacity.org/sites/default/files/ufd_tree_removal_permit.pdf.

ISA (International Society of Arboriculture). 2019. Guide for Plant Appraisal. 10th edition. Council of Tree and Landscape Appraisers.

Certification of Performance

I, Douglas Gordon-Blackwood, certify:

- That I have personally inspected the tree(s) and/or the property referred to in this report, and have stated my findings accurately. The extent of the evaluation and appraisal is stated in the attached report and the Terms of Assignment;
- That I have no current or prospective interest in the vegetation or the property that is the subject of this report and have no personal interest or bias with respect to the parties involved;
- That the analysis, opinions, and conclusions stated herein are my own;
- That my analysis, opinions, and conclusions were developed and this report has been prepared according to commonly accepted arboricultural practices;
- That no one provided significant professional assistance to the consultant, except as indicated within the report;
- That my compensation is not contingent upon the reporting of a predetermined conclusion that favors the cause of the client or any other party.

I further certify that I am a member of the American Society of Consulting Arborists, Registered Consulting Arborist #689, and acknowledge, accept, and adhere to the ASCA Standards of Professional Practice. I am an International Society of Arboriculture Certified Arborist, and have been involved in the practice of arboriculture and the study of trees for over 15 years.

Signed:



Date: 10/08/2021
Douglas Gordon-Blackwood
Registered Consulting Arborist, #689
Certified Arborist, WE-11726-AU
Qualified Tree Risk Assessor



This report comprises a total of 37 pages and four full-size maps. Unauthorized separation or removal of any portion of this report deems it invalid as a whole. Conditions represented in this report are limited to the inventory date and time. Rating for health and structure do not constitute a health or structural guarantee beyond that date.

Arborist Disclosure Statement

Arborists are tree specialists who use their education, knowledge, training and experience to examine trees, recommend measures to enhance the beauty and health of trees, and attempt to reduce the risk of living near trees. Clients may choose to accept or disregard the recommendations of the arborist, or to seek additional advice.

Arborists cannot detect every condition that could possibly lead to the structural failure of a tree. Trees are living organisms that fail in ways we do not fully understand. Conditions are often hidden within trees and below ground. Arborists cannot guarantee that a tree will be healthy or safe under all circumstances, or for a specified period of time.

Treatment, pruning and removal of trees may involve considerations beyond the scope of the arborist's services such as property boundaries, property ownership, site lines, disputes between neighbors, and other issues. Arborists cannot take such considerations into account unless complete and accurate information is disclosed to the arborist. An arborist should then be expected to reasonably rely upon the completeness and accuracy of the information provided.

Trees can be managed, but they cannot be controlled. To live near trees is to accept some degree of risk. The only way to eliminate all risk associated with trees is to eliminate all trees.

Formal risk assessments were not requested nor performed on the trees in this report.

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Appendix A

Street Tree Inventory

APPENDIX A
STREET TREE INVENTORY

Tree #	Species	DBH (in.)	Height (ft.)	Canopy Measurements (in ft.)								Health	Aesthetic	Balance	Vigor	City Regulated Status	Comments
				N	NW	W	SW	S	SE	E	NE						
1	Jacaranda <i>Jacaranda mimosifolia</i>	5, 5, 3, 2	15	8	8	8	8	8	8	8	8	A	A	A	A	Unregulated Tree – Culver City	Young tree. Possible candidate for transplanting. Tree located beyond sidewalk/parkway.
2	Desert Museum Palo Verde <i>Parkinsonia</i> X 'Desert Museum'	4	12	4	4	4	4	4	4	4	4	B	B	B	B	Unregulated Tree – Culver City	Sparse canopy, slight lean. Tree located beyond sidewalk/parkway. Possible candidate for transplanting.
3	Desert Museum Palo Verde <i>Parkinsonia</i> X 'Desert Museum'	4.5, 3, 2	15	10	10	10	10	10	10	10	10	B	B	B	B	Unregulated Tree – Culver City	Slight lean, young tree. Tree located beyond sidewalk/parkway. Possible candidate for transplanting.
4	Desert Museum Palo Verde <i>Parkinsonia</i> X 'Desert Museum'	5, 4, 3, 2	15	8	8	8	8	8	8	8	8	B	B	B	B	Unregulated Tree – Culver City	Slight lean, sparse, young tree. Tree located beyond sidewalk/parkway. Possible candidate for transplanting.
5	Desert Museum Palo Verde <i>Parkinsonia</i> X 'Desert Museum'	2, 1	9	5	5	5	5	5	5	5	5	A	A	A	A	Unregulated Tree – Culver City	Young tree. Tree located beyond sidewalk/parkway. Possible candidate for transplanting.
6	Desert Museum Palo Verde <i>Parkinsonia</i> X 'Desert Museum'	1, 1, 1, 1	11	7	7	7	7	7	7	7	7	A	A	A	A	Unregulated Tree – Culver City	Young tree. Tree located beyond sidewalk/parkway. Possible candidate for transplanting.
7	Desert Museum Palo Verde <i>Parkinsonia</i> X 'Desert Museum'	3, 2, 1, 1	10	7	7	7	7	7	7	7	7	A	A	A	A	Unregulated Tree – Culver City	Coated wire causing slight girdling in trunk, consider removing bracing and coated wire. Tree located beyond sidewalk/parkway. Possible candidate for transplanting.
8	African Sumac <i>Searsia lancea</i>	14	17	6	8	9	7	8	9	7	8	C	C	C	C	Regulated Street Tree – City of Los Angeles	Basal sprouting, lean, topped, lion tailed and canopy raised, pavement over roots, roots lifting sidewalk.

Tree #	Species	DBH (in.)	Height (ft.)	Canopy Measurements (in ft.)								Health	Aesthetic	Balance	Vigor	City Regulated Status	Comments
				N	NW	W	SW	S	SE	E	NE						
9	African Sumac <i>Searsia lancea</i>	18	23	6	8	10	14	12	12	3	5	C	C	C	C	Regulated Street Tree – City of Los Angeles	Cavity in trunk, lean, exposed roots and root crown, lion tailed, exfoliating bark along trunk, multiple large limbs removed and flush cut, pavement over roots.
10	African Sumac <i>Searsia lancea</i>	14.9	13	7	7	7	7	7	7	7	7	C	B	C	C	Regulated Street Tree – City of Los Angeles	Lean, topped, exfoliating bark, pruned for street clearance, pavement over roots.
11	African Sumac <i>Searsia lancea</i>	12.8	18	6	8	9	10	9	8	6	5	B	C	C	C	Regulated Street Tree – City of Los Angeles	Exposed roots, flush cuts, street side pruning, basal sprouting, pavement over roots.
12	African Sumac <i>Searsia lancea</i>	13.1	17	5	5	5	5	5	5	5	5	B	C	C	C	Regulated Street Tree – City of Los Angeles	Exposed root crown, basal sprouting, topped, flush cuts. exfoliating bark, pavement over roots.
13	African Sumac <i>Searsia lancea</i>	15.9	13	6	7	7	7	9	9	7	7	B	B	B	B	Regulated Street Tree – City of Los Angeles	Exposed roots, exfoliating bark, cavities in trunk and canopy, exudate on trunk, pavement over roots.
14	African Sumac <i>Searsia lancea</i>	15.9	18	9	9	9	9	9	9	9	9	A	A	B	A	Regulated Street Tree – City of Los Angeles	Exposed roots but otherwise healthy. Better condition due to unrestricted root area in turf.
15	Crape Myrtle <i>Lagerstroemia indica</i>	2.5	7	4	4	4	4	4	4	4	4	B	B	B	A	Regulated Street Tree – Culver City	Buried root crown, unnecessarily staked, limited soil volume for roots, young tree. Possible candidate for transplanting
16	Crape Myrtle <i>Lagerstroemia indica</i>	3	12	5	5	5	5	5	5	5	5	B	B	C	B	Regulated Street Tree – Culver City	Basal sprouting, unnecessarily staked, powdery mildew, limited soil volume for roots, young tree. Possible candidate for transplanting
17	Crape Myrtle <i>Lagerstroemia indica</i>	3	13	5	6	5	5	5	6	5	6	B	B	B	B	Regulated Street Tree – Culver City	Unnecessarily staked, limited soil volume for roots, young tree. Possible candidate for transplanting
18	Jacaranda <i>Jacaranda mimosifolia</i>	5, 4	20	10	12	9	7	8	7	6	5	A	A	A	B	Unregulated Street Tree – Culver City	Mechanical damage at base. Tree located beyond sidewalk/parkway. Possible candidate for transplanting.

Tree #	Species	DBH (in.)	Height (ft.)	Canopy Measurements (in ft.)								Health	Aesthetic	Balance	Vigor	City Regulated Status	Comments
				N	NW	W	SW	S	SE	E	NE						
19	Jacaranda <i>Jacaranda mimosifolia</i>	4.5, 4.5	17	6	6	6	5	6	5	6	5	A	A	B	B	Unregulated Street Tree – Culver City	Young tree. Tree located beyond sidewalk/parkway. Possible candidate for transplanting.

Appendix B

Street Tree Photographs



Photo 1: View of Tree #1 – Jacaranda, facing northwest. Unregulated Tree – Culver City.

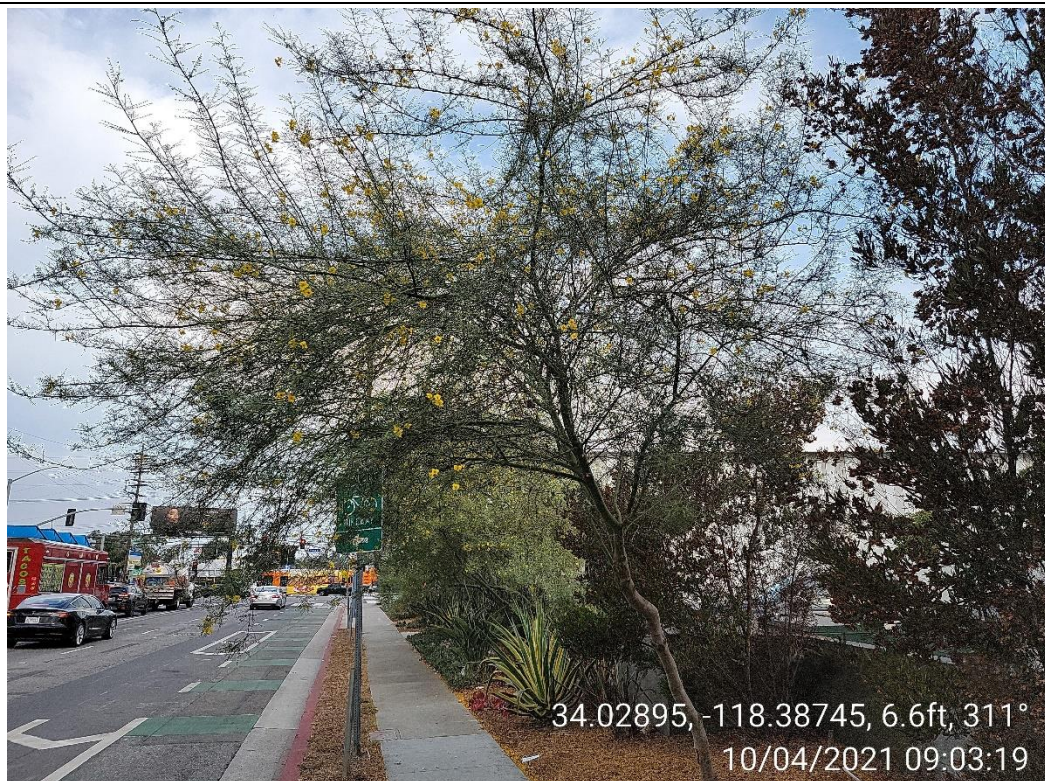


Photo 2: View of Tree #2 – Desert Museum palo verde, facing northwest. Unregulated Tree – Culver City.



Photo 3: View of Tree #3 – Desert Museum palo verde, facing northwest. Unregulated Tree – Culver City.



Photo 4: View of Tree #4 – Desert Museum palo verde, facing southeast. Unregulated Tree – Culver City.



Photo 5: View of Tree #6 – Desert Museum palo verde, facing north. Unregulated Tree – Culver City.



Photo 6: View of Tree #6 – Desert Museum palo verde, facing north. Unregulated Tree – Culver City.



Photo 7: View of Tree #7, Desert Museum palo verde, facing northwest. Unregulated Tree – Culver City.



Photo 8: View of Tree #8– African sumac, facing northeast. Photo depicts raised canopy and cracks in pavement from restricted root system. Regulated Tree – City of Los Angeles



Photo 9: View of Tree #9 - View of Tree #8– African sumac, facing southwest. Photo depicts raised and sparse canopy and self corrected lean. Regulated Tree – City of Los Angeles.



Photo 10: View of Tree #10 – African sumac, facing northeast. Regulated Tree – City of Los Angeles.

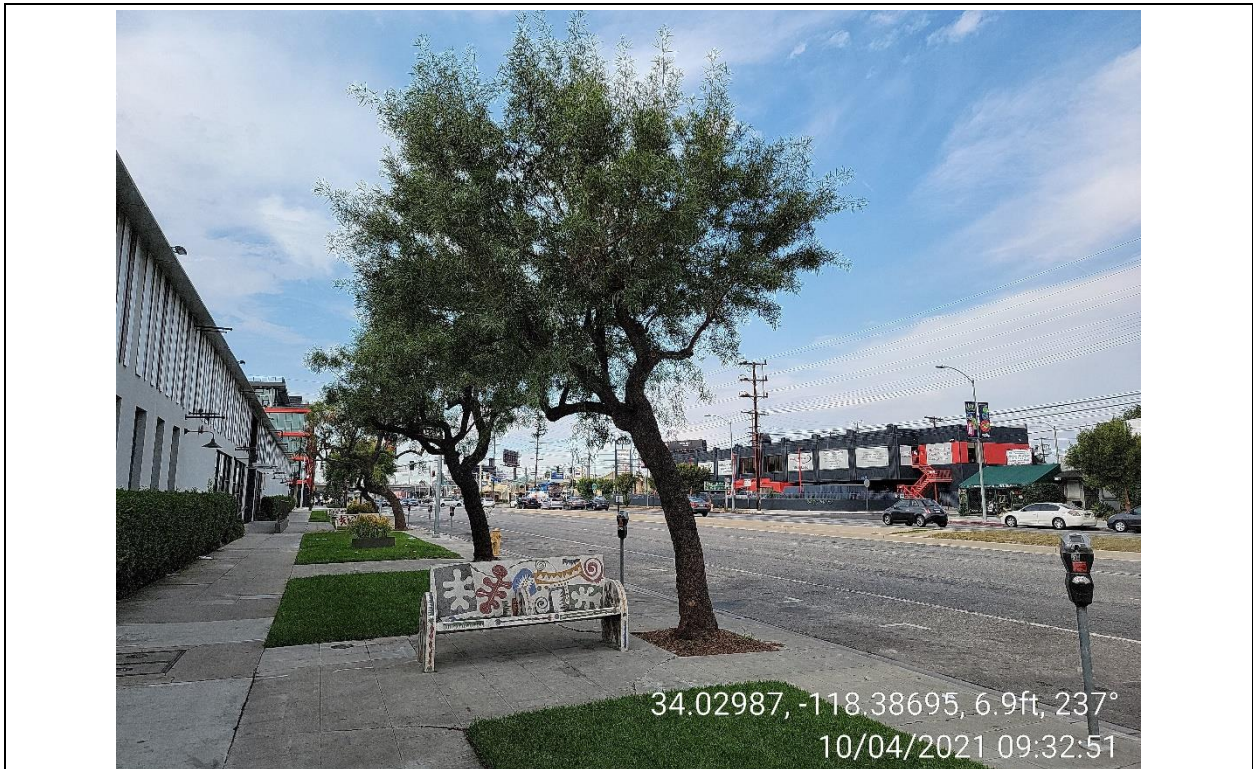


Photo 11: View of Tree #11 – African sumac, facing northwest. Regulated Tree – City of Los Angeles.



Photo 12: View of Tree #12 – African sumac, facing northeast. Regulated Tree – City of Los Angeles.



Photo 13: View of Tree #13 – African sumac, facing northeast. Regulated Tree – City of Los Angeles.



Photo 14: View of Tree #14 – African sumac, facing northeast. Regulated Tree – City of Los Angeles.



Photo 15: View of Tree #15 – Crape myrtle, facing southeast. Regulated Tree – Culver City.



Photo 16: View of Tree #16 – Crape myrtle, facing southeast. Regulated Tree – Culver City.



Photo 17: View of Tree #17 – Crape myrtle, facing northwest. Regulated Tree – Culver City.

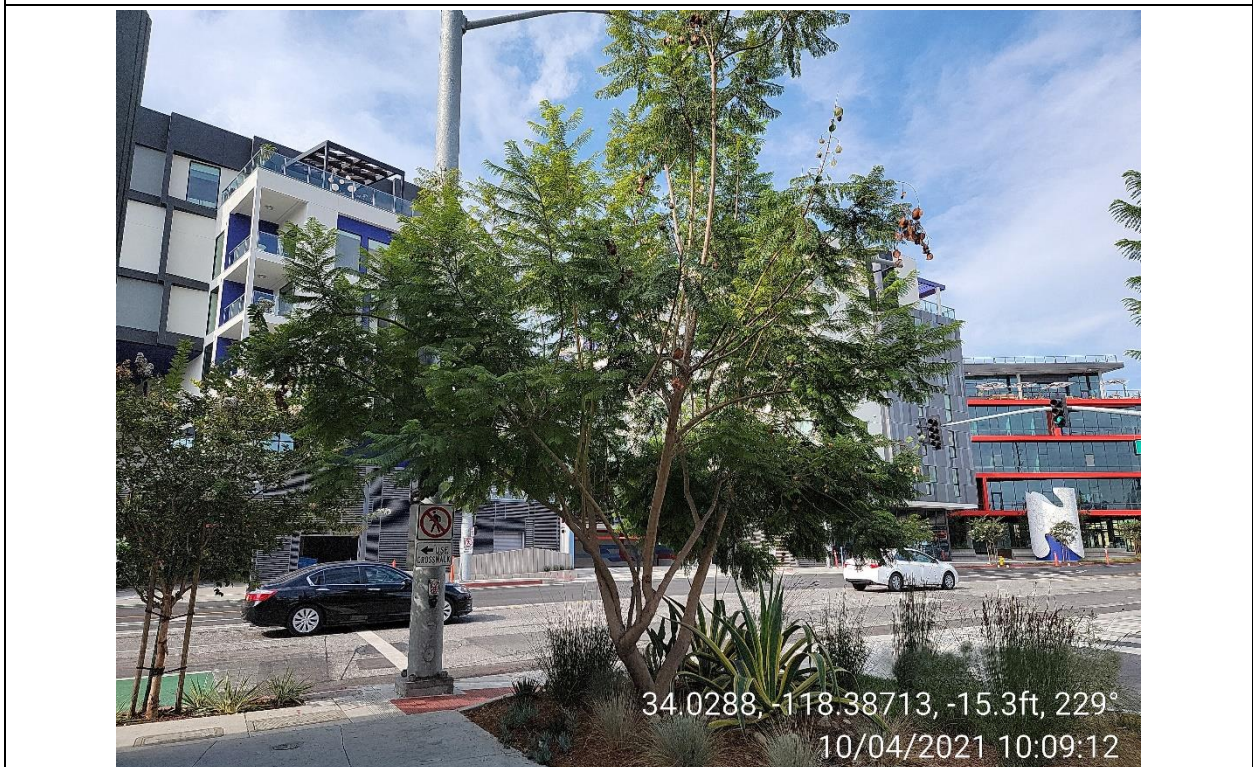


Photo 18: View of tree #18– Jacaranda, facing west. Unregulated Tree – Culver City



Photo 19: View of tree #19 – Jacaranda, facing west. Unregulated Tree – Culver City

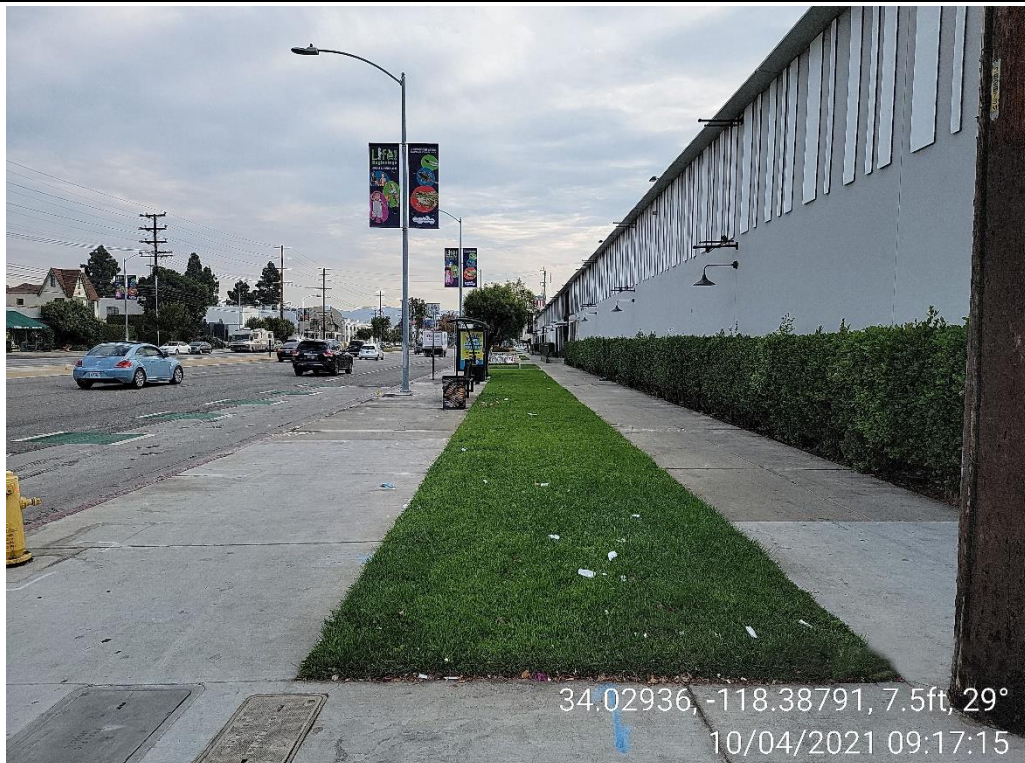


Photo 20: View east along Venice Boulevard from intersection of Venice Boulevard and National Boulevard

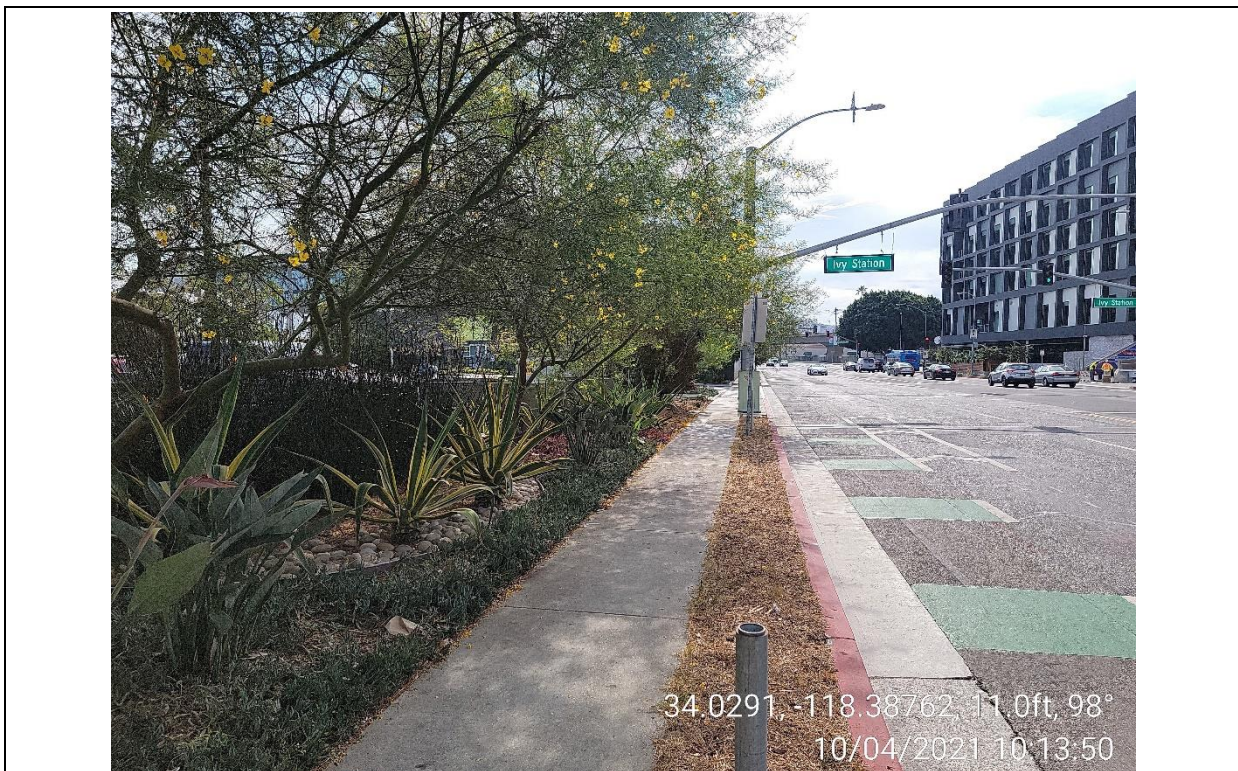


Photo 21: View southeast along National Boulevard towards Washington Boulevard and Ivy Station Intersection. Photo depicts trees beyond parkway and sidewalk.

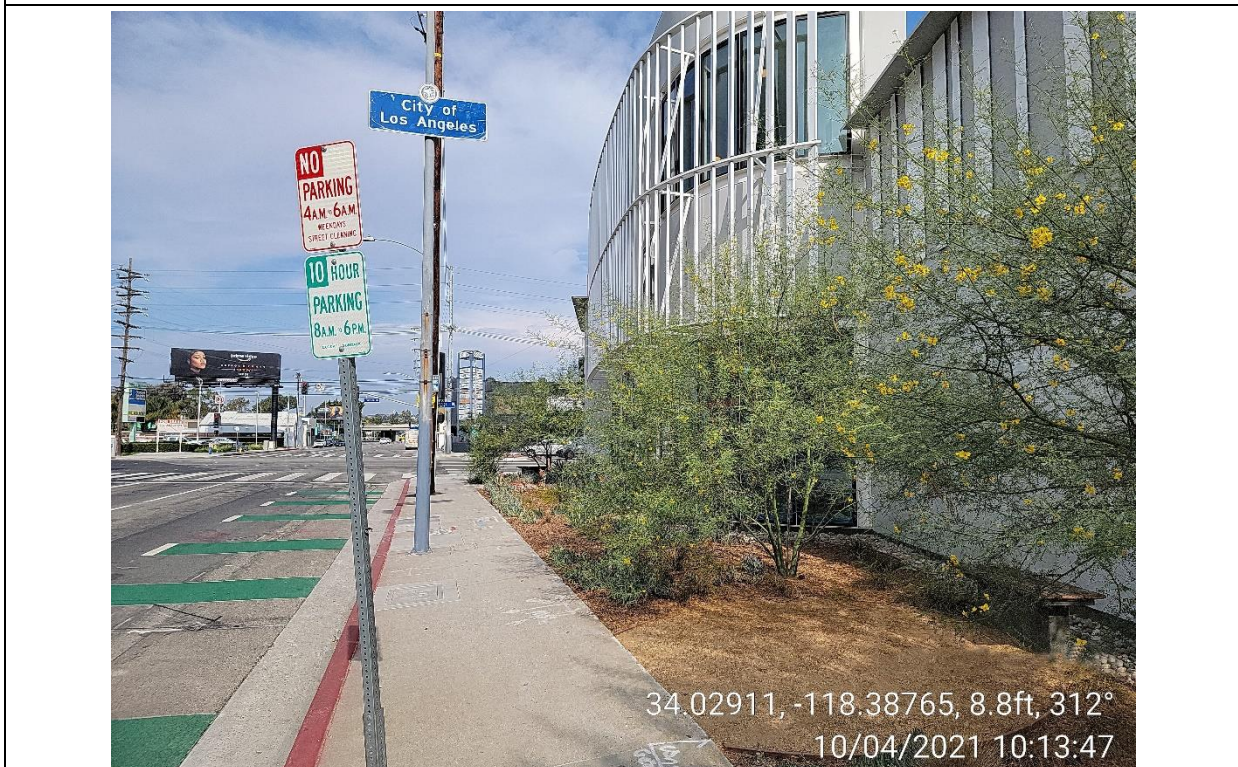


Photo 22: View northwest along National Boulevard towards Venice Boulevard. Photo depicts trees beyond parkway and sidewalk.

A-3 Scoping Meeting Materials

EIR SCOPING MEETING

Project Crossings

December 6, 2021

7:00 p.m. – 8:00 p.m.



EIR Scoping Meeting Objectives

- Provide information about Project Crossings
- Provide information on the Environmental Impact Report (EIR) process
- Identify environmental issues for analysis in the EIR
- Solicit community input on environmental issues or concerns to be addressed in the EIR

The EIR Scoping Meeting is for community input on what should be studied in the EIR, which is one of the initial steps of the environmental review process.



Project Site and Vicinity

- Project Site is made up of 2 parcels – one in Culver City and one in Los Angeles
- 4.46-acres (194,334 square feet)
- Bounded by Venice Boulevard to the north, Washington Boulevard to the south, National Boulevard to the west, and existing commercial uses to the east.
- Primary regional access provided by the I-10 and I-405, as well as the Metro E Line



Existing Conditions

- The Project Site is fully developed
- Warehouse buildings converted into retail, office, storage, and parking
- Surface parking lots serving all uses on-site

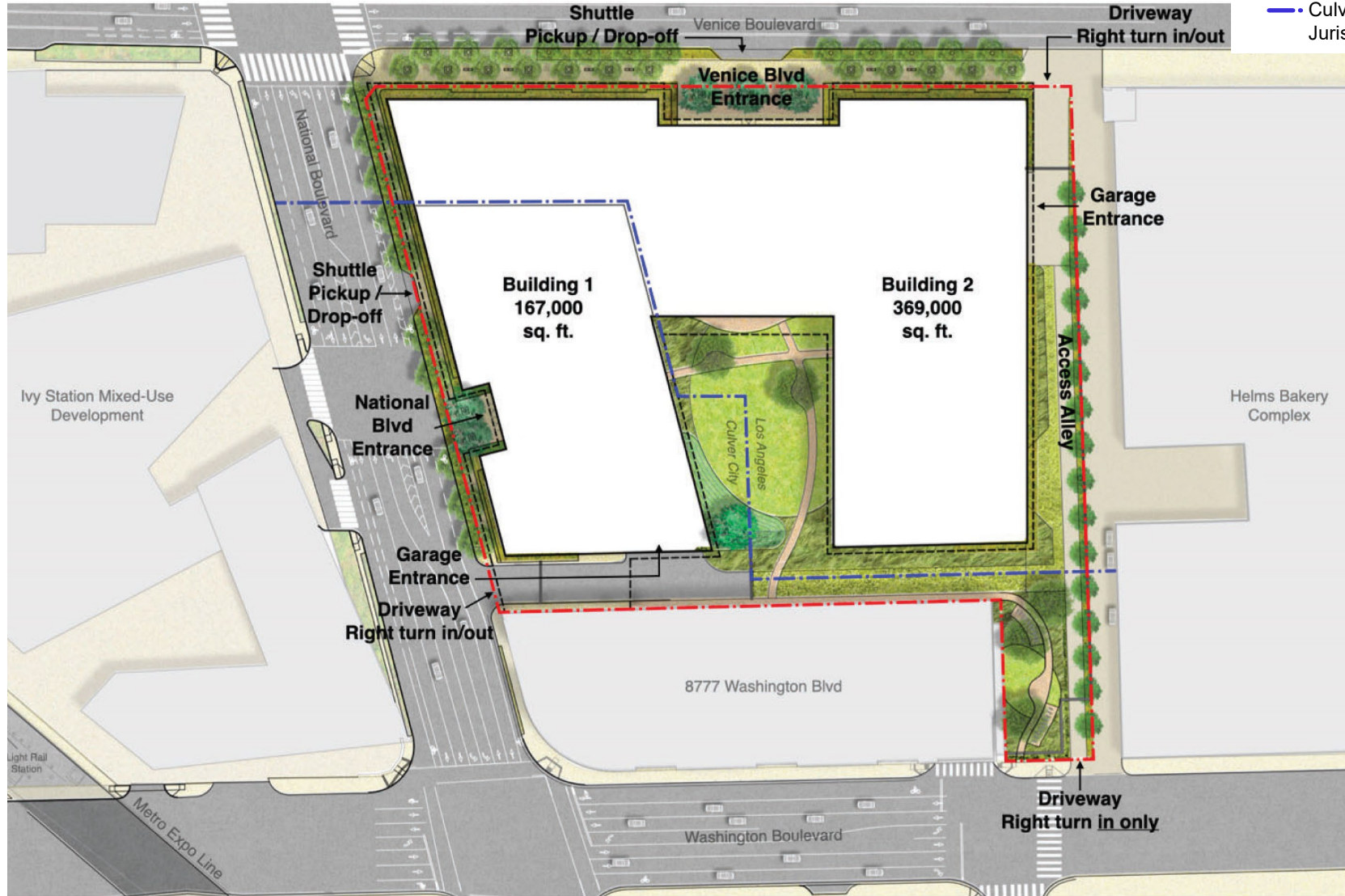


Project Description

- Total of 536,000 square feet of office space within two, four- to five-story buildings
- Net new floor area of 430,953 square feet
- Building heights would reach a maximum of up to 56 feet on the Culver City Parcel and up to 75 feet on the Los Angeles Parcel
- Approximately 750 linear feet of landscaped streetscapes on Venice and National Boulevards
- Widened landscaped sidewalks on Venice and National Boulevards
- Two primary driveways for ingress/egress and an ingress-only driveway for ancillary and emergency access
- Two shuttle stops for employee shuttles
- 1,215 vehicular parking spaces
- 162 bicycle parking spaces



Conceptual Site Plan



—•— Property Boundary

—•— Culver City / Los Angeles Jurisdictional Boundary



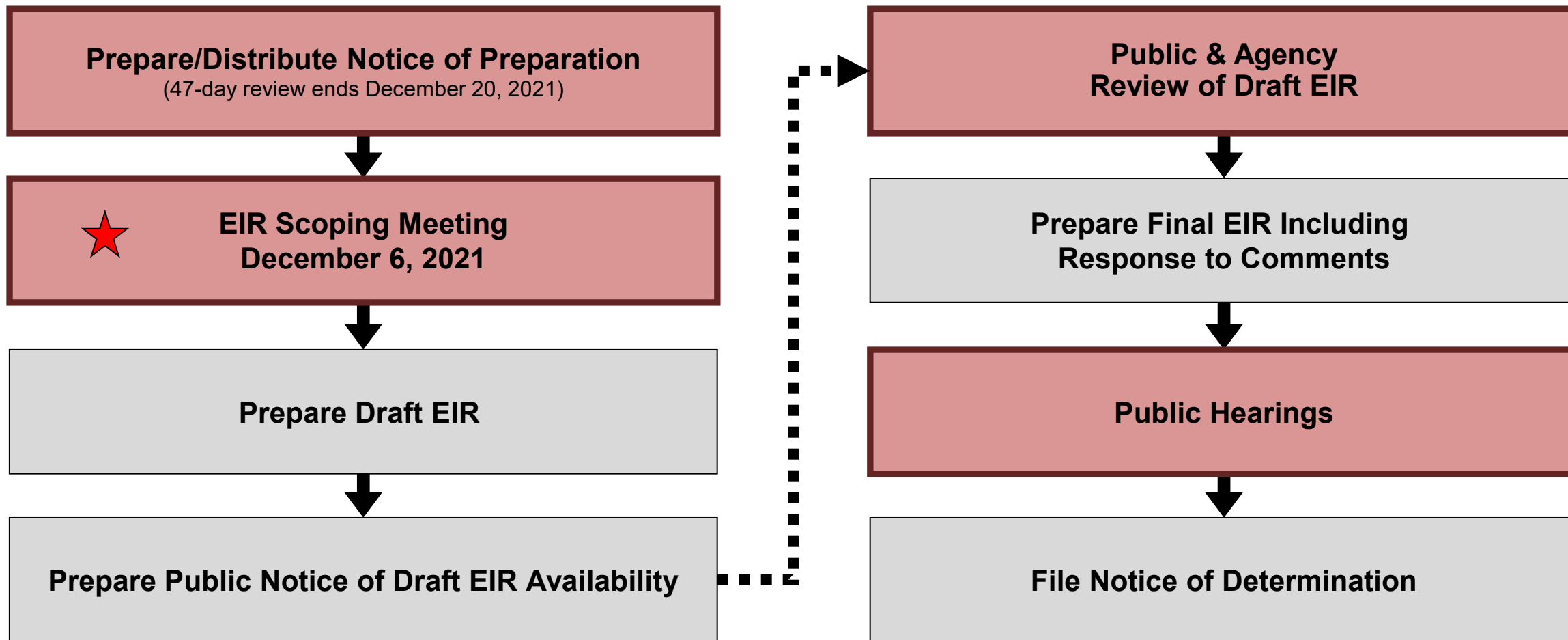
California Environmental Quality Act (CEQA)

Purpose of CEQA Review:


- To inform decision-makers and the public of a project's potential environmental effects
- Increases public understanding of and participation in environmental review process
- Discloses potential impacts on the environment
- Identifies ways to avoid or reduce potential environmental impacts through mitigation measures or alternatives



The EIR Process



 = Opportunities for Public Input

 = We are here in the process



CulverCITY
PLANNING DIVISION

EIR Scope and Content

Topics Found to be Less Than Significant – Not Evaluated in the EIR

- Agriculture and Forestry Resources
- Biological Resources
- Mineral Resources
- Population and Housing
- Public Services
(Schools, Parks, Libraries)
- Recreation
- Utilities and Service Systems
(Solid Waste)
- Wildfire



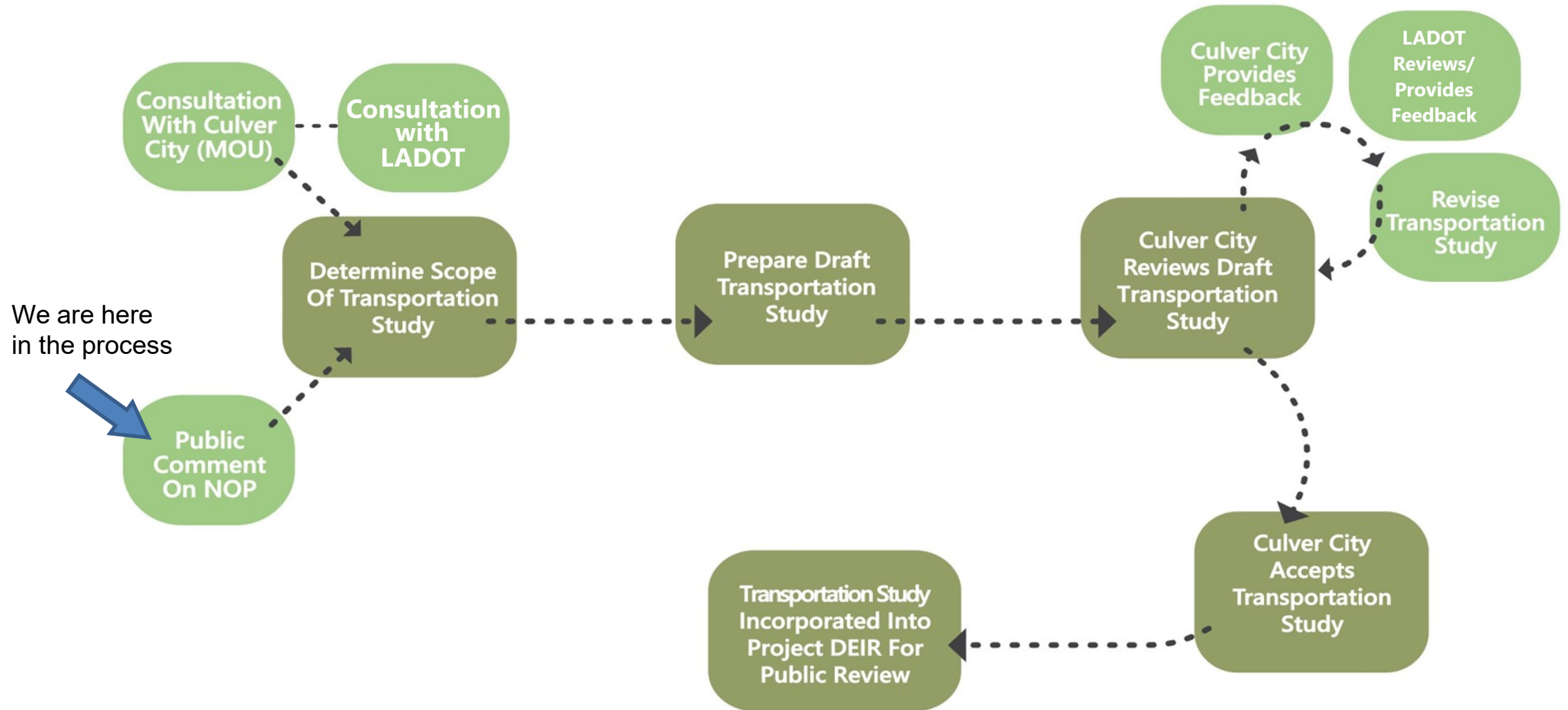
EIR Scope and Content

Topics to be Analyzed in the EIR

- Aesthetics (for informational purposes)
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
(Fire and Police Protection)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
(Water and Wastewater)



Transportation Assessment Process



Transportation Assessment Scope (CEQA)

The State recently required vehicle-miles-traveled (VMT) as the primary metric for evaluating CEQA transportation impacts. Both the City of Culver City and the Los Angeles Department of Transportation (LADOT) have recently updated their transportation study guidelines to comply with new State requirements. Culver City will act as the lead agency on this study.

- VMT Analysis
- Adherence to City's adopted Programs, Plans, Ordinances, and Policies
- Analysis of effects on potential on-street hazards (Geometric Design)



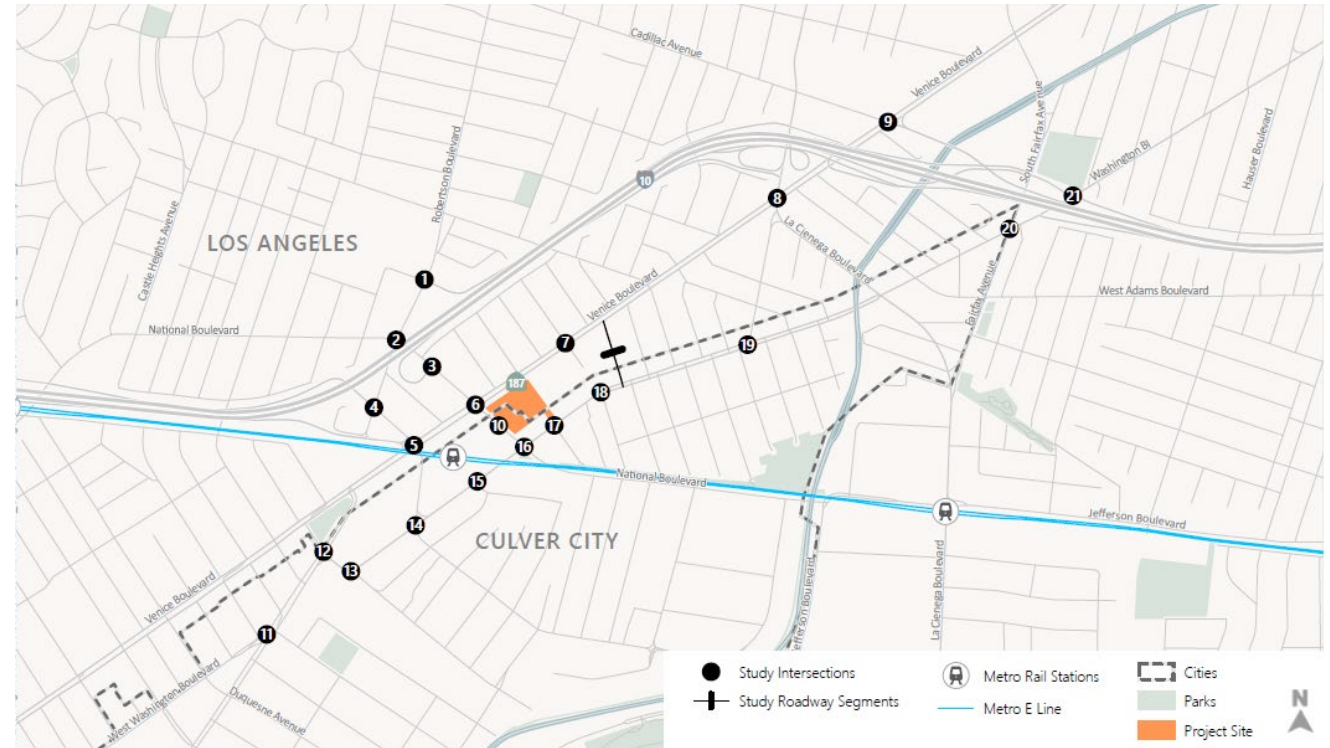
What is Vehicle Miles Traveled (VMT)?



Additional Non-CEQA Transportation Analyses

Intersection Level of Service (LOS)

- Transit Operations Analysis
- Street Segment Analysis
- Driveway Access Analysis
- Safety Analysis
- Transportation Demand Management (TDM)



Submittal of Public Comments

Due date for public comments on the scope of the EIR:

5:30 p.m. on Monday, December 20, 2021

Please direct EIR comments to:

- **Jeff Anderson, Interim Planning Manager**
City of Culver City Planning Division
9770 Culver Boulevard
Culver City, California 90230
- **Email:** Jeff.Anderson@culvercity.org
- **Reference:** *Project Crossings*



Comments and Questions

Oral Comments

Zoom

- Mouse over the bottom of the Zoom application
- Click “Raise Hand” button
- Wait until moderator calls your name and unmutes you

By Phone

- Dial *9 to raise your hand
- Wait until moderator calls your name and unmutes you



For comments or questions on the EIR, please direct to:

Email: Jeff.Anderson@culvercity.org

For questions on the Project, please direct to:

Email: community@ccpmanager.com

Due date for public comments on the scope of the EIR:
5:30 p.m. on Monday, December 20, 2021

A-4 NOP Comments

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 269-1124

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life*

December 17, 2021

Mr. Jeff Anderson
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

RE: Project Crossings
SCH # 2021110079
Vic. LA-10/PM R7.841
GTS # LA-2021-03752-NOP

Dear Mr. Anderson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced recirculated NOP. The Project would construct two four- to five-story buildings that would provide a total of 536,000 sf of new office floor area, which is intended to be occupied by Apple, Inc. The Project would provide a total of 1,215 vehicular parking spaces within two separate three-level subterranean garages under each proposed building. The Project would also provide 162 bicycle parking spaces, including spaces for employees and visitors, short-term spaces, and long-term spaces in compliance with respective City codes. The proposed office buildings would be designed to accommodate creative office uses and could include associated production spaces for multimedia content creation and capture as well as amenities for building tenants including a cafeteria, coffee stations, employee shuttle service, and other ancillary uses typical of an integrated office complex development. The Project would also include pedestrian facing landscaping at the ground floor on National Boulevard and Venice Boulevard, as well as an internal courtyard for the use of employees and occasional private tenant events.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review these resources at the following links:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-lidgr-safety-review-guidance-a11y.pdf>

Caltrans encourages lead agencies to prepare traffic safety impact analysis on the State facilities for this development in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-03752AL-NOP.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse



NATIVE AMERICAN HERITAGE COMMISSION

November 12, 2021

Jeff Anderson
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

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Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
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RECEIVED
NOV 17 2021
Culver City
Planning Division

Re: 2021110079, Project Crossings Project, Los Angeles County

Dear Mr. Anderson:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation" shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
- c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:

Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

December 7, 2021

jeff.anderson@culvercity.org

Jeff Anderson, Contract Interim Manager
City of Culver City, Current Planning Division
9770 Culver Boulevard, Second Floor
Culver City, California 90232

Notice of Preparation of an Environmental Impact Report for the Project Crossings

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send a copy of the EIR upon its completion and public release directly to South Coast AQMD as copies of the EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan⁶, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy⁷.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS
LAC211104-01
Control Number

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

⁷ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.



December 14, 2021

Mr. Jeff Anderson, Contract Interim Current Planning Manager
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RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for Project Crossings [SCAG NO. IGR10511]

Dear Mr. Anderson

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for Project Crossings ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.¹

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is also the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for Project Crossings in Los Angeles County. The proposed project includes the demolition of existing building and construction of two four- to five-story buildings with 536,000 square feet of office use with 1,215 vehicular parking spaces in two three-level subterranean garages, and 162 bicycle parking spaces on 4.46 acres.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

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**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR
PROJECT CROSSINGS [SCAG NO. IGR10511]**

CONSISTENCY WITH CONNECT SOCIAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with Connect SoCal.

CONNECT SOCIAL GOALS

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCIAL GOALS		
Goal		Analysis
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.		etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect

SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted City of Culver City Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	40,257	40,743	41,011	41,573
Households	6,333,458	6,902,821	7,170,110	7,633,451	17,146	17,505	17,675	18,014
Employment	8,695,427	9,303,627	9,566,384	10,048,822	60,312	61,635	62,303	64,071

MITIGATION MEASURES

SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG's Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

December 20, 2021

Mr. Jeff Anderson
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

Dear Jeff Anderson:

Subject: Project Crossings Initial Study

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the Project Crossing Initial Study (Project). The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. Based on our review of the Project Initial Study we respectfully submit the below comments:

XIX. Utilities and Service Systems (Pages B-28 and B-29):

1. LADWP recommends that the Project Proponent and City of Culver City discuss water service capacity with both LADWP and Golden State Water to determine water service availability for the proposed project.
2. LADWP requests that the City of Culver City notify LADWP when the Project Crossings Draft EIR becomes available.
3. This reply shall not be construed as an approval of any project.

For any questions regarding the above comments, please contact Mr. Marshall Styers of my staff at (213) 367-3541 or Marshall.Styers@ladwp.com.

Sincerely,

Nadia Parker *Digitally signed by Nadia Parker*
Date: 2021.12.20 16:31:23 -08'00'

Charles C. Holloway
Manager of Environmental Planning and Assessment

MS:lr
c: Mr. Marshall Styers

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: November 30, 2021

TO: Jeff Anderson, Contract Interim Current Planning Manager
City of Culver City Current Planning Division

FROM: Lenise Marrero, Acting Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment



SUBJECT: PROJECT CROSSINGS - NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND COMMUNITY MEETING/EIR SCOPING MEETING

This is in response to your November 2, 2021 letter requesting a review of the proposed mixed-use project located at 8825 National Boulevard, 8771 Washington Boulevard, Culver City, CA 90232; 8876, 8884, 8886, and 8888 Venice Boulevard; 8827, 8829 National Boulevard, Los Angeles, CA 90232. The project will consist of office areas. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<i>Proposed</i>			
Office Building	120 GPD/KGSF	536,000 SF	64,320
Total			64,320

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on N Venice Blvd. The sewage from the existing 8-inch line feeds into an 18-inch line on Venice Blvd. The sewage from the 18-inch pipe feeds into a 24-inch line on Venice Blvd S before discharging into a 63-inch sewer line on Burchard Ave R/W. Figure 1 shows the details of the

sewer system within the vicinity of the project. The current flow levels (d/D) in the 8-inch line and the 18-inch line cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	N Venice Blvd.	*	205,000 GPD
18	Venice Blvd.	*	1.78 MGD
24	Venice Blvd S	75	2.96 MGD
63	Burchard Ave R/W	48	21.81 MGD

* No gauging available

Based on estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at the time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

All sanitary wastewater ejectors and fire tank overflow ejectors shall be designed, operated, and maintained as separate systems. All sanitary wastewater ejectors with ejection rates greater than 25 GPM shall be reviewed and must be approved by LASAN WESD staff prior to other City plan check approvals. Lateral connection of development shall adhere to Bureau of Engineering Sewer Design Manual Section F 480.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org.

STORMWATER REQUIREMENTS

LA Sanitation, Stormwater Program is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

In accordance with the Municipal Separate Storm Sewer (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R4-2012-0175, NPDES No. CAS004001) and the City of Los Angeles Stormwater and Urban Runoff Pollution Control requirements (Chapter VI, Article 4.4, of the Los Angeles Municipal Code), the Project shall comply with all mandatory provisions to the Stormwater Pollution Control Measures for Development Planning (also known as Low Impact Development [LID] Ordinance). Prior to issuance of grading or building permits, the applicant shall submit a LID Plan to the City of Los Angeles, Public Works, LA Sanitation, Stormwater Program for review and approval. The LID Plan shall be prepared consistent with

the requirements of the Planning and Land Development Handbook for Low Impact Development.

Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lacitysan.org. It is advised that input regarding LID requirements be received in the preliminary design phases of the project from plan-checking staff. Additional information regarding LID requirements can be found at: www.lacitysan.org or by visiting the stormwater public counter at 201 N. Figueroa, 2nd Fl, Suite 280.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local groundwater basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. Green Street standard plans can be found at: www.eng2.lacity.org/techdocs/stdplans/

CONSTRUCTION REQUIREMENTS

All construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the rainy season between October 1 and April 15. Construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit issued by the State of California, and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

If there are questions regarding the stormwater requirements, please call WPP's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 2nd Fl, Suite 280.

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4). It reads as follows: “Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer.”

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

To help offset costs of water conservation and reuse systems, LADWP offers a Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of \$1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from the Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection “3”.

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

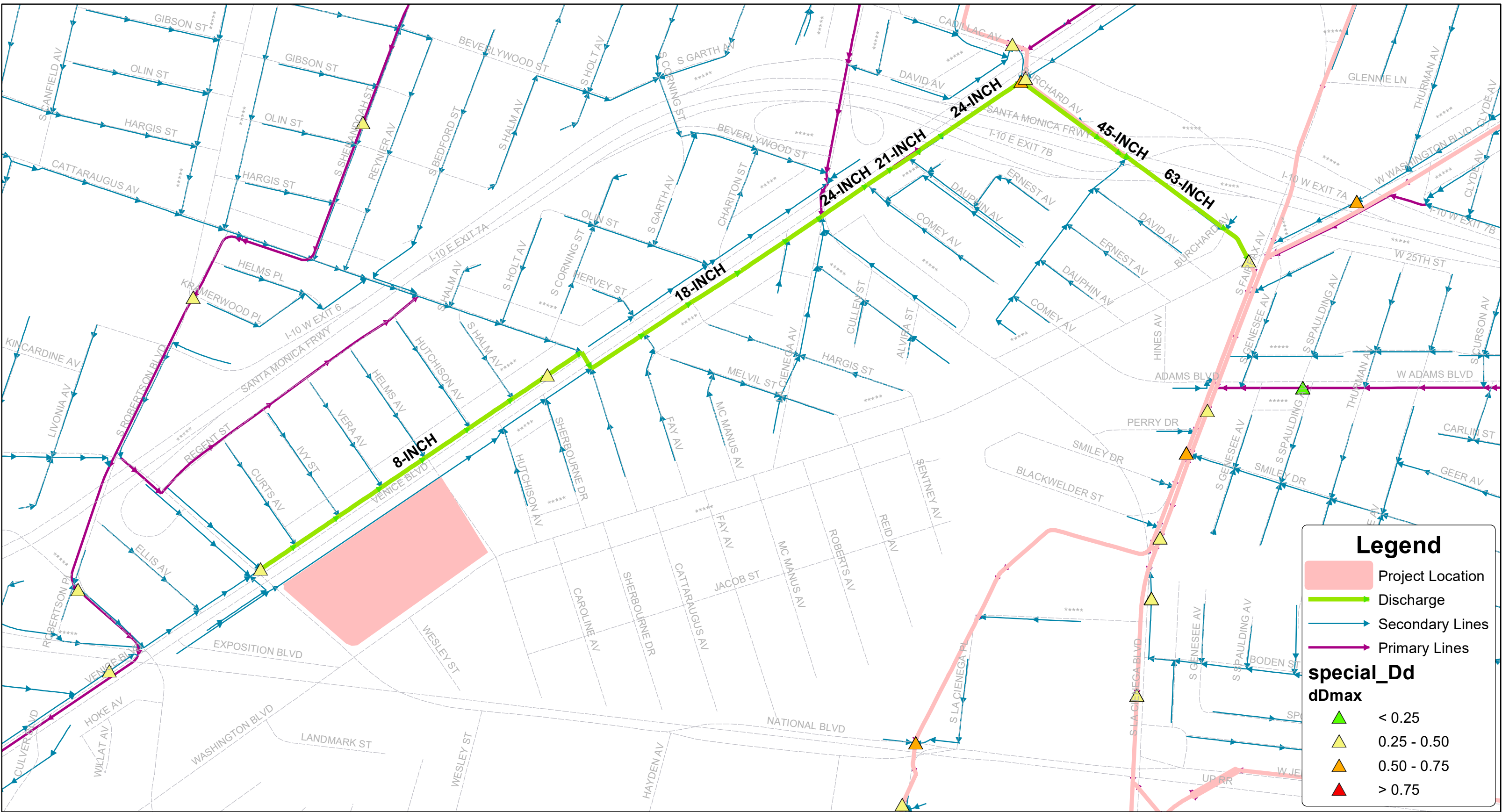
SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact LA Sanitation Solid Resources Recycling hotline 213-922-8300.

LM/CD: ra

Attachment: Figure 1 - Sewer Map

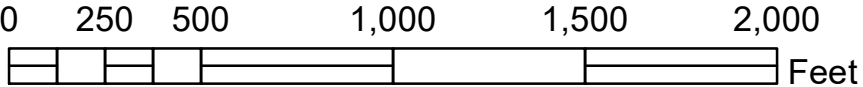
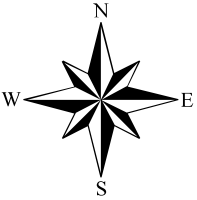
c: Shahram Kharaghani, LASAN
Michael Scaduto, LASAN
Wing Tam, LASAN
Christopher DeMonbrun, LASAN



Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles



Figure 1
PROJECT CROSSINGS
Sewer Map





Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro™

December 20, 2021

Jeff Anderson
City of Culver City
Current Planning Division, 2nd Floor
9770 Culver Boulevard
Culver City, CA 90232
Sent by Email: jeff.anderson@culvercity.org

RE: Project Crossings
Notice of Preparation of Environmental Impact Report (EIR)

Dear Mr. Anderson:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Project Crossings (Project) located at 8825 National Boulevard in the City of Culver City (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the Metro E Line (Expo) which should be analyzed in the EIR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

In addition to the specific comments outlined below, Metro is providing the City and Trammel Crow (Applicant) with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at <https://www.metro.net/devreview>.

Project Description

The Project includes construction of two four- to five-story buildings that would provide a total of 536,000 sf of new office floor area, which is intended to be occupied by Apple, Inc. The project would

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

also provide in 1,215 vehicular parking spaces within two separate three-level subterranean garages under each proposed building.

Transit Supportive Planning: Recommendations and Resources

Considering the Project's proximity to Culver City Station, Metro would like to identify the potential synergies associated with transit-oriented development:

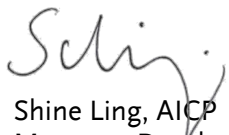
1. Transit Supportive Planning Toolkit: Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/about/funding-resources/>.
2. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project's proximity to Culver City Station, including orienting pedestrian pathways towards the station.
3. Transit Connections and Access: Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project, including:
 - a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby rail station.
 - b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged.
 - c. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf
4. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

5. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.
6. Transit Pass Programs: Metro would like to inform the Applicant of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs' website at <https://www.metro.net/riding/eapp/>.

If you have any questions regarding this letter, please contact me by phone at 213.547.4326, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Shine Ling, AICP
Manager, Development Review
Transit Oriented Communities

cc: Gabriel Hungerford, Trammell Crow, GHungerford@trammellcrow.com

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/devreview>



Culver City Arts District Business Improvement District
8623 Washington Blvd. Culver City, CA 90232

December 20, 2021

Reference: Apple Environmental Impact Report for Culver Crossings Properties LLC
Attn: Jeff Anderson, City of Culver City and Applicant Project Team:

The Culver City Arts District BID welcomes and supports the addition of Culver Crossings Properties LLC and it's anchor tenant Apple to the district, and looks forward to working closely to illuminate the local business community's interests and impact concerns.

After attending the meetings with the public so far, CCAD BID is keenly interested to follow progress and current status of plans regarding the new upcoming project at the corner of Venice and National. CCAD BID is particularly focused and interested regarding your ingress / egress, parking, design and operations, as these items affect the future of the other businesses on Washington Blvd and in the Arts District.

CCAD BID asks that the project teams develop ways to avoid directing a high volume of vehicles coming into your new project from the east down Washington Blvd. With none of the currently planned ingress/egress happening at a signalized intersection, the current plan would result in this type of increase.

The City of Culver City has several precedents set for goals evolving the multi-modality transit areas adjacent the project. These include an adopted Transit Oriented Visioning process, A Bicycle and Pedestrian Master Plan and more recently the MOVE Culver City reconfiguration of the Washington roadway.

All of these designs have been planning for changes in the modality of the roadways that would increase public transport, bicycle and pedestrian viability in an effort to increase overall commuting throughput by additional means beyond single occupancy vehicles.

The CCAD BID position is the project's Environmental Impact Review should include studies on traffic, housing and population, because this project will be affecting all of these. We also believe business and citizens of the district will have concerns that will need direct input and solutions.

Washington Blvd only has one lane in each direction for car traffic. Venice has three lanes east and west and direct access to the 10 freeway. The current National entry has no plan for use of an existing signal built for Ivy Station, therefore has no southbound left/east entry from National.

Changing the plan to utilize the recently implemented signal crossing at the midpoint of National between Washington and Venice in conjunction with adding a signalized intersection on Venice around Ivy Street could net the optimal auto volume while minimizing unnecessary additional car volume increases on Washington.

The BID is committed to working in support of the project and in particular to influence a best path forward that aligns with the city's stated transportation goals and initiatives.

Sincerely,
Michael Russell

A handwritten signature in black ink, appearing to read "Michael Russell". The signature is fluid and cursive, with a large initial "M" and "R".

Executive Director
Culver City Arts District Business Improvement District
info@culvercityartsdistrict.com

 Reply all   Delete  Junk Block ...

Fwd: Urgent light needed on Venice for Arts District Apple Project Crossings

CG

[Christie Gaynor <christiemg@gmail.com>](#)

Mon 12/6/2021 5:56 PM

To: Anderson, Jeff; community@ccpmanager.com

    ...

Please note:

Apple Employees & Associates will not get to work on time if entering from Washington Blvd.

At this time:

The new single lane system on Washington is extremely crowded to the maximum Westbound in the mornings.

I respectfully submit:

To facilitate entering Apple parking lots:

A new Light is URGENTLY needed at:

Venice & The Access Alley,
East of Building 2.

This will optimize the traffic flow in all directions for all concerned.

We would appreciate your exploring this as a viable option.

Thank you in advance for your kind & wise attention in this timely matter.

Respectfully,

Christie

Arts District Residents Association

Christie

[Reply](#) | [Reply all](#) | [Forward](#)

12/20/2021

Jeff Anderson, Contract Interim Planning Manager
City of Culver City, Current Planning Division 2nd Floor
9770 Culver Blvd, Culver City, CA 90232
jeff.anderson@culvercity.org

RE: NOP Comments for Project Crossings

Dear Mr. Fairbanks,

On behalf of The Coalition for Responsible Equitable Economic Development ("CREED LA") thank you for the opportunity to provide comments on the Notice of Preparation (NOP) for environmental review of the proposed Project Crossings (the "Project"). The Project applicant is Culver Crossings Properties, LLC.

The Project proposes the removal of three existing buildings and a surface parking, and construction of two, four- to five-story buildings that would provide a total of 536,000 sf of new office floor area. The Project provides a total of 1,215 vehicular parking spaces within two separate three-level subterranean garages under each proposed building.

The NOP and its Initial Study ("IS") identify the Project's potentially significant impacts under CEQA to include all factors except aesthetics, agriculture and forestry resources, biological resources, mineral resources, population / housing, recreation, and wildlife. CREED LA respectfully requests, under CEQA complete analysis of these impacts, imposition of all feasible mitigation and study of a reasonable range of alternatives to the Project.

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 Cal. Code Regs. ("Guidelines") § 15002(a)(1). Second, CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring implementation of "environmentally superior" alternatives and all feasible mitigation measures. Guidelines § 15002(a)(2) and (3); Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d at 564. Any unavoidable significant effects on the environment are "acceptable due to overriding concerns." Pub. Res. Code § 21081; Guidelines § 15092(b)(2)(A) and (B).

General Comments

- i) CREED LA has a particular interest in air quality and public health. Estimates of the significance of air quality impacts must be consistent with current epidemiological studies regarding the effects of pollution and various kinds of environmental stress on public health.
- ii) Mitigation measures must be effective and enforceable. Every effort must be made to incorporate modern technology in the mitigation measures and MMRP. For example, a requirement that all off-road equipment and trucks using the site during construction and operations be zero emission would both reduce and/or eliminate air pollution impacts and CO2 emissions.
- iii) In response to community concerns, the EIR should analyze reasonable Alternatives that use parking as an opportunity to address potential air quality, GHG and traffic impacts.
- iv) Provide all sources and referenced materials when the DEIR is made available.

Thank you for the opportunity to submit NOP comments. Again, CREED LA respectfully requests under CEQA full analysis of the environmental impacts, feasible mitigation, and reasonable alternatives to the Project.

We look forward to reviewing and commenting on the subsequent environmental review documents when the documents are circulated for public review.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Modrzejewski', with a long horizontal flourish extending to the right.

Jeff Modrzejewski
Executive Director

 Reply all   Delete  Junk Block ...

Comments

DM

Dan Morrical <dan.morrical@gmail.com>

Mon 12/20/2021 11:51 AM

To: Anderson, Jeff

    ...

1. Culver City is trying to make its city user friendly for those who choose to use alternative modes of travel to the automobile. How is this project helping the City meet that goal?
2. Is it possible to reduce the number of parking spaces?
3. How can you increase the number of bike racks?
4. How can I see the list of people who were registered and tuned into Community Meeting #2?
5. What is the City code requirement for parking spaces for this project? When was the last time this City code was updated? What is the process for getting this code updated?
6. Has the project's proximity to the train station allowed for fewer parking spaces?
7. Since you plan to add an entrance and a light at Venice, would it now be possible to eliminate the Washington Boulevard entrance?

Sent from my iPhone

[Reply](#) | [Forward](#)

↩ Reply all ▾ 🗑 Delete 🚫 Junk Block ⋮

Apple Crossing Project - Comment

DM

Darrel Menthe <dmenthe@sagelawpartners.com>

Mon 12/20/2021 3:47 PM

👍 ↩ ⏪ ➡ ⋮

To: Anderson, Jeff; community@ccpmanager.com

This comment regards the Apple Crossing Project at 8825 National Boulevard, partly in the City of Culver City.

I am the President of the Culver City Downtown Business Association, but I am submitting this comment in my individual capacity only. It has come to my attention that in its current configuration, the Apple Crossing project may direct additional traffic onto Washington Boulevard. Additional automobile traffic on Washington Boulevard should be considered carefully, because it may exacerbate an already complex and crowded automobile traffic situation downtown. I believe it is wise to divert as much traffic to Venice Boulevard in order to improve automobile access to the Culver City downtown area, especially during the morning and evening rush hour period.

I understand that there is a proposal to add a traffic light on Venice that would help in moving traffic towards Venice Boulevard. That addition would surely be popular with local residents in the Downtown neighborhood (where I live as well as work) as well as in the Arts District on Washington Boulevard. I think I speak for many when I say that I hope Apple's integration into downtown Culver City continues to be successful, and I think this addition to the project (better access from Venice Boulevard) will help make it so.

Regards,

Darrel C. Menthe



9696 Culver Boulevard | Ste. 301 | Culver City, CA 90232 | Direct: [310.601.1200](tel:310.601.1200) | Mobile: [310.770.2830](tel:310.770.2830)

Main: [310.388.4870](tel:310.388.4870)

| Fax: [310.388.4871](tel:310.388.4871) | dmenthe@sagelawpartners.com | www.sagelawpartners.com

[Reply](#) | [Reply all](#) | [Forward](#)

Apple Crossing project notes

DG

Dylan Gottlieb <dylan3d@gmail.com>

Mon 12/20/2021 12:42 PM



To: Anderson, Jeff; community@ccpmanager.com

The Apple project is literally across the street from the Metro station. 1250 parking spaces goes against the entire TOD vision. Both the City and the developer need to be forward thinking and strategic in mobility options. What was presented showed car centric thought processes that will undoubtedly cause future gridlock and frustration for everyone involved. Be innovative, think outside the box.

The developer needs to work with the Move Culver City vision. No incoming or outgoing cars should be permitted on Washington. There should be protected bike paths around the entire complex. There should be ample bike parking on-site for their employees with space allotment considered if the demand for bike racks grows.

Don't create a dead unused block for the community. If you're creating a corporate park, integrate it with the neighborhood. Be a good neighbor, add ground retail and community spaces along the sidewalks.

Note for the City: As we continue to build more and more office buildings without balancing out the need for housing, Culver City is guaranteeing further escalation of traffic and congestion. It is unfortunate the Foundation Office space kitty-corner to this development decided against their original plan for housing. This would have provided many future employees an option to live and work locally. We need to think holistically about future development.

Foundation Office Park:

<https://urbanize.city/la/post/office-campus-takes-shape-next-helms-bakery-district>

original concept:

<https://urbanize.city/la/post/mixed-use-project-planned-near-helms-district-and-culver-city-station>

As we further develop the TOD area please create a safe, protected and convenient bike plan for connecting the expo bike path from where it currently ends behind the Co-op, to where it begins again across the street from Venice. That path is integral to mobility in this area, more people are likely to use alternate forms of transportation if the infrastructure works. It's a shame this was not considered during the construction of the metro E-line. Now is the time to correct this. Everyone from Culver City's workforce to their family members should feel safe riding through (or over?) these large intersections.

Thank you.

⏪ Reply all ▾ 🗑 Delete 🚫 Junk Block ...

Apple Community Meeting

EZ

ELizabeth Gibbs Zehnder <123egz@gmail.com>

Mon 12/6/2021 7:05 PM

To: Anderson, Jeff

👍 ↶ ⏪ → ...

Hi Mr. Anderson,

I live in the Arts District. I am so excited about the new single traffic lane with dedicated bus and bike lanes. I am VERY concerned about the impact this project will have on traffic congestion on Washington Blvd. PLEASE consider adding a traffic light on Venice

+peace,

Elizabeth Gibbs Zehnder

writing from traditional Tongva, Chumash & Kizh land in the Santa Monica Bay watershed

pronoun: she/her [\(Why is this important?\)](#)

[Reply](#) | [Forward](#)

Anderson, Jeff

From: Erik <erik@emarstudio.com>
Sent: Thursday, December 9, 2021 12:28 PM
To: community@ccpmanager.com
Cc: Anderson, Jeff
Subject: Apple complex at Venice/National

Hi,

I attended the Zoom meeting this past Monday on the proposed Apple complex fronting National Blvd. between Venice Blvd. and Washington Blvd. I am a resident and small business owner in the Helms Arts District and would like to have the following added to the list of comments by local residents.

- **Housing.** The project should include a housing component, including affordable units. While the Culver City zone may not allow for housing without a variance, the C2 LA City zone does allow for housing. This was a common request from the various participants, and it is the most important one for me. While this will require a reworking of the pro forma and will require resubmittal of the entitlements package, perhaps Apple's \$200 billion in cash on hand will be sufficiently large to accommodate the additional work.

- **Sustainability.** The developer says the project will meet LEED Gold equivalent standards and will be powered by "100% renewable" energy. While official LEED certification may not be desirable due to the additional costs and time associated, there are a few points to be made regarding this proposal:

- a. Because CA Title 24 is so strict, virtually all new buildings meet LEED Silver standards for Energy & Atmosphere (arguably the most important category) just by meeting code. Gold is only one step above. For a prominent project such as this, with a client who loudly proclaims their sustainability bona fides at every opportunity, LEED Platinum should be a minimum, and Net Zero should be the goal.
- b. The developer should be clear about exactly how the project is Gold "equivalent". If it meets, for example, the Sustainable Sites criteria, but does not meet the E & A or verification credit criteria, it is a very weak equivalency.
- c. The 100% renewable energy claim is also ambiguous. Does this simply mean that they will purchase their electricity from 100% renewable sources (e.g., Culver City's Clean Power Alliance)? Or does it mean that the building will be 100% electrified, with no fossil fuel use for water heating or forced air heat? Although purchasing 100% renewable electricity is a good step, a better step would be to do that in addition to offsetting a reasonable percentage of calculated energy use with in-site solar, with the elimination fossil fuels entirely from the building.

- **Parking.** The developer says that they are meeting applicable parking codes. Does this mean that they are at the minimum, or do they exceed it? Also, it is likely that we as a city will soon be over-parked, with too much parking availability to meet demand. When and if this occurs, what will happen to the large amount of space that the project aims to devote to parking? Can it be retrofitted to accommodate other uses? Obviously, this is a very difficult issue to resolve, due to the confluence of different space, construction type, egress, and light/ventilation requirements for B and S occupancies, and it will likely require a reworking of the building massing, to allow for more light and air shafts down to the underground levels. Regardless, I believe that all new buildings with underground parking should be addressing this issue. If the developer chooses to address it by disregarding it, that's their right, but they should state so explicitly.

- **Sustainability (part 2).** During the comments period for both the design and EIR presentations, local tradespeople made the case for local contracting and hiring for the construction phase. I would like to reinforce this and make it a verifiable requirement, not simply a show of "good faith" efforts as is common. Local hiring not only reduces traffic, and therefore carbon, impacts during the construction period, but it also provides multipliers for the local economy, thereby recouping some of the tax and other breaks that the developer has probably negotiated with the municipalities, without adding much, if anything, to the construction budget.

Thanks for your attention,
Erik Mar
3341 Helms Ave.
Culver City, CA 90232

Project Crossings (Apple Building) #1

EP

Erik Paesel <epaesel29@gmail.com>

Sun 12/19/2021 10:44 PM

To: Anderson, Jeff

Hi Jeff,

I hope you are well. I attended the Dec. 6th meeting. I hope at the next meeting that everyone will be able to see the attendees names. Since it's a public meeting. If we were in an in-person meeting we would be able to see everyone.

That's actually pretty shady taking advantage of the Covid Pandemic and a Zoom format to conceal attendees.

It's also disingenuous to say they alerted everyone. What is the rule 1,000 feet from the project they have to flyer? From the corner of National / Washington Blvd that probably doesn't reach Helms. I know no one in our neighborhood(Arts District) got a flyer from them. If they're genuine in their desire to reach the community then they would flyer our neighborhood; the Arts District and even Rancho Higuera Neighborhood and not just throw up their hands and say well we did what's in the rules. That's a cop out.

Also the huge amount of parking is a disaster in a building that is part of TOD project and next to a train stop. Again it's Culver City's rules..but the rules need to be changed. Especially when it's a TOD project. There should be parking maximums, not minimums.

And finally the majority of the employees coming to the building will be coming down Washington Blvd. As it is now you can't access the Venice entrance West bound and the entrance on National is going to be useless...even the developer from Ivy Station pointed that out.

They should break the median on Venice and install a traffic light there so both East and West. bound commuters can access the parking from Venice Blvd.

Thank you,
Erik Paesel
Culver City Resident

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Apple Campus

GB

Gillian Brecker <gillian@slackorama.com>

Mon 12/6/2021 5:32 PM

To: Anderson, Jeff; community@ccpmanager.com

    ...

Hello,

I will be attending the community meeting this evening regarding Apple's intention to have traffic to its new campus flow in from Washington Boulevard. In advance of the meeting, I would like to inform you that I do not wish for any additional traffic to be directed this way. I own a home in the Art District and already feel traffic in our area is awful. Please do whatever you can to make sure Apple will use Venice Boulevard for entry.

Thank you,
Gillian Brecker

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GREGORY GORMAN

Gorman Partners, LLC

(310) 770-3291

DrGGGorman@gmail.com

<https://www.linkedin.com/in/gregorygorman/>

GormanPartnersllc.com

5610 South Garth Ave

Los Angeles, CA 90056

Via Delivery and Email

Jeff Anderson, Contract Interim Current Planning Manager
City of Culver City Current Planning Division, 2nd floor
9770 Culver Boulevard, Culver City, CA 90232 Phone: (310) 253-5727 E-mail:
jeff.anderson@culvercity.org

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DEC 20 2021

**Culver City
Planning Division**

PROJECT TITLE: Project Crossings

APPLICANT/OWNER: Culver Crossings Properties, LLC

PROJECT ADDRESS: 8825 National Boulevard and 8771 Washington in Culver City, California, 90232 (Culver City Parcel); and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in Los Angeles, California, 90232 (Los Angeles Parcel)

Dear Mr. Anderson:

This letter is written on behalf of an association of concerned individuals sometimes referred to as the Arts District Residents Association of Culver City ("Residents Association"). These associations are comprised of members of the Culver City community who are concerned about the above-referenced Project. Accordingly, set forth below are some of the issues we believe should be included within the scope of the Project EIR.

The Project's EIR is to examine all phases of the proposed Project, including planning, construction, and operation (14 CCR 15161). We respectfully remind the City that it must provide a reasonable description of the nature and magnitude of all significant impacts if the EIR is to survive judicial scrutiny and that the failure to do so on one area may lead to the invalidation of the entire Project EIR. See *Sierra Club v. County of Fresno* (2018) 6 Cal. 5th 502.

We have reviewed the Initial Study for the Project, the Notice of Preparation of An Environmental Impact Report and attended the scoping meeting held in connection with those documents. Since this comment letter is to identify issues to be reflected in the EIR, we do not delve into all of the details, analyses, facts and figures supporting our concerns but will gladly share them with the City during the EIR process. This letter is directed to identifying the potential environmental impacts of the Project and issues and alternatives which should be addressed in the EIR in addition to those previously identified, which we list as follows:

1. Literally all of the streets in the area commonly referred to as the Arts District are cul-de-sacs and all of the neighborhood's ingress and egress relies on Washington

Boulevard. The amount of traffic contemplated to utilize the Washington Boulevard entrance will undoubtedly have a severe impact on this neighborhood, whose size is not insignificant relative to the overall population of Culver City. Traffic management, increases in time of trips and access to emergency services must be considered. It should be noted that as currently designed, the large majority of the Project is located in Los Angeles while the overwhelming impact of traffic would be borne by Culver City. It is our understanding that the Applicant/Owner is aware of our desire that this entrance be relocated.

2. Many elements of the Project appear to be inconsistent with the Culver City Transient Oriented Development Visioning Plan. The City's complete streets policy is of particular import.
3. The unique cultural and architectural aspects of Culver City that are to be protected as recognized in the Revised Community Vision, Core Values and Guiding Principles. Will there be sufficient community space? Will the architecture of the Project be consistent with that of Culver City's Values? We are also concerned about the compliance with the City's Bicycle and Pedestrian Action Plan.
4. It is currently estimated that the Project will generate an additional 3,000 jobs. Given the size of Culver City, this will clearly have an impact on the price and availability of housing. This is especially significant if many of the new employees locate within a close radius of the Project, which is likely given efforts to increase reliance on public transit, bicycles and walking. We believe the Project may be attempting to shortcut the system by using a CEQA Mitigated Negative Declaration with respect to housing as set forth in the Project's Initial Study.
5. As discussed above, we attended the Scoping Meeting held December 6, 2021. During this call a variety of residents and interested parties forwarded a host of well thought out concerns about the project. Culver City possesses a transcript of the meeting. We request that those comments/concerns be incorporated here and be addressed in the EIR as well.

We are excited about the Project and look forward to making sure that its impact on Culver City is as positive as possible.

Very Truly Yours,


Gregory G. Gorman, Esq.

Cc: Arts District Residents Association

Project Crossings

Heather Witt <heather@thehouseagents.com>

Mon 11/8/2021 10:27 AM

To: Anderson, Jeff <Jeff.Anderson@culvercity.org>

Hi Jeff,

I am not sure if you drive or live in this area, but it is completely unnavigable at this point. They are turning Washington into a single lane and it was awful with 2 lanes. We can't add any more buildings unless we can be sure to have at LEAST 2 lanes (but we need 3) of traffic in all streets in and out of the area.

Any previous reports would have been completed before the full impact of the buildings opening in this area and are therefore not applicable to the reality of the traffic congestion. Our streets are at their max capacity now and unless this complex can find a way to make throughways in the area, I don't see how this building can be added.

Thanks so much,
Heather Witt homeowner at
3158 Hutchison Ave,
Los Angeles, CA. 90034



Heather Witt
Rodeo Realty Fine Estates Beverly Hills
Phone: [310-948-9000](tel:310-948-9000)
DRE#: 01853528
heather@redsonrodeo.com
www.redsonrodeo.com

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LOSE BUS LANES ASAP. BRING BACK OUTDOOR DINING

JB

Jay Blumenfield <jay@jayandtonyshow.com>

Mon 12/6/2021 9:59 AM

To: Anderson, Jeff

Cc: community@ccmanager.com; Jaclyn Lieber <jslieber@me.com>

    ...

You guys need to lose these bus lanes. They are screwing up traffic and are dangerous. I have hit the barriers several times and i actually know they are there!

Also please bring back the outdoor eating in downtown. IT was the best part about Culver City and should continue all year around.

And we need light on Venice to accommodate cars from all directions.

Jay Blumenfield
Sherbourne Drive
Culver City
310 994 3769

[Reply](#) | [Reply all](#) | [Forward](#)

Apple and Washington traffic plan

JL

Jeremy London <jeremy.london@gmail.com>

Sun 12/5/2021 2:41 PM

To: Anderson, Jeff

    ...

Hi there!

I am writing to you about the current proposal for Apple's new 550,000 sq ft office on the corner of Venice and National. Based on my current understanding, the plan is to have all westbound traffic to this new office building come down Washington Blvd.

As an Arts District resident, this worries me greatly. With the recent changes to Washington Blvd, rush hour traffic is already even more of a disaster than it was previously, since the road was reduced to 1 lane in each direction. Arts District residents depend on Washington blvd to leave/return to their homes. We literally have no other way to get to our house!

To put it in a way Apple could understand, Washington Blvd has already been turned into "the world's thinnest" thoroughfare. The headphone jack has already been removed. There are no ports/inputs. We simply can't have more cars clogging up Washington, preventing us residents from getting to/from our houses!

There appears to be a counter proposal to have the entrance to this monstrosity placed on Venice Blvd, which seems to make a lot more sense seeing how the vast majority of this building will be on Venice. This is a much more sensible way to handle this new building, and I STRONGLY suggest you consider it instead.

Thank you very much for your time.

—Jeremy London

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Re: Urgent light needed on Venice for Arts District Apple Project Crossings

JW

Jillian Windfall <jillian.windfall@gmail.com>

Mon 12/6/2021 8:49 AM

To: Anderson, Jeff; community@ccpmanager.com

    ...

Hi Jeff

Please note:

Apple Employees & Associates will not get to work on time if entering from Washington Blvd.

At this time:

The new single lane system on Washington is extremely crowded to the maximum Westbound in the mornings.

I respectfully submit:

To facilitate entering Apple parking lots:

A new Light is URGENTLY needed at:

Venice & The Access Alley,

East of Building 2.

This will optimize the traffic flow in all directions for all concerned.

We would appreciate your exploring this as a viable option.

Thank you in advance for your kind & wise attention in this timely matter.

Respectfully,

Jillian,

Arts District Residents Association

[Reply](#) | [Reply all](#) | [Forward](#)

 Reply all   Delete  Junk  Block ...

Apple's submittal for parking entrance on Washington Blvd..

JB

Jim Berland <jim.berland@berlandtech.com>

Wed 12/15/2021 9:53 AM

To: Anderson, Jeff; commuynity@ccpmanager.com

    ...

Re: Apples plans for their new Venice and National Parking routes:

This does not seem like the best planning. They have taken an already narrowed street and proposed another stoplight and driveway for buildings that are located on Venice Blvd, also directing all Westbound traffic to their Venice Blvd. buildings, down Washington. Given the wideness of Venice, and the traffic patterns, it would seem far more thoughtful to build a left turn lane with a light that would be coordinated to the long open periods from Eastbound Venice traffic, which results from the already operational light at National.

Please know that my wife and I share these strong feelings. Wee are exited by and supportive of the Washington Blvd. changes with the bus and bike lanes, and don't want to have them undercut by the Apple plan.

Sincerely,

Jim and Brenda Berland
3330 Sherbourne Drive
Culver City, CA 90232
residents 46 years.

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Re: Apple meeting #2 - Recording of the meeting

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KS

Karim Sahli <public@logicalnot.com> ...

Tue 12/21/2021 9:26 AM

To: Anderson, Jeff

Mr. Anderson,

Thank you for the link.

Another of my email may be stuck in the spam folder as well.

I also sent you a question via email on Dec. 14th.

Here's the content of the email :

- -

Mr Anderson,

I appreciate your expertise and maybe you can help me with those two questions:

1/ Is the Apple Crossing project technically part of the TOD vision? I heard everything within 500ft of the metro station is considered TOD. Is this accurate?

2/ What are the parking requirements for the TOD? What are the parking requirements for the rest of the City?

Thank you so much for your time.

Best regards,
Karim Sahli

- - -

Again, thank you for your time.

Best regards,
Karim Sahli

Apple Complex Questions/Concerns

Karl Herbst <kherbst@me.com>

Tue 12/7/2021 10:31 AM

To: Anderson, Jeff <Jeff.Anderson@culvercity.org>

Jeff,

Thank you for the presentation last night for this proposed project.

I think a statement was made that the VMT study would be negligible given proximity to the Ivy Station. Did I hear that correctly? If so, how is that calculated? Given that the parking looks to be about 45% of the total capacity of the complex shouldn't the study include an assumption that roughly 50% would travel by car to see the worst impact vs the best?

I'm also not one of the members of this community that is on the hunt to penalize those who need to commute by car which seems to be the push by many. Not everyone can commute by bike and train, that's just nonsense. The mass transit in LA is not ready to deal with how all the employees of this new complex will most likely need to travel even with the train/buses as is and not everyone can live close to their job. So I'm more concerned that there will not be enough flow for traffic and not enough parking so people will start parking on side street neighborhoods creating additional neighborhood traffic and more congested parking along those streets. We already see this in other areas of the community and the Move project at this stage has only made things worse along Washington, this complex will most certainly make things even worse on Washington.

Can part of the study include undoing the Move project on that side of town in conjunction with an assumption that 40-50% of employees will travel by car?

Given the intent to have only two access points for parking underground, do we know if those two structures will be connect? I can see an issue with the entrance on Venice that will then push more cars down National, so will those cars be able to enter on National and have access to all the available parking?

The 10 Freeway will be one of the main arteries for those traveling by car, is part of the impact study going to be if the roads and access to the 10 needs to be upgraded and expanded? It's already over capacity as is.

Thanks,
Karl Herbst

Kathryn Pellman <kathryn.pellman@gmail.com>

Wed 1/12/2022 6:00 PM

To: Anderson, Jeff; Manager Ccp <community@ccpmanager.com>

Hi Jeff,

I thought the last meeting was informative and I hope it is not too late for public comment. These are a few items that I would like addressed.

- I'm glad to learn that the sidewalk on the east side of National is being widened. The should be the standard going forward and not be considered "special". If we want people to use public transportation and become a more walkable City, the sidewalks need to be wide enough for people to comfortably pass by each other.
- I would like to challenge Apple to become part of our community with their presence and building becoming a welcome asset. They are a prominent company that can and should set the standard for future development. For example:
 - The space Amazon has designated for community use is simply not large enough to be significant. It should be at least the size of the outdoor space designated for their employees. Los Angeles is eventually going to become more a vertical city whether the current residents like it or not. That means that more people will be living in housing that does not have outdoor space in a city that does not have a lot of neighborhood parks. I would like to see them propose an outdoor public, park like space for the community. A place where people can casually gather outside, have a picnic, enjoy the outside, a respite from a busy city...It should have a lot of usable green space, benches, picnic tables, shade, perhaps public art, a water feature...I would like to see Apple be creative and do something that would set an example of what a company can do for a City. I invite them to visit Reynier Park which is a small neighborhood park without anything fancy to see how the local community uses the park as a casual gathering place and to with families picnicking and kids running around. As someone who was instrumental in cleaning up the park so it could be comfortably used by the local community, it has been amazing to see just how much a local park is used and needed. I understand that they would be losing square footage and would prefer their building be a story higher to accommodate more public space. Perhaps, they could consider a rooftop garden outside space for their employees.
 - I would like to see Apple contribute and be part of our community. On a small scale, the underpasses (National Blvd., Bagley and Cattauragus) could certainly benefit from murals and better lighting to feel more inviting to people who want to walk or bike to DT Culver City. Perhaps, do something with the local schools...I am open to their ideas.

Sincerely,

Kathryn Pellman
8937 Hargis Street
Los Angeles, CA. 90034

Reply **Reply all** **Forward**

Anderson, Jeff

From: Lori Garcia <lbgarcia2012@live.com>
Sent: Monday, December 20, 2021 7:48 PM
To: Anderson, Jeff
Subject: RE: EIR Comments on Project Crossings

Dear Jeff,

I know it is after the deadline, and embarrassingly MANY errors in my comments, so would like to correct/elaborate on two comments which are important.

“My point with the questions is there are so many projects, I haven’t even listed ones on National, so there is no way a traffic study could reflect real data.” ***“National” is incorrect. I meant “Washington”. I am not sure how many and what kind of projects are currently being built.***

“Our City is on the verge of upzoning on the falsehood that it will create equality. Nowhere is it stated in SB 9 and 10 that this is a requirement. Housing needs to be included onsite, without parking. The City needs to “put their money where their mouth”. ***I did not include that SB9 and 10 do not require affordable or low income.***

This project is wrong on so many levels. I was very impressed with my neighbors’ insight and suggestions. Just one example brought up by a participant: the developer is touting “gold equivalent” LEED (I am assuming LEED). What is “equivalent”? Same participant questioned “net zero” with examples why this project is not. His questions were valid. Are we being fed “developer speak”?

Again, please extend the comment period. There seems to be a big rush, which reminds me that Culver City is the “lead” on this project not the City of LA, which actually has a larger parcel. Makes sense, Culver City seems to rubber stamp all projects; City of LA takes forever to approve.

Sincerely,

Lori Garcia

Sent from [Mail](#) for Windows

From: [Lori Garcia](#)
Sent: Monday, December 20, 2021 5:28 PM
To: jeff.anderson@culvercity.org
Subject: EIR Comments on Project Crossings

Dear Mr. Anderson,

I would like to ask for an extension on comments on the EIR for Project Crossings. It is five days until Christmas and the timing of this and other Culver City matters not thought out for a lack of a better words. I have 35 minutes to submit.

Two community meetings and I missed the first. I participated in the December 6, 2021 Community Meeting and EIR Scoping Meeting. To ask for comments before or on December 20 seems very tight especially considering the time of year.

I do not have time to look at the initial findings so will go off my notes from the Zoom meeting.

National Blvd will be the “front door” of the project per Mr. Ames. From the rendering, I can barely tell that will be the main entrance. (Smoke and mirrors.) There is only one other way to ingress which is on Washington.

I live on Wesley near Washington and the Move Culver City has already caused a massive, yes massive amount of traffic. (Helms and Schaefer have no left turns at certain times. Once again, Wesley is prohibited for any kind of mitigation due to the Turning Point School on the corner.

When will Amazon employees start at their new facilities on the Culver Studio lot. When will HBO move into their new offices on Washington and National. How many people are currently renting apartments at the Ivy? How many are currently not occupied? How many tenants are currently at the office building on National and Venice? How many square feet are still not leased?

My point with the questions is there are so many projects, I haven’t even listed ones on National, so there is no way a traffic study could reflect real data.

The project has been given some kind of exemption because it is across the street from a Metro station. Cut out at least half of the parking and I might believe public transportation should be factored in.

I am running out of time, so the next big issue is housing. I cannot quote from what the City wrote but stated no impact on housing as there is not housing onsite.

Our City is on the verge of upzoning on the falsehood that it will create equality. Nowhere is it stated in SB 9 and 10 that this is a requirement. Housing needs to be included onsite, without parking. The City needs to “put their money where their mouth”.

I am running out time, but have serious questions why Trammel Crowe is dictating how community meetings are run, etc. Once again, I ask for an extension.

I do not have time to proof so assume there are errors.

Sincerely,

Lori Garcia

Sent from [Mail](#) for Windows



T 510.836.4200
F 510.836.4205

1939 Harrison Street, Ste. 150
Oakland, CA 94612

www.lozeaudrury.com
richard@lozeaudrury.com

Via Email

November 5, 2021

Jeff Anderson, Planning Manager
Current Planning Division
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232
jeff.anderson@culvercity.org

City Clerk
City of Culver City
9770 Culver Boulevard, 1st Floor
Culver City, CA 90232
city.clerk@culvercity.org

Re: CEQA and Land Use Notice Request for Project Crossings (SCH 2021110079)

Dear Mr. Anderson and City Clerk:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the project known as Project Crossings (SCH 2021110079), including all actions related or referring to the proposed construction of two four- to five-story buildings that would provide a total of 536,000 square feet of new office floor area, with a total of 1,215 vehicular parking spaces provided within two separate three-level subterranean garages under each proposed building, located at 8825 National Boulevard and 8771 Washington in the City of Culver City, and 8876, 8884, 8886 and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in the City of Los Angeles ("Project").

We hereby request that the City of Culver City ("City") send by electronic mail, if possible or U.S. mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:
 - Notices of any public hearing held pursuant to CEQA.
 - Notices of determination that an Environmental Impact Report ("EIR") is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
 - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
 - Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
 - Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
 - Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.

November 5, 2021

CEQA and Land Use Notice Request for Project Crossings (SCH 2021110079)

Page 2 of 2

- Notices of any addenda prepared to a previously certified or approved EIR.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which require local counties to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please send notice by electronic mail or U.S. Mail to:

Richard Drury
Stacey Osborne
Molly Greene
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
richard@lozeaudrury.com
stacey@lozeaudrury.com
molly@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Molly Greene
Lozeau | Drury LLP

Apple Project plan

MT

Martin Taube <martintaube94@gmail.com>

Sat 12/4/2021 6:23 PM

To: Anderson, Jeff



Hello Jeff!

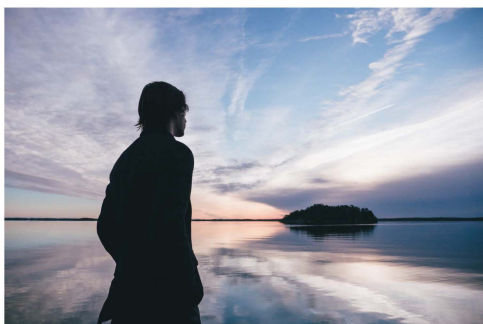
It's just come to my attention that the construction of the new apple campus on Venice and National is planning on rerouting traffic from Venice down onto Washington.

That's going to lead to a massive increase in traffic on a road that's already been reduced to a one lane.

I instead suggest and urge there to be a green light installed on Venice during construction.

--

Martin Taube | Director - Cinematographer | (941) 763-9426 | martintaube.com



Cinematographer | Director | Martin Taube

Martin Taube is a Los Angeles | Stockholm based Cinematographer and Director working in commercial and narrative film.

martintaube.com

[Reply](#) | [Forward](#)

Anderson, Jeff

From: Mary Daval <marydaval@yahoo.com>
Sent: Monday, December 20, 2021 2:33 PM
To: Anderson, Jeff; community@ccpmanager.com
Subject: Culver Crossings

Some thoughts re: the new “Culver Crossings” development:

1. To suggest that adding 2500-3000 new jobs without adding any new housing will have no environmental impact on the community is absurd. Where will those workers come from? How will they arrive? Instead of wasting money on catacombs full of car parking raise up a floor or two (I know you will have to get permission—at least give it a try!!!) and include some housing. We are in a housing crisis. To allow a project of this size that does not contain housing is completely irresponsible.
2. Do not allow right in , right out access on National. The right out will be fine but right in means all of those cars will come from Washington. All cars should be arriving via Venice Blvd
3. You say you want a “pedestrian oriented streetscape” and “walkability” but you showed us was not inviting to pedestrians. Where will they go? Is it just employees taking a stroll on their break? You must include ground level retail/restaurant to invigorate the street level. It needs to be infrastructure that invites a mix of community and employees otherwise you are just building an Apple silo. We don’t want or need that! Please make this a mixed use projective if the majority of space is office please include ground floor retail/restaurant and housing . Less car parking!
4. We need a scramble crosswalk at Washington/National
5. Way too much car parking. Not enough bike parking and not enough HOUSING
6. Will the proposed shuttles be electric? What exactly will their routes be? How big will they be? What hours will they operate? Who will train the drivers? Without having specifics , I don’t see this as an asset but rather as a detriment— just another entitled motor vehicle on the road that cyclists and pedestrians will have to avoid.
7. Fancy sidewalks are not parks, although having lots of trees is great!
8. Please include a green roof.
9. In a short while our new GPU will be finished. I know we can’t hold developers to a standard that does not yet exist, however, I find this concept to be contrary to so much of what is in the new plan, which I find disturbing.

Thank you very much and I look forward to additional community meetings

Mary Daval

Jacqueline De La Rocha

From: Michael Monagan <michael@monagan.com>
Sent: Friday, November 19, 2021 8:22 AM
To: Anderson, Jeff
Subject: Apples mistake

Mr. Anderson,

I have lived in the CC Arts District for 20 years and watched as the traffic on Washington has gotten worse and worse. Apple's idea of directing their traffic to Washington is a mistake. They need to used Venice and install a new traffic light there.

Sincerely,

Michael Monagan

--

monagan.com

Apple/Project Crossings comments

OL

Olga Lexell <olga.lexell@gmail.com>

Mon 12/20/2021 11:03 AM

To: Anderson, Jeff; community@ccpmanager.com

Hi Jeff,

Since the SORO NC has not been able to take up this project for official comment, I am reaching out to comment as an individual.

I have a few concerns about this project. In addition to the impact it will have on housing within my neighborhood directly north which has a lot of low income tenants, I have general environmental review thoughts:

This project is less than 500 feet from a major Metro station. More than 1200 parking spots is far too much. As someone who works in entertainment in Culver City at an adjacent office, people working at this office are very likely to live in the surrounding area and should be encouraged to bike, bus, or take the train to work. We simply don't have the bandwidth to safely introduce 1200 cars to this environment. We are in the middle of traffic CALMING measures and we want to keep it that way. If Apple wants to have 1200 parking spots, they should consider building their office somewhere that isn't next door to a Metro station. This environmental study needs to account the MOVE Culver City project by encouraging people to bike to work -- we need much more bike space here than is currently being planned, because that number is ridiculously low. There should be at minimum 2,000 bicycle spots for 3,000 employees, and Apple should seriously consider subsidizing company bikes and offering other public transit and biking incentives. We also need improved pedestrian safety measures such as additional crosswalks ie. on National, and at National & Washington. The drop-off station at National needs significant improvements in order to be safe for pedestrians and cyclists -- it currently prioritizes cars. Apple must add protections to the existing bike lanes to make sure cyclist commuters are not impacted by this construction.

Additionally, this is an area people go to to eat and shop. It would be nice if there were space for a restaurant or retail on the premises so that residents in the area receive some kind of benefit to having such a massive office space next door that is surely going to displace low income folks as Apple employees move into the area (just like what happened with Sweet Green HQ). Culver Studios agreed to these arrangements, and has far less money than Apple. We cannot create a corporate park at a major Metro station that offers no retail.

The park included in the plans should be accessible to the public. This construction is going to be a massive burden to the residents of this area, and in order to gain their support, there need to be tangible benefits to them. HBO's office allow the public access to their parklet space.

 Reply all   Delete  Junk  Block ...

Culver City Apple Project

RC

Roman Chiu <romanchiu@gmail.com>

Mon 12/6/2021 5:31 PM

To: Anderson, Jeff

Cc: community@ccpmanager.com

    ...

Hi,

I'm writing to express concern about the Apple project on National. While I'm generally in favor of the project and do support it, a few things come to mind.

- 1) traffic on Washington is tough. TOD visioning and Move Culver City have worked hard to prioritize alternate modes of transportation. Please have main entrance on Venice.
- 2) please have wide sidewalks. Prioritize pedestrians and have 10' sidewalks for people, families and accessibility.
- 3) please consider ground floor retail to further enliven this part of town!

Thanks and looking forward to seeing the plan.

Roman

[Reply](#) | [Reply all](#) | [Forward](#)

Re: Project Crossings Community Meeting & EIR Scoping Meeting Confirmation

RW

Ryan Wolfe <vandywolfer@gmail.com>

Mon 12/6/2021 12:04 PM

To: Anderson, Jeff



Jeff,

I live on Sherbourne Drive in the CC Arts District and I wanted to urge that the city use it's planning and approval process to complement the Move CC project by actively diverting traffic away from Washington Blvd. The proposal to add a light on Venice Blvd seems like a good way to accomplish that. This is in reference to National/Washington development in which Apple's developer is proposing to utilize Washington Blvd. for ingress/egress.

We are homeowners since 2016 with our kids in CC schools. I am a Public Defender for LA County and my wife is a PhD student at the Rand Corporation. We're excited about both Apple's arrival and Move CC, but it has certainly impacted our ability to get places by vehicle when needed. We're being patient and looking forward to the payoffs from this investment, but also looking for the city to utilize the leverage it has to make the project a success.

Thank you.

Ryan Wolfe

vandywolfer@gmail.com

310-569-1778

www.linkedin.com/in/ryanwolfe

On Sun, Dec 5, 2021 at 8:41 AM Jeff Anderson <no-reply@zoom.us> wrote:

Hi Ryan Wolfe,

Thank you for registering for Project Crossings Community Meeting & EIR Scoping Meeting.

Please submit any questions to: jeff.anderson@culvercity.org

Date Time:

Dec 6, 2021 06:00 PM Pacific Time (US and Canada)

-->

Join from a PC, Mac, iPad, iPhone or Android device:

[Click Here to Join](#)

Note: This link should not be shared with others; it is unique to you.



TECHNICAL MEMORANDUM

Date: December 17, 2021

To: Steve Webb, Principal – Tilles Webb Kulla & Grant

From: Ryan Kelly, TE – KOA Corporation

Subject: Project Crossings Office Development – Environmental Impact Report Notice of Preparation Public Comments

KOA Corporation has performed a review of the Project Crossings office development (the “Project”) proposed by Culver Crossings Properties, LLC, at the following addresses in the Cities of Culver City and Los Angeles:

- 8825 National Boulevard in Culver City
- 8771 Washington Boulevard in Culver City
- 8876, 8884, 8886, and 8888 Venice Boulevard in Los Angeles
- 8827 and 8829 National Boulevard in Los Angeles

The City of Culver City, as Lead Agency, will prepare an Environmental Impact Report (EIR) for the Project pursuant to the requirements of the California Environmental Quality Act (CEQA). The City of Los Angeles will serve as a Responsible Agency. The City of Culver City is in the process of collecting public comments on the Notice of Preparation (NOP) in order to inform the environmental effects and alternatives that will be studied as part of the EIR. As part of our review, we have compiled a series of 10 comments for consideration by the City of Culver City, as detailed below.

I. PROJECT DESCRIPTION

The Project would consist of the construction of two new office buildings on a site that is currently occupied by low-rise warehouses that have been converted into retail and office space. The first new building would be located entirely within the City of Culver City and is proposed for 167,000 square feet of office space across four above-ground levels, with three levels of subterranean automobile parking. The second new building would be located entirely within the City of Los Angeles and is planned for 369,000 square feet of office space across five above-ground levels, with three levels of subterranean automobile parking. A connection may be provided between the two new buildings via a shared wall. The overall Project would provide 536,000 square feet of office space, which is intended to be occupied entirely by Apple, Inc. The Project would also provide 1,215 automobile parking spaces and 162 bicycle parking spaces. Vehicular access/egress is proposed from Washington Boulevard (one right-turn in only driveway), National Boulevard (one right-turn in/out only driveway) and Venice Boulevard (one right-turn in/out only driveway).

II. PUBLIC COMMENTS

As part of the EIR, it is critical that the City of Culver City evaluate the potential transportation- and parking-related impacts and effects of the Project on adjacent land uses, including those along Washington Boulevard in the vicinity of the Project site.

A. MOVE CULVER CITY PROJECT

The City of Culver City recently implemented a quick-build mobility lane pilot project in Downtown Culver City as part of the MOVE Culver City project. The Downtown Corridor project stretches for approximately 1.3 miles along Culver Boulevard and Washington Boulevard, between Duquesne Avenue and La Cienega Boulevard, and it includes the segments of Washington Boulevard west and east of National Boulevard in the direct Project vicinity. During the December 6, 2021 EIR Scoping Meeting, the Project's environmental consultant assisting the City with preparation of the EIR indicated that the Downtown Corridor project would be considered part of the existing condition in the Project's environmental analysis. Given that the Downtown Corridor project is still in a pilot program stage, we recommend the following:

1. Existing and future transportation analyses should be performed for both with and without MOVE Culver City Downtown Corridor project alternatives, given that the mobility lane project is in the pilot phase and is not guaranteed for implementation in the future. Analyses of the with MOVE Culver City Downtown Corridor project alternative should be based on transportation volume data collected following the mobility lane project implementation in 2021 (and not estimates from pre-implementation analyses).

B. WASHINGTON BOULEVARD NEIGHBORING PROPERTIES

Although all development projects should consider potential impacts to neighboring properties, this is especially true for the Project's potential impacts to neighboring properties along Washington Boulevard. The segments of Washington Boulevard west and east of National Boulevard have been altered dramatically due to the recent implementation of the MOVE Culver City Downtown Corridor project. As such:

2. A detailed analysis should be provided of the Project's potential impacts to land uses and businesses that take access from Washington Boulevard, along the roadway segments west and east of National Boulevard. These segments are currently affected by the MOVE Culver City Downtown Corridor project and would be most impacted by the Project's added vehicular traffic. If the Project is expected to add vehicle trips to segments of Washington Boulevard that presently have constrained access/egress conditions for neighboring properties, the Project should provide appropriate mitigation measures to maintain adequate access/egress for these neighboring properties.
3. Heavy vehicle access should be evaluated for neighboring properties, as well. The MOVE Culver City Downtown Corridor project has reduced capacity for automobile traffic flow along Washington Boulevard, west and east of National Boulevard. At the same time, the Project and other nearby development projects that are planned, proposed, under construction, or not yet fully occupied (i.e., related projects) will add substantial vehicle trips to these segments. The EIR analysis should determine if the cumulative impact of the Downtown Corridor project roadway modifications, Project traffic, and related project traffic would impede heavy vehicle access to neighboring properties along Washington Boulevard.
4. Vehicle queuing analyses should be performed at study intersections and neighboring property driveways along these segments of Washington Boulevard. The EIR should ensure that expected vehicle queuing does not hinder vehicles from entering and exiting neighboring properties.

C. PROJECT TRIP GENERATION

Development of accurate Project trip generation estimates will be a key element of the EIR transportation analysis. As such, we recommend:

5. The analysis needs to consider multiple independent variables for the development of the Project's proposed land use vehicle trips. While vehicle trip estimates for office uses are often made using gross floor area as the independent variable, it may be more accurate to use number of employees as the independent variable in this case.
6. Based on the Project description provided in the NOP, development of accurate vehicle trip generation estimates for the existing, on-site land uses may be difficult given the mix and conversion of land uses. The EIR should consider developing trip generation estimates for the existing, on-site uses based on empirical observations, if data are available. Given the conversion of on-site warehouse space into other land uses (e.g., office, retail), empirical data may provide a more accurate representation of existing vehicle trip activity than estimation using a source like the Institute of Transportation Engineers (ITE) *Trip Generation Manual*. The estimated trip generation for existing uses should be cross-checked against the existing use parking supply for reasonableness.

D. RELATED PROJECTS ANALYSIS

The Project is being proposed in an area surrounded by related projects that will reshape multimodal transportation operations in the local area.

7. A detailed accounting of related projects should be included in the EIR analysis. There are several large-scale related projects in the greater Project vicinity that are in various stages of development, so it will be necessary to understand each related project's entitlement and/or construction schedule. From a transportation analysis perspective, care should be taken in the generation, distribution, and assignment of related project vehicle trips along the local area roadway system. For example, if the existing land uses being replaced by a proposed related project were not actively generating vehicle trips during the collection of transportation data for the Project's existing conditions analysis, then no existing use trip credits should be applied for that related project.

E. PROJECT DRIVEWAY ANALYSIS

Based on the proposed Project access/egress scheme, the EIR should include a full analysis of driveway operations and safety.

8. Proposed Project driveways must be fully analyzed as part of the EIR. In addition to multimodal transportation operations and vehicle queuing analyses, the driveway configurations should be assessed in terms of safety considerations (vehicle-vehicle lines of sight, vehicle-bicyclist lines of sight, vehicle-pedestrian lines of sight, driveway spacing from local intersections and driveways, etc.). In addition, the EIR should evaluate potential secondary effects of the proposed limited-access driveway configurations. None of the proposed Project driveways would allow inbound or outbound left-turn movements. It should be determined if the lack of left-turn access/egress may result in Project-generated motorists attempting unsafe u-turn (or other) maneuvers in order to enter or exit the site.

F. PROJECT PARKING SUPPLY

As highlighted by many public commenters during the December 6, 2021 EIR Scoping Meeting, the Project proposes to provide 1,215 automobile parking spaces.



9. The EIR analysis should consider the effects of relaxing the off-street minimum parking requirements of the City's Municipal Code to allow for a reduced Project automobile parking supply. As a transportation demand management (TDM) measure, the reduced parking supply may result in the Project generating fewer automobile trips, as the lack of automobile parking may increase the attractiveness of alternative travel modes.

G. FREEWAY ANALYSIS CONSIDERATIONS

The EIR should evaluate potential impacts of Project vehicle traffic extending to the State freeway system.

10. Operations at surface street interchanges with the Interstate 10 (I-10) Freeway should be evaluated, especially as they relate to the Project's effects on vehicle queuing conditions. The Robertson Boulevard interchange and network of streets in its vicinity that provide primary access/egress to it are severely congested during weekday peak periods. This has been the subject of intense study by the State of California Department of Transportation ("Caltrans") and the Cities of Los Angeles and Culver City. The addition of Project-related vehicle trips at this interchange and surrounding intersections warrants detailed analysis.

Community meeting

VH

[Victoria Huang](#) <victoriahuang@gmail.com>

Mon 12/6/2021 5:19 PM

To: community@ccpmanager.com; Anderson, Jeff



Hi,

I'm hoping to attend tonight's community meeting regarding the development of Apple's new building and learn what is being considered.

In case I am not able to make it on time, I'd like to say that as a resident who lives on Sherbourne Dr I would strongly like to request that the development please consider having the main entrance and exit off of Venice Blvd. I commute on Washington blvd as the only way to get to my home and can say the traffic at Washington and National and other entry points like Robertson or Cattaraugus are already severely impacted.

Even at 5pm, I'll frequently find myself sitting at the light from National to Washington for at least 3-4 traffic light cycles trying to turn left to get home. With the recent decrease of lanes from the Move project, this has only gotten worse. Cars are now starting to get backed up to Venice from National now. I am concerned that any additional traffic from a large employer like Apple being directed to National or Washington would worsen an already overwhelmed street. Venice, being a large thoroughfare with multiple lanes, would make a lot more sense to this layman.

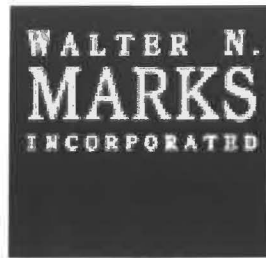
Thank you for your time and consideration of this local resident who will be directly affected by this development.

Victoria Huang

Sent from my iPhone

[Reply](#) | [Reply all](#) | [Forward](#)

Helms Hall of Fame
8758 Venice Boulevard
Los Angeles, CA 90034
Telephone: 310.204.1865
Facsimile: 310.836.2208
wally@wnmrealty.com



Walter N. Marks (1903-1997)
Founder
Walter N. Marks, Jr. (1930-2009)
Walter N. Marks III

Friday, December 17, 2021

Sent via Email

Mr. Jeff Anderson
jeff.anderson@culvercity.org
Interim Current Planning Manager
City of Culver City
Current Planning Division, 2nd Floor
9770 Culver Boulevard
Culver City, CA 90232

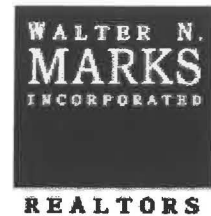
**RE: Notice of Preparation of an Environmental Impact Report – Project Crossings
City of Culver City Project Record Number: P2021-0272-CP/ZCMA/EIR
City of Los Angeles Case Numbers: CPC-2021-9506-CPIO-SP-SPR-WDI;
ENV-2021-9507-EIR**

Dear Mr. Anderson:

As CEO of Walter N. Marks, Inc., I appreciate this opportunity to comment on the Notice of Preparation of an Environmental Impact Report ("EIR") for the proposed Project Crossings office development ("Project") at 8825 National Boulevard and 8771 Washington Boulevard in the City of Culver City, and 8876, 8884, 8886, and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in the City of Los Angeles ("Project Site").

Since 1972, Walter N. Marks, Inc. has been the steward of the iconic Helms Bakery, an eleven acre campus, which has frontage on both Venice and Washington Boulevards, and abuts the Project Site to the east (see attached Exhibit 1). Since its inception in 1931 as the Helms Bakery, and the closure of bakery operations in the 1960s, the Bakery and then its collective community, the Helms Bakery District, has been reimagined as a dynamic and popular array of buildings with uses such as general retail, home furnishings, restaurants, office, and cultural programming.

The Helms Bakery buildings are separated from the Project Site by a heavily used, approximately 20-foot wide, two-way private alley (shown in attached Exhibits 1 and 2), which is accessible from Venice and Washington Boulevards and used for retail loading, deliveries, trash, and access to tenant businesses along with patron and employee parking.



While we are supportive of new development that contributes to the vibrancy of our increasingly walkable, mixed-use neighborhood, we are also aware that construction and operation of this large-scale Project adjacent to the Helms Bakery has potential to negatively impact our property, tenants, and customers. We, therefore, respectfully request that the following issues be assessed during preparation of the EIR:

PROJECT REVIEW

- **Roles of Public Agencies:** The Initial Study acknowledges that under the California Environmental Quality Act ("CEQA"), the City of Culver City will serve as the Lead Agency for this Project, and the City of Los Angeles will be a Responsible Agency. Given that the Project Site is within both cities (the majority is in the City of Los Angeles), it is of vital importance that both cities play an active role in reviewing and addressing Project impacts.

CONSTRUCTION

Impacts of Project demolition, grading, and construction activities are of paramount concern. These activities would occur within 20 feet of our buildings and adjacent to a heavily used, two-way private alley along the western edge of our property.

Impacts associated with all construction-related activities, including demolition, grading, construction, haul routes, traffic/circulation, air quality, noise and vibration, parking, safety, hazardous materials, and drainage should be evaluated in the EIR. The EIR should incorporate project design features and/or mitigation measures to address all identified impacts. Key construction-related concerns are as follows:

- **Vibration:** The existing 1930s-era, reinforced concrete Helms Bakery buildings (which are acknowledged as historical resources in the Initial Study) are susceptible to vibration-related damage, including cracking and damage to original skylights (which are particularly delicate). The Project applicant should implement all necessary measures to protect the Helms Bakery buildings from potential vibration-related damage during construction. The Project applicant should also monitor the condition of adjacent Helms Bakery buildings during construction and immediately cease/modify activities if vibration-related damage is observed.
- **Noise:** The Helms Bakery buildings include original single-glazed windows that face the Project Site. All feasible measures to shield our buildings from construction-related noise should be implemented.



- **Construction Schedule:** We request a copy of the construction schedule and request that all activities be timed to minimize disruptions for our tenants, visitors, and customers.
- **Closures of Streets, Lanes, and Sidewalks:** Complete street closures should be avoided. We also request that closure of individual traffic lanes be avoided to the extent feasible. If lane closures are necessary, we request advance notice of such closures so that we can plan our operations accordingly. We also request that accommodations be made to ensure continuous, secure paths of travel are available to pedestrians along all edges of the Project Site throughout the duration of construction activities.
- **Construction Management and Traffic Plan ("CMTP"):** As described in the Initial Study, a preliminary CMTP will be prepared during the entitlement process and a final CMTP will be published before construction commences. These documents will be subject to approval by the City of Culver City and City of Los Angeles. We request the opportunity to review and comment on these documents before they are approved.
- **Security:** The EIR should describe all security measures (including, and not limited to, fencing and surveillance) that will be implemented during construction.

TRANSPORTATION

- **Traffic:** While we are committed to a future that includes use of alternative modes of transportation, we recognize that many of our tenants, visitors, and customers rely on private vehicles to access our campus. The Project has the potential to add significant levels of new vehicular trips in this neighborhood, which should be carefully analyzed in the EIR. This analysis should account for the current striping of adjacent streets, including the recent changes made to Washington Boulevard as part of the MOVE Culver City initiative (which designated one lane as bus only and maintained only one lane in each direction for private vehicles), and assess if additional changes to lane striping are warranted. Recent changes to traffic signal timing should also be evaluated to ensure optimal traffic flow.
- **Site Access:** The Conceptual Site Plan (Initial Study Figure A-3) shows three driveways providing vehicular access to the Project Site. One of the driveways would be a right turn in/out driveway along National Boulevard. The other two driveways (including a right turn in/out driveway on Venice Boulevard and right turn in only driveway on Washington Boulevard) would serve a proposed Access Alley along the eastern edge of the Project Site, which would provide vehicular access to a Project garage entrance facing our campus. The EIR should evaluate the impact of limiting all Project Site access to right turn in (without a left turn in option) on existing and anticipated future traffic flow



in the vicinity. The EIR should assess if modifications to proposed Project Site access would allow for more efficient traffic flow. These modifications might include alternative driveway locations that better align with the signalized access to Ivy Station on National Boulevard and the signalized intersection of Washington Boulevard and Wesley Street, and accommodating left turns into the Project Site.

- **Access Alley:** The proposed Access Alley along the eastern edge of the Project Site is of particular concern because it is adjacent to, and would share driveways with, a heavily used, two-way private alley along the western edge of the Helms Bakery, which plays a critical role in our operations. We want to ensure the ability to continuously use our private alley is not compromised and that the new Access Alley does not create hazardous traffic conditions, especially at the signalized intersection of Washington Boulevard and Wesley Street. We would also like to better understand how the Access Alley will be used for deliveries and trash service. We are interested in working with the Project applicant to explore design and operational solutions that allow for safe and efficient use of the proposed Access Alley/existing private driveway areas along our shared property line.
- **Transportation Demand Management:** The EIR should analyze transportation demand management measures that will reduce the reliance of Project employees and visitors on single-occupancy vehicles, such as incentives for commuting via bicycle and public transportation. Additional measures to consider include alternative office hours and hybrid office setups, to reduce the number of rush hour vehicular trips to/from the Project Site.

SHADE, SHADOW, AND SOLAR

- **Shade and Shadow Analysis:** The proposed five-story, 56-foot tall Project would add considerable height on a site that is currently occupied by what are generally one-story buildings. The extent of shade and shadow generated by the Project should be analyzed.
- **Solar Analysis:** The Helms Bakery includes a 1,000-panel, roof-mounted photovoltaic solar array (see Exhibit 1). Assessment of Project-related shade and shadow impacts should analyze whether any existing Helms Bakery solar panels would be impacted.

PEDESTRIAN REALM

- **Right-of-Way Improvements:** Right-of-way improvements (including new hardscaping and landscaping) should be constructed on rights-of-way abutting the Project Site in a manner consistent with the urban design goals and policies of the City of Culver City and City of Los Angeles. Such improvements would enhance the pedestrian realm and



better integrate the Project Site with the surrounding, increasingly walkable neighborhood and nearby Culver City Metro Station.

- **Open Space along Washington Boulevard:** The Conceptual Site Plan shows proposed landscaped open space near the southeast corner of the Project Site, fronting Washington Boulevard. Please clarify if this area would be open to the general public.
- **Venice / National Bus Stop:** A heavily used Metro bus stop is located on the south side of Venice Boulevard, near the main pedestrian entry to Building Two of the Project and a proposed shuttle pickup / drop-off area. The EIR should account for the high demand and active use of this existing bus stop (especially by high school students during the afternoon hours), and clarify if there are any plans to move or modify this bus stop.

Thank you for reviewing my comments. If you have any questions, please feel free to contact me at 310-204-1865 or by email at wally@wnmrealty.com.

Very truly yours,

WALTER N. MARKS, INC.

A handwritten signature in blue ink, appearing to read "Wally Marks", written over a horizontal line.

Walter N. Marks III, CEO

cc: Vince Bertone, Director of City Planning, City of Los Angeles, Department of City Planning

Attachment: Exhibits

Exhibit 1: Aerial View of Project Site and Helms Bakery District



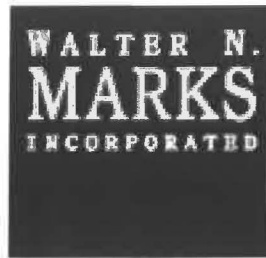
Legend

Project Site **Helms Bakery District** **Helms Bakery District Private Alley (used for parking/loading)**

***Exhibit 2: Project Proximity to Helms Bakery District
(view from Washington Boulevard)***



Helms Hall of Fame
8758 Venice Boulevard
Los Angeles, CA 90034
Telephone: 310.204.1865
Facsimile: 310.836.2208
wally@wnmrealty.com



Walter N. Marks (1903-1997)
Founder
Walter N. Marks, Jr. (1930-2009)
Walter N. Marks III

Friday, December 17, 2021

Sent via Email

Mr. Jeff Anderson
jeff.anderson@culvercity.org
Interim Current Planning Manager
City of Culver City
Current Planning Division, 2nd Floor
9770 Culver Boulevard
Culver City, CA 90232

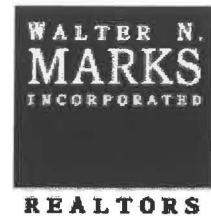
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- **Vibration:** The existing 1930s-era, reinforced concrete Helms Bakery buildings (which are acknowledged as historical resources in the Initial Study) are susceptible to vibration-related damage, including cracking and damage to original skylights (which are particularly delicate). The Project applicant should implement all necessary measures to protect the Helms Bakery buildings from potential vibration-related damage during construction. The Project applicant should also monitor the condition of adjacent Helms Bakery buildings during construction and immediately cease/modify activities if vibration-related damage is observed.
- **Noise:** The Helms Bakery buildings include original single-glazed windows that face the Project Site. All feasible measures to shield our buildings from construction-related noise should be implemented.



- **Construction Schedule:** We request a copy of the construction schedule and request that all activities be timed to minimize disruptions for our tenants, visitors, and customers.
- **Closures of Streets, Lanes, and Sidewalks:** Complete street closures should be avoided. We also request that closure of individual traffic lanes be avoided to the extent feasible. If lane closures are necessary, we request advance notice of such closures so that we can plan our operations accordingly. We also request that accommodations be made to ensure continuous, secure paths of travel are available to pedestrians along all edges of the Project Site throughout the duration of construction activities.
- **Construction Management and Traffic Plan ("CMTP"):** As described in the Initial Study, a preliminary CMTP will be prepared during the entitlement process and a final CMTP will be published before construction commences. These documents will be subject to approval by the City of Culver City and City of Los Angeles. We request the opportunity to review and comment on these documents before they are approved.
- **Security:** The EIR should describe all security measures (including, and not limited to, fencing and surveillance) that will be implemented during construction.

TRANSPORTATION

- **Traffic:** While we are committed to a future that includes use of alternative modes of transportation, we recognize that many of our tenants, visitors, and customers rely on private vehicles to access our campus. The Project has the potential to add significant levels of new vehicular trips in this neighborhood, which should be carefully analyzed in the EIR. This analysis should account for the current striping of adjacent streets, including the recent changes made to Washington Boulevard as part of the MOVE Culver City initiative (which designated one lane as bus only and maintained only one lane in each direction for private vehicles), and assess if additional changes to lane striping are warranted. Recent changes to traffic signal timing should also be evaluated to ensure optimal traffic flow.
- **Site Access:** The Conceptual Site Plan (Initial Study Figure A-3) shows three driveways providing vehicular access to the Project Site. One of the driveways would be a right turn in/out driveway along National Boulevard. The other two driveways (including a right turn in/out driveway on Venice Boulevard and right turn in only driveway on Washington Boulevard) would serve a proposed Access Alley along the eastern edge of the Project Site, which would provide vehicular access to a Project garage entrance facing our campus. The EIR should evaluate the impact of limiting all Project Site access to right turn in (without a left turn in option) on existing and anticipated future traffic flow



in the vicinity. The EIR should assess if modifications to proposed Project Site access would allow for more efficient traffic flow. These modifications might include alternative driveway locations that better align with the signalized access to Ivy Station on National Boulevard and the signalized intersection of Washington Boulevard and Wesley Street, and accommodating left turns into the Project Site.

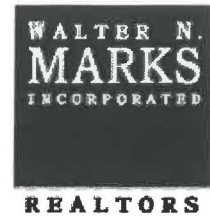
- **Access Alley:** The proposed Access Alley along the eastern edge of the Project Site is of particular concern because it is adjacent to, and would share driveways with, a heavily used, two-way private alley along the western edge of the Helms Bakery, which plays a critical role in our operations. We want to ensure the ability to continuously use our private alley is not compromised and that the new Access Alley does not create hazardous traffic conditions, especially at the signalized intersection of Washington Boulevard and Wesley Street. We would also like to better understand how the Access Alley will be used for deliveries and trash service. We are interested in working with the Project applicant to explore design and operational solutions that allow for safe and efficient use of the proposed Access Alley/existing private driveway areas along our shared property line.
- **Transportation Demand Management:** The EIR should analyze transportation demand management measures that will reduce the reliance of Project employees and visitors on single-occupancy vehicles, such as incentives for commuting via bicycle and public transportation. Additional measures to consider include alternative office hours and hybrid office setups, to reduce the number of rush hour vehicular trips to/from the Project Site.

SHADE, SHADOW, AND SOLAR

- **Shade and Shadow Analysis:** The proposed five-story, 56-foot tall Project would add considerable height on a site that is currently occupied by what are generally one-story buildings. The extent of shade and shadow generated by the Project should be analyzed.
- **Solar Analysis:** The Helms Bakery includes a 1,000-panel, roof-mounted photovoltaic solar array (see Exhibit 1). Assessment of Project-related shade and shadow impacts should analyze whether any existing Helms Bakery solar panels would be impacted.

PEDESTRIAN REALM

- **Right-of-Way Improvements:** Right-of-way improvements (including new hardscaping and landscaping) should be constructed on rights-of-way abutting the Project Site in a manner consistent with the urban design goals and policies of the City of Culver City and City of Los Angeles. Such improvements would enhance the pedestrian realm and



better integrate the Project Site with the surrounding, increasingly walkable neighborhood and nearby Culver City Metro Station.

- **Open Space along Washington Boulevard:** The Conceptual Site Plan shows proposed landscaped open space near the southeast corner of the Project Site, fronting Washington Boulevard. Please clarify if this area would be open to the general public.
- **Venice / National Bus Stop:** A heavily used Metro bus stop is located on the south side of Venice Boulevard, near the main pedestrian entry to Building Two of the Project and a proposed shuttle pickup / drop-off area. The EIR should account for the high demand and active use of this existing bus stop (especially by high school students during the afternoon hours), and clarify if there are any plans to move or modify this bus stop.

Thank you for reviewing my comments. If you have any questions, please feel free to contact me at 310-204-1865 or by email at wally@wnmrealty.com.

Very truly yours,

WALTER N. MARKS, INC.

A handwritten signature in blue ink, appearing to read "Wally Marks", written over a horizontal line.

Walter N. Marks III, CEO

cc: Vince Bertone, Director of City Planning, City of Los Angeles, Department of City Planning

Attachment: Exhibits

Exhibit 1: Aerial View of Project Site and Helms Bakery District



Legend

Project Site **Helms Bakery District** **Helms Bakery District Private Alley (used for parking/loading)**

***Exhibit 2: Project Proximity to Helms Bakery District
(view from Washington Boulevard)***

